Inclusion is at the
heart of our trust

Child Protection and Safeguarding Policy and Procedures

Oak Learning Partnership

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This policy relates to: Elms Bank, which is part of the Oak Learning Partnership Multi-Academy Trust	
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65. Key staff, roles and contact details

Role	Name	Contact
Designated Safeguarding Lead (school)	Katie Cass Deputy Head	Cass.k@elmsbank.oaklp.co.uk
Headteacher & Deputy Designated Safeguarding Lead	Catherine Dent	Dent.c@elmsbank.oaklp.co.uk
Safeguarding LGC Link Member	Elaine Cairns	Cairns.e@hazelwood.oaklp.co.uk
Chief Executive Officer	James Franklin-Smith	0161 553 0030 franklin-smith.j@oaklp.co.uk
Trust Director of Safeguarding	Rebecca Carney	Carney.r@oaklp.co.uk
Deputy Designated Safeguarding Lead	Alison Morrell, Deputy Head	morrell.a@elmsbank.oaklp.co.uk
Deputy Designated Safeguarding Lead	Andrea Jones-Hatcher, Business Manager	jones-hatcher.a@elmsbank.oaklp.co.uk
Deputy Designated Safeguarding Lead	Emma Farnworth, Assistant Head / SENDCO	farnworth.e@elmsbank.oaklp.co.uk
Deputy Designated Safeguarding Lead	Jo Pagliuca, Assistant Head	Pagliuca.j@elmsbank.oaklp.co.uk
Deputy Designated Safeguarding Lead	Cate Williams, Assistant Head	Williams.c@elmsbank.oaklp.co.uk
Deputy Designated Safeguarding Lead	Caroline Hirst, Assistant Head	Hirst.c@elmsbank.oaklp.co.uk
Deputy Designated Safeguarding Lead	Jeanette Turner, Pastoral Manager & Operational Safeguarding Lead	Turner.J@elmsbank.oaklp.co.uk
Deputy Designated Safeguarding Lead	Omar Akhtar, Pastoral Manager - Engagement	akhtar.o@elmsbank.oaklp.co.uk
Deputy Designated Safeguarding Lead	Allison McNab, Pastoral Manager - Attendance	mcnab.a@elmsbank.oaklp.co.uk

Deputy Designated Safeguarding Lead	Jess Clarke, Pastoral Officer-Attendance & Engagement	mcnab.a@elmsbank.oaklp.co.uk
Deputy Designated Safeguarding Lead	Alisha Akwammoa-Berkoh Pastoral Officer -Attendance & Safeguarding	Akwammoa-Berkoh.A@elmsbank.oaklp.co.uk
Deputy Designated Safeguarding Lead	Caroline Renshaw Pastoral Officer -Attendance & Safeguarding	Renshaw.C@elmsbank.oaklp.co.uk
Deputy Designated Safeguarding Lead	Angela Manfredi, Pastoral Support College	manfredi.a@elmsbank.oaklp.co.uk
Deputy Designated Safeguarding Lead	Tim Ashworth, Pastoral Support School	Ashworth.t@elmsbank.oaklp.co.uk
Deputy Designated Safeguarding Lead	Morgan Meredith, Intervention & Well-being Lead	Meredith.m@elmsbank.oaklp.co.uk
Deputy Designated Safeguarding Lead	Jordan Harrop, College Middle Leader	Harrop.j@elmsbank.oaklp.co.uk
Deputy Designated Safeguarding Lead	Lauren Hodgson, Internship Middle Leader	Hodgson.l@elmsbank.oaklp.co.uk
Deputy Designated Safeguarding Lead	Rachel Rose, Internship Tutor	Rose.r@elmsbank.oaklp.co.uk

66. Trustees

Role	Name	Contact
Chair of Trustees	Bernie Garner	garner.b@oaklp.co.uk
Safeguarding Trustee	Bernie Garner	garner.b@oaklp.co.uk

Oak Learning Partnership is a Multi Academy Trust comprising of primary, secondary, special schools and an Alternative Provision Academy. Our vision is to transform lives through a highly inclusive educational approach. Inclusion is at the heart of our trust:

- We are compassionately rigorous: we care deeply about our community which is why we push everyone to reach their full potential even if this feels difficult.

- We have unconditional positive regard: we treat everyone with respect, dignity and warmth regardless of the circumstance or challenge.
- We leave no one behind: we count in ones and focus on individual needs whilst ensuring everyone can thrive.
- Everyone is welcome: we actively embrace diversity and are relentless in how we teach our stakeholders the importance of this.

67. Quick guide to taking action

Our procedure if there is an urgent concern about **student** welfare or safeguarding is:

- Report concern to DSL/DDSL verbally
- Record concern(s) on CPOMS and actions taken
- The DSL will provide guidance on next steps
- In the unlikely event that there is not a DSL available on site/contactable by phone, please contact **MASSH** to discuss your concern.

When discussing with MASSH share:

- **What are you worried about? (Concern)**
- **What have you seen, heard, or been told? (Evidence)**
- **How is the child affected? (Impact on child)**
- **What support is already in place? (Protective Factors)**
- **Why do you believe statutory intervention may be required? (Professional analysis)**
- **What support or action do you believe is needed? (Desired outcome)**
- **Has parental consent been sought where appropriate? (Consent)**
- **Would seeking consent increase risk to the child? (Risk)**
- **Agree needs to happen next**
- If you are concerned a student is in immediate danger call the Police on **999**
- For a student over 18, the procedure is the same (without parental consent), however the agency is the Adult Safeguarding Team
- **MASSH:** Multi-Agency Safeguarding Support Hub (Bury): 0161-253-5678 (8:45am – 4:45pm)
- **Adult Safeguarding Team:** (Bury) 0161 253 5151
- **Emergency Duty Team:** (Bury) 0161-253-6606 (Out of Office hours)

Our procedure if there is an allegation that an **adult** has harmed a child, or that a child is a risk from a named adult is:

- Inform the headteacher as soon as possible.
- If the concern relates to the Headteacher/Executive Headteacher/Executive Director reports should be escalated to the CEO James Franklin-Smith or Chair of the Trustees.
- In the event that staff feel unable to report concerns internally, or are not satisfied that appropriate safeguards have been put into place, this can be reported to the Local Authority Designated Officer:

- Local Authority Designated Officer (LADO): (Bury) Matt Heatley **T**: 01612536729 **M**: 07458006063 **E:** LADO@bury.gov.uk
- Staff can contact NSPCC Whistleblowing Advice Service: 0808 800 5000, email help@nspcc.org.uk or fill in the online form.

For **mental health** concerns staff or parents can contact their local CAMHS for advice from the duty practitioner: (Bury) 0161 716 1100 or the local mental health crisis advice line which can be accessed via 111.

For urgent concerns about a young person's mental health staff can signpost students and their carers to call **999** or attend their nearest

Accident & Emergency. Alternatively, advice should be sought from dialling **111**, or the person's general practitioner (**GP).**

68. Terminology and Legal Frameworks

68.1 A glossary of abbreviations is available in Appendix A and Legal Frameworks which this policy has due regard to are listed in Appendix F.

69. Introduction

69.1 Through this policy and its procedures, Oak Learning Partnership seeks to maintain a safe learning environment and a culture in which children and adults feel safe, valued and able to raise concerns, confident that they will be listened to and taken seriously. Our schools are committed to an inclusive, anti-discriminatory culture where racism, and other forms of discriminatory behaviour are recognised, challenged and addressed as part of their safeguarding responsibilities. Our systems, processes and policies are developed with the best interests of children at their heart.

69.2 This policy applies to all adults working in our schools, including leaders, staff, supply staff, volunteers, governors, trustees, contractors and visitors. It supports a consistent approach to safeguarding and promoting the welfare of children, ensuring concerns are identified and addressed at the earliest opportunity.

69.3 The Trust and its academies have a statutory duty to safeguard and promote the welfare of children. We are committed to safeguarding practice that reflects the principles and requirements of Working Together to Safeguard Children (2026) and Keeping Children Safe in Education (2026).

69.4 "Safeguarding and promoting the welfare of children is everyone's responsibility." We adopt a child-centred approach and expect all staff, governors, trustees, volunteers and contractors to play their part in protecting children from harm and acting in their best interests at all times (KCSIE, 2026).

69.5 Safeguarding is everyone's responsibility and extends beyond child protection procedures. It is embedded within all aspects of the Trust's culture, practice and operations.

69.6 Our Trust is committed to maintaining a strong culture of safeguarding; this is underpinned by:

Culture of Safeguarding

- Robust safer recruitment and vetting processes, supported by both schools and central services.
- A clear Staff Code of Conduct, setting expectations for staff, volunteers, visitors, trainee teachers and contractors, alongside well-established whistleblowing procedures.
- Effective induction, safeguarding training and ongoing professional development to ensure all staff can recognise, respond to and report concerns appropriately.
- A culture of professional curiosity and vigilance, where all staff maintain the mindset that safeguarding concerns can arise anywhere and that signs and indicators of harm may be present even when a child does not disclose. Staff are expected to be alert to signs and indicators of abuse, neglect, exploitation and harm, and to act promptly on any concerns
- Clear and consistently applied procedures for reporting, recording and escalating safeguarding concerns.
- A curriculum that supports pupils to understand risks, develop resilience and keep themselves safe, including online and within their communities.
- Positive, trusted relationships between staff and pupils, ensuring children feel safe, valued, listened to and know who they can speak to if they have a concern.
- Effective site security, visitor management, safeguarding systems and online safety measures.
- Strong governance and leadership oversight through Local Governing Committees, Safeguarding Governors and Trust-level assurance and scrutiny arrangements.
- A commitment to preventing bullying, discrimination and child-on-child abuse, recognising that harmful behaviours, including sexual harassment and violence, are never tolerated and should be addressed promptly and effectively.

69.7 Safeguarding and promoting the welfare of children is defined for the purposes of this policy as:

- **providing help and support to meet the needs of children as soon as problems emerge;**
- **protecting children from maltreatment, whether this occurs within or outside the home, including online;**
- **preventing the impairment of children's mental and physical health or development;**
- **ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and**

- **taking action to enable all children to have the best outcomes**

(KCSIE, 2026)

69.8 **Child protection** is part of safeguarding and promoting the welfare of children. **It refers to the activity undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.** This includes harm that occurs within or outside the home, including in foster care, residential care and online.

69.9 Our policy ensures that we comply with our statutory duties and that we work in partnership with other organisations, where appropriate, to identify any concerns about child welfare and take action to address them. This policy ensures that we comply with local policies, procedures and arrangements.

69.10 Our policy complements and supports other associated school and Trust policies:

- Behaviour for Learning Policy (and Procedural Manuals where applicable)
- Care & Control Policy
- Attendance Policy (including CME and 1st day absence reporting)
- Anti-bullying (and/ or Child on Child Abuse) Policy
- Whistleblowing Policy
- Prevent Policy (where applicable)
- Remote Learning Policy
- Medical Conditions Policy
- Personal & Intimate Care Policy (where applicable)
- Staff Handbook (including Acceptable Use)
- Staff Code of Conduct
- Safer Recruitment Policy
- Searching, Screen and Confiscation Policy (where applicable)
- Alternative Provision Policy
- Mobile Phone Policy
- Allergies and Anaphylaxis Policy
- Data Protection Policy

69.11 Oak Learning Partnership remains responsive to new guidance and legislation and is committed to promoting the safety of pupils and staff. This policy is reviewed at least annually, and all staff receive annual safeguarding training and regular briefings.

70. Definitions of abuse, neglect and exploitation

70.1 All staff should be aware of the indicators of abuse, neglect, exploitation and modern slavery understanding that children can be at risk of harm inside and outside of the school/college, inside and outside of home, and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection. Staff should be aware that incidents rarely happen in isolation and that often multiple issues will overlap one another and can put children at risk of

harm; therefore, staff will be vigilant and always raise concerns with the DSL or their deputies. All staff, especially the DSL and deputy DSLs, will be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments; this includes being aware that pupils can be at risk of abuse or exploitation in situations outside their families (extra-familial harms). Extra familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse - including physical, sexual, emotional abuse, and stalking), criminal exploitation (including financial exploitation), serious youth violence, county lines and radicalisation.

70.2 All staff will be aware of the appropriate action to take following a pupil being identified as at potential risk of abuse and, in all cases, will speak to the DSL if they are unsure.

70.3 All staff will be aware that technology is a significant component in many safeguarding and wellbeing issues, including online abuse, cyberbullying, and the sharing of indecent images.

70.4 For the purposes of this policy;

70.5 **Abuse** is defined as a form of maltreatment of a child which involves inflicting harm or failing to prevent an act of harm. Harm can include ill treatment that is not physical as well as the impact of witnessing the ill treatment of others – this can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family, institutional or community setting by those known to them or by others, e.g. via the internet. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by one or multiple adults or other children. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

70.6 **Physical abuse** is defined as a form of abuse which may involve actions such as hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical abuse can also be caused when a parent fabricates the symptoms of, or deliberately induces, illness in a child.

70.7 **Emotional abuse** is defined as the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. This may involve conveying to a child that they are worthless, unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include verbal abuse, such as persistent criticism, belittling, or name-calling, as well as not giving the child the opportunities to express their views, deliberately silencing them, 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children,

such as interactions that are beyond their developmental capability, overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, including cyberbullying, causing the child to frequently feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, but it may also occur alone.

70.8 **Sexual abuse** is defined as abuse that involves forcing, causing or inciting a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Children can be sexually abused within the family, an institution or a community setting, and are more likely to know their abuser than not. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and should follow the procedures outlined in the policy for reporting concerns. Staff should be aware that there are specific offences for children under 13, who can never provide valid consent to sexual activity and there are specific offences which make clear that sexual activity with a child under 16 is an offence, regardless of whether they agreed to that activity; in any event concerns should be reported to the DSL without delay.

70.9 **Neglect** is defined as the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of a child's health or development. This may involve a parent or carer failing to provide a child with adequate food, clothing or shelter (including exclusion from home or abandonment); failing to protect a child from physical or emotional harm or danger; failing to ensure adequate supervision (including through the use of inappropriate caregivers); or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

70.10 **Exploitation** occurs where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal or sexual activity. It may involve an exchange for something the victim needs or wants (for example, money, gifts or affection), and/or for the financial benefit or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. Children can be exploited by adult males or females, as individuals or groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim. Whilst the age of the child may

be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including, sexual identity, cognitive ability, having a physical or learning disability, or being neurodivergent, communication ability, physical strength, status, and access to economic or other resources. Information regarding Modern Slavery is available in Appendix B.

71. **Roles and responsibilities of the Trustees, LGCs, key leaders and staff**

Trust board and LGCs

71.1 Our trustees and LGC members are fully aware of our role in multi-agency safeguarding arrangements set out by local Safeguarding Partnership arrangements and of the Child Death Review Partnership arrangements and will ensure that we work together with appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs.

71.2 Our The Trust Board has strategic responsibility for safeguarding and promoting the welfare of children across all Trust schools. The Board will ensure that safeguarding arrangements are effective, compliant with relevant legislation, statutory guidance and local safeguarding partnership requirements, and are subject to appropriate oversight, challenge and review.

71.3 The Trust Board will ensure that:

- effective safeguarding and child protection policies, procedures and systems are in place, implemented consistently and reviewed regularly;
- safeguarding is embedded within the Trust's culture, leadership, curriculum, decision-making and wider school improvement activity;
- suitably trained Designated Safeguarding Leads (DSLs), Deputy DSLs, Designated Teachers for Looked After Children and a nominated Safeguarding Trustee are appointed and supported to fulfil their responsibilities;
- staff, governors, trustees, volunteers and contractors receive appropriate safeguarding, child protection, online safety, filtering and monitoring, safer recruitment and staff conduct training;
- robust safer recruitment, vetting, visitor management and allegations management procedures are in place, including referrals to the DBS, Teaching Regulation Agency and other bodies where required;
- pupils are taught how to keep themselves safe, including online, and have accessible systems for reporting concerns, abuse or harm;
- effective arrangements are in place to safeguard vulnerable pupils, including children in need, children with a social worker, looked after and previously looked after children, children absent from education and pupils experiencing mental health difficulties;
- schools work effectively with safeguarding partners and other relevant agencies, contributing to multi-agency safeguarding arrangements and information sharing where appropriate;

- safeguarding arrangements comply with equality, human rights, data protection and other relevant statutory duties; and
- a culture of vigilance, professional curiosity, accountability and continuous improvement is promoted, enabling staff to raise concerns and challenge practice where necessary.

CEO and Headteachers

71.4 The CEO and Headteachers are responsible for ensuring that effective safeguarding arrangements are in place across the Trust and that schools fulfil their statutory duties to safeguard and promote the welfare of children. They will ensure compliance with relevant legislation, statutory guidance and local safeguarding partnership arrangements, and will work collaboratively with children's social care, health services, the police and other agencies to support children, contribute to multi-agency plans and facilitate access for statutory assessments where required.

71.5 They will ensure that:

- safeguarding and child protection policies, procedures and systems are effectively implemented, monitored and reviewed;
- a suitably trained and resourced Designated Safeguarding Lead (DSL) and Deputy DSLs are appointed, with appropriate cover in place at all times;
- all staff, volunteers and governors receive appropriate safeguarding, child protection, online safety, filtering and monitoring, and staff conduct training;
- safeguarding arrangements are regularly evaluated through audit, quality assurance and continuous improvement processes;
- children, parents and carers have access to clear safeguarding information, including how to report concerns and seek support;
- effective arrangements are in place to identify, support and safeguard vulnerable children, including those who are absent from education;
- concerns about the welfare of children, safeguarding practice, low-level concerns and allegations against staff are managed appropriately and in accordance with statutory guidance;
- appropriate safeguarding, safer recruitment, visitor management and due diligence processes are applied to staff, volunteers, contractors, external providers and organisations working with pupils;
- a culture of vigilance, professional curiosity, listening to children and shared responsibility for safeguarding is promoted across all schools.

Executive Directors of Education and Executive Headteachers

71.6 Executive Directors of Education and Executive Headteachers provide strategic oversight, support and challenge to ensure that safeguarding and inclusion remain priorities across the Trust. They hold Headteachers and senior leaders accountable for the effectiveness of safeguarding arrangements, provide guidance and support in complex safeguarding cases, oversee risk management, and offer professional challenge and coaching where required. Duties include:

- Working collaboratively with the CEO, DSLs and wider executive team to strengthen safeguarding systems, policies and practice.
- Providing strategic oversight and challenge to ensure safeguarding arrangements are effective and compliant.
- Supporting decision-making in complex safeguarding and risk management matters.
- Promoting consistency and continuous improvement in safeguarding practice across all schools.
- Ensuring that decisions and actions are guided by the best interests, safety and welfare of children.

Director Of Safeguarding

71.7 Our Director of Safeguarding works with Trustees, the Executive Leadership Team, Headteachers, Designated Safeguarding Leads, Governors and key stakeholders to promote a robust culture of safeguarding across the trust.

71.8 Duties include:

- To lead on the development of policies and practices which support safeguarding and child protection.
- To quality assure safeguarding practice in line with statutory guidance.
- Be a point of contact for external agencies in relation to safeguarding enquiries at schools.
- Ensure that DSLs can identify and support children who would benefit from community-based support, through to child protection.
- Support DSLs with complex decision making.
- Lead the DSLs professional network.
- Act as a source of guidance and support for all stakeholders and support DSLs and Headteachers in the local escalation/professional differences process.
- Develop staff's knowledge and awareness of safeguarding and procedures through CPD and regular updates.
- Develop relationships with key agencies in the LA, Police and ICBs acting a representative for the Trust in safeguarding networks.
- Provide a framework for link Safeguarding Governors to assure themselves of safeguarding within our schools.
- Provide governors and trustees with up to date information on safeguarding guidance, policy and the landscape within schools.

Designated safeguarding leads (DSLs)

71.9 The Designated Safeguarding Lead (DSL) is a member of the senior leadership team and has lead responsibility for safeguarding and child protection, including online safety. Whilst certain safeguarding activities may be delegated to appropriately trained deputies, the DSL retains overall responsibility for safeguarding arrangements within the school.

71.10 The DSL will:

- lead the school's safeguarding and child protection arrangements and act as the principal source of safeguarding advice and support for staff;
- ensure that concerns are identified, recorded, managed and referred appropriately to children's social care, the police, Channel, the Disclosure and Barring Service (DBS) and other agencies as required;
- work collaboratively with children, families, safeguarding partners and other agencies to promote the welfare of pupils and secure appropriate support and intervention;
- support staff to recognise, respond to and report safeguarding concerns, ensuring that safeguarding training and updates are provided regularly;
- maintain secure, accurate and up-to-date safeguarding and child protection records and ensure that files are transferred promptly when pupils move schools;
- promote a culture of listening to children, taking account of their wishes and feelings and ensuring that their views inform decision-making;
- liaise with the Headteacher, governors, trustees, social workers, Virtual School Heads, Mental Health Leads, the Local Authority Designated Officer (LADO) and other relevant professionals where appropriate;
- support safeguarding arrangements for vulnerable pupils, including children in need, those with a social worker, looked after and previously looked after children, and pupils experiencing mental health difficulties;
- ensure that safeguarding policies and procedures are implemented effectively, reviewed regularly and made available to staff, parents and carers;
- maintain an appropriate level of training, knowledge and professional development to fulfil the role effectively.
- understand the requirement for children to have an Appropriate Adult as per PACE Code C 2019 sec 1.7-1.7A
- ensure that all referrals made to Children's Services are effective and in line with the local council's procedures and the Greater Manchester Tri-X procedures and follow escalation process if necessary. If there is dissent in relation to the outcome of a referral or statutory intervention the DSL will follow the escalation procedure outlined in the local manual.

Special educational needs coordinators

71.11 The SENCO, Emma Farnworth, will work closely with the DSL, Headteacher and other professionals to ensure that children with SEND receive appropriate support, achieve positive outcomes and are safeguarded effectively.

71.12 The SENCO will:

- identify and support pupils with SEND who may be at increased risk of abuse, neglect, exploitation, bullying, mental ill-health or poor attendance;
- ensure that Education, Health and Care Plans (EHCPs) are reviewed in accordance with statutory requirements and that pupils' needs are accurately identified and met;

- coordinate provision and support for pupils with SEND, including maintaining oversight of interventions, reasonable adjustments and specialist support;
- work collaboratively with parents, carers, education, health and social care professionals to secure joined-up support and positive outcomes for pupils;
- make referrals to, and liaise with, external agencies where additional assessment, advice or intervention is required;
- work closely with the DSL to ensure safeguarding concerns relating to children with SEND are identified, recorded and responded to appropriately;
- support safeguarding arrangements for vulnerable pupils, including those attending alternative provision, by monitoring the suitability, attendance, welfare and educational progress of placements;
- contribute to multi-agency meetings, assessments and plans for pupils with complex needs;
- work closely with the Designated Teacher and DSL to support the educational achievement, wellbeing and safeguarding of looked after and previously looked after children with SEND; and
- promote an inclusive culture in which pupils with SEND are listened to, feel safe and are supported to participate fully in school life.

Strategic leads for attendance, behaviour and safeguarding

71.13 Our engagement managers, Ally McNab, Omar Akhtar, Jeanette Turner work collaboratively with school leaders, staff, pupils and their families, and local authorities.

71.14 Their duties include:

- To oversee attendance recording, monitoring and first day absence procedures
- To ensure that there are procedures in place for monitoring attendance and responding to children who are absent from education, and those who are Missing from Education.
- To work with the LA School Attendance Team to prevent school refusal and children missing education
- To lead on the implementation of attendance, behaviour, care and control policies
- To provide support to staff in the development of individual behaviour profiles and positive handling plans
- To quality assure such plans and ensure that they are agreed by parents and carers
- To quality assure behaviour reporting, sanctions and rewards systems
- To monitor care and control practices across the school to ensure that positive handling (where appropriate) is executed safely and using the least restrictive approaches, and is in line with any licence agreements from the provider e.g. Team Teach, and statutory expectations

Katie Cass, oversees the strategic plan for pupil wellbeing and leads on securing external accreditations related to well-being

Strategic lead for professional development

71.15 Professional development leads support the whole-school approach to CPD and work collaboratively with the Headteacher, DSL, SENCO and Designated Teacher to ensure that staff have access to high quality professional development opportunities. Their duties include:

- To ensure all staff have a thorough induction process that allows them to undertake their duties safely
- To ensure that staff have access to and engage in quality CPD activities pertinent to their role
- To seek feedback from staff on their CPD needs and the quality of training received
- To collaborate with the DSL and Operations Manager to ensure that there are clear, accurate records for safeguarding related CPD.

72.**All staff responsibilities:**

72.1 All staff, including supply staff and volunteers, have responsibility for safeguarding, according to their roles and under the guidance of the DSL. All staff to read KCSIE (2026) Part One and Annex A, the Staff Code of Conduct and Safer Working Practice (2022) guidance. Staff working in school based nurseries or reception classes (Early Years Foundation Stage [EYFS] should also read the Early Years Statutory Framework (2026) Section 3.

72.2 All staff will:

- Maintain an attitude of '**it could happen here'** where safeguarding is concerned.
- Provide a safe environment in which pupils can learn.
- Follow our agreed Staff Code of Conduct Policy and 'Safer Working Practices' guidance as well as Acceptable Use Agreements.
- Consider, at all times, what is in the best interests of the pupil.
- Be prepared to identify pupils who may benefit from early help.
- Be aware of the school's systems which support safeguarding, including any policies, procedures, information and training provided upon induction.
- Be aware of the role and identity of the DSL and deputy DSLs.
- Undertake safeguarding training, including online safety training, during their induction – this will be regularly updated.
- Receive and understand child protection and safeguarding (including online safety) updates, e.g. via email, as required, and at least annually.
- Understand their roles and responsibilities in relation to supporting online safety and of the filtering and monitoring processes within school. Staff will escalate concerns about pupil's exposure to these risks to the DSL/DDSL.
- Be aware of the local early help process and understand their role in it.

- Be aware of, and understand, the process for making referrals to MASSH, as well as for making statutory assessments under the Children Act 1989 and their role in these assessments.
- Make a referral to MASSH and/or the police immediately, if at any point there is a risk of immediate serious harm to a child.
- Support social workers in making decisions about individual children, in collaboration with the DSL.
- Be aware of and understand the procedure to follow in the event that a child confides they are being abused, exploited or neglected.
- Be aware that a pupil may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful.
- Maintain appropriate levels of confidentiality when dealing with individual cases.
- Reassure victims that they are being taken seriously, that they will be supported, and that they will be kept safe.
- Speak to the DSL if they have a safeguarding concern.
- Be aware of safeguarding issues that can put pupils at risk of harm.
- Be aware of behaviours that could potentially be a sign that a pupil may be at risk of harm.
- Be aware that teaching staff have a statutory duty to report any cases of known cases of Female Genital Mutilation (FGM) to the Police on 101/999.

73. **Availability of the DSL**

73.1 The Headteacher will ensure that appropriate safeguarding arrangements are in place at all times, including sufficient DSL and Deputy DSL cover during periods of absence, leave or unavailability.

73.2 The school will maintain a confidential shared safeguarding mailbox which should be the primary point of contact for safeguarding email enquiries:

safeguarding@elmsbank.oaklp.co.uk

73.3 This mailbox will be monitored regularly by the DSL and Deputy DSLs during term time and at agreed intervals during school holiday periods.

73.4 Where the DSL is unavailable, Deputy DSLs will have the knowledge, status and authority to carry out the role and make safeguarding decisions, including referrals to Children's Social Care, the Multi-Agency Safeguarding Hub (MASSH), the police and other agencies as required.

73.5 Where the DSL's absence is planned, arrangements for safeguarding cover will be communicated to relevant staff and key stakeholders in advance. Appropriate out-of-office messages from the DSL's school email address will direct enquiries to an available Deputy DSL or alternative safeguarding contact.

73.6 In the event of an unplanned absence, the Headteacher or nominated safeguarding lead will ensure that staff, pupils, families and partner agencies are aware of the temporary safeguarding arrangements and how to access support and report concerns.

73.7 Staff must not delay taking action because the DSL is unavailable. Where there is an immediate safeguarding concern, staff should follow the school's safeguarding procedures and seek support from a Deputy DSL, senior leader, Children's Social Care/MASSH or the police, as appropriate.

74.**Responding to concerns about a child**

74.1 All staff should maintain an attitude of "it could happen here" and always act in the best interests of the child.

74.2 Any member of staff who has a safeguarding concern, or receives a disclosure from a pupil about themselves or another child, must act immediately and report it to the DSL or a Deputy DSL.

74.3 Staff should be aware that children may not feel ready, or know how, to disclose abuse, neglect or exploitation, and may not recognise their experiences as harmful. This must not prevent staff from exercising professional curiosity and reporting concerns to the DSL or Deputy DSL.

74.4 All staff receive safeguarding training and understand their responsibilities regarding reporting concerns, confidentiality and information sharing.

74.5 **The DSL or their deputy will consider the following options:**

- managing any support for the child internally via the school or college's own pastoral support processes, including considering where doing so does not place the child at additional risk, whether the designated safeguarding lead (or a deputy) should inform parents or carers to further support the child's wellbeing,
- undertaking a family help assessment, or
- making a referral to statutory services, for example as the child could be in need, is in need or is suffering, or likely to suffer harm.

74.6 As stated, the Designated Safeguarding Lead (DSL) or a Deputy DSL should always be available during school hours to discuss safeguarding concerns and support staff in responding to them. This may be via telephone or online such as Microsoft Teams.

74.7 If, in exceptional circumstances, the DSL or a Deputy DSL is not immediately available, staff must not delay taking appropriate action to safeguard a child. Staff should seek support from a member of the senior leadership team and/or contact Children's Social Care, the Multi-Agency Safeguarding Support Hub (MASSH) or the police, as appropriate.

74.8 Any actions taken in the absence of the DSL or Deputy DSL must be shared with them as soon as practically possible and recorded in accordance with the school's safeguarding procedures.

74.9 **Information Sharing and managing the child protection file**

74.10 The Trust recognises that effective information sharing is essential to safeguarding and promoting the welfare of children. Timely and appropriate information sharing supports the early identification of need, helps to prevent abuse, neglect and exploitation, and contributes to improved outcomes for children, including their educational progress and

wellbeing. The Trust is also aware that among other obligations, the data protection laws place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

74.11 The DSL will ensure that safeguarding and child protection records are accurate, up to date, confidential and stored securely. A separate child protection file will be maintained where appropriate and access will be restricted to those who need the information to fulfil their safeguarding responsibilities. Records will be clear, factual and clearly distinguish between observations, professional opinion and historical information. They will include a summary of the concern, details of any actions taken, decisions made, the rationale for those decisions, and outcomes. Information will only be shared on a need-to-know basis and in accordance with statutory guidance and information sharing requirements.

74.12 The Trust will ensure that robust information-sharing arrangements are in place and understood by all staff. Information will be shared lawfully, proportionately, securely and in a timely manner, in accordance with statutory guidance, data protection legislation and the school's safeguarding procedures.

74.13 The Trust recognises that effective safeguarding depends upon collaborative working and appropriate information sharing between practitioners and agencies to ensure that children receive the right help, at the right time, and are protected from harm.

74.14 Staff will pay due regard to the principles of data protection which allow the Trust to share (and withhold) personal information, as provided for in the data protection laws. This includes:

- being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal, and should be treated as 'special category personal data',
- understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner. It would be legitimate to share information without consent where:

  -it is not possible to gain consent;

  -it cannot be reasonably expected that a practitioner gains consent;

  -and, if to gain consent would place a child at risk,

  -and not providing pupils' personal data where the serious harm test under the legislation is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harm test is met, they must withhold providing the data in compliance with schools' obligations under the data protection laws. Where in doubt schools should seek independent legal advice.

74.15 **The data protection laws do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.**

74.16 Professional judgement should be used to ensure that the information shared is focused and proportionate. This may include summarising or omitting information which is not necessary for safeguarding purposes. But care should be taken not to omit information where it may be relevant to understanding or managing safeguarding risk. This is further supported by the new information sharing duty, which is intended to give staff greater confidence to share and will be supported by statutory guidance.

74.17 All staff have a responsibility to share safeguarding concerns with the DSL or Deputy DSL without delay. This applies whether a child has emerging needs, requires targeted support, is receiving Early Help, is a Child in Need, is subject to a Child Protection Plan, or is looked after by a local authority.

74.18 Staff should follow statutory guidance, including Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers, and have regard to the Seven Golden Rules of Information Sharing when making decisions about sharing information:

- **Data protection is not a barrier** to sharing information where a child is at risk.
- **Be open and honest** unless doing so could increase risk*****.
- **Seek advice if unsure**, but do not delay action.
- **Consent should be sought where appropriate**, but a lack of consent should not prevent safeguarding action.
- **Put the child's safety and welfare first** in all decisions.
- **Share information that is necessary, relevant, accurate, timely and secure.**
- **Record your decision, actions taken and the reasons for them.**

* Wherever possible, the school will discuss concerns and referrals with parents/carers and seek consent before making a referral for support. However, consent will not be sought where doing so may place a child at increased risk of harm, compromise a safeguarding enquiry, prejudice a criminal investigation, or lead to evidence being lost.

Examples may include:

- Suspected sexual abuse by a parent, carer or family member.
- Suspected fabricated or induced illness (FII).
- Suspected physical abuse by a parent, carer or family member.
- Concerns relating to honour/faith-based abuse, forced marriage or female genital mutilation (FGM).
- Cases where informing parents may increase the risk of harm to the child or another person.
- Situations where Children's Social Care, the police or another statutory agency advises that parents should not be informed.

In such circumstances, the DSL will act in the child's best interests and follow advice from Children's Social Care, the police and relevant safeguarding procedures.

74.19 **Where staff are unsure whether information should be shared, they should seek advice from the DSL or Deputy DSL. However, concerns about confidentiality, information sharing or data protection must never prevent appropriate action being taken to safeguard a child.**

74.20 When a pupil transfers to another school or college, the DSL (or Deputy DSL) will ensure that **the child protection file is transferred securely and separately from the main pupil file as soon as possible, and no later than five working days for an in-year transfer or within the first five working days of a new term**. Receipt of the file will be obtained and recorded.

74.21 The DSL will ensure that appropriate safeguarding information is shared with the receiving setting to support the child's welfare and safety, including information relating to previous social care involvement, ongoing safeguarding concerns, exploitation, harmful behaviour, serious violence, Prevent/Channel support, or any other risks requiring ongoing support or management.

74.22 Where there are significant safeguarding concerns, the DSL will liaise directly with the receiving school/college's DSL to support a safe and effective transition. Receiving schools should ensure that relevant staff, including the DSL and SENCO (or equivalent), are informed as appropriate and that suitable support and risk management arrangements are in place when the child starts.

75.**Recording and reporting concerns**

75.1 All staff, volunteers and visitors have a responsibility to act on concerns about the welfare and safety of a student and all such concerns must be taken seriously. All concerns regarding students should be recorded securely on CPOMS. Records should be accurate, factual and contemporaneous. Staff should describe what they have seen or heard. If opinion is necessary, this **should be clearly distinguishable from fact** and a reason for the opinion should be given clearly, without prejudice or personal emotion. **When deciding whether to refer an incident to MASSH, the DSL or their deputies should state clearly the reason for their decision.**

75.2 Safeguarding is everyone's responsibility. All staff, volunteers and visitors must maintain an attitude of ***"it could happen here"*** and act in the best interests of the child. Any concern about a child's welfare, safety or wellbeing must be reported immediately.

75.3 **All safeguarding concerns must be recorded on CPOMS as soon as possible. Records should:**

- Be clear, factual, accurate and contemporaneous.
- Record what was seen, heard, reported or disclosed
- Use the child's own words wherever possible.
- Record any injuries, observations or behaviours.

- Clearly distinguish between fact, observation and professional opinion.
- Include actions taken, decisions made and the rationale for those decisions.
- Record any discussions with the child, parents/carers, colleagues or external agencies. Ensure names and roles are captured for staff and external professionals.

75.4 Teaching and support staff should record concerns directly on CPOMS. Visitors, volunteers, administrative staff and site staff must report concerns immediately to the DSL or a Deputy DSL, who will ensure they are recorded appropriately. They will ask for a written record which can be uploaded to CPOMS. Handwritten records should include the name, role, signature and date of the author.

75.5 Staff must not assume that someone else will take action. If they have any concern, they must report it. If unsure, they should seek advice from the DSL or a Deputy DSL without delay.

75.6 Staff should recognise that children may not feel ready, or know how, to tell someone they are being abused, neglected or exploited, and may not recognise their experiences as harmful. This must not prevent staff from exercising professional curiosity and sharing concerns with the DSL.

75.7 **Early Help and Emerging Concerns**

75.8 **All concerns, including emerging welfare concerns, must be acted upon and recorded.** Early identification and intervention can prevent problems from escalating.

75.9 Staff should be alert to indicators that a child may benefit from early help and support. This includes concerns relating to attendance, behaviour, wellbeing, family circumstances, neglect, parental engagement, mental health, exploitation or other vulnerabilities.

75.10 Accurate recording and appropriate action help build a picture of a child's lived experience and may contribute to assessments, early help interventions or statutory safeguarding processes.

75.11 **Staff should record:**

- Concern: What was observed or reported.
- Action: What the member of staff did.
- Rationale: Why the action was taken.
- Outcome: What happened as a result and whether further intervention was required.

Staff should share concerns with the DSL where additional support may be required.

Any injuries, disclosures or concerns that indicate a child may be at risk of harm must be reported immediately to the DSL or Deputy DSL. Staff should not discuss safeguarding concerns, disclosures or injuries with parents/carers without first seeking advice from the DSL or Deputy DSL, unless there is an immediate risk to the child and delay would place them at greater risk.

75.12 The DSL and Deputy DSLs are available to provide advice and support where staff are unsure whether a concern requires further safeguarding action.

75.13 **Ongoing Safeguarding Concerns and Referrals**

75.14 Concerns that are persistent, escalating or indicate a pattern of need or risk must be shared with the DSL or Deputy DSL without delay. If staff are not satisfied that an issue has improved, they should continue to record and discuss with the DSL who will decide on the most appropriate action.

75.15 **All concerns must be recorded by the member of staff raising them, even where the concern has already been discussed verbally.**

75.16 If external professionals or agencies contact a member of staff regarding a child, the information must be shared with the DSL as soon as possible.

75.17 The DSL will consider the appropriate level of intervention, including:

- Internal pastoral support.
- Community based Early Help.
- Targeted Early Help (Family Help)
- Referral to Children's Social Care/MASSH (Family Help/Sc 17 or Safeguarding sec 47).
- Referral to other specialist services.
- Immediate contact with the police where necessary.

75.18 Where a child and family would benefit from coordinated support from more than one agency, the DSL may initiate or contribute to an Early Help assessment and associated multi-agency planning.

75.19 **If a child is in immediate danger or at risk of significant harm, a referral will be made to Children's Social Care/MASSH and/or the police without delay.**

75.20 The DSL will monitor the progress and outcome of all referrals. Where there is no response, or concerns remain, the DSL will seek reconsideration to ensure the child's needs are appropriately addressed. Where they remain concerned or dissatisfied, the DSL or headteacher will escalate following the Safeguarding Partnership's Escalation/Professional Differences Pathway as per local Tri-x Online.

75.21 Where community based help is identified as appropriate, the child's circumstances will be regularly reviewed. If concerns escalate or outcomes do not improve, a referral for statutory intervention will be considered.

75.22 All concerns, discussions, decisions and actions, together with the reasons for those decisions, will be recorded in writing and securely maintained on CPOMS.

75.23 Where a child may have committed a serious offence, including sexual violence, the police will be informed as appropriate and without delay.

75.24 The school will ensure that children's wishes and feelings are considered when responding to safeguarding concerns. Staff will respond calmly, listen carefully and provide appropriate reassurance and support.

75.25 **Injuries and Signs of Abuse**

75.26 Any visible injury must be recorded on CPOMS, including a body map where appropriate, and reported immediately to the DSL or Deputy DSL. Records should include a clear, factual description of the injury, including its location, size, colour, appearance and any explanation offered by the child.

75.27 Staff must never ask a child to remove clothing to show an injury. If a child chooses to show an injury, staff should listen, observe and record. Staff should use professional judgement when deciding whether it is appropriate to view an injury, taking account of factors such as the location of the injury, the child's age, wishes and dignity, the availability of another member of staff, and the environment in which the injury is being shown. Where possible, staff should seek support from another appropriate adult, such as a trusted member of staff, first aider, DSL or Deputy DSL. Staff should ensure that their actions are always necessary, proportionate and focused on the child's welfare, and that they always maintain appropriate professional boundaries.

75.28 Photographs alone cannot determine the cause, age or severity of an injury. Accurate written records and body maps remain the primary method of recording injuries and safeguarding concerns within schools. Where photographs are considered necessary, these should be taken by appropriately trained professionals in accordance with their own professional standards, safeguarding procedures and information governance requirements. School staff should not routinely take photographs of injuries on behalf of other agencies

75.29 Where it is necessary to clarify a child's account, staff may use simple open questions to understand what the child is saying;

- **Tell** me what happened...
- **Explain** that to me...
- **Describe** what happened...
- What happened next?
- Can you tell me more about that?
- Who?
- What?
- Where?
- When?

Staff should ask only enough questions to establish whether there is a safeguarding concern and what immediate action is required. They must not investigate, repeatedly question the child, ask leading questions, suggest answers or seek to prove or disprove what has been said. Staff should record the child's words as accurately as possible and report the concern immediately to the DSL or Deputy DSL.

75.30 **Responding to Disclosures**

75.31 **Any disclosure of abuse, neglect, exploitation or harm must be reported immediately to the DSL or Deputy DSL and always before the child leaves school that day.**

75.32 When a child makes a disclosure, staff should:

- Listen carefully and actively.
- Remain calm and non-judgemental.
- Take the child seriously.
- Reassure the child they have done the right thing by speaking up.
- Explain that information may need to be shared with those who can help keep them safe.
- **Never promise confidentiality.**

75.33 Staff should record:

- The child's exact words wherever possible.
- The date, time and location of the disclosure.
- Any questions asked.
- The child's presentation, demeanour and emotional state.
- Any actions taken and who the concern was reported to.
- The rationale for any immediate decisions made.

75.34 Staff should only ask open questions to clarify information where necessary. They must not investigate, interview or repeatedly question the child.

75.35 Written records must be uploaded to CPOMS or passed immediately to the DSL or Deputy DSL for secure recording and follow-up. Handwritten records should include the name, role, signature and date of the author.

75.36 Where a child makes a written disclosure, creates a drawing, or produces other work that raises a safeguarding concern, the original document should be retained and treated as a safeguarding record. Staff should record the child's name, the date and time the information was received, and their own name and role on the reverse of the document where possible. Any explanation provided by the child should be recorded using the child's own words wherever possible. The original document should not be altered and should be uploaded to CPOMS and shared immediately with the DSL or Deputy DSL.

75.37 Concerns relating to extremism, radicalisation or terrorism must be reported immediately to the DSL and managed in accordance with the school's Prevent procedures.

75.38 All children should be listened to, taken seriously and supported. Staff should recognise that children may not immediately recognise that they are experiencing abuse, neglect or exploitation, and may find it difficult to seek help.

75.39 Safeguarding information should only be shared on a need-to-know basis, in line with data protection requirements and under the direction of the DSL.

76.**Inter-agency working**

76.1 Oak Learning Partnership is committed to effective multi-agency working to safeguard and promote the welfare of children. We will work collaboratively with local safeguarding partners, children's social care, health services, the police and other relevant agencies to identify needs, provide early help, share information appropriately and contribute to assessments, plans and interventions that support children and families.

76.2 Information will be shared lawfully, proportionately and in a timely manner in accordance with relevant data protection legislation. Staff understand that data protection legislation does not prevent the sharing of information where this is necessary to safeguard or promote the welfare of a child. Where staff are unsure about information sharing, they will seek advice from the DSL.

76.3 The Trust adopts a child-centred approach to safeguarding. Pupils' wishes and feelings will be considered when making decisions about their safety, welfare and support, taking account of their age, understanding and circumstances. Where appropriate and safe to do so, parents/carers will be involved in safeguarding processes.

76.4 The Trust will not delay taking action to safeguard children because of the status or outcome of statutory, police or safeguarding investigations. We will work proactively with children, families and partner agencies to ensure that children receive the right help, at the right time, from the right services.

77.**Community-based early help**

77.1 Universal services and community based Early Help play a crucial role in identifying emerging problems and providing support at an early stage. They are not an individual service, but a system of support delivered by local authorities and their partners working together and taking collective responsibility to provide the right provision in their area. This level of Early Help is provided through universal services and other voluntary and community services.

77.2 The school recognises that any child may benefit from support at any stage of their life. All staff should be particularly alert to the potential need for additional help and support for a child who:

- is disabled or has a health condition and requires additional support;
- has special educational needs and/or disabilities (SEND), whether or not they have an Education, Health and Care Plan (EHCP);
- has a mental health need;
- is a young carer;
- is pregnant and/or a parent;
- has exhibited early signs of abusive, violent or harmful behaviour;
- is showing signs of being drawn into anti-social behaviour, criminal exploitation, organised crime, gangs or county lines activity;
- is persistently absent, frequently missing from education, home or care;
- has been repeatedly removed from lessons, experienced multiple suspensions, is on a part-time timetable, is at risk of permanent exclusion, or is attending Alternative Provision;
- is at risk of, or experiencing, exploitation, modern slavery, trafficking, criminal exploitation or sexual exploitation;
- is at risk of radicalisation or involvement in terrorism;

- has a parent or carer in custody, or is affected by parental offending;
- lives in circumstances that may impact their welfare, including domestic abuse, substance misuse, parental mental ill health, homelessness or family breakdown;
- is misusing drugs, alcohol or other substances;
- is at risk of honour/faith-based abuse, including Female Genital Mutilation (FGM) or forced marriage; or
- is privately fostered.

77.3 Staff should also be alert to children whose needs may not be immediately apparent and should exercise professional curiosity where there are concerns about a child's welfare, wellbeing, behaviour, presentation or safety. Any concerns should be recorded and shared with the DSL or Deputy DSL without delay.

77.4 All staff will be made aware of the local early help process and understand their role in it. Jeanette Turner, Pastoral Manager & Operational Safeguarding Lead will take the lead where community-based early help is appropriate under the guidance of the DSL. They will lead the liaison with other
agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in carrying out this assessment, in some cases acting as the lead practitioner.

77.5 The DSL will ensure that staff are aware of how to contact their local Best Start Family Hubs, Early Help partners and of the assessment and review processes. For more information see: Bury Early Help Procedure

77.6 Where concerns persist, escalate, or outcomes do not improve, the case will be reviewed and consideration given to a referral to Children's Social Care for a statutory assessment. Where appropriate, non-statutory support may continue to be coordinated by a qualified lead practitioner (i.e. not a social worker, up to and including section 17).

78.Child in need and Children at Risk of Significant Harm

78.1 A child in need is a child who requires additional services to achieve or maintain a reasonable standard of health or development, or who is disabled. Support may be provided through assessment and coordinated services to safeguard and promote the child's welfare. A qualified lead professional may lead a child in plan assessment and plan.

78.2 A child may be considered at risk of significant harm where there are concerns that they are suffering, or are likely to suffer, abuse, neglect or exploitation. In these circumstances, Children's Social Care has a duty to make enquiries and take appropriate action to protect the child and promote their welfare. Enquiries are led by Children's Social Care. An allocated social worker will act as the lead professional and coordinate multi-agency safeguarding and child protection arrangements.

78.3 We will notify the named Social Worker if:

- A child subject to a child protection plan is at risk of permanent exclusion or receives a fixed term suspension
- There is an unexplained absence of a child who is subject to a child protection plan

79. Early Years Foundation Stage

15.1 The Trust's early years provision operates within school-based settings and is therefore subject to the Trust's overarching safeguarding and child protection procedures as set out in this policy. In addition to these arrangements, early years settings will comply with the safeguarding and welfare requirements of the **Early Years Foundation Stage (EYFS) Statutory Framework**.

This includes ensuring:

- appropriate staff supervision, deployment and ratios;
- suitable paediatric first aid provision and arrangements for meeting children's medical needs;
- safe administration, storage and management of medication;
- effective supervision of children during play, learning, eating, sleeping and all daily routines;
- safe sleep practices that reflect current guidance and promote children's welfare;
- safe eating procedures, including the management of allergies, dietary requirements and choking risks;
- robust risk assessment processes and a safe, secure learning environment;
- close partnership working with parents, carers and relevant professionals to promote children's safety, wellbeing and development.

All safeguarding concerns within the EYFS will be managed in accordance with this Child Protection and Safeguarding Policy, with the best interests of the child remaining paramount at all times.

80.Training and awareness

80.1 In accordance with KCSIE (2026), all new staff and regular volunteers will receive appropriate safeguarding training and information during induction, including online safety training, with an emphasis on the impact of technology on increasing risks to children, knowing that children and young people can be both victims and perpetrators of abuse.

80.2 All new staff and volunteers will be made aware of the systems within the school and college which support safeguarding e.g. the Behaviour for Learning Policy, Acceptable Use Agreements, Care and Control Policy etc. This is inclusive of reading such policies and engaging in the robust induction programme which covers key policies, procedures and practices. As well as supporting the safety of students, the induction process also includes thorough training on understanding and supporting the varied and sometimes complex needs of students, such as communication, EAL, moving and handling and personal care as required.

80.3 All staff must ensure that they have read and understood Part One and Annex A of 'Keeping Children Safe in Education (2026)' so everybody in the setting understands their safeguarding responsibilities.

80.4 All staff will receive Safeguarding and Child Protection training at least annually which includes safeguarding information about our policies and procedures, signs and symptoms of abuse, neglect and exploitation, how to manage a disclosure from a child, preventing and responding to child-

on-child abuse, and issues surrounding sexual violence and sexual harassment, as well as when and how to record a concern about the welfare of a child, with regular updates in relation to local and national changes.

80.5 Staff undertake an annual KCSIE questionnaire to evidence understanding of the material and support the DSL in understanding if there are gaps in knowledge/areas for development. Such sessions form part of INSET/PAD Day agendas and will feature on the CPD calendar throughout the year. Staff also have access to safeguarding bulletins via email and can access materials via the safeguarding boards in schools.

80.6 All staff need to understand the impact mental health problems may have on all aspects of safeguarding and this could be an indication of abuse, including the relevance of Adverse Childhood Experiences (ACEs) and the impact on the child/young person.

80.7 All staff and volunteers should read and sign to say that they have read and understood the following policies and guidance (as appropriate):

- The Child Protection and Safeguarding Policy
- The Staff Code of Conduct and Acceptable Use Agreements
- KCSIE (2026) Part One and Annex A
- Safer Working Practices (2022)

81.**Adverse Childhood Experiences (ACES)**

ACES are a wide range of stressful or traumatic experiences that occur when a child is growing up. They include events that affect a child directly (such as abuse) or indirectly (such as living with domestic abuse or a parent with mental health problems.) ACES can be single events, long term or repeated experiences. ACES are very common – about half of all people will have experienced one ACE and about one in ten will have experienced four or more ACES. Research shows the more ACES that occur (in childhood) the higher the chances of adults having poor mental health and also physical health conditions such as liver disease and cancer. Having more ACES also increases the likelihood of engaging in health harming behaviours such as smoking, using drugs, criminal behaviour, early sexual activity. Many people do not develop problems despite having ACEs. Things that improve the chances of staying well despite experiencing ACES include relationships with trusted adults and physical activity in childhood.

82.**Specific safeguarding issues**

82.1 There are certain specific safeguarding issues that can put children at risk of harm; staff will be aware of these issues.

82.2 Appendix B of this policy sets out details about specific safeguarding issues that pupils may experience and outlines specific actions that would be taken in relation to individual issues.

83.**Operation encompass**

83.1 Oak Learning Partnership schools participate in Operation Encompass, a national safeguarding initiative which supports children affected by

domestic abuse. Under Section 104 of the Victims and Prisoners Act 2024, the police have a statutory duty to notify the school's designated Key Adult (usually the DSL) when they attend a domestic abuse incident where a child is connected to the household, regardless of whether the child was present at the incident. Forces may also make notifications to other settings, for example early years settings or further education provision for young people with SEND, although these are not covered under the duty. Where possible, this notification will be made before the start of the next school day, enabling the school to provide timely, appropriate and child-centred support, safeguard the child's welfare and respond to any emerging needs.

- Encompass reports should be sent to: encompass@elmsbank.oaklp.co.uk

83.2 When a report is received this information is shared with key adults who support the child, on a need-to-know basis and is also recorded on CPOMS.

83.3 Operation Encompass does not replace statutory safeguarding procedures or referrals and applies solely to domestic abuse incidents. Where appropriate, the police and/or schools should make a referral to local authority children's social care if they are concerned about a child's welfare. If an officer makes a referral alongside issuing an Operation Encompass notification, they should tell the child's education setting.

83.4 Staff should not assume that an Operation Encompass notification or police attendance will result in a referral to children's social care. The police may not hold all relevant information known to the school and, when considered alongside existing concerns, the school may determine that the threshold for targeted support, Family Help or statutory intervention is met. Where a child has an allocated social worker, the school will liaise with them regarding any necessary safeguarding actions. Where no social worker is involved, the DSL (or deputy DSL) will consider consultation with, or referral to the MASSH in accordance with local procedures and threshold guidance.

83.5 In accordance with data protection regulations, the school will ensure the Operation Encompass notifications are stored securely and processed fairly.

83.6 The notification from the police should include:

- the name, date of birth and protected characteristics (e.g., disability, race, religion etc.) of any child from that education setting who is related to any adult involved in the incident, whether the adult is the alleged perpetrator or non-abusive relative
- the relationship of the child to the victim and to the perpetrator,
- the police reference number,
- the location, time and date of the incident,
- if the child was present, and if so, where they were (notifications should be
- shared even if the child was not present at the particular incident),
- the voice of the child, such as what they are saying and how they are behaving, and the context and the circumstances of the incident, including whether an arrest was made,

- whether the incident was attended in person or via Rapid Video Response, and where possible, information on previous domestic abuse incidents.

The notification should not include:

- information or reference to sexual offences disclosed at the domestic abuse incident. This must not be disclosed in the notification. Under the Sexual Offences (Amendment) Act 1992, anonymity for victims of sexual offences must be preserved.

84. **Contextual safeguarding issues**

84.1 Contextual Safeguarding is an approach to understanding, and responding to, children/young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence, abuse and exploitation. Contextual Safeguarding, therefore, expands the objectives of child protection systems in recognition that young people are vulnerable to abuse in a range of social contexts.

84.2 Contextual safeguarding looks at how we can best understand these risks, engage with children and young people and help to keep them safe.

84.3 All staff are aware of contextual safeguarding issues and that these can put children or young people at risk of harm. When responding to concerns staff will consider whether there are wider environmental factors that are a threat to their safety and/or welfare. The school will provide as much contextual information as possible when making referrals to MASSH and or police. Further information is available on specific forms in Annex B.

85. **Behaviour and safeguarding**

85.1 The Trust recognises that positive behaviour and effective relationships are fundamental to creating calm, safe and inclusive learning environments where pupils can learn, thrive and feel a sense of belonging. Schools will promote high standards of behaviour through a culture of respect, clear expectations and consistent practice. The school's Behaviour Policy and expectations will be clearly communicated to pupils, staff and parents/carers.

85.2 All schools will adopt a proactive and inclusive approach to behaviour, providing early support and appropriate interventions to help pupils succeed. Where behaviour concerns arise, schools will respond consistently, fairly and proportionately, taking account of individual needs and circumstances, including any vulnerabilities or additional needs.

85.3 Behaviour management, suspension, permanent exclusion and any safeguarding-based separation arrangements will be implemented in accordance with the school's Behaviour Policy and the Department for Education's *Suspension and Permanent Exclusion Guidance*, ensuring that decisions are lawful, reasonable, proportionate and made in the best interests of the child and the wider school community.

85.4 Staff will receive appropriate training and guidance to ensure that behaviour expectations are applied consistently and that safeguarding

considerations are fully considered when responding to incidents of behaviour.

86. Behaviour and SEND

86.1 Pupils with SEND may require additional consideration when responding to behaviour concerns; however, it should not be assumed that all behaviours are directly related to a pupil's SEND. Schools will manage behaviour consistently and fairly, while taking account of individual needs and circumstances. Where a pupil is identified as having SEND, a graduated approach will be used to assess, plan, implement and review support to ensure their needs are appropriately identified and met.

86.2 Further details regarding behaviour expectations, rewards, sanctions and support can be found in the school's Behaviour for Learning Policy.

87. Child-on-child abuse (formerly peer on peer)

87.1 Oak Learning Partnership takes a zero-tolerance approach to all forms of child-on-child abuse and recognises that, even where no cases are reported, abuse may still be taking place and may simply not be disclosed. Schools will minimise risk through a strong safeguarding culture, clear behaviour expectations, supervision, curriculum teaching, online safety, pupil voice and accessible reporting routes.

87.2 Systems for children to report concerns will be well-promoted, easily understood and accessible, and children will be reassured that they will be listened to, taken seriously and supported.

87.3 All allegations will be recorded, risk assessed, investigated or referred as appropriate, and managed in line with safeguarding, behaviour and external agency procedures.

87.4 Victims, alleged perpetrators and any other children affected will receive appropriate support and safety planning. Abuse will never be dismissed as "banter", "just having a laugh", "part of growing up" or "boys being boys". Some forms of abuse are more likely to involve girls as victims and boys as perpetrators, but all child-on-child abuse is unacceptable and will be taken seriously.

87.5 The Trust recognises that children can abuse other children and that such behaviour can occur both inside and outside of school, including online. All allegations and concerns of child-on-child abuse will be taken seriously, investigated appropriately, and responded to promptly and effectively.

87.6 The Trust will:

- Maintain a zero-tolerance approach to all forms of child-on-child abuse and will never dismiss abuse as "banter", "part of growing up", "just having a laugh" or "boys being boys".
- Promote a culture of respect, safety and inclusion through preventative education, clear expectations of behaviour, effective supervision, and a whole-school safeguarding approach.
- Provide clear, accessible and well-publicised reporting systems that enable pupils to raise concerns confidently, knowing they will be listened to and taken seriously.

- Recognise that child-on-child abuse may occur even where no incidents have been reported and will remain vigilant to indicators, patterns and barriers to disclosure.
- Ensure all concerns, disclosures and allegations are recorded, assessed, investigated and managed in line with safeguarding procedures and local safeguarding partnership arrangements.
- Provide appropriate support for victims, alleged perpetrators, and any other children affected, taking account of their individual needs, safety, wellbeing and educational outcomes.
- Consider the wishes, feelings and experiences of the victim when determining next steps and ensure their safety and protection remain paramount.
- Recognise that some forms of child-on-child abuse disproportionately affect girls, while acknowledging that any child can be a victim or perpetrator and that all incidents will be taken seriously regardless of age, sex, gender, disability, ethnicity, religion, sexual orientation or other protected characteristic.
- Respond to incidents in a proportionate, fair and child-centred manner, working with parents, carers and external agencies where appropriate.

87.7 All staff will receive training to identify, prevent, challenge and respond to child-on-child abuse, including behaviour that may indicate harmful attitudes, misogyny, prejudice, exploitation or abuse. All staff should be aware that child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator. All staff are expected to understand the importance of challenging inappropriate behaviours between children that are abusive in nature. All staff should recognise that racism, faith-targeted abuse, and other forms of discriminatory behaviour may have a significant impact on a child's welfare, wellbeing, mental health and sense of safety and should be considered within safeguarding practice where appropriate.

87.8 Downplaying certain behaviours can lead to a culture of unacceptable behaviour, misogyny, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it. This is not acceptable.

Staff must respond to, report and record any concerns detailing the concern, any actions taken, the rationale and outcome.

87.9 Child-on-child abuse is preventable and timely, evidence-based support can be key to preventing children from going on to commit abuse or violence.

87.10 For the purposes of this policy, **"child-on-child abuse"** is defined as abuse between children and may include:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying),
- discriminatory behaviour, including racism, faith-targeted abuse, and other prejudice based incidents,
- abuse in intimate personal relationships between children (also known as teenage relationship abuse),

- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm,
  physical assault and harm, or the threat of harm with a weapon,
- harmful sexual behaviour, sexual violence and sexual harassment –
- which may include misogyny/misandry,
- consensual and non-consensual making or sharing of nudes and semi nudes, including those generated using AI.
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party,
- upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and
- initiation/hazing type violence and rituals.

87.11 The Trust has a zero-tolerance approach to child-on-child abuse, as confirmed in this policy's introduction, the welfare of the child is paramount.

87.12 All staff will be aware that child-on-child abuse can occur between pupils of any age and gender, both inside and outside of school, as well as online. All staff will be aware of the indicators of child-on-child abuse, how to identify it, and how to respond to reports. All staff will also recognise that even if no cases have been reported, this is not an indicator that child-on-child abuse is not occurring. Staff should recognise that for some (but not all) forms of child-on-child abuse it is more likely that girls will be victims and boys' perpetrators, but that all child-on-child abuse is unacceptable and will be taken seriously. All staff will speak to the DSL if they have any concerns about child-on-child abuse. Staff and leaders should also try to be alert to when children might be at highest risk around the school day (for example immediately after school).

87.13 Signs and indictors of child-on-child abuse may include but are not limited to:

- Absence from education or lack of interest in activities at the education setting.
- Rumours or 'coded' talk among students that suggest concerning interactions or coercion is occurring.
- Physical injuries.
- Mental or emotional ill-health.
- Becoming withdrawn.
- Poor self-esteem.
- Tiredness.
- Alcohol or other substance misuse.
- Changes in behaviour.
- Unexpected behaviour for their age and stage of development.
- Enacting harmful behaviour towards others.

87.14 Pupils will be made aware of what constitutes unreasonable pressure from peers to engage in risk-taking or inappropriate behaviour, and of how to report their concerns including directly to adults in school, family

members or other means individual to the school such as worry boxes, online systems or external organisations such as NSPCC.

87.15 **Allegations of abuse by a peer/child will be treated as seriously as allegations of abuse from an adult, it should never be dismissed as "normal" behaviour or "banter"**.

87.16 Any incidents of child-on-child abuse will be dealt with seriously and on a case-by-case basis. Consideration should be given to the significance of the young person's disability or learning difficulty (if applicable) when determining their intent to commit an incident of child-on-child abuse, their understanding of their actions and when assessing the risk posed by the incident of abuse.

87.17 **The school's procedures for managing allegations of child-on-child abuse are outlined in the Anti-Bullying/Child-on-child Abuse Policy. Staff will follow these procedures, as well as the Behaviour for Learning Policy and procedures for Suspension and Exclusion, where relevant.**

87.18 Individuals will be given a copy of the school's Complaints Procedures Policy to assist them with the appeals process.

88.**Harmful sexual behaviour**

88.1 The umbrella term 'harmful sexual behaviour' (HSB) is widely used in child protection and applies to behaviour occurring online, face-to-face, or both. HSB should always be considered within a child protection context.

88.2 Harmful Sexual Behaviour (HSB) is developmentally inappropriate sexual behaviour which is displayed by children and young people, and which may be harmful or abusive. It may also be referred to as sexually harmful behaviour or sexualised behaviour. HSB can occur between two or more children of any age and sex, from primary through to secondary stage and into college. It can occur also through a group of children towards a single child or towards another group of children. HSB exists on a continuum and may escalate into sexual harassment or sexual violence, it can occur online or face-to-face (both physically and verbally) and is never acceptable.

88.3 Hackett defines Harmful Sexual Behaviour as: 'Sexual behaviours expressed by children and young people under the age of 18 years old that are developmentally inappropriate, maybe harmful towards self or others, or be abusive towards a child, young person or adult'. Behaviour that is problematic, abusive or violent is developmentally inappropriate and may cause developmental damage.

88.4 Sexual behaviour between young people, where one of the children is much older can be considered harmful (especially if there is more than two years difference, and if one is pre-pubescent and one is not) and where the child may have SEND. However, a younger child can still harm an older child.

88.5 The Trust adopts a zero-tolerance approach to harmful sexual behaviour, sexual harassment and sexual violence. The Trust recognises that these behaviours can be underreported and is committed to early identification, challenging inappropriate and potentially criminal behaviour, and preventing the escalation of misogyny and abuse. All incidents involving the creation, possession or sharing of nude or semi-nude images will be treated as safeguarding concerns, regardless of whether they are shared

consensually or non-consensually, and will be managed through a proportionate safeguarding response that takes account of the age, development, vulnerabilities and circumstances of the children involved.

88.6 Harmful sexual behaviour is characterised by a range of behaviours that can include:

- Sexual name-calling
- Sexual harassment
- Online sexual bullying
- Sexual image sharing
- Sexual assault
- Rape

88.7 Harmful sexual behaviour may include:

- Using sexually explicit words and phrases.
- Inappropriate touching.
- Sexual violence or threats.
- Sexual violence and sexual harassment within intimate personal relationships between children
- Full penetrative sex with other children or adults.
- Sexual interest in adults or children of very different ages to their own.
- Forceful or aggressive sexual behaviour.
- Compulsive habits.
- Sexual behaviour affecting progress and achievement.
- Using sexually explicit words and phrases.
- Inappropriate touching.
- Sexual violence or threats.

88.8 This is an especially difficult issue to deal with children, particularly in the younger age groups or with SEND, may engage in such behaviour with no knowledge that it is wrong or abusive. For this reason, it may be more accurate to talk about harmful sexual behaviour rather than abuse.

88.9 In such circumstances, instead of talking about 'the abuser', we endeavour to use the term 'young person who has exhibited harmful sexual behaviour'. As children themselves, they have the right to be protected and supported to lead better lives. We must not ignore the risk they may continue to pose, but we must also recognise that, with the right help, the vast majority will not re-offend.

88.10 In conclusion, the process of dealing with referrals for HSB should not be seen as somehow separate or different to child sexual abuse referrals of any other type and in order that children are safeguarded (victim and/or perpetrator) the Trust is committed to the multi-agency requirements for Child Protection Strategy Discussions/Meetings.

88.11 All referrals to either Greater Manchester Police or MASSH regarding HSB should be considered in conjunction with the Child Protection Procedures.

88.12 To support further understanding of and appropriate responses to HSB, some staff within the Trust have undertaken AIM checklist/Brook Traffic

Light tool training. Staff may also refer to the Hackett continuum, Sexual development and behaviour in children | NSPCC Learning and Responding to children who display sexualised behaviour.

88.13

89.**Sexual violence and sexual harassment**

89.1 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.

89.2 **What are sexual violence and sexual harassment?**

Sexual violence

89.3 It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual violence 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 see 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.

Consent

89.4 Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity, and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice:

- a child under the age of 13 can never consent to any sexual activity,
- the age of consent is 16, and
- sexual intercourse without consent is rape.

Sexual harassment

89.5 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, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
- non-consensual sharing of sexual images and videos;
- sexualised online bullying;
- sending nudes (previously known as sexting) is when someone shares a sexual message, naked or semi-naked image, video or text message with another person. It doesn't have to be a nude image of them and could be an image of someone else. Young people can send nudes using phones, tablets and laptops and can share them across any app, site or game, including during a livestream. Many young people also share them on social media channels.

Response to Sexual Violence and Harassment

89.6 Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, 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) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and lesbian, gay and bisexual children are at greater risk.

89.7 Following a report of harmful sexual behaviour, sexual harassment or sexual violence, the school will consider the needs of all children involved and determine what support is required.

89.8 In some cases, such as one-off incidents of HSB or sexual harassment, it may be appropriate for the school or college to manage the situation internally, using the behaviour policy and providing pastoral support, without involving statutory services.

89.9 Where appropriate, this may include managing the incident internally alongside community-based Early Help and other support services for the victim, alleged perpetrator(s), or both. The school will work with relevant agencies, parents and carers to provide timely support and will maintain a zero-tolerance approach to sexual harassment and sexual violence. All concerns, discussions, decisions, actions and the rationale for those decisions will be recorded clearly and comprehensively.

89.10 In some cases of reported harmful sexual behaviour, sexual harassment or sexual violence, the DSL will consider whether additional support is required through Family Help, targeted Early Help, specialist services or referral to local authority children's social care. Referrals to children's social care will be made where a child has been harmed, is at risk of harm, or is in immediate danger. The school will work collaboratively with children's social care, Family Help services and other relevant agencies to support all children involved, while taking immediate action to safeguard pupils and reduce risk. Parents or carers will normally be informed of referrals unless doing so would place a child at increased risk of harm.

89.11 In any event, the Trust maintains a zero-tolerance approach to sexual harassment and sexual violence, and all concerns, decisions, actions and rationales will be recorded appropriately.

89.12 In managing incidents, staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts
- dismissing or tolerating such behaviours risks normalising them. The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe.
- A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. As is always the case, if staff are in any doubt as to what to do they should speak to the designated safeguarding lead (or a deputy).

89.13 All staff should:

- Understand that whatever the response, it should be underpinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated.
- All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim be made to feel ashamed for making a report.
- All staff should be aware that children might not tell staff about their abuse ad that staff may overhear a conversation or to look out for changes in behaviour.
- All staff should report incidents of sexual harassment to their DSL.

90. Nudes and semi-nudes, including where generated by AI

90.1 At Oak Learning Partnership we ensure that staff are aware to treat the sharing of indecent images of pupils through sharing nudes or semi-nude images/video as a safeguarding concern.

90.2 The term 'making or sharing nudes and semi-nudes' refers to the creation, sending or posting of nude or semi-nude images by young people under the age of 18. The term 'images' includes all visual content, such as photographs, videos and livestreams.

90.3 In line with KCSIE, we use the term 'nudes' because it is the most widely understood by young people and best captures the full range of image-sharing behaviours covered in this guidance.

90.4 Images may be taken by the child themselves (sometimes referred to as 'self-generated imagery') or taken or created by another person. They may also be digitally altered or wholly generated using artificial intelligence, including what are sometimes described as 'deepfakes' or 'deep nudes'.

90.5 Staff will receive appropriate training regarding child sexual development and will understand the difference between sexual behaviour that is considered normal and expected for the age of the pupil, and sexual behaviour that is inappropriate and harmful. In any event, whether consensual or not, incidents involving the sharing of nudes or semi-nudes will be treated as a safeguarding concern.

90.6 Staff will receive appropriate training around how to deal with instances of sharing images of a sexual nature in the school community, including understanding motivations, assessing risks posed to pupils depicted in the images, and how and when to report instances of sharing nudes or semi-nude images/video.

90.7 Staff will be aware that creating, possessing, and distributing indecent imagery of pupils is a criminal offence, regardless of whether the imagery is created, possessed, and distributed by the individual depicted; however, staff will ensure that pupils are not unnecessarily criminalised. Where a member of staff becomes aware of an incidence of sharing nudes or semi-nude images/video that involves indecent images of a pupil, they will refer this to the DSL as soon as possible.

90.8 Where a pupil confides in a staff member about the circulation of indecent imagery, depicting them or someone else, the staff member will:

- **Refrain from viewing, copy, printing, sharing, storing or saving the imagery.**
- **Tell the DSL immediately if they accidentally view an indecent image and seek support.**
- **Explain to the pupil that the incident will need to be reported.**
- **Respond positively to the pupil without blaming or shaming anyone involved and reassuring them that they can receive support from the DSL.**
- **Report the incident to the DSL.**

90.9 The DSL (or deputy DSL) will seek to establish the nature of the incident, the content of any image and the circumstances surrounding its creation

or sharing, wherever possible without viewing the image itself. Where there is a safeguarding concern, pupils' devices may be searched, screened or confiscated in accordance with the school's Searching, Screening and Confiscation Policy/DfE Guidance.

90.10 **Staff must not intentionally view, copy, print, share, save or forward nude or semi-nude images of children. Any concerns must be reported immediately to the DSL**. If there is an exceptional reason why it is necessary to view an image, this decision will be made by the DSL, and wherever possible, the viewing will take place with a second member of staff present and a clear record kept of the rationale and actions taken.

90.11 Where a member of staff reasonably believes that a device has been used to commit an offence, or may contain evidence of an offence, the device will be secured and handed to the police without delay.

90.12 The DSL will categorise the incident into one of two categories:

- **Aggravated:** incidents which involve additional or abusive elements beyond the creation and distribution of indecent images of pupils, including where there is an adult involved, where there is an intent to harm the pupil depicted, or where the images are used recklessly.
- **Experimental:** incidents involving the creation and distribution of indecent images of pupils where there is no adult involvement or apparent intent to cause harm or embarrassment to the pupil. Where it is necessary to view the imagery, e.g. If this is the only way to make a decision about whether to inform other agencies, the DSL should:
  - Discuss this decision with a member of the SLT (preferably someone trained to DSL level)
  - Consider seeking advice from police
  - If absolutely necessary to view, ensure the image is, where possible, viewed by someone of the same sex as the individual depicted.
  - Ensure viewing takes place on school premises and with another member of staff present in the room – this staff member does not need to view the imagery.
  - Record how and why the decision was made using defensible decision making

90.13 Where the incident is categorised as 'experimental', the pupils involved are supported to understand the implications of sharing indecent imagery and to move forward from the incident. Where there is reason to believe that indecent imagery being circulated will cause harm to a pupil, the DSL will escalate the incident to MASSH.

90.14 Where indecent imagery of a pupil has been shared publicly, the DSL will work with the pupil to report imagery to sites on which it has been shared and will reassure them of the support available.

90.15 **In all cases where an adult is involved, this will be referred to the police.**

90.16 DSLs will refer to UK Council for Internet Safety Guidance for further support.

91.**Online safety and filtering and monitoring**

91.1 Online safety considerations will be embedded across all aspects of the Trust's safeguarding culture, helping to protect pupils from abuse,

exploitation, harmful content, inappropriate contact and conduct, both within and beyond the school environment. Governors will seek to assurance regarding online safety arrangements including filtering and monitoring data at least annually.

91.2 The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm. We have an effective approach to online safety and educate the whole school community in their use of technology and have mechanisms to identify, intervene in, and escalate any incident where appropriate. The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- **content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories,
- **contact:** being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes,
- **conduct:** online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, including those generated using AI and online bullying, and
- **commerce**: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

  Anyone who is concerned about phishing scams can report to APWG.

91.3 As part of a broad and balanced curriculum, all pupils will be made aware of online risks and taught how to stay safe online.

91.4 The senior leadership team and DSL are responsible for ensuring the operational functions of filtering and monitoring within schools to ensure that appropriate safeguards are in place on school devices and school networks. They will:

- identify and assign roles and responsibilities to manage filtering and monitoring systems
- review filtering and monitoring provision at least annually against the filtering and monitoring standards set out by the DFE
- undertake an online safety risk assessment, reviewing this annually
- ensure that the review includes checks that filtering and monitoring is working appropriately across all internet-enabled device types used within the school, in all relevant locations.
- ensure that records of the checks undertaken are kept and any issues are rectified
- endeavour to block harmful and inappropriate content without unreasonably impacting teaching and learning
- have effective monitoring strategies in place that meet their safeguarding needs

- collaborate with IT leaders and support colleagues to review systems and resolve issues.

91.5 Through training, all staff members will be made aware of:

- Pupil attitudes and behaviours which may indicate they are at risk of potential harm online
- Their responsibilities in supporting filtering and monitoring procedures within school
- The procedure to follow when they have a concern regarding a pupil's online activity.

Social Media

91.6 Social media can provide positive connectivity for children however it can also make children vulnerable. We provide advice and guidance on safety on social media and digital resilience. This is explored through the curriculum and any issues around the use of social media e.g. grooming, exploitation or cyberbullying etc should be reported to the DSL where a multi-agency safeguarding response will be considered.

Communicating with parents

91.7 As part of the usual communication with parents, the school will reinforce the importance of pupils being safe online and inform parents that they will find it helpful to understand what systems the school uses to filter and monitor online use.

91.8 The school will also make it clear to parents what their children are being asked to do online for school.

91.9 Where pupils need to learn online from home, Oak Learning Partnership will support them to do so safely. We understand that a significant part technology has on safeguarding and wellbeing issues of children and young people.

Use of Generative Artificial Intelligence (AI)

91.10 The Trust recognises that generative AI tools may offer educational and administrative benefits when used appropriately. Any use of AI by pupils, staff or volunteers must be safe, lawful and ethical, and aligned with the Trust's safeguarding, data protection, ICT acceptable use and staff conduct policies. Appropriate safeguards, including staff training, filtering and monitoring, and age-appropriate supervision, will be in place.

91.11 Staff must not input personal, sensitive or confidential information into AI systems unless authorised and compliant with data protection requirements. Pupils will be taught to use AI responsibly, critically evaluate AI-generated content and report any harmful, inaccurate or inappropriate material. Concerns relating to the misuse of AI will be managed in accordance with the Trust's safeguarding procedures.

91.12 Staff should refer to the Department for Education's guidance on Generative Artificial Intelligence in Education and the DfE/Chiltern Learning Trust/Chartered College of Teaching AI training resources,

particularly Module 3, which covers safeguarding, ethics, data protection and intellectual property considerations.

Reviewing online safety and cyber security

91.13 The school will carry out an annual review of its approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by pupils.

91.14 The Trust recognises that effective cyber security is an important aspect of safeguarding and promoting the welfare of children. We will take appropriate measures to protect personal information, prevent unauthorised access to systems and data, and reduce the risk of disruption, data breaches, and safeguarding incidents. Schools will implement proportionate cyber security controls, taking account of the Cyber Security Standards for Schools and Colleges, and will regularly review their arrangements to strengthen digital resilience. Relevant guidance from the National Cyber Security Centre (NCSC), National Education Network (NEN), and the Department for Education will be used to inform practice and support continuous improvement.

91.15 All staff and governors will undertake regular training to ensure that they are aware of cyber-security risks.

92. Mobile Phones and Smart Devices

92.1 All Trust schools are **mobile phone-free environments by default**. Pupils must not have access to mobile phones or other personal smart devices during the school day, including during lessons, between lessons, at breaktimes and during lunchtime, except where an authorised exception has been agreed by the school.

92.2 For the purposes of this policy, **smart devices** include, but are not limited to, mobile phones, smart watches, smart glasses (including AI-enabled and Meta-style glasses), earbuds, wearable technology, audio or video recording devices, and any device capable of communication, internet access, photography, audio recording, video recording or location tracking.

92.3 Visitors must not use mobile phones, smart devices or recording equipment whilst on school premises unless prior permission has been granted by the Headteacher or their authorised delegate. Staff may only use personal mobile phones and smart devices in designated staff areas where pupils are not present, except where use is required for authorised educational, operational or emergency purposes.

92.4 Each school will implement and enforce arrangements appropriate to its context to maintain a mobile phone-free environment in line with Department for Education guidance. The specific expectations, procedures and any authorised exceptions are set out within the school's Mobile Phone Policy.

92.5 Photographs and videos of pupils will be carefully planned before any activity with particular regard to consent and adhering to the Trust's Data Protection Policy. Only Trust devices may be used for photography purposes.

92.6 Where photographs and videos will involve pupils who are CLA, adopted pupils, or pupils for whom there are security concerns, the headteacher will liaise with the DSL to determine the steps involved. The DSL will, in

known cases of pupils who are CLA or who have been adopted, liaise with the pupils' social workers, carers or adoptive parents to assess the needs and risks associated with the pupils.

92.7 Staff will report any concerns about pupils' or other staff members' use of personal electronic devices to the DSL, following the appropriate procedures.

Upskirting

92.8 Under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment for the purpose of upskirting. **"Operating equipment"** includes enabling, or securing, activation by another person without that person's knowledge, e.g. a motion-activated camera.

92.9 Upskirting will not be tolerated by the Trust. Any incidents of upskirting will be reported to the DSL, who will then decide on the next steps to take, which may include referring to police.

93.**Acceptable use agreements**

93.1 This is in association with the Staff Code of Conduct Policy.

93.2 Mobile Phone Use and Camera Safety:

- Staff members, visitors, trainee teachers and volunteers will not use personal mobile phones or cameras when pupils are present.
- Staff may use mobile phones on school premises outside of working hours when no pupils are present.
- Staff may use mobile phones in the staffroom during breaks and non-contact time. Mobile phones will be safely stored and in silent mode whilst pupils are present. Staff will use their professional judgement in emergency situations.
- Staff may take mobile phones on trips, but they must only be used in emergencies and should not be used when pupils are present.
- Personal mobile devices will not be used to take images or videos of pupils or staff under any circumstances.
- The sending of inappropriate messages or images from mobile devices is strictly prohibited.
- Staff who do not adhere to this policy will face disciplinary action.
- Photographs and videos of pupils will be carefully planned before any activity with particular regard to consent and adhering to the Data Protection Policy.
- The Senior Leaders will oversee the planning of any events where photographs and videos will be taken. Where photographs and videos will involve CLA pr previously looked after pupils, adopted pupils, or pupils for whom there are security concerns, the DSL/Headteacher will determine the steps involved.
- The DSL will, in known cases of a pupil who is a CLA or who has been adopted, liaise with the pupil's social worker, carers or adoptive parents to assess the needs and risks associated with the pupil.
- Staff will report any concerns about another staff member's use of mobile phones to the Headteacher, following the procedures outlined in

this Child Protection and Safeguarding Policy as well as the OLP Whistleblowing Policy.

94.**Private fostering**

94.1 Private fostering is when a child or young person under the age of 16 (or under age 18 if the child or young person is SEND) is cared for by someone who is not their parent or a 'close relative' for 28 days or more. This is a private arrangement made between a parent and a carer.

94.2 Where Oak Learning Partnership becomes aware of a pupil being privately fostered, they will notify MASSH as soon as possible to allow the LA to conduct any necessary checks.

95.**Students potentially at greater risk of harm**

95.1 The Trust recognises that some groups of pupils can face additional safeguarding challenges and understands that further barriers may exist when determining abuse and neglect in these groups of pupils. Additional considerations for managing safeguarding concerns and incidents amongst these groups are outlined below.

Pupils who need social workers

95.2 Pupils may need social workers due to safeguarding or welfare needs. These needs can leave pupils vulnerable to further harm and educational disadvantage.

95.3 As a matter of routine, the DSL will hold and use information from the LA about whether a pupil has a social worker in order to make decisions in the best interests of the pupil's safety, welfare, and educational outcomes.

95.4 Where a pupil needs a social worker, this will inform decisions about safeguarding, e.g. responding to unauthorised absence, and promoting welfare, e.g. considering the provision pastoral or academic support.

Children who are absent from education

95.5 The Trust recognises that persistent absence and children missing education may be indicators of safeguarding concerns, including neglect, child criminal exploitation, child sexual exploitation and other forms of harm. Schools will monitor attendance closely, identify concerns at the earliest opportunity, and work with families, local authorities and other agencies to safeguard pupils and promote regular attendance. Particular attention will be given to vulnerable pupils, including those with a social worker, child protection plan, child in need plan or looked after status. The Trust will fulfil its statutory duties in relation to attendance and children missing education and will take appropriate action where safeguarding concerns are identified.

Electively home-educated children

95.6 Parents may choose elective home education (EHE) for their children. In some cases, EHE can mean that children are less visible to the services needed to safeguard and support them.

95.7 In line with the Education (Pupil Registration) (England) Regulations 2006, the school will inform the LA of all deletions from the admissions register when a pupil is taken off roll.

95.8 Where a parent has expressed their intention to remove a pupil from school for EHE, the school will inform the LA SEN team, and in collaboration with the LA and other key professionals, will coordinate a meeting with the parent, where possible, before the final decision has been made, particularly if the pupil has SEND, is vulnerable, and/or has a social worker.

Looked After and Previously Looked After Children

95.9 The Trust recognises that looked after and previously looked after children are particularly vulnerable and may have experienced abuse, neglect or other adverse experiences. Staff will be provided with the knowledge and skills necessary to safeguard and promote the welfare of these pupils. The DSL/Designated Teacher will maintain appropriate information relating to a child's legal status, care arrangements, social worker and Virtual School Head, and will work closely with parents, carers and relevant agencies to ensure that timely and effective support is provided. Multi-agency working and information sharing will be prioritised to help keep these children safe and promote positive educational outcomes.

Care Leaver

95.10 A care leaver is a young person aged 16 or over who was previously looked after by a local authority for a qualifying period and is entitled to ongoing support under the Children Act 1989. This may include support from a Personal Adviser and a Pathway Plan to help meet their education, training, employment, accommodation and wellbeing needs.

95.11 The Trust recognises the ongoing support available to care leavers through their local authority. The DSL will maintain awareness of the Personal Adviser allocated to eligible care leavers and, where appropriate, will work with them and other professionals to support the young person's education, wellbeing and safeguarding needs.

Young carers

95.1 A young carer is a child or young person under 18 who gives unpaid care to a family member or friend. This person often has a physical illness, disability, mental health condition, or a drug or alcohol problem. Many young carers look after a parent or sibling.

95.2 The Trust recognises that young carers may face additional challenges that can affect their attendance, attainment, wellbeing and wider outcomes. Early identification is essential to ensure that appropriate support is provided at the earliest opportunity. Schools will work with pupils, families and relevant agencies to identify young carers and provide suitable pastoral support, referrals and access to services where required. We encourage pupils and families to inform the school of any caring responsibilities so that appropriate support can be put in place.

Pupils with SEND

95.3 When Children with SEND can face additional safeguarding challenges, and staff should be aware that these can create barriers to recognising abuse, neglect and exploitation. Our child protection policy reflects the fact that children with Special Education Needs and Disabilities (SEND) face additional barriers in remaining safe. These can include:

- Communication difficulties, which may make it harder for a child to recognise, understand or report abuse.
- Difficulties distinguishing between fact and fiction online, which may increase the risk of a child copying, repeating or acting on harmful, misleading or inappropriate content without fully understanding the potential consequences.
- Difficulties expressing concerns, feelings or experiences, particularly where a child has speech, language or communication needs.
- Assumptions that indicators of abuse are related to the child's disability or additional needs, rather than being recognised as possible signs of harm.
- The potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Reduced independence, increased reliance on adults for care and support, and greater levels of intimate care.
- Social isolation and fewer friendship groups, which may increase vulnerability to abuse, coercion or exploitation.
- Greater dependence on technology and online communication, increasing exposure to online harms.
- Difficulties understanding healthy relationships, boundaries, consent and personal safety.
- Behaviours, injuries or emotional presentations being misinterpreted or overlooked because they are seen as part of the child's condition.
- A higher risk of abuse, neglect, exploitation and peer-on-peer harm than their peers.

Further advice can sought from the local SENDIASS service, NSPCC Safeguarding Children with SEND and Safeguarding Children who are d/Deaf and who have disabilities

95.4 Staff should maintain a high level of professional curiosity and be alert to the fact that children with SEND are statistically more likely to experience abuse, neglect and exploitation than their peers. Safeguarding concerns should be identified, recorded and responded to promptly, taking account of the child's individual needs and preferred methods of communication.

95.5 When managing a safeguarding issue, the DSL will liaise with the SENCO as required, as well as the pupil's family/carers where appropriate, to ensure that the pupil's needs are effectively met.

95.6 Additionally, The Trust recognises that some children may have experienced adverse childhood experiences (ACEs) or trauma which can increase their vulnerability. We are committed to a trauma-informed approach and ensure staff are trained to recognise the impact of trauma and respond in a supportive, nurturing and child-centred way.

Children with medical conditions

95.7 The Trust recognises that incidents relating to a pupil's medical condition or allergy do not automatically constitute a safeguarding concern. However, where concerns arise that a pupil may be at risk of neglect, abuse or exploitation, such as where essential medical information is withheld or a pupil is repeatedly without necessary medication, safeguarding procedures will be followed. Schools will support pupils with medical conditions and allergies in accordance with statutory guidance

and will take appropriate action where a pupil's welfare may be at risk. For full details, see Trust Medical Conditions Policy and Allergies and Anaphylaxis Policy.

Pupils who are Lesbian, Gay, Bisexual

95.8 The fact that a pupil may be lesbian, gay, or bisexual is not in itself an inherent risk factor for harm; however, staff will be aware that these pupils can be targeted by other individuals. Staff will also be aware that, in some cases, a pupil who is perceived by others to be lesbian, gay or bisexual (whether they are or not) can be just as vulnerable as pupils who are.

95.9 Staff will also be aware that the risks to these pupils can be compounded when they do not have a trusted adult with whom they can speak openly with. Staff will endeavour to reduce the additional barriers faced by these pupils and provide a safe space for them to speak out and share any concerns they have.

95.10 Schools have at least one designated adult who can support and signpost children to support services in relation to their sexuality or gender questioning. Information signposting to safe adults and safe spaces will be shared through assemblies, student noticeboards and/or curriculum.

Gender Questioning pupils

95.11 Gender questioning pupils children who are questioning the way they feel about being a boy or a girl, including the physical attributes of their sex and the related ways in which they fit into society.

95.12 Our starting point is that it is not for schools and colleges to initiate any action in this area; the following relates to circumstances where a child or their parent has raised a request relating to social transition to which a school or college is responding.

95.13 The Trust recognises that children may express interests, behaviours or preferences that do not align with gender stereotypes and that some children may question their gender. Schools will respond with sensitivity, respect and professional curiosity, taking time to understand each child's individual circumstances, wishes and needs. Staff will remain alert to any vulnerabilities, including risks relating to mental health, wellbeing, family relationships, peer relationships, discrimination or bullying, and will provide appropriate support and safeguarding where required. The Trust will promote an inclusive environment and avoid unnecessary restrictions based on gender stereotypes.

95.14 **Bullying:** The Trust recognises that bullying can have a significant impact on a pupil's wellbeing, mental health, safety and educational outcomes. All forms of bullying are unacceptable and will not be tolerated. Schools will take a proactive approach to preventing bullying, promote a culture of respect and inclusion, and respond promptly and effectively to any concerns to prevent escalation and safeguard pupils.

95.15 **Considering requests for support with social transition:** The Trust will respond sensitively and appropriately to children who are questioning their gender, with the welfare, safeguarding and best interests of all pupils as the primary consideration. Requests for support relating to social transition will be considered on a case-by-case basis, in partnership with parents/carers wherever possible, taking account of safeguarding duties, relevant clinical or professional advice, and the needs of all affected

pupils. Schools will maintain appropriate records of decisions and support provided. Staff must not initiate social transition and will follow KCSIE guidance when considering requests for support. Any arrangements relating to toilets, changing facilities, residential accommodation and single-sex sporting activities will comply with safeguarding requirements and relevant legislation.

95.16 In line with the responsibilities of schools and colleges to adhere to the highest standards of safeguarding for the children and young people in their care, alongside obligations under the School Premises (England) Regulations 2012 and the Education (Independent School Standards) Regulations 2014, schools must not allow pupils into toilets, changing rooms, or residential accommodation designated for the opposite sex, with no exceptions. Similarly, where our schools have implemented single-sex sports as being necessary for safety reasons, there should be no exceptions and pupils must not be allowed to participate in sports designated for the opposite sex.

95.17 **Policy development:** When developing, implementing or reviewing policies, the Trust will consider the potential impact on all pupils, including those who are questioning their gender. Where a policy may place a pupil at a particular disadvantage, leaders will consider whether the policy pursues a legitimate aim, such as safeguarding, privacy, dignity, fairness or safety, and whether it remains a proportionate means of achieving that aim. Decisions will take account of the welfare, best interests and rights of all affected pupils, consider whether alternative approaches are available, and balance the potential impact on both the individual pupil and the wider school community. All decision-making will be evidence-informed, appropriately documented and consistent with safeguarding, equality and human rights obligations.

95.18 **Constraints:** Where a pupil requests social transition, the school will respond sensitively and explain any relevant legal and practical limitations. Any support provided will not include access to toilets, changing facilities, boarding or residential accommodation designated for the opposite sex, or participation in opposite-sex PE activities where single-sex arrangements are required for safety or privacy reasons.

95.19 The school will take robust action to prevent and address bullying, harassment or discrimination. In doing so, it will also respect the rights of pupils and staff to hold protected religious or philosophical beliefs. Where appropriate, the school may consider practical arrangements that support respectful interactions and safeguard the rights and wellbeing of all those involved.

95.20 **Reviews:** Our schools will keep any decisions relating to a child's social transition under regular review. Where circumstances change, including the emergence of safeguarding concerns or changes in the child's needs, the decision may be reconsidered in consultation with the DSL and, where appropriate, parents or carers. The school will also review any existing arrangements to ensure they remain appropriate, proportionate and in the child's best interests.

95.21 **Correct information:** The school will ensure that accurate information about each child, including their biological sex, is maintained in line with legal requirements. Relevant staff will be provided with the information necessary to fulfil their safeguarding, welfare and statutory responsibilities.

95.22 **Children living in 'stealth':** Some children may have fully socially transitioned at a very young age, meaning they consistently use a different name, pronouns and presentation, and that others may not know their biological sex. Our schools recognise that some children who have socially transitioned may experience increased emotional, wellbeing or safeguarding vulnerabilities, particularly as they approach puberty because:

- Physical changes associated with their biological sex may cause significant distress or anxiety.
- They may fear that their biological sex will become apparent to others.
- They may face additional emotional, wellbeing or safeguarding vulnerabilities.
- Decisions made earlier in childhood may need reviewing as the child's needs and circumstances change.

95.23 In such cases, the DSL will be involved in assessing needs, monitoring welfare and reviewing support arrangements to ensure they remain appropriate and in the child's best interests.

95.24 **Support for pupils de-transitioning**: Our schools recognise that a child's views and wishes may change over time. Where a pupil seeks to modify or reverse previously agreed social transition arrangements, the school will respond sensitively, provide appropriate support, and work with parents or carers and relevant professionals to ensure the child's wellbeing and best interests remain central to decision-making.

Pupils requiring mental health support

95.25 All staff will be made aware that mental health problems can, in some cases, be an indicator that a pupil has suffered, or is at risk of suffering abuse, neglect or exploitation and that concerns should be raised with a DSL/DDSL and/or SENCO to ensure that support can be identified.

95.26 Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, still have an important role to play. Specifically, they can support the fulfilment of 4 key roles:

- promoting good mental wellbeing and preventing the onset of mental illness,
- observing pupils and identifying early those who may be experiencing mental health problems or being at risk of developing one,
- ensuring early targeted support is provided, and
- liaison with/referral to specialist services where needed.

95.27 If a child is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which education staff are well placed to recognise. These could include:

- significant changes in behaviour,
- ongoing difficulty sleeping,
- withdrawing from social situations,
- not wanting to do things they usually like, and
- physical signs of self-harm or neglecting themselves.

95.28 Not every child who exhibits these behaviours is suicidal or has a mental health concern. However, by identifying these and other potential warning signs, education staff can identify children who may be struggling with their mental health and contemplating suicide and offer support and vital early intervention. Schools and colleges should ensure that any interventions they offer are evidenced as safe and effective and appropriate for the need and phase of education.

95.29 Where support is needed, the designated safeguarding lead (or a deputy) should consider whether to inform parents or carers to support the child's wellbeing, where doing so would not place the child at additional risk.

95.30 Staff will not attempt to make a diagnosis of mental health problems, staff will, however, be encouraged to identify pupils whose behaviour suggests they may be experiencing a mental health problem or may be at risk of developing one.

95.31 If staff have a concern about a child's mental health that is also a safeguarding concern, they should speak to the DSL or their deputy. If staff feel that a child is in danger, they should call 999 or arrange for them to be taken to A&E immediately by a parent/carer or other suitable person. If a child needs help urgently for their mental health, but it's not an emergency, staff can get help from NHS 111 online or call 111 and select the mental health option.

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

95.33 Oak Learning Partnership will access a range of advice to help them identify pupils in need of additional mental health support, including working with external agencies. The school's mental health lead will support the whole-school approach to metal health. Students can access a wealth of support from their form tutor, school nurse, pastoral team, SENCO as well as accessing external agencies such as School counsellors, CAMHS, Early Break, Rise, Kooth and Childline.

95.34 Where available, schools will make use of mental Health Support Teams (MHST) and the mental health lead will liaise with them when considering the whole school approach to mental health and wellbeing.

Supporting additionally vulnerable students

95.35 We ensure that all key staff work together to safeguard vulnerable children. This may include school-led support or referring to external organisations or both.

95.36 The Trust recognises the role of the Virtual School Head in promoting the educational progress, attainment and attendance of children in care and children with a social worker. Attendance will be viewed as an important safeguarding factor, and our schools will work with Virtual School Heads, local authorities and other professionals to support positive attendance, wellbeing and educational outcomes.

95.37 Students are discussed at pastoral meetings, safeguarding briefings, NIFTE briefings, SLT meetings and progress reviews, where key indicators of abuse and neglect may be raised, e.g. persistent absenteeism, behavioural difficulties, poor attainment etc. Where staff have a

safeguarding concern, they will liaise with the Operational Safeguarding Lead or DDSL linked to their Pathway.

96.**Allergies**

96.1 The Trust is committed to safeguarding pupils with allergies and medical conditions. All schools will comply with statutory guidance on allergy safety in schools and maintain robust procedures to identify, assess and manage allergy-related risks.

96.2 All school-based staff receive appropriate training in allergy awareness and emergency response, including the recognition and management of anaphylaxis. Each school has a designated Allergy Lead, maintains a whole-school allergy risk assessment, and holds spare adrenaline auto-injectors (AAIs) in accordance with national guidance.

96.3 Further details can be found in the Trust's Allergy Safety and Anaphylaxis Policy.

97.Child's voice

97.1 Children are encouraged to contribute to the development of policies and share their views. All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim be made to feel ashamed for making a report.

97.2 We have 'a culture of listening'; where there is a safeguarding concern, we should ensure that the child's wishes and feelings are considered when determining what action to take and what services to provide.

97.3 Staff will be aware that pupils may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or they may not recognise their experiences as harmful. Staff will be aware that this must not prevent them from having professional curiosity and speaking to the DSL, or deputy DSL, if they have a concern about a pupil.

97.4 Students have opportunities to discuss their feelings, know how to raise a concern, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback. This approach is encouraged throughout form-time, assemblies, curriculums and in targeted interventions.

97.5 Our schools have dedicated safeguarding pages on our school websites where families can access advice and support. Students also have access to signposting in school.

98. The Curriculum

98.1 We are committed to promoting emotional health and wellbeing and to supporting the development of the skills needed to help keep children safe and healthy. We recognise that a preventative education is most effective in the context of a whole-school or college approach that prepares pupils and students for life in modern Britain and creates a culture of zero tolerance for sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict.

98.2 All children have access to an appropriate curriculum, differentiated to meet their needs. They are encouraged to express and discuss their ideas, thoughts and feelings through a variety of activities and have access to a range of cultural opportunities which promote the fundamental British values of tolerance, respect, rule of law and empathy for others.

98.3 There is a planned programme of evidence based RSHE is delivered in regularly timetabled lessons and reinforced throughout the whole curriculum. Our programmes are fully inclusive and developed to be age and stage of development appropriate (especially when considering the needs of children with special educational needs and/or disabilities (SEND) and other vulnerabilities).

98.4 This programme will tackle, at an age-appropriate stage, issues such as:

- supporting children to develop the skills that form the building blocks of all positive relationships
- healthy and respectful relationships,
- boundaries, consent and kindness in relationships,
- stereotyping, prejudice and equality,
- body confidence and self-esteem,
- how to recognise and report concerns about an abusive relationship, including coercive and controlling behaviour,
- the concepts of, and laws relating to all forms of sexual harassment, and abuse, and how to access support,
- what constitutes sexual harassment and sexual violence and why these are always unacceptable, emphasising that it is never the fault of the person experiencing it, and
- understanding online harms such as sharing images, the prevalence of deepfakes, pornography and misogynistic influencers and when and where to seek help.

98.5 Personal, Social and Health Education (PSHE), Relationships, Sex and Health Education (RSHE), Citizenship and Religious Knowledge lessons will provide opportunities for children and young people to discuss and debate a range of subjects including lifestyles, family patterns, religious beliefs and practices and human rights issues.

98.6 We take account of the latest advice and guidance provided to help address specific harms and forms of grooming and exploitation e.g. through AI literacy, awareness of deepfake images, misogyny, misandry incel culture, Domestic Abuse, Child Sexual Exploitation, Child on Child abuse, Radicalisation, 'Honour-based' Abuse, including Forced Marriage, Female Genital Mutilation, Breast Ironing, Modern Slavery and County Lines.

98.7 Students are encouraged to seek out an adult at school/college if they are feeling worried and are reassured that their concerns will be taken seriously and treated with respect.

98.8 Children are encouraged to contribute to the development of policies through Drop Down Day engagement and feedback from the school council.

98.9 Evidence based resources which support the development of our PSHE and RSHE policies and curriculum can be found in KCSIE paragraph 160.

99.**Attendance**

99.1 A child missing from education (CME) or a child who is absent from education, particularly on repeat occasions/for prolonged periods, is a potential indicator of abuse, neglect or exploitation and, as such, these children are increasingly at risk of being victims of harm, exploitation or radicalisation. We view poor attendance as a safeguarding issue and recognise the potential impact on pupils' mental health, as well as their attainment and wellbeing. In accordance with our Attendance Policy, absences are rigorously pursued and recorded. Any concerning patterns are reviewed.

99.2 In partnership with the appropriate agencies, we take action to pursue and address all unauthorised absences in order to safeguard the welfare of children in our care.

99.3 Our Attendance Policy identifies how individual cases are managed and how we work proactively with parents/carers to ensure that they understand why attendance is important. In certain cases, this may form part of an Early Help Assessment e.g. Story So Far/CAF or a parent contract.

99.4 We implement the statutory and Local Authority requirements in terms of monitoring and reporting Children Missing from Education (CME).

99.5 For children with EHCPs in addition to working with the LA Attendance Team, we also work closely with the LA SEN team to address and overcome barriers to attendance and engage in multi-disciplinary discussions in deciding on outcomes.

99.6 Full attendance procedures including first day absences and CME procedures are detailed in school's Attendance Policy.

100. Alternative provision

100.1 Where a pupil attends alternative provision, the school retains overall responsibility for their safeguarding and welfare. The school will undertake appropriate due diligence, obtain assurance that all required safeguarding checks have been completed, and ensure the placement is suitable, safe and able to meet the pupil's individual needs. The school will maintain accurate records of the pupil's location during school hours, monitor attendance and wellbeing, and review placements regularly, at least termly. Any safeguarding concerns will be acted upon immediately, and placements will be reviewed or ended where necessary to protect the pupil's safety and welfare. Full details can be found in the Oak Learning Partnership Alternative provision Policy.

101. Meeting needs of learners with EHCPs

101.1 Where there are significant concerns that a pupil's current placement may no longer be able to safely meet their educational, safeguarding, health or special educational needs, the school will request an emergency review of the Education, Health and Care Plan (EHCP) and work with the local authority, parents/carers and relevant professionals to review the support and provision in place.

101.2 Pending any decision by the local authority regarding the pupil's placement, the school will continue to fulfil its safeguarding and education responsibilities, maintain regular contact with the pupil and family, and

work with relevant agencies to monitor the pupil's welfare, attendance and engagement. Where appropriate, safeguarding contact may be undertaken jointly with, or by, another professional involved with the child, such as a social worker, in accordance with the child's needs and agreed multi-agency arrangements.

102. Work experience

102.1 The school will ensure that all work experience placements are appropriately risk assessed and that providers have suitable safeguarding, child protection, health and safety, and staff conduct arrangements in place. Reasonable assurances will be sought that individuals involved in the supervision, training, instruction or care of pupils are suitable to work with children and are not barred from regulated activity where this applies. The school will work with placement providers to ensure that pupils are safeguarded throughout their placement and that any concerns are reported and managed in accordance with safeguarding procedures.

102.2 Where work experience takes place in a school, college or other specified place, the school will ensure that appropriate safeguarding checks and supervision arrangements are in place in accordance with statutory guidance and safer recruitment requirements.

102.3 Key principles for arranging work experience:

- Placement providers must have appropriate safeguarding arrangements in place to protect children from harm.
- Where an individual will be teaching, training, instructing, caring for or supervising a pupil frequently, intensively, overnight, or for more than three days in a 30-day period, they may be carrying out regulated activity and must not be barred from working with children.
- Employees who are not responsible for supervising, teaching, instructing or caring for the pupil are not undertaking regulated activity simply because they work in the same setting.
- Our schools will not require a work experience provider to obtain an Enhanced DBS check with children's barred list information for staff supervising pupils in most workplace settings.
- Schools should instead seek appropriate assurance from the placement provider that suitable safeguarding arrangements and recruitment checks are in place.
- Where work experience takes place in a school, college or other specified place, additional safeguarding and DBS requirements may apply depending on the nature of the role and contact with children.
- All placements should be risk assessed, and pupils should know how to report any safeguarding concerns arising during their placement.

On occasions when Oak Learning Partnership offers work experience at school or college, an enhanced DBS check will be obtained if the pupil is over the age of 16 and the Code of Conduct will be followed along with a clear induction. A risk assessment will also be undertaken.

103. Homestay exchange visits

School-arranged homestays in UK

103.1 Where the school is arranging for a visiting child to be provided with care and accommodation in the UK in the home of a family to which the child is not related, the responsible adults are considered to be in regulated activity for the period of the stay. In such cases, the school is the regulated activity provider; therefore, the school will obtain all the necessary information required, including a DBS enhanced certificate with barred list information, to inform its assessment of the suitability of the responsible adults.

103.2 Where criminal record information is disclosed, the school will consider, alongside all other information, whether the adult is a suitable host. In addition to the responsible adults, the school will consider whether a DBS enhanced certificate should be obtained for anyone else aged over 16 in the household.

Privately arranged homestays

103.3 Where a parent or pupil arranges their own homestay, this is a private arrangement and the school is not the regulated activity provider.

104. Private fostering

104.1 Where a period of UK homestay lasts 28 days or more for a child aged under 16, or under 18 for a child with SEND, this may amount to private fostering under the Children Act 1989. Where the school becomes aware of a pupil being privately fostered, they will notify the LA as soon as possible to allow the LA to conduct any necessary checks.

105. Exclusions

105.1 Only the headteacher can exclude a pupil and this must be on disciplinary grounds. A pupil may be excluded for one or more fixed periods (up to a maximum of 45 school days in a single academic year), or permanently. A fixed-period exclusion does not have to be for a continuous period.

105.2 The Headteacher/DSL will be involved when a fixed term exclusion is implemented and any safeguarding issues will be considered. If there is an open Early Help, CIN or CP plan, the Practitioner or Social Worker will be informed.

105.3 Details on fixed term and permanent exclusion policies and procedures can be found in the school's Behaviour for Learning Policy.

105.4 As stated, the Trust follows the DfE statutory guidance for the management of exclusions.

106. Case management, record-keeping and multi-disciplinary working

Record Keeping

106.1 The DSL will ensure that all safeguarding concerns, discussions, decisions and actions are recorded accurately, securely and in a timely manner, including the rationale for decisions and any referrals made or considered.

Records will be maintained in accordance with data protection requirements and stored on the school's safeguarding recording system.

106.2 Child protection files will be kept up to date, include relevant safeguarding, welfare, attendance and multi-agency information, and be accessible only to those who need the information to safeguard the child.

106.3 Where a pupil transfers to another school or college, the child protection file will be transferred securely and separately from the main pupil record **as soon as possible and within five working days**, with receipt obtained from the receiving establishment. For children subject to a child protection plan, the DSL will ensure that key safeguarding information is shared promptly with the receiving school.

Pupils moving schools

106.4 Where a pupil transfers to another school, college or educational setting, the DSL and SENCO will ensure that relevant safeguarding, welfare and SEND information is shared promptly and securely with the receiving provision to support a safe and effective transition. This will include, where appropriate, child protection records, risk assessments, individual healthcare plans, Education, Health and Care Plans (EHCPs), multi-agency plans, attendance information, and details of any specialist support in place. For children who have a social worker, looked after children and previously looked after children, the receiving school will also be informed of the child's social worker, Virtual School Head and Personal Education Plan (PEP), where applicable. The school will seek confirmation that the information has been received and understood by the receiving provision.

Working with parents and carers

106.5 Our responsibility is to safeguard and promote the welfare of all the children in our care. We aim to do this in partnership with our parents/carers and would expect them to provide up-to-date contact details, including at least 2 emergency contacts.

106.6 In most cases parents/carers will be informed when concerns are raised about the safety and welfare of their child and given the opportunity to address any concerns raised.

106.7 We aim to engage with parents/carers through 'strength-based model' conversations.

106.8 We will inform, and gain consent from parents/carers if possible for multi-agency checks, if a referral is to be made to Children's Social Care or any other agency unless it is believed that by doing so would put the child at risk. In such cases the DSL or Headteacher will seek advice from MASSH/ /Children's Social Care.

Confidentiality & Information Sharing

106.9 Staff will ensure that confidentiality protocols are followed and under no circumstances will they disclose any information about children outside of their professional role.

106.10 Information about children will only be shared with other members of staff on a need-to-know basis.

106.11 All staff and volunteers understand that they have a professional responsibility to share information with other agencies, in the best

interests of the child's safety, welfare and educational outcomes. This is a matter of routine.

106.12 We have arrangements in place that set out clearly the process and principles for sharing information within school and with the three safeguarding partners, other organisations, agencies and practitioners as required. This includes an agreed rationale for gaining consent, when and what to share, when and what not to share and systems for recording these decisions.

106.13 We comply with the Data Protection Act 2018, Data (Use and Access) Act 2025 and UK GDPR in that we ensure that we process all personal information lawfully and keep it safe and secure, with appropriate retention schedules. Further information can be found in the Records Management Policy. School Data Protection Officer is: Andrea Jones-Hatcher - jones-hatcher.a@elmsbank.oaklp.co.uk

Child Protection (CP), Family Help & Team around the Family/Family Meetings and Conferences:

106.14 Where there are concerns that a child is suffering, or is likely to suffer, significant harm, Children's Social Care may convene a Child Protection Conference and implement statutory child protection arrangements in accordance with *Working Together to Safeguard Children 2026*.

106.15 The Trust will actively participate in multi-agency safeguarding arrangements and will attend and contribute to Child Protection Conferences, Child in Need meetings, Family Help meetings, core groups, Team Around the Family meetings and other relevant multi-agency forums. The DSL, Deputy DSLs and other appropriate staff will contribute information, assessments and professional challenge as required to support effective planning and decision-making.

106.16 The Trust will make every effort to ensure appropriate representation at safeguarding meetings, including during school holidays where exceptional circumstances require attendance, such as Child Protection Conferences, strategy discussions or other urgent safeguarding meetings.

Invitations outside of term time should be sent to:

safeguarding email address e.g.
safeguarding@elmsbank.oaklp.co.uk

106.17 Members of staff who are asked to attend a child protection conference (either in person or virtually) about an individual pupil/family will need to have as much relevant updated information about the child as possible and will send a report, using the most up-to-date pro forma to the Chair within the required timescales, at least 24 hours prior to the meeting.

106.18 Our reports will always include the voice of the child, which is especially important where there may be barriers to communication.

106.19 We will discuss and share reports with the parents/carers before the conference. We understand that it can sometimes be difficult for parents to hear/read concerns; however, it is important that we are transparent in order to collectively address concerns in the best interests

of the child. We expect that the LA explain to parents and carers the importance of this collaborative approach.

107. Learning from case reviews

107.1 Oak Learning Partnership will participate in case reviews where a child has been seriously harmed or died as a result of abuse of neglect. We may also contact the local authority/ICB/police to request a learning circle where a child has not had appropriate, timely or effective support and the DSL asserts that this would be helpful to prevent further instances of children not receiving the right support at the right time. Our DSL will keep up to date with the findings from reviews and other learning reviews nationally, share the learning and review our safeguarding procedures if relevant.

108. Concerns raised by children, staff and volunteers

108.1 Any concern, disclosure or expression of disquiet made by a child or adult will be listened to seriously and acted upon as quickly as possible to safeguard the welfare of students.

108.2 We will make sure that the child or adult who has expressed the concern or made the complaint will be informed not only about the action to be taken but also where possible about the length of time required to resolve the complaint.

108.3 We will endeavour to keep the child or adult informed about the progress of the complaint/expression of concern.

109. Managing allegations against staff and volunteers

109.1 All allegations made against a member of staff, including supply staff, trainee teachers and volunteers, contractors or security staff working on site, will be dealt with quickly and fairly and in a way that provides effective protection for the child while at the same time providing support for the person against whom the allegation is made.

109.2 The Headteacher supported by SLT has a duty of care to investigate all allegations of abuse. All staff are encouraged to recognise that **"it could happen here**" and therefore need to remain vigilant at all times. Staff should always act in children's best interests.

109.3 If staff have a safeguarding concern or an allegation about another member of staff including supply staff, trainee teachers and volunteers, contractors or security staff harming or posing a risk of harm to children the headteacher or principal, the headteacher must be informed.

109.4 The headteacher will consider whether an onward referral to the LADO is required. For concerns relating to staff working in the central team, these should be shared with the CEO who will make the same considerations.

109.5 Oak Learning Partnership follows KCSIE (2026) guidance on handling allegations as follows:

- Allegations that may meet the harms threshold
- Allegations and/or concerns that do not meet the harms threshold, referred to in KCSIE as 'low-level concerns'

109.6 Allegations or concerns relating to supply staff, trainee teachers, contractors or other individuals not directly employed by the school will be managed in accordance with the same safeguarding procedures applied to employed staff. The school will take the lead in establishing the facts, managing any safeguarding concerns and liaising with the LADO, police and other relevant agencies as appropriate, while working closely with the individual's employer, agency or training provider.

109.7 The school will not cease to use an individual solely because of safeguarding concerns without first establishing the facts and consulting the LADO where required. Employers, agencies and training providers will be expected to cooperate fully with safeguarding enquiries, share relevant information, and fulfil their own responsibilities in relation to disciplinary processes, referrals to the Disclosure and Barring Service (DBS), Teaching Regulation Agency (TRA) and other regulatory bodies where appropriate.

109.8 Where allegations management meetings are convened, relevant employers, agencies or training providers may be invited to participate to support effective information sharing and decision-making.

110. Low level concerns

110.1 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.
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

110.2 KCSIE gives examples such as being over friendly with children; having favourites; taking photographs of children on their mobile phone; engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or humiliating pupils.

110.3 The staff code of conduct sets out the standards of professionalism and accountability that staff are expected to maintain. It is crucial that any concerns are shared responsibly and with the right person and recorded and dealt with appropriately.

110.4 We ensure that all staff are aware of how to raise a concern, including anonymously as a whistleblower. Staff should follow the guidance set out in the Whistleblowing Policy and all staff will receive information on Whistleblowing as part of their induction, and/or as part of a suite of CPD.

110.5 Oak Learning Partnership encourage staff to raise concerns in relation matters both within, and where it is appropriate, outside of the workplace (including online), which may have implications for the safeguarding of children or the wellbeing of staff.

110.6 Oak Learning Partnership will ensure that all safeguarding concerns, regardless of their perceived level of risk, are reported, recorded and acted upon appropriately. When concerns are shared with the Headteacher and Designated Safeguarding Lead (DSL) they should be recorded in accordance with statutory safeguarding guidance, including Keeping Children Safe in Education. Records will be clear, factual,

accurate and contemporaneous, and will include the concern, action taken, decisions made and the rationale for those decisions.

110.7 Staff are encouraged to reflect on their behaviour and interactions and self-refer where 'they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.'

110.8 Reports of low-level concerns about supply staff and contractors will be notified to their employers.

110.9 Low level safeguarding concerns will not be included in references for a member of staff unless a low-level concern (or group of concerns) has met the threshold for referral to the LADO or the investigation has substantiated the concern and resulted in disciplinary action, in which case, it will be referred to in a reference.

110.10 Low level safeguarding reports will be reviewed to identify potential patterns of behaviour. If any are identified, the Headteacher will take appropriate action by bringing to the attention of SLT who review policies, procedures and consider training needs.

110.11 Historic allegations will be referred to the police on 101/999.

111. Allegations that may meet the threshold

111.1 The harms test is outlined as follows:

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

111.2 Allegations that may meet the harms threshold will be referred to the LADO. The headteacher will seek advice from the LADO in how to proceed and will act as case manager in investigating any concerns. Where concerns are in relation to supply staff or contactors, the headteacher will continue to act as the case manager as they are likely to have access to staff, students and knowledge of the environment and systems.

111.3 Where the allegation relates to an individual or organisation letting school property, the matter will be referred to the LADO for advice and investigation as required.

112. Reporting concerns about staff, visitors and volunteers

112.1 Staff should report any concerns about the conduct of staff and visitors to the headteacher. If the concern related to a headteacher, the CEO James Franklin-Smith should be notified. Concerns about the CEO should be referred to the Chair of Trustees, Bernie Garner.

112.2 Any member of staff can make a referral to the LADO (see link in Appendix C) or utilise the NSPCC whistleblowing hotline if they feel unable

to raise concerns internally or believe that children are still at risk of harm.

113. Safety onsite and offsite (Educational Visits)

113.1 Our sites are secure with safeguards in place to prevent any unauthorised access and also to prevent children leaving the site unsupervised.

113.2 We have good up to date knowledge of our local area and any safeguarding risks within the wider community.

113.3 All visitors, including visiting speakers, are subject to our safeguarding protocols while on site and will be supervised at all times, if no checks have been obtained. They will wear a red lanyard. Staff and visitors are required to sign in and out of the building for safety purposes.

113.4 We will ensure that any contractor, or any employee of a contractor, who is to work in our school, has been subject to the appropriate level of DBS check or is accompanied on site at all times. We are responsible for determining the appropriate level of supervision depending on the circumstances. We will always check the identities of contractors and their staff on arrival.

113.5 We operate a responsible booking protocol and will carry out appropriate checks on all organisations which request to hire our facilities.

113.6 We exercise due diligence to prevent any organisation or speaker from using our facilities to disseminate extremist views or radicalise pupils or staff.

113.7 We have a work experience placement policy and procedures in place. We will ensure that any person supervising a child on a placement has been subject to the appropriate level of DBS check. The Trust recognises that educational visits, including residential visits, outdoor learning, work-related learning and off-site activities, can make a valuable contribution to pupils' education, development and wellbeing. All educational visits will be planned and managed in accordance with the Department for Education's guidance on health and safety, safeguarding and risk management.

113.8 Appropriate risk assessments, supervision arrangements, safeguarding measures and emergency procedures will be in place, taking account of the age, needs and vulnerabilities of pupils, including those with SEND and medical conditions.

113.9 Where concerns arise during an educational visit, staff will follow the Trust's safeguarding procedures and report concerns to the Designated Safeguarding Lead (DSL) or an appropriate safeguarding contact without delay. Safeguarding and the welfare of pupils will remain paramount at all times.

113.10 **Residential activities:** When planning residential visits or overnight stays, school leaders will ensure that sleeping arrangements are safe, appropriate and compliant with safeguarding requirements, equality duties and relevant regulatory standards. Accommodation arrangements will normally be based on a pupil's biological sex and will take account of the safety, privacy, dignity and wellbeing of all pupils. Where a pupil raises concerns about room-sharing arrangements, these will be considered sensitively on an individual basis, and alternative arrangements will be explored where practicable.

113.11 To comply with our safeguarding duties, our schools and colleges must not allow a child to share overnight accommodation with a child of the opposite biological sex. Responding to a request to support any

degree of social transition must not include allowing access to residential accommodation designated for the opposite sex.

114. Remote education

114.1 For details of remote education, please see Remote/Blended Learning Policy/statement on individual school websites.

115. Safer recruitment

115.1 Oak Learning Partnership is committed to following Safer Recruitment procedures. Please see Appendix G for further information. Full details can be found in OLP Safer Recruitment Policy.

116. Reasonable force and restrictive interventions

116.1 There may be exceptional circumstances where staff need to use reasonable force to prevent a pupil from causing harm to themselves or others, damaging property, or seriously disrupting good order and discipline. Any use of reasonable force will be lawful, proportionate, necessary and used for the shortest time required, taking account of the individual circumstances and the needs of the pupil. The Trust does not operate a 'no contact' approach and recognises that appropriate physical contact may be necessary to safeguard and support pupils. Staff will exercise professional judgement, follow relevant guidance and training, and record and report incidents in accordance with Trust procedures. Full details can be found in OLP Reasonable Force and Restrictive interventions policy.

117. Use of school premises for non-school activities

117.1 Where the Trust hires or rents out school facilities or the school premises to organisations or individuals, e.g. for providers to run community or extracurricular activities, it will ensure that appropriate arrangements are in place to keep users safe.

117.2 Where the Trust provide the activities under the direct supervision or management of school staff, child protection arrangements in this policy will apply. Where activities are provided separately by another body, this may not be the case; therefore, school leaders will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place, including inspecting these as needed. The leadership team will also ensure that there are arrangements in place to liaise with the school on these matters where appropriate. The Trust will ensure safeguarding requirements are included in any transfer of control agreement, i.e. a lease or hire agreement, as a condition of use and occupation of the premises, and specify that failure to comply with this would lead to termination of the agreement.

117.3 Providers using school facilities are expected to comply with Keeping Children Safe in Out of School Settings.

117.4 In the event that schools receive any allegations relating to incidents that happened when an individual or organisation was using school premises,

school will follow the OLP Safeguarding procedures including informing the LADO who may be best placed to investigate.

Extracurricular activities and clubs

117.5 External bodies that host extracurricular activities and clubs at the school, e.g. charities or companies, will work in collaboration with the school to effectively safeguard pupils and adhere to local safeguarding arrangements.

117.6 Staff and volunteers running extracurricular activities and clubs are aware of their safeguarding responsibilities and promote the welfare of pupils. Paid and volunteer staff understand how they should respond to child protection concerns and how to make a referral to MASSH or the police, if necessary. The extended services leaders are trained to DSL level/hold contact details for the DSL and the DDSL who is on call. There is an 'on duty' SLT & DDSL at all times.

118. The Equality Act 2010

118.1 The Trust will comply with its duties under the Equality Act 2010 and will not unlawfully discriminate against pupils, students, staff or others on the basis of a protected characteristic. Safeguarding arrangements will take account of the needs, experiences and vulnerabilities of children with protected characteristics, and reasonable adjustments will be made for disabled children where required. Where appropriate and proportionate, positive action may be taken to address disadvantage, reduce risk and improve outcomes for particular groups of children.

119. Human rights and public sector quality duty

119.1 The Human Rights Act 1998 (HRA) sets out the fundamental rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (ECHR) (the Convention) that are deemed to apply in the UK.

119.2 The specific Convention rights applying to schools and colleges are:

- Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)
- Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity
    - Article 14: requires that all of the rights and freedoms set out in the Act must be protected
    - and applied without discrimination, and protected and applied without discrimination, and
    - Protocol 1, Article 2: protects the right to education.

119.3 Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances. Through its policies, procedures, safeguarding culture and school values, the Trust ensure that learners' human rights are protected.

119.4 The Public Sector Equality Duty (PSED) places a general duty on schools and colleges to have, in the exercise of their functions, due regard to the need to eliminate unlawful discrimination, harassment and victimisation (and any other conduct prohibited under the Equality Act), to advance equality of opportunity and foster good relations between those who share a relevant protected characteristic and those who do not. The duty applies to all protected characteristics and means that whenever significant decisions are being made or policies developed, specific consideration must be given to the equality implications of these such as, for example, the need to eliminate unlawful behaviours that relate to them, such as sexual violence and sexual harassment, misogyny and racism.

119.5 Through its policies, procedures, safeguarding culture and school values, the Trust ensure that staff and learners' human rights are protected and that the PSED is put into practice.

120. Sport, safety and fairness

120.1 The Trust will ensure that participation in physical education and sport is safe, fair and inclusive. In accordance with the Equality Act 2010, which contains an exception in relation to single-sex sport, children may be separated by biological sex in competitive sports or activities where this is necessary to ensure safety or fairness. Requests relating to participation in sport will be considered on an individual basis, taking account of the child's best interests (and advice relating to social transitions), the safety and wellbeing of all children, legal requirements, and the need to maintain safe and fair sporting environments.

121. Regulations and safeguarding requirements relating to school premises

121.1 **Toilets: Schools must not allow children into toilets designated for the opposite biological sex. This includes where schools are responding to a request to support any degree of social transition for children who are questioning their gender.**

121.2 Schools must provide separate toilets for boys and girls aged 8 and over (apart from where individual toilets are in a room that can be locked from the inside, intended for use by one pupil at a time). This is required by the School Premises (England) Regulations 2012 and the Education (Independent School Standards) Regulations 2014 which apply to academies and reflects schools' safeguarding obligations. It should be noted that gender-neutral toilets are not a legal requirement.

121.3 If a gender-questioning child does not want to use the toilet designated for their biological sex, the school or college should consider whether they can provide an alternative toilet facility, for example self-contained individual toilets, without compromising the provision of single-sex facilities. These alternative arrangements should not compromise the safety, comfort, privacy or dignity of the child, or of any other children.

121.4 The school must keep a clear record of these situations, ensure they are communicated appropriately, and review them regularly.

121.5 Where our schools or colleges provide mixed-sex toilets in addition to single sex toilets, leaders should assess safeguarding risks and plan

accordingly, for example, **mixed-sex toilets should be in individual, lockable rooms and open directly onto public areas (e.g. a corridor).**

121.6 **Changing Rooms and Showers:** The school will ensure that changing and shower facilities are provided in accordance with legal requirements and safeguarding obligations. Pupils aged 11 and over must not undress in the presence of pupils of the opposite biological sex. Pupils will not be permitted to use changing or shower facilities designated for the opposite biological sex. The school will consider individual requests for support on a case-by-case basis, taking account of the child's best interests, the safety, privacy and dignity of all pupils, and relevant legal requirements. Any reasonable adjustments will not compromise statutory duties.

121.7 If a gender-questioning child does not want to use the changing rooms and showers designated for their sex, the school should consider whether they can provide an alternative changing or washing facility without compromising the provision of single-sex facilities. This could be a fully enclosed room – for use by one child at a time that can be secured from the inside – or by allowing access to facilities at an alternative time. These alternative arrangements should not compromise the safety, comfort, privacy or dignity of the child or of any other children.

121.8 The school should keep a clear record of these situations, ensure they are communicated appropriately, and review them regularly.

122. Appendix A Acronym list and description/Glossary

ACES	Adverse childhood Experiences	Traumatic events which can have an impact on both children and/or adult's lives.
CCE	Child Criminal Exploitation	Where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
CIN	Child in Need	Refers to the statutory support provided under section 17 of the Children Act 1989 for a child who is unlikely to reach or maintain a satisfactory level of health or development, or their health or development will be significantly impaired without the provision of children's social care services, or the child is disabled. The duty to provide support is on the local authority. Children may have a Child in Need care plan.
CLA	Looked After Child	Children looked after: A child who has been placed in local authority care or where children's services have looked after a child for more than a period of 24 hours.
CME	Child Missing from Education	Children Missing Education (CME) are children who are of compulsory school age who are not on a school roll and who are not receiving a suitable education by other means (e.g. privately, electively home educated (EHE) or in alternative provision).
CP	Child Protection	Under section 47 of the Children Act 1989, the local authority has a duty to make enquiries when this is the case and to take decisive action when needed to protect a child from abuse, neglect, and exploitation. Children may have a child protection plan.
CSC	Children's Social Care	The branch of the local authority that deals with children's social care.
CSE	Child Sexual Exploitation	Where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, and/or for the financial advantage, increased status or other advantage of the perpetrator or facilitator.
DBS	Disclosure and barring service	The service that performs the statutory check of criminal records for anyone working or volunteering in a school.

DfE	Department for Education	The national government body with responsibility for children's' services, policy and education, including early years, schools, higher and further education policy, apprenticeships and wider skills in England.
DPO	Data Protection Officer	The appointed person in school with responsibility for overseeing data protection strategy and implementation to ensure compliance with data protection legislation.
DSL	Designated Safeguarding Lead	A member/s of the senior leadership team who has lead responsibility for safeguarding and child protection
EHC Plan	Education, Health and Care Plan	A funded intervention plan which coordinates the educational, health and social needs for pupils who have significant needs that impact on their learning and access to education. The plan identifies any additional support needs or interventions and the intended impact they will have for the pupil.
EYFS	Early Years Foundation Stage	The Early Years Foundation Stage (EYFS) is from birth to the end of the Reception year (age 5) in England. There is a statutory framework setting out the expectations for education, learning, development, safeguarding and care of children in early years provisions.
FGM	Female Genital Mutilation	A procedure where the female genital organs are injured or changed and there is no medical reason for this.
GDPR	General Data Protection Regulation	UK Legislative provision designed to strengthen the safety and security of all data held within an organisation and ensure that procedures relating to personal data are fair and consistent.
HBA/HBV	Honour Based Abuse/ Violence	'Honour-based' abuse encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation, forced marriage, and practices such as breast ironing.
HMCTS	HM Courts and Tribunals Service	HM Courts and Tribunals Service is responsible for the administration of criminal, civil and family courts and tribunals in England and Wales.
HSB	Harmful Sexual Behaviour (also known as Sexually Harmful Behaviour)	Harmful Sexual behaviour is sexual behaviour expressed by children or young people under the age of 18 years old that is developmentally inappropriate, this may be harmful towards oneself or others or be abusive towards another child, young person or adult.

ICB	Integrated Care Board	An Integrated Care Board is the NHS organisation responsible for planning, commissioning and overseeing most NHS services for a local area in England. ICBs replaced Clinical Commissioning Groups (CCGs) in July 2022 as part of the move to Integrated Care Systems.
KCSIE	Keeping Children Safe in Education	"Keeping Children Safe in Education" Statutory guidance setting out schools and colleges' duties to safeguard and promote the welfare of children.
LA	Local Authority	A local government agency responsible for the provision of a range of services in a specified local area, including education.
LADO	Local Authority Designated Officer	All allegations about people who work with children, in statutory, independent or voluntary organisations, must be referred to the Local Authority Designated Officer (LADO) if they indicate the person could pose a risk to children.
LGC	Local governance committee	Formerly known as school governors. LGCs are accountable to Trustees.
NPCC	National Police Chiefs' Council	The National Police Chiefs' Council is a national coordination body for law enforcement in the United Kingdom and the representative body for British police chief officers.
OLP	Oak Learning Partnership	The Multi-Academy Trust
PSHE	Personal Social and Health Education	A non-statutory subject in which pupils learn about themselves, other people, rights, responsibilities and relationships
PHE	Public Health England	An executive agency of the Department of Health and Social Care which aims to protect and improve the nation's health and wellbeing.
QTS	Qualified teacher status	A requirement in England to work as a teacher of children in state schools and special schools.
RSHE	Relationships, Sex and Health Education	A compulsory subject from Year 7 for all pupils. Includes the teaching of sexual health, reproduction and sexuality as well as promoting positive relationships.
SCR	Single Central record	A statutory secure record of recruitment and identity checks for all permanent and temporary staff, proprietors, contractors, external coaches and instructors, and volunteers who attend educational provision in a non-visitor capacity.
SENCO	Special educational needs coordinator	A statutory role within all schools maintaining oversight and coordinating the implementation of HWHS's special educational needs policy and provision of education to pupils with special educational needs.

SEND	Special educational needs and/or disabilities	A pupil is assessed to have SEND if they have a learning problem or disability that makes it more difficult for them to learn than most pupils their age.
SLT	Senior leadership team	Staff members who have been delegated leadership responsibilities in a school/college setting.
TRA	Teaching Regulation Agency	An executive agency of the DfE with responsibility for the regulation of the teaching profession.
VSH	Virtual School Head	Virtual school heads are responsible for promoting the educational achievement of all the children looked after (CLA), previously LAC (PLAC), children with a social worker, and those with kinship care agreements including child arrangement orders.

123. Appendix B Specific Safeguarding issues

Domestic abuse

Domestic abuse is any pattern of physical, sexual, emotional, psychological, economic, controlling or coercive behaviour between individuals aged 16 or over who are personally connected, including current or former intimate partners and family members. If one or both parties are under 16).Depending on the age of the young people this may not be recognised in law under the statutory definition of 'domestic abuse,' however, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed.

Domestic abuse can affect anyone regardless of age, sex, ethnicity, disability, sexuality, gender identity, religion or socio-economic background and may occur inside or outside the home. Types of domestic abuse include intimate partner violence, abuse between family members, teenage relationship abuse and child-to-parent or caregiver abuse.

The Trust recognises that children who see, hear or experience the effects of domestic abuse are victims in their own right and may suffer significant harm to their emotional wellbeing, development and mental health. Concerns relating to domestic abuse, including abuse within young people's relationships, will be managed in accordance with the Trust's safeguarding procedures, with appropriate support provided to both victims and those displaying harmful behaviours, this includes child to parent/care giver abuse.

"Refuge" runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247.

Domestic abuse: specialist sources of support (includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse).

Homelessness and temporary accommodation

The Trust recognises that homelessness and housing instability can be indicators of vulnerability and may have a significant impact on a child's welfare, wellbeing, attendance and educational outcomes. The DSL and deputy DSLs will be familiar with local referral pathways and will work with the Local Housing Authority, Family Help services and other relevant agencies to ensure children and families receive appropriate support at the earliest opportunity.

Indicators that a family may be at risk of homelessness can include household debt, rent arrears, domestic abuse, anti-social behaviour, or reports that a family is required to leave their current accommodation. Such concerns will be considered as part of the school's wider safeguarding assessment.

The Trust recognises that some young people, particularly those aged 16 and 17, may be homeless or living independently of their parents or carers and may require a different level of intervention and support. In these circumstances, the DSL will ensure that appropriate referrals are made to children's social care and other relevant services.

Referrals to the Local Housing Authority do not replace safeguarding responsibilities or referrals to Family Help or children's social care where a child has been harmed, is at risk of harm, or requires additional support.

Where the school receives notification that a child has been placed in temporary accommodation, the DSL will consider whether any additional safeguarding, pastoral or educational support is required to promote the child's welfare, minimise disruption and improve outcomes. Such notifications do not replace existing safeguarding procedures, and concerns about a child's safety or welfare will continue to be managed in accordance with child protection procedures.

Homelessness referrals can be made via: Bury Council 0161 253 5537 between 9am and 5pm. For emergencies after 5pm or at weekends please call 0161 253 6606.

Information is available at: https://www.bury.gov.uk/homeless

Children missing from education

A child going missing from school is a potential indicator of abuse or neglect and, as such, these children are increasingly at risk of being victims of harm, exploitation or radicalisation. Staff will monitor pupils that go missing from the school, and those who have unexplainable and/or persistent absences from education, particularly on repeat occasions, and will report them to the DSL following normal safeguarding procedures, in accordance with Attendance Policy. The school will inform the LA of any pupil who fails to attend regularly or has been absent without the school's permission for a continuous period of 10 school days or more.

Admissions register

Pupils are placed on the admissions register at the beginning of the first day that is agreed by the school, or when the school has been notified that the pupil will first be attending. The school will notify the LA within 5 days of when a pupil's name is added to the admissions register.
The school will ensure that the admissions register is kept up-to-date and accurate at all times and will inform parents when any changes occur. Two emergency contacts will be held for each pupil where possible. Staff will monitor pupils who do not attend the school on the agreed date and will notify the LA at the earliest opportunity.
If a parent notifies the school that their child will live at a different address, the school will record the following information on the admissions register:

- The full name of the parent with whom the pupil will live
- The new address
- The date from when the pupil will live at that address

If a parent notifies the school that their child will be attending a different school, or is already registered at a different school, the following information will be recorded on the admissions register:

- The name of the new school
- The date on which the pupil first attended, or is due to attend, that school

Where a pupil moves to a new school, the school will use a secure internet system to securely transfer pupils' data.
To ensure accurate data is collected to allow effective safeguarding, the school will inform the LA of any pupil who is going to be deleted from the admission register, in accordance with the Education (Pupil Registration) (England) Regulations 2006 (as amended), where they:

- Have been taken out of the school by their parents, and are being educated outside the national education system, e.g. home education.
- Have ceased to attend the school, and no longer live within a reasonable distance of the premises.
- Have been certified by the school's medical officer as unlikely to be in a fit state of health to attend, before ceasing to be of compulsory school age, and their parent has not indicated the intention to the pupil continuing to attend school after ceasing to be of compulsory school age.
- Have been in custody for a period of more than four months due to a final court order and the school does not reasonably believe they will be returning to the school at the end of that period.
- Have been permanently excluded.

The school will also remove a pupil from the admissions register where the school and LA has been unable to establish the pupil's whereabouts after making reasonable enquiries into their attendance.
If a pupil is to be removed from the admissions register, the school will provide the LA with the following information:

- The full name of the pupil
- The full name and address of any parent with whom the pupil lives
- At least one telephone number of the parent with whom the pupil lives
- The full name and address of the parent with whom the pupil is going to live, and the date that the pupil will start living there, if applicable
- The name of the pupil's new school and the pupil's expected start date there, if applicable
- The grounds for removal from the admissions register under regulation 8 of the Education (Pupil Registration) (England) Regulations 2006 (as amended)

The school will work with the LA to establish methods of making returns for pupils back into the school. The school will highlight to the LA where they have been unable to obtain necessary information from parents, e.g. where an address is unknown. The school will also highlight any other necessary contextual information, including safeguarding concerns.

Child abduction and community safety incidents

For the purposes of this policy, **"child abduction"** is defined as the unauthorised removal or retention of a child from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents and other relatives, other people known to the victim, and strangers.
All staff will be alert to community safety incidents taking place in the vicinity of the school that may raise concerns regarding child abduction, e.g. people loitering nearby or unknown adults conversing with pupils.
Pupils will be provided with practical advice and lessons to ensure they can keep themselves safe outdoors.
Students with an EHCP who may otherwise access LA School and College transport, but whom wish to travel to and from school independently have the opportunity to undergo "Independent Travel Training" (with parental consent) where their capacity to keep themselves safe in the community is assessed. Only where trainers are confident that a child has the knowledge and skills to keep travel safely to and from school/college, will they be recommended to do so.
Enquiries are sent to schoolandcollegetransport@bury.gov.uk

Child criminal exploitation (CCE)

For the purposes of this policy, **"child criminal exploitation"** is defined as a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

This can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group.
Specific forms of CCE can include:

- Being forced or manipulated into transporting drugs or money through county lines.
- Working in cannabis factories.
- Shoplifting or pickpocketing.
- Committing vehicle crime.
- Committing, or threatening to commit, serious violence to others.

The school will recognise that pupils involved in CCE are victims themselves, regardless of whether they have committed crimes, and even if the criminal activity appears consensual. The school will also recognise that pupils of any gender are at risk of CCE and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. This may constitute modern slavery, and further information is available in the Modern Slavery statutory guidance. In accordance with this guidance, a relevant child

protection and modern slavery referral should be completed where a potential victim of CCE or CSE is identified.

School staff will be aware of the indicators that a pupil is the victim of CCE, including:

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly missing school or education or not taking part.

County lines

For the purposes of this policy, **"county lines"** is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". As well as the general indicators for CCE, school staff will be aware of the specific indicators that a pupil may be involved in county lines, including:

- Going missing and subsequently being found in areas away from their home.
- Having been the victim or perpetrator of serious violence, e.g. knife crime.
- Receiving requests for drugs via a phone line.
- Moving drugs.
- Handing over and collecting money for drugs.
- Being exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection.
- Being found in accommodation they have no connection with or a hotel room where there is drug activity.
- Owing a 'debt bond' to their exploiters.
- Having their bank account used to facilitate drug dealing.

Staff will be made aware of pupils with missing episodes who may have been trafficked for the purpose of transporting drugs. Staff members who suspect a pupil may be vulnerable to, or involved in, county lines activity will immediately report all concerns to the DSL.
Referring cases: Where CCE, or the risk of it, is suspected, staff will discuss the case with the DSL. If after discussion a concern still remains, local safeguarding procedures will be triggered, including referral to MASSH noting concerns around CCE. Bury Complex Safeguarding Team should offer a consultation where there are factors relating to CCE.

Cyber-crime

For the purposes of this policy, **"cyber-crime"** is defined as criminal activity committed using computers and/or the internet. This includes 'cyber-enabled' crimes, i.e. crimes that can happen offline but are enabled at scale and at speed online, and 'cyber-dependent' crimes, i.e. crimes that can be committed only by using a computer. Crimes include:

- Unauthorised access to computers, known as 'hacking'.
- Denial of Service attacks, known as 'booting'.

- Making, supplying or obtaining malicious software, or 'malware', e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence.

Cyber-dependent crime continues to represent one of the most significant and rapidly evolving threats within the United Kingdom's (UK) crime landscape. Offences under the Computer Misuse Act 1990 (CMA) have risen substantially. All staff will be aware of the signs of cyber-crime and follow the appropriate safeguarding procedures where concerns arise. Where appropriate, the DSL may seek support from specialist services, including the National Crime Agency's Cyber Choices programme, to help divert pupils towards the safe, legal and positive use of their digital skills and interests. Cyber Choices can be contacted for advice at cyberchoices@nca.gov.uk Information is available at Cyber Choice (National Crime Agency)

Child sexual exploitation (CSE)

For the purposes of this policy, **"child sexual exploitation"** is defined as a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage, increased status or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

This can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group.

The school will recognise that CSE can occur over time or be a one-off occurrence, and may happen without the pupil's immediate knowledge, e.g. through others sharing videos or images of them on social media. The school will recognise that CSE can affect any pupil who has been coerced into engaging in sexual activities, even if the activity appears consensual; this includes pupils aged 16 and above who can legally consent to sexual activity. Some children do not realise they are being exploited and may believe they are in a genuine romantic relationship. This can be committed by an individual or an organised network and most sexual abuse is committed by those previously known to the victim. CSE can affect children, both male and female, and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. This may constitute modern slavery, and further information is available in the Modern Slavery statutory guidance. In accordance with this guidance, a relevant child protection and modern slavery referral should be completed where a potential victim of CCE or CSE is identified.

School staff will be aware of the key indicators that a pupil is the victim of CSE, including:

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly missing school or education or not taking part.
- Having older partners.
- Suffering from sexually transmitted infections.
- Displaying sexual behaviours beyond expected sexual development.

- Becoming pregnant.

As with CCE, victims are not always recognised and can be criminalised for actions they take whilst under coercion. Referring cases: Where CSE, or the risk of it, is suspected, staff will discuss the case with the DSL. If after discussion a concern still remains, local safeguarding procedures will be triggered, including referral to MASSH noting concerns around CSE. Bury Complex Safeguarding Team should offer a consultation where there are factors relating to CSE.

Modern slavery

Modern slavery is a serious crime that violates human rights, this can include CCE, CSE, and other forms of exploitation. Victims are forced, threatened or deceived into situations of subjugation, degradation and control which undermine their personal identity and sense of self. It may encompass exploitation, including sexual exploitation, criminal financial exploitation, human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including forced labour, slavery, servitude, forced criminality and the removal of organs. As a result of modern slavery, children can experience injuries, malnutrition, emotional and sexual harms, loss of learning and social opportunities and are at a high risk of going missing, particularly from local authority care and unregulated temporary accommodations. All staff will be aware of and alert to the signs that a pupil may be the victim of modern slavery. Staff will also be aware of the support available to victims of modern slavery and how to refer them to the National Referral Mechanism.

Honour based abuse or faith based abuse

Honour based abuse (HBA)/faith based abuse are a collection of practices used to control behaviour within families in order to protect perceived cultural and faith beliefs and/or honour.

HBA occurs when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.

Examples of HBA:

- physical abuse (kicking and beating);
- psychological pressure (strict monitoring, humiliation, threats);
- forced marriage;
- abandonment (leaving someone in their country of origin or sending them back there);
- forced suicide;
- honour killing (murder)
- Female Genital Mutilation (FGM) FGM is encompassed within the term Honour Based Abuse

All staff and volunteers are aware of the "one chance rule" (a practitioner may only have one chance to speak to a potential victim and have one chance to save a life) and will report all cases of suspected Honour Based Violence to the DSL immediately.

Indicators that HBA may have already taken place include the following:

- Becoming anxious, depressed and emotionally withdrawn with low self-esteem

- Showing signs of mental health disorders and behaviours such as self-harm or anorexia
- Displaying a sudden decline in their educational performance, aspirations or motivation
- Regularly being absent from school
- Displaying a decline in punctuality
- An obvious family history of older siblings leaving education early and marrying early
-

Breast ironing

Breast Flattening or Breast Ironing is:
"the process during which young pubescent girls' breasts are ironed, massaged, flattened and/or pounded down over a period of time (sometimes years) in order for the breasts to disappear or delay the development of the breasts entirely."
Breast ironing is often carried out by the girl's mother with the belief that she is:

- Protecting her daughter from sexual harassment and / or rape
- Preventing the risk of early pregnancy by "removing" signs of puberty
- Preventing her daughter from being forced into marriage, so she will have the opportunity to continue with her education

Breast ironing is often a well-kept secret between the girl and her mother. This can make it difficult for professionals to identify. Care must be taken to navigate the deep-seated cultural belief and familial sensitivity of this practice. Many girls will not disclose that they are a victim of breast ironing for fear that their mother will get into trouble; or they believe it is being done for their own good.

Some signs that a girl is at risk from breast ironing include:

- Unusual behaviour after an absence from school or college including depression, anxiety, aggression, becoming withdrawn
- Reluctance in undergoing medical examinations
- Some girls may ask for help, but may not be explicit about the problem due to embarrassment or fear
- Fear of changing for physical activities due to scars showing or bandages being visible

The practice of breast ironing is not explicitly covered under legislation. However, it is understood by the Government to be physical abuse.

Female Genital Mutilation

FGM is defined as all procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.
All staff will be alert to the possibility of a pupil being at risk of FGM, or already having suffered FGM. If staff are worried about someone who is at risk of FGM or who has been a victim of FGM, they are required to share this information with CSCS and/or the police. The school's procedures relating to managing cases of FGM and protecting pupils will reflect multi-agency working arrangements.

As outlined in Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015), teachers are **legally required** to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a pupil under the age of 18. Teachers failing to report such cases may face disciplinary action. Teachers will not examine pupils, and so it is rare that they will see any visual evidence, but they must personally report to the police where an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also consider and discuss any such case with the DSL and involve CSCS as appropriate. **NB:** This does not apply to any suspected or at-risk cases, nor if the individual is over the age of 18. In such cases, local safeguarding procedures will be followed.
All staff will be aware of the indicators that pupils may be at risk of FGM. While some individual indicators they may not indicate risk, the presence of two or more indicators could signal a risk to the pupil. It is important to note that the pupil may not yet be aware of the practice or that it may be conducted on them, so staff will be sensitive when broaching the subject.

Indicators that a pupil may be at heightened risk of undergoing FGM include:

- The socio-economic position of the family and their level of integration into UK society.
- The pupil coming from a community known to adopt FGM.
- Any girl with a mother or sister who has been subjected to FGM.
- Any girl withdrawn from PSHE.

Indicators that FGM may take place soon include:

- When a female family elder is visiting from a country of origin.
- A girl confiding that she is to have a 'special procedure' or a ceremony to 'become a woman'.
- A girl requesting help from a teacher if she is aware or suspects that she is at immediate risk.
- A girl, or her family member, talking about a long holiday to her country of origin or another country where FGM is prevalent.

All staff will be vigilant to the signs that FGM has already taken place so that help can be offered, enquiries can be made to protect others, and criminal investigations can begin. Indicators that FGM may have already taken place include the pupil:

- Having difficulty walking, sitting or standing.
- Spending longer than normal in the bathroom or toilet.
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- Having prolonged or repeated absences from school, followed by withdrawal or depression.
- Being reluctant to undergo normal medical examinations.
- Asking for help, but not being explicit about the problem due to embarrassment or fear.

FGM is included in the definition of **"'honour-based' abuse (HBA)"**, which involves crimes that have been committed to defend the honour of the family and/or community. All forms of HBA are forms of abuse and will be treated and escalated as such. Staff will be alert to the signs of HBA, including concerns that a child is at risk of HBA, or has already suffered from HBA, and will consult with the DSL who will activate local safeguarding procedures if concerns arise.

Virginity testing and hymenoplasty

Under the Health and Care Act 2022, it is illegal to carry out, offer or aid and abet virginity testing or hymenoplasty in any part of the UK. It is also illegal for UK nationals and residents to do these things outside the UK.

Virginity testing - Also known as hymen, '2-finger' or vaginal examination, this is defined as any examination (with or without contact) of the female genitalia intended to establish if vaginal intercourse has taken place. This is irrespective of whether consent has been given. Vaginal examination has no established scientific merit or clinical indication.

Hymenoplasty - A procedure which can involve a number of different techniques, but typically involving stitching or surgery, undertaken to reconstruct a hymen with the intent that the person bleeds the next time they have vaginal intercourse. Hymenoplasty is different to procedures that may be performed for clinical reasons, e.g. surgery to address discomfort or menstrual complications.
Virginity testing and hymenoplasty are forms of violence against women and girls and are part of the cycle of HBA, and can be precursors to child or forced marriage and other forms of family and/or community coercive behaviours, including physical and emotional control. Victims are pressurised into undergoing these procedures, often by family members or their intended husbands' family to fulfil the requirement that a woman remains 'pure' before marriage. Those who 'fail' to meet this requirement are likely to suffer further abuse, including emotional and physical abuse, disownment and even honour killings.

The procedures are degrading and intrusive, and can result in extreme psychological trauma, provoking conditions such as anxiety, depression and PTSD, as well as physical harm and medical complications. Staff will be alert to the possible presence of stress, anxiety and other psychological or behavioural signs, and mental health support should be made available where appropriate. Victims face barriers in coming forward, e.g. they may not know that the abuse was abnormal or wrong at the time, and may feel shameful, having been taught that speaking out against family and/or the community is wrong, or being scared about the repercussions of speaking out. The school will educate pupils about the harms of these practices and dispel myths, e.g. the belief that virginity determines the worth of a woman, and establish an environment where pupils feel safe enough to make a disclosure.

Pupils aged 13 and older are considered to be most at risk, but it can affect those as young as 8, and anyone with female genitalia can be a victim regardless of age, gender identity, ethnicity, sexuality, religion, disability or

socioeconomic status. All staff will be aware of the following indicators that a pupil is at risk of or has been subjected to a virginity test and/or hymenoplasty:

- A pupil is known to have requested either procedure or asks for help
- Family members disclose that the pupil has already undergone the practices
- Pain and discomfort after the procedures, e.g. difficulty in walking or sitting for a long period of time which was not a problem previously
- Concern from family members that the pupil is in a relationship, or plans for them to be married
- A close relative has been threatened with either procedure or has already been subjected to one
- A pupil has already experienced or is at risk of other forms of HBA
- A pupil is already known to social services in relation to other safeguarding issues
- A pupil discloses other concerns that could be an indication of abuse, e.g. they may state that they do not feel safe at home, that family members will not let them out the house and/or that family members are controlling
- A pupil displays signs of trauma and an increase in emotional and psychological needs, e.g. withdrawal, anxiety, depression, or significant change in behaviour
- A pupil appears fearful of their family or a particular family member
- Unexplained absence from school, potentially to go abroad
- Changes in behaviour, e.g. a deterioration in schoolwork, attendance, or attainment

The above list is not exhaustive, but if any of these indicators are identified, staff members will immediately raise concerns with the DSL. An assessment of the risk they face will be undertaken. If there is believed to be immediate danger, the police will be contacted without delay.
The school will not involve families and community members in cases involving virginity testing and hymenoplasty, including trying to mediate with family or using a community member as an interpreter, as this may increase the risk of harm to the pupil, including expediting arrangements for the procedure.

Forced marriage

Forced marriage is a marriage where one or both spouses do not consent to the marriage but are coerced into it. Force can be physical, psychological, financial, sexual and emotional pressure. A lack of full and free consent can be where a person does not consent or where they cannot consent, e.g. due to some forms of SEND. Where an individual lacks the capacity to consent to marriage, coercion is not required for a marriage to be forced. In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages. For a child under 18 any marriage is considered a forced marriage, even if there is no physical or emotional pressure involved.

All staff will be alert to the indicators that a pupil is at risk of, or has undergone, forced marriage, including, but not limited to, the pupil:

- Being absent from school – particularly where this is persistent.
- Requesting for extended leave of absence and failure to return from visits to country of origin.
- Being fearful about forthcoming school holidays.
- Being subjected to surveillance by siblings or cousins at school.
- Demonstrating a decline in behaviour, engagement, performance, exam results or punctuality.
- Being withdrawn from school by their parents.
- Being removed from a day centre when they have a physical or learning disability.
- Not being allowed to attend extracurricular activities.
- Suddenly announcing that they are engaged to a stranger, e.g. to friends or on social media.
- Having a family history of forced marriage, e.g. their older siblings have been forced to marry.
- Being prevented from going on to further or higher education.
- Showing signs of mental health disorders and behaviours, e.g. depression, self-harm, anorexia.
- Displaying a sudden decline in their educational performance, aspirations or motivation.

Staff who have any concerns regarding a pupil who may have undergone, is currently undergoing, or is at risk of forced marriage will speak to the DSL or headteacher and local safeguarding procedures will be followed – this could include referral to CSCS, the police or the Forced Marriage Unit. The DSL or headteacher will ensure the pupil is spoken to privately about these concerns and further action taken as appropriate. Pupils will always be listened to and their comments taken seriously.

It will be made clear to staff members that they should not approach the pupil's family or those with influence in the community, without the express consent of the pupil, as this will alert them to the concerns and may place the pupil in further danger.

Advice will be sought from the Forced Marriage Unit following any suspicion of forced marriage among pupils.

If a pupil is being forced to marry, or is fearful of being forced to, the school will be especially vigilant for signs of mental health disorders and self-harm. The pupil will be supported by the DSL and senior mental health lead and referrals will be made on a case-by-case basis.

Staff members will make themselves aware of how they can support victims of forced marriage in order to respond to the victims needs at an early stage, and be aware of the practical help they can offer, e.g. referral to social services and local and national support groups.

Local child safeguarding procedures will be activated following concerns regarding forced marriage – the school will use existing national and local protocols for multi-agency liaison with police and children's social care.

The school will support any victims to seek help by:

- Making them aware of their rights and choices to seek legal advice and representation.
- Recording injuries and making referrals for medical examination where necessary.
- Providing personal safety advice.
- Developing a safety plan in case they are seen, e.g. by preparing another reason for why the victim is seeking help.

The school will establish where possible whether pupils at risk of forced marriage have a dual nationality or two passports.

The school will aim to create an open environment where pupils feel comfortable and safe to discuss the problems they are facing; this means creating an environment where forced marriage is discussed openly within the curriculum and support and counselling are provided routinely.

The school will take a whole school approach towards educating on forced marriage in the school curriculum and environment; in particular, the school's RSHE curriculum will incorporate teaching about the signs of forced marriage and how to obtain help. Appropriate materials and sources of further support will be signposted to pupils. Pupils will be encouraged to access appropriate advice, information and support.

Teachers and other staff members will be educated through CPD about the issues surrounding forced marriage and the signs to look out for.
Forced Marriage Unit Tel: 020 7008 0151 Email: fmu@fcdo.gov.uk

Extremism, Radicalisation and Terrorism

Children may be susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools or colleges safeguarding approach.

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

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Protecting pupils from the risk of radicalisation is part of the school's wider safeguarding duties. The school will actively assess the risk of pupils being radicalised and drawn into extremism and/or terrorism. Staff will be alert to

changes in pupils' behaviour which could indicate that they may need help or protection. Staff will use their professional judgement to identify pupils who may be at risk of radicalisation and act appropriately, which may include contacting the DSL or making a Prevent referral. The school will work with local safeguarding arrangements as appropriate.

The school will ensure that they engage with parents and families, as they are in a key position to spot signs of radicalisation. In doing so, the school will assist and advise family members who raise concerns and provide information for support mechanisms. Any concerns over radicalisation will be discussed with the pupil's parents, unless the school has reason to believe that the child would be placed at risk as a result.

The DSL will undertake Prevent awareness training to be able to provide advice and support to other staff on how to protect pupils against the risk of radicalisation. The DSL will hold formal training sessions with all members of staff to ensure they are aware of the risk indicators and their duties regarding preventing radicalisation.

The Prevent duty

Under section 26 of the Counterterrorism and Security Act 2015, all schools are subject to a duty to have "due regard to the need to prevent people from being drawn into terrorism", known as **"the Prevent duty"**. The Prevent duty will form part of the school's wider safeguarding obligations.

The school's procedures for carrying out the Prevent duty, including how it will engage and implement the Channel programme, are outline in the Prevent Duty Policy, however school staff will follow the principles of:

- **Notice** – if someone's behaviour or the things they say cause us a concern
- **Check** – discuss with colleagues who know the young person and with a DSL.
- **Share** – Share with a DSL who will be best placed to advise on whether a referral to Channel and/or MASSH, or Early Help is needed

Staff can contact local police by dialling 101 and ask for the PREVENT team, or if you require urgent police assistance dial 999.

Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. Prevent referrals are first assessed by police and may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are at risk of being drawn into terrorism and consider the appropriate support required. Whilst the referral is being assessed, should any further or new information come to light, this should also be passed to police. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. Although consent is not required to refer to Channel, an individual's consent will be

required to provide their consent before any support delivered through the programme is provided.

Contact Counter Terrorism Police services for advice on:

Name	Email	Phone
GMP Prevent Team	channel.project@gmp.police.uk	0161 856 6362

Channel helpline	020 7340 7264

Referrals to Channel

You do not need the consent of the subject to make a referral - consent will be sought by the Channel Team before being adopted by Channel.

Bury: Complete Prevent Referral Form or call MASSH 0161 253 5678. Completed forms should be sent to childwellbeing@bury.gov.uk (for children) OR adultcareservices@bury.gov.uk (for adults)

If staff have any questions whilst completing referrals they should call the local policing Prevent team for advice.

Pupils with family members in prison

Pupils with a family member in prison are at risk of poor outcomes as a result of poverty, stigma, isolation and poor mental health. School and college staff should be aware that children who have experienced parental imprisonment are more likely to be absent (or excluded) than their peers, to experience mental ill health and drug and alcohol misuse; they are also less likely to be in education, training or employment in later life. Staff should understand the need for tailored, trauma informed and sensitive support that can help mitigate potential harm and help encourage stability. These pupils will be offered pastoral support as required. They may receive a copy of 'Are you a young person with a family member in prison?' from Action for Prisoners' Families where appropriate and allowed the opportunity to discuss questions and concerns. They and their families may also be sign-posted to Prisoners' Families Helpline.

Pupils required to give evidence in court

Pupils required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support.

Primary School Pupils will be provided with the booklet 'Going to Court' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

Secondary and college Pupils will be provided with the booklet 'Going to Court and being a witness' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

Serious violence

Serious violence is a significant safeguarding concern. It may involve physical assault, carrying, threatening with or using weapons, and can occur in the context of peer conflict, bullying or child-on-child abuse. Serious violence may also be associated with criminal exploitation, county lines activity, gangs and other forms of organised or exploitative harm. Children may be at risk as victims, witnesses or perpetrators, and all concerns should be considered within a safeguarding context.

Our schools play a key role in protecting children from violence, safeguarding victims, as well as those who may be at risk of, or are involved in committing violence (who may also be victims themselves). Staff should be alert to signs that a child may be at risk of or involved in serious violence.

These indicators include, but are not limited to:

- Increased absence from school.
- A change in friendships.
- Relationships with older individuals or groups.
- A significant decline in academic performance.
- Signs of self-harm.
- A significant change in wellbeing.
- Signs of assault.
- Unexplained injuries.
- Unexplained gifts or new possessions.

Staff will be made aware of some of the most significant risk factors that could increase a pupil's vulnerability to becoming involved in serious violence. These risk factors include, but are not limited to:

- Being male.
- Having been frequently absent from school.
- Having disrupted education (e.g. suspensions, permanent exclusions, time in alternative provision).
- Having a history of offending.
- Having experienced child maltreatment.
- Having been involved in offending, such as theft or robbery.

Early, evidence-based support for those considered at risk, as well as at critical points when concerns emerge, is vital. This includes access to trusted adults, social and emotional skill support, and, where available, targeted interventions such as mentoring or therapeutic support.

Staff should report:

- Any concerns about a child carrying or using a weapon (or expressing intent to do so) to the designated safeguarding lead (or a deputy) without delay.
- Inform the DSL if they have any concerns that a child is susceptible to or involved with serious violence.

The designated safeguarding lead should immediately:

- Assess whether there is an immediate risk of harm to the child or others.
- Consider whether a weapon may be present.
- Evaluate risks to other pupils, staff, siblings, or the wider community.
- Determine whether urgent intervention from police or emergency services is required.
- Where a child is believed to be carrying a weapon or poses an immediate threat, the police should be contacted without delay.

The DSL should consider contextual safeguarding risks which may include:

- Association with older peers or adults.
- Gang involvement.
- County lines activity.
- Child criminal exploitation.
- Peer conflict and child-on-child abuse.
- Links to social media, local community risks, or neighbourhood violence and;
- That children affected by serious violence are often vulnerable to exploitation and coercion.

Serious violence should be viewed through a welfare and safeguarding lens, recognising that children involved may themselves be vulnerable. Depending on the risk, they should put in place a safety and support plan, and where relevant, consider action to de-escalate peer conflict. Support and consultation can be sought from local safeguarding partners.

The DSL should consider arranging support through:

- Community-based Early Help
- Targeted Early Help
- Children's Social Care/MASSH referral for section 17 Family Help or section 47 Child Protection.
- Police involvement.
- Youth offending or violence reduction services.
- Multi-agency risk management arrangements.

Referrals should not be delayed where there is a risk of significant harm.

124. Appendix C LADO referrals

Bury LADO Referrals lado-referral-form-dec-2023.docx.
Telephone: 01612536729

125. Appendix D Useful links and contact numbers

Websites for additional advice and support on Specific Safeguarding Issues can be found in KCSIE pages 173 onwards

Other useful numbers:

Bury

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

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

Complex Safeguarding Team: 0161 253 5678

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

First Point Family Support Services: 0161-641-4585

HCRG Sexual Health Hub: 0300 303 8565

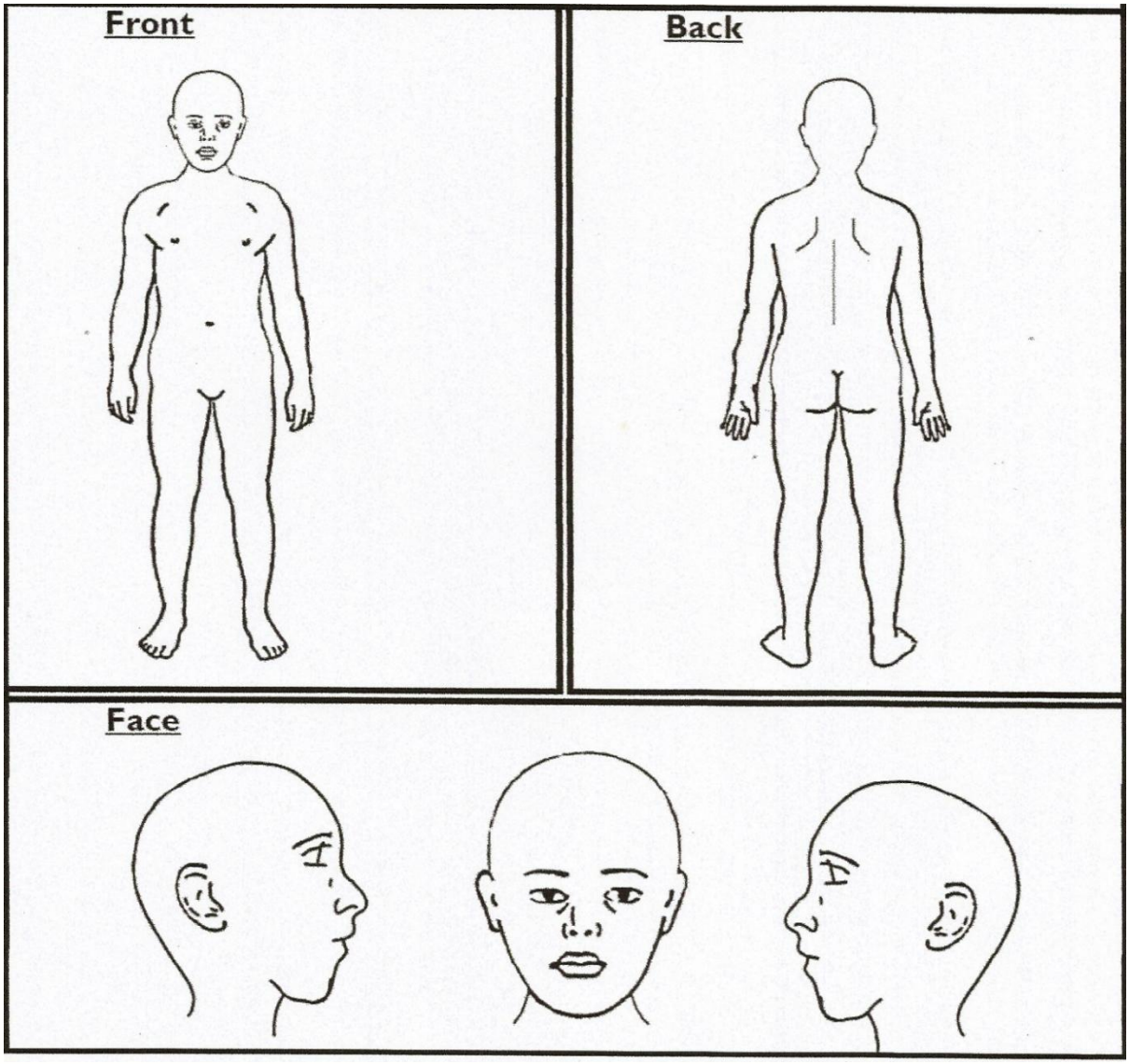
NSPCC Whistleblowing Line: 0808 800 5000

126. Appendix E Body map

Name:……

Date and time:……..

Name of person completing form…….



Description of Injuries and Circumstances in which they have been found / disclosed:……
……
……
……
……
……

If the young person volunteers an account of this injury (please do not prompt) give details:
……
……
……
……
……

If the parent / guardian has given an account of this injury, give details:…… …… …… …… …… ……

Action taken:…… …… …… …… ……

- CPOMS updated?
- DSL/SLT notified?
- Parent notified (unless this would place child at risk of significant harm)?

Guidance

To be completed by the person who has seen the injuries themselves – to avoid discrepancies in reporting. This should not be completed over the phone. The body map should be used to document and illustrate visible signs of harm and physical injuries.

Clearly indicate the location of the injuries on the body map using black pen. Please also note the size (ruler below for guidance), colour and type of injury in the "description of injury" section.

Please take care recording details as this document could be used as evidence.

127. Appendix F Legal Frameworks

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

Legislation

- Children Act 1989
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
- The Marriage and Civil Partnership (Minimum Age) Act 2022
- Apprenticeships, Skills, Children and Learning Act 2009
- Equality Act 2010
- Counter-Terrorism and Security Act 2015
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Data (Use and Access) Act 2025
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021
- The Crime and Policing Act 2026

Statutory guidance

- DfE (2023) 'Prevent Duty Guidance: For England and Wales'
- DfE (2026) 'Working Together to Safeguard Children'
- DfE (2018) 'Disqualification under the Childcare Act 2006'
- DfE (2026) 'Keeping Children Safe in Education'
- HM Government (2020) 'Multi-agency statutory guidance on female genital
- mutilation'
- Home Office (2025) Channel duty guidance: Protecting people susceptible to radicalisation.
- Home Office and Foreign, Commonwealth and Development Office (2023) 'Multi-agency statutory guidance for dealing with forced marriage and Multi-agency practice guidelines: Handling cases of forced marriage'
- DfE (2024) 'Suspension and permanent exclusion from maintained schools, academies and pupil referral units in England, including pupil movement'
- DfE (2022) 'Searching, Screening and Confiscation'
- DfE (2026) Restrictive Interventions, including Use of Reasonable Force, in Schools.
- DfE (2025) 'Arranging Alternative Provision'
- DfE (2025) Relationships Education, Relationships and Sex Education (RSE) and Health Education.

Non-statutory guidance

• DfE (2025) 'What to do if you're worried a child is being abused'.
• DfE (2024) 'Information sharing'
• DfE (2024) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
• DfE (2021) 'Teachers' Standards'
• DfE (2024) 'Recruit Teachers from Overseas'.
• DHSC (2024) 'Virginity Testing and Hymenoplasty: Multi-Agency Guidance'.
• DfE (2024) 'Behaviour in Schools'

128. Appendix G Safer recruitment and selection of staff

Oak Learning Partnership is committed to keeping pupils safe by ensuring that adults who work or volunteer in school are safe to do so.

The Trust's full policy and procedures for safer recruitment are outlined in the Safer Recruitment Policy.

An enhanced DBS check with barred list information will be undertaken for all staff members and volunteers engaged in regulated activity. A person will be considered to be in 'regulated activity' if they work on a frequent basis in a specified establishment, such as a school, or in connection with the purposes of the establishment, where the work gives opportunity for contact with children.

A person will also be in regulated activity if, as a result of their work or volunteering, they:

- will be responsible, on a frequent basis in a school or college, for teaching, training instructing, caring for or supervising children, providing advice or guidance on physical, emotional or educational wellbeing, or driving a vehicle only for children, or
- engage in intimate or personal care or healthcare or any overnight activity, even if this happens only once.

Further details on regulated activity include:

The full legal definition of regulated activity is set out in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedoms Act 2012 and The Crime and Policing Act 2026.

Regulated activity includes:

a) paid and unpaid work that involves teaching, training, instructing, caring for or supervising children, or providing advice or guidance on physical, emotional or educational well-being, or driving a vehicle only for children;

b) any other type of paid work for a limited range of establishments (known as 'specified places', which include schools and colleges), with the opportunity for contact with children.

Work under (a) or (b) is regulated activity only if done frequently, on more than 3 days in a 30-day period or overnight.83 Some activities are always regulated activities, regardless of frequency.

This includes:

c) relevant personal care, or health care provided by or provided under the supervision of a health care professional:

o personal care includes helping a child with eating and drinking for reasons of illness or disability or in connection with toileting, washing, bathing and dressing for reasons of age, illness or disability;

o health care means care for children provided by, or under the direction or supervision of, a regulated health care professional.

Regulated activity will not be:

• paid work in specified places which is occasional and temporary and does not involve any of the activities in (a) above.

The DfE's DBS Workforce Guides will be consulted when determining whether a position fits the child workforce criteria.

Oak Learning Partnership will conduct the appropriate pre-employment checks for all prospective employees, including internal candidates and candidates who have lived or worked outside the UK.

The appropriate DBS and suitability checks will be carried out for all governors, volunteers, and contractors.

Where schools our schools are also subject to the EYFS framework, volunteers will not be permitted to begin working within the settings covered by the EYFS framework until the school or nursery school has received the volunteer's enhanced DBS certificate including barred list information.

The Headteacher and School Operations Manager will ensure that there are sufficient staff in the last 3 years to enable at least one person on every recruitment panel to be appropriately trained.

The Headteacher and Trust will ensure that all external staff and volunteers, contractors including out of hours organisations using our school and college sites have been recruited safely, including DBS checks as appropriate.

Staff suitability

All staff members and volunteers are required to sign the Staff Disqualification Declaration Form confirming that they are not disqualified from working in a schooling environment. A disqualified person will not be permitted to continue working at the school unless they apply for and are granted a waiver from Ofsted. The school will provide support with this process.

Ongoing suitability

Following appointment, consideration will be given to staff and volunteers' ongoing suitability – to prevent the opportunity for harm to children or placing children at risk.

Referral to the Disclosure and Barring Service and Teaching Regulation Agency

The school will refer to the DBS anyone including staff and volunteers who has harmed a child or poses a risk of harm to a child, or if there is reason to believe the member of staff has committed an offence and has been removed from working in regulated activity. The duty will also apply in circumstances where an individual is deployed to another area of work that is not in regulated activity or they are suspended.

When considering referrals to the Teaching Regulation Agency or other regulatory bodies, the Trust will have due regard to its duties under the Equality Act 2010, ensuring that decisions are evidence-based, fair, proportionate and free from unlawful discrimination, while maintaining its safeguarding responsibilities and commitment to professional standards.

Single central record (SCR)

The Trust keeps an SCR which records all staff, including agency and third-party supply staff, contractors and teacher trainees on salaried routes, who work at the school.

The Trust's SCR contains information that is easily accessible and recorded in such a way that allows for details for each individual academy to be provided separately, and without delay, to all who need to see it, including Ofsted.

The following information is recorded on the SCR:

- An identity check
- A barred list check
- An enhanced DBS check
- A prohibition from teaching check
- A check of professional qualifications, where required
- A check to determine the individual's right to work in the UK
- Additional checks for those who have lived or worked outside of the UK
- Whether the employee's position involves relevant activity, i.e. regularly caring for, training, supervising or being solely in charge of persons aged under 18 (college only)
- A section 128 check for those in management positions

For agency and third-party supply staff, the school will also record whether written confirmation from the employment business supplying the member of staff has been received which indicates that all the necessary checks have been conducted and the date that confirmation was received.

If any checks have been conducted for volunteers, this will also be recorded on the SCR. Risk assessments will be undertaken for all volunteers.

Written confirmation that supply agencies have completed all relevant checks will also be included.

The school is free to record any other information it deems relevant.

The details of an individual will be removed from the SCR once they no longer work at the school.

129. Appendix H – Visitors

The school will maintain appropriate safeguarding arrangements for all visitors. All visitors will report to reception, provide identification where required, sign in and receive safeguarding information, including details of safeguarding procedures and reporting concerns.

Visitors must wear the visitor lanyard issued to them at all times. Staff are expected to maintain a culture of professional curiosity and challenge any individual not displaying appropriate identification, accompanying them to reception to verify their identity where necessary.

Professional visitors will be required to provide identification, and the school will seek appropriate assurance that any necessary safeguarding, safer recruitment and DBS checks have been completed by their employer where required. Decisions regarding supervision will be based on the nature of the visit, the visitor's role and an assessment of risk.

Visitors for whom the school has not received appropriate safeguarding assurances will be issued with a red lanyard and must be accompanied at all times. Visitors for whom satisfactory assurance has been received may be granted access in accordance with the purpose of their visit and any risk assessment undertaken by the school. The Headteacher, or their representative, retains the right to refuse access or require supervision where this is considered necessary.

Where external organisations are commissioned to work regularly with pupils, the school may request evidence of safeguarding arrangements, including safer recruitment procedures, staff conduct expectations and appropriate safeguarding checks. The school will seek written assurance that any identified risks relating to staff suitability have been appropriately assessed and managed by the employer.

The suitability of external speakers, organisations and activities will be considered in advance, including their educational value, age appropriateness and any safeguarding requirements.