The Rowan Learning Trust

Three Towers
An Alternative Provision Academy
Expanding Horizons

Safeguarding & Child Protection Policy
(including Early Help)

Adopted: February 2024
Review: As required by statutory guidance
(at least annually or in line with national statutory changes)

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Key Contacts

Key safeguarding responsibilities within each of the roles below are set out in Keeping Children Safe in Education (KCSIE) 2020			
Role	**Name**	**Phone**	**Email**
Headteacher / Senior DSL	A Isherwood	01942 932760 (Hindley option)	safeguarding@ttapa.net
Deputy DSL for Online Safety	C Seggie		
Deputy DSLs	S Box		
	D Heyes		
	G Murphy		
	A Scott		
	V Scott		
	C Higgins	01942 932760 (Whelley option)	
CLA Lead teacher	A Roberts	01942 932760	hindleyoffice@ttapa.net
SENDCo	C Arstall		SEND@ttapa.net
Chair of Governors	P Smith	c/o e.roberts@rlt.education	
Safeguarding Governor	P Smith		
CEO of Rowan Learning Trust	P Rimmer	p.rimmer@rlt.education	
Agency Contact Details			
LADO	Andrew Chisnall	01942 486042	lado@wigan.gov.uk
Virtual School Head (VSH)	Michelle Ambrey		m.ambrey@wigan.gov.uk
Children's Social Care referrals	Duty Team	01942 828300	https://www.wigan.gov.uk/Resident/Health-Social-Care/Children-and-young-people/ProfessionalReferralForm.aspx
Wigan Safeguarding Children's Board		01942 486025	wscb@wigan.gov.uk
School nurses		0300 707 1091	Wwl-tr.wiganschoolnursing@nhs.net
CAMHS Schools Link Worker	N/A		
SDF Huddle Manager	N/A		
Channel helpline		020 7340 7264	
If you believe a child or young person is at **immediate risk** of significant harm or injury, **contact the Police on 999**			

Three Towers (TTAPA) fully recognises the contribution it makes to safeguarding children and young people and supporting / protecting learners in the academy. **Safeguarding underpins all that we do.** Three Towers ensures that safeguarding procedures are in place to protect our learners from harm and to help learners to feel safe and empower them to stay safe.

We also recognise that we are an agent of referral and not of investigation therefore we adopt a multi-agency approach to provide appropriate and timely support to learners through adoption of the early help framework.

Our policy applies to **all** members of our school community. We recognise that all adults, including temporary staff, volunteers and governors, have a full and active part to play in protecting our learners from harm, and that the child's welfare is our paramount concern.

1 Aims

We aim to ensure:

- appropriate action is taken in a timely manner to safeguard and promote learners' welfare;
- adults at TTAPA are aware of their expected behaviours and their statutory responsibilities in relation to safeguarding;
- staff are properly trained in recognising and reporting safeguarding issues.

We will do this by:

- providing a high quality, safe and stimulating environment in which learners feel safe, secure, valued, respected and confident so they are able to enjoy them learn, build positive relationships so they know how to approach staff if they are in difficulties, believing they will be effectively listened to;
- supporting our learners' development in ways that will foster security, confidence and independence;
- raising the awareness of staff of the need to safeguard learners, of their responsibility in identifying and reporting possible cases of abuse and preventing/intervening earlier to address support and social needs through the early help framework;
- providing a systematic means of monitoring learners known or thought to be at risk of harm, and ensure we contribute to assessments of need and support packages for those learners;
- emphasising the need for good levels of communication between all members of our community;
- providing a structured procedure which is followed by all staff in cases of suspected abuse;
- providing staff access to safeguarding training and awareness raising concerning:
    - DSL training
    - KCSIE part 1
    - Looked after children (CLA)
    - Online safety training (including filtering and monitoring)
    - Preventing radicalisation
    - whistleblowing

- developing and promoting effective working relationships with external agencies, especially the Police, Health and Social Care;
- ensuring that all our staff have been recruited safely and that a single central record is maintained;
- teaching about safeguarding through a personalised curriculum that promotes their spiritual, moral, cultural, mental and physical development, and prepares them for the opportunities, responsibilities and experiences of life.

2 Legislation and Statutory Guidance

This policy has been developed in accordance with the Department for Education's statutory guidance:

Keeping Children Safe in Education (2023) and
Working Together to Safeguard Children (2023), and
the Governance Handbook.

We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners (See Section 3).

This policy has been developed in accordance with the principles established by:

- Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of learners
- The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques
- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of learners at the school
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)

- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their learners with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting learners (where we can show it's proportionate). This includes making reasonable adjustments for disabled learners. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve learner outcomes. Some learners may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children

This policy also complies with our funding agreement and articles of association.

Other key documents are noted, which have prompted changes to safeguarding requirements over time. This policy references these throughout where relevant:

- UK GDPR and the Data Protection Act 2018.
- Information Sharing: Advice for Practitioners 2018.
- Sexual Violence and Sexual Harassment between Children in Schools and Colleges (guidance document) 2018.
- Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018.
- Childcare Act 2006 (as amended in 2018).

This policy should also be read in conjunction with Wigan's Threshold of Need [1]Document / Procedure, Wigan's Resolution Policy[2] and the associated safeguarding policies of The Rowan Learning Trust.

3 Definitions

Safeguarding and promoting the welfare of children means:

- Providing help and support to meet the needs of children as soon as problems emerge;
- protecting children from maltreatment whether that is within or outside the home, including online;
- preventing 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;

[1] Thresholds of Need (wiganlscb.com)
[2] Escalation policy recently update to Resolution Protocol Resolution Protocol (wiganlscb.com)

- taking action that enables all children to have the best outcomes.

It encompasses a preventative approach through the early help framework to keeping children safe that incorporates child health and safety; school behaviour and preventing bullying; supporting learners with medical conditions; personal, health, social economic education; providing first aid and site security.

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm. This includes harm that occurs insode or outside the home, including online.

Children includes everyone under the age of 18.

Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. *Appendix 2* explains the different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. *Appendix 2* explains neglect in more detail.

Sharing of nudes and semi-nudes (also known as sexting or youth produced sexual imagery) is the sharing of nude or semi-nude images, videos or live streams by children

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

Further definitions are contained in the Glossary *(Appendix 1)*

The following **3 safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017):

- the local authority (LA);
- integrated care boards (previously known as clinical commissioning groups) for an area within the LA;
- the chief officer of police for a police area in the LA.

They work together to safeguard and promote the welfare of local children, including identifying and responding to their needs.

This policy assumes that any of the categories of abuse could be disclosed within the Borough of Wigan, and gives further information relating to individual types of abuse within this document in line with advice and guidance within Keeping Children Safe in Education.

4 Equality Statement

Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances.

We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- have special educational needs (SEN) or disabilities or health conditions (See Section 11.2);
- are young carers;
- may experience discrimination due to their race, ethnicity, religion, gender identification or sexuality;
- have English as an additional language;
- are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence;
- are at risk of FGM, sexual exploitation, forced marriage, or radicalisation;
- are asylum seekers;
- are at risk due to either their own or a family member's mental health needs;
- are looked after or previously looked after (See Section 11.5);
- are missing or absent from education for prolonged periods and/or repeat occasions;
- whose parent/carer has expressed an intention to remove them from school to be home educated.

5 Roles and Responsibilities

Safeguarding and child protection is **everyone's** responsibility so all adults, including temporary staff[3], volunteers and governors, have a full and active part to play in protecting our learners from harm and ensuring that their welfare is our paramount concern. This policy applies to all adults working with TTAPA learners and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing learners for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence / harassment. This will be underpinned by our:

- Behaviour & Relationships Policy;
- Pastoral support systems;
- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
    - healthy and respectful relationships;
    - boundaries and consent;
    - stereotyping, prejudice and equality;
    - body confidence and self-esteem;
    - how to recognise an abusive relationship (including coercive and controlling behaviour);
    - the concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic

[3] Wherever the word "staff" is used, it covers ALL staff on site, including ancillary supply and self-employed staff, AP providers, contractors, volunteers working with children etc, and governors

abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support;

- what constitutes sexual harassment and sexual violence and why they're always unacceptable.

All staff believe that we should provide a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual learner. We recognise that:

- a child / young person who is neglected, abused or witness to violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of worth;
- we may provide the only stability in the lives of children and young people who have been abused or are at risk of harm;
- research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn**;**
- the early help framework provides opportunities to intervene early and prevent safeguarding issues developing, as well providing a framework for appropriate support to be wrapped around the child / young person and their family.

This section outlines the roles and responsibilities of our staff.

5.1. All staff are expected to:

- read and understand part 1 and Annex B of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually;
- read and be familiar with this safeguarding policy;
- sign a declaration at the start of the academic year to say that they have read the KCSIE guidance and this policy;
- reinforce the importance of online safety when communicating with parents/carers. This includes making parents/carers aware of what we ask children to do online (e.g. sites they need to visit or who they will be interacting with online);
- provide a safe space for learners who are LGBTQ+ to speak out and share their concerns.

All staff will be aware of:

- our systems and policies which support safeguarding, including the RLT Staff Code of Conduct, this policy, the TTAPA staff behavioural expectations (see staff handbook), the Behaviour & Relationships Policy, the Online Safety Policy and the safeguarding response to children who go missing from education;
- know who the Designated Safeguarding Lead (DSL) and the deputy DSLs are, and what their role is;
- the early help assessment process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment;
- the process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play;

- what to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals;
- the signs and indicators of different types of abuse, neglect and exploitation, including domestic and sexual abuse (including controlling and coercive behaviour as well as parental conflict that is frequent, intense and unresolved) as well as specific safeguarding issues such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of risk from or involvement in serious violent crime, female genital mutilation (FGM), radicalisation and serious violence (including that linked to county lines);
- new and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation and the role of technology and social media in presenting harm;
- the importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe;
- be involved in the implementation of individual education programmes, integrated support plans, child in need plans and interagency child protection plans as required;
- the fact that children can be at risk of harm inside and outside of their home, at school and online;
- the fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBTQ+) can be targeted by other children;
- that a child and their family may be experiencing multiple needs at the same time;
- what to look for to identify children who need help or protection.

Section 12 of this policy outline in more detail how staff are supported to do this.

5.2 The Designated Safeguarding Lead (DSL) is a member of the core leadership team (CLT) and takes lead responsibility for child protection and wider safeguarding in the school. They are supported in their role by several deputies including one specifically tasked with responsibility for online safety which includes online safety and understanding our filtering and monitoring processes on school devices and school networks to keep learners safe online.

During term time, the DSL or one of the deputies will be available during school hours for staff to discuss any safeguarding concerns in person (preferable), by phone or via email. When the DSL is absent the deputies will act as cover. If the DSL and all the deputy DSLs are all unavailable, the Deputy Headteacher will act as cover. During school holidays safeguarding concerns should be reported directly to the Child in Need Team.

The DSL is given time, training, resources and support to:

- provide advice and support to other staff on child welfare and child protection matters including supporting staff who make such referrals directly;
- take part in strategy discussions and inter-agency meetings and/or support other staff to do so;
- contribute to the assessment of children;
- refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police) and

acting as a focal point for staff to discuss these concerns. Referrals to social care should be made by calling the Child in Need duty team;

- have a good understanding of harmful sexual behaviour;
- have a good understanding of the filtering and monitoring systems and processes in place within school;
- keep written records of concerns about a child even if there is no need to make an immediate referral;
- ensure that all such records are kept confidentially, securely stored and are separate from other learner records, are transferred securely and held by the setting where the learners attend until their 25th birthday. In the instance of an early help intervention, consideration will be given to the welfare of the learner and consult with the family for appropriate transfer of information;
- ensuring that an indication of the existence of the additional file outlined above is clearly marked on the learner's records;
- ensuring that all records are kept and retained in line with the "Record retention" policy, and that Children Looked After (CLA) records are retained for 99 years, and a record is kept and witnessed of the disposal of individual's record;
- making sure when a learner leaves, any information regarding safeguarding (current or historic) as well as the child protection file, where applicable, is transferred to the new education setting as soon as possible. This should be transferred separately from the main learner file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENDCo or the named person with oversight for SEND in colleges, are aware as required;
- ensuring that they, or the staff member attending case conferences, core groups, early help meetings or other multi-agency planning meetings, contribute to assessments and provide a report which has been shared with the parents;
- ensuring that any learner currently with a child protection plan who is absent in the educational setting without explanation for 2 days is referred to their key worker's Social Care Team;
- organising child protection induction and update training every 3 years (as a minimum) for all school staff;
- ensure that staff have appropriate Prevent training and induction.

The DSLs will also:

- keep the headteacher informed of any issues;
- liaise with local authority case managers and designated officers for child protection concerns as appropriate;
- discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies;
- be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support;
- be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search.

The full responsibilities of the DSL are set out in their job description.

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

- ensuring that staff (including temporary staff) and volunteers
    - are informed of our systems which support safeguarding, including this policy, as part of their induction;
    - understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect;
- communicating this policy to parents/carers when their child joins the school and via the school website;
- ensuring that the DSLs have appropriate time, funding, training and resources, and that there is always adequate cover if they are absent;
- acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate;
- making decisions regarding all low-level concerns, though they may wish to collaborate with the DSLs on this;
- ensuring the relevant staffing ratios are met, where applicable.

5.4 The Local Governing Committee (LGC) will read Keeping Children Safe in Education in its entirety which has information on they are supported to fulfil their role. They will:

- facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development;
- receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities;
- evaluate and approve this policy at each review, ensure it complies with the law and hold the headteacher to account for its implementation;
- be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements;
- appoint a Nominated Governor (NG) for Safeguarding to monitor the effectiveness of this policy in conjunction with the LGC. This is always a different person from the Designated Safeguarding Lead (DSL);
- ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners;
- ensure that the school is provided with appropriate filtering and monitoring systems in place and review their effectiveness in line with the scheme of delegation. This may include:
    - making sure that the CLT and staff are aware of the provisions in place and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training;
    - reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards;

- make sure:
    - the DSL is a member of the CLT and has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support;
    - online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies;
    - the DSL has lead authority to manage safeguarding concerns, including online safety and understanding the filtering and monitoring systems and processes in place;
    - the school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors).
    - that this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised.
- where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
    - seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed;
    - make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate;
    - make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply.

The chair of governors may act as the 'case manager' in the event that an allegation of abuse is made against the headteacher if the CEO is unable to do so.

Section 15 of this policy has information on how governors are supported to fulfil their role.

5.5 The CEO will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher if the CEO is unable to do so.

5.6 Trustees will:

- ensure there is a whole-trust approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development in line with the Trustee's safeguarding statement of intent.
- ensure that the school has appropriate filtering and monitoring systems in place and review their effectiveness. This includes:
    - making sure that the CLT and staff are aware of the provisions in place and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training;
    - reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards.

5.7 Virtual School Heads (VST) in the local authority have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of learners with a social worker. They should also identify and engage with key professionals, e.g. DSLs, SENDCos, social workers, mental health leads and others.

6 Confidentiality and Information Sharing

Confidentiality is an issue which needs to be discussed and fully understood by all those working with children/young people, particularly in the context of child protection. The only purpose of confidentiality in this respect is to the benefit of the child.

Staff must NEVER guarantee confidentiality to a learner, nor should they agree to keep a secret. This is for the protection of the learner and because no suspicion of abuse may go unreported or unrecorded. Any learner disclosing must be told sensitively that the adult will need to pass on information which relates to their safety or that of another child/young person and they should be helped to understand why this has to be so.

Information regarding individual cases will only be shared with staff who, for the well-being of the child/young person, need to have some or all of this information. Such information must be treated confidentially.

6.1 Information Sharing

TTAPA recognises that all matters relating to child protection are confidential[4] and information is handled in line with the Trust's policy.

All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and cannot assume that someone else will pass on the information. This has been recognised in principle by the courts. Any disclosure of personal information to others [including Children's Social Care] must always have due regard to both common and statute law.

Staff should note that:

- timely information sharing is essential to effective safeguarding;
- fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children;
- The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe;
- if staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk;
- staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests.
- if a victim asks the school not to tell anyone about the sexual violence or sexual harassment:

4 https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_practitioners_safeguarding_services.pdf

        - There is no definitive answer, because even if a victim does not consent to sharing information, staff may still lawfully share it if there is another legal basis under the UK GDPR that applies;
        - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children;
        - The DSL should consider that:
            - Parents/carers should normally be informed (unless this would put the victim at greater risk);
            - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care;
            - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains.
- regarding anonymity, all staff will:
    - be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system;
    - do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved;
    - consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.

Confidentiality is also addressed in this policy with respect to record-keeping in Section 14, and in our procedures for managing allegations of abuse against staff and procedures for safer recruitment.

If staff are in any doubt about sharing information, they should speak to the DSL.

The Government's information sharing advice for safeguarding practitioners includes 7 'Golden Rules' of sharing information and will support staff who have to make decisions about sharing information. The Government guidance (described by the NSPCC, 2018) is:

1. **Remember that the General Data Protection Regulation (GDPR) Data Protection Act 2018 and human rights law are not barriers** to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. **Be open and honest with the individual** (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.

3. **Seek advice from other practitioners** if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. **Share with informed consent where appropriate** and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, there is good reason to do so, such as where safety may be at risk.
5. **Consider safety and well-being**: Base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. **Necessary, proportionate, relevant, adequate, accurate, timely and secure**: Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.
7. **Keep a record of your decision and the reasons for it** – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

Sharing of information will be necessary for the purpose for which it's being shared, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.

Key organisations who have a duty under Section 11 of the Children Act 2004 to have arrangements in place to safeguard and promote the welfare of children are:

- the local authority;
- NHS England;
- CCG - clinical commissioning groups;
- NHS Trusts, NHS Foundation Trusts;
- the local policing body;
- British Transport Police Authority;
- prisons;
- National Probation Service and Community Rehabilitation Companies;4
- youth offending teams;
- bodies within the education and /or voluntary sectors, and any individual to the extent that they are providing services in pursuance of section 74 of the Education and Skills Act 2008.

*As data controllers who process personal information we are registered with the Information Commissioner's Office *NB* The Data Protection Act requires every data controller who is processing personal information to register with the Information Commissioner's Office, unless they are exempt. To check if you are required to register check here: https://ico.org.uk/for-organisations/data-protection-fee/self-assessment/*

Governing bodies and proprietors should ensure relevant staff have due regard to the data protection principles, which allow them to share personal information, as provided for in the Data Protection Act 2018 and the GDPR. Relevant staff should be confident of the processing conditions under the Data Protection Act 2018 and the GDPR 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'. Schools should not under the GDPR as supplemented by the Data Protection Act 2018 provide learners' education data where the serious harm test under that legislation is met. Therefore, in a situation where a child is in a refuge, this could mean that schools can withhold education data under the GDPR; they should do so where the serious harm test is satisfied. (KCSiE, 2023)

7 Recognising Abuse and Taking Action

A significant part in the prevention of harm to our learners is achieved by providing them with good lines of communication with trusted adults. Strong pastoral support from form tutors, pastoral assistants/keyworkers and Heads of House ensure that each child is known to key staff. Staff work hard to establish open, honest and trusting relationships with learners so that the learner feels valued as an individual and cared for by the adults they see in school.

TTAPA will support all children and young people by:

- encouraging self-esteem and mutual respect through the curriculum, as well as our relationships, whilst not condoning aggression or bullying or any other form of abuse;
- promoting and modelling healthy positive relationships;
- providing a caring, safe and positive environment within the school;
- liaising and working together with other support services particularly those involved in the safeguarding of children;
- notifying Social Care as soon as there is a significant concern;
- providing continuing support to a learner, about whom there have been concerns, who leaves the school by ensuring that appropriate information is copied under confidential cover to their new setting and ensuring the school medical records are forwarded as a matter of priority.

7.1 Reporting System for our learners

Where there is a safeguarding concern, we will endeavour to take the learner's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring learners feel safe and comfortable to come forward and report any concerns and/or allegations. To achieve this, we will:

- explain to all learners and their parents/carers during their induction meeting that they can report abuse or any issues to any member of staff they trust;
- ensure learners identify and have access to trusted adults in order to confidently report abuse or raise concerns, knowing they will be listened to, supported and valued, and that the issues they raise will be taken seriously;
- make it clear to learners that their concerns will be taken seriously, and that they can safely express their views and give feedback;
- promote our reporting systems through PSHE lessons and displays which are easily understood and easily accessible for learners.

7.2 Creating a supportive environment in school and minimising the risk of abuse including child-on-child abuse

We recognise the importance of creating a supportive environment where victims feel confident in reporting incidents and of us taking proactive action to minimise the risk of abuse, including child-on-child abuse. To achieve this, we will:

- ensure staff are trained to understand:
    - how to recognise the indicators and signs of abuse, including child-on-child abuse, and know how to identify it and respond to reports;
    - that even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of "it could happen here"

- the important role they have to play in preventing abuse, and in particular child-on-child abuse and responding where they believe a child may be at risk from it;
- that if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims of abuse including child-on-child abuse may not always make a direct report. For example:
    - children can show signs or act in ways they hope adults will notice and react to;
    - a friend may make a report;
    - a member of staff may overhear a conversation;
    - a child's behaviour might indicate that something is wrong.
- that certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation;
- that a learner harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy;
- that social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between victim(s), alleged perpetrator(s) and friends/family from either side;
- that they should speak to the DSL if they have any concerns.

➢ ensure that all staff are able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to the potential need for early help for a child who:

- has experienced multiple suspensions and is at risk of, or has been permanently excluded;
- is missing education, or persistently absent from school, or not in receipt of full-time education;
- has special educational needs (whether or not they have a statutory education health and care plan);
- is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime;
- is frequently missing/goes missing from care or home;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online;
- is misusing drugs or alcohol;
- is suffering from mental ill health;
- is a privately fostered child;
- has a parent or carer in custody;
- has returned home to their family from care;
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation;
- is at risk of being radicalised or exploited;
- is bereaved;

- is disabled;
- is a young carer;
- is at risk of so-called 'honour'-based abuse such as female genital mutilation or forced marriage.

- challenge any form of derogatory, prejudicial or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images;
- be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female learners, and initiation or hazing type violence with respect to boys;
- ensure our curriculum helps to educate learners about appropriate behaviour, healthy relationships (including consent) and keeping themselves safe;
- ensure learners are able to easily and confidently report abuse using our reporting systems;
- ensure staff reassure victims that they are being taken seriously;
- be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners;
- support learners who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed;
- consider intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment;

All adults must follow the procedures set out below in the event of a safeguarding issue.

7.3 If the child is suffering or likely to suffer harm or is in immediate danger

Make a referral to the Child in Need team and / or the police **immediately** if you believe the learner is in immediate danger. Inform the DSL as soon as possible if you make a referral. **Anyone can make a referral** using this link https://www.gov.uk/report-child-abuse-to-local-council

7.4 If a child makes a disclosure to you

Bear in mind that some children may:

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

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

If a child does disclose then all staff adhere to the following Dos and Don'ts when concerned about abuse or when responding to a disclosure of abuse.

Do:

- **Create a safe environment by offering** the child a private and safe place if possible;
- **Listen carefully** allowing them time to talk freely and believe them;

- **Stay calm** and reassure the child and stress that he/she is not to blame, do not show you are shocked or upset;
- **Tell** the child that they have done the right thing in telling you and that you know how difficult it must have been to confide in you;
- Use the **'tell me', 'explain', 'describe'** and/or mirroring strategy;
- **Explain to** the child what you are going to do next and that you will have to pass this information on;
- **Tell only the Designated or Deputy Safeguarding Lead;**
- **Record** in detail using CPOMS without delay, using the child's own words sticking to the facts.

Don't:

- postpone or delay the opportunity for the learner to talk;
- promise confidentiality, e.g. Say you will keep 'the secret';
- tell them they should have told you sooner;
- take notes while the learner is speaking or ask the learner to write an account;
- take photographs of any injuries;
- try to investigate the allegation yourself;
- include your thoughts/opinions/interpretations in your write up;
- approach or inform the alleged abuser.

All staff record any concern about or disclosure of abuse or neglect by a learner and report this to the DSL using CPOMS. It is the responsibility of each adult in school to ensure that the DSL receives the record of concern without delay. In the absence of the DSL, staff will seek advice direct from Children's Social Care. In some circumstances, the DSL or member of staff seeks advice by ringing Children's Social Care.

During term time, the DSL is always available during school hours for staff to discuss any safeguarding concerns.

The voice of the child is central to our safeguarding practice and learners are encouraged to express and have their views given due weight in all matters affecting them.

We are committed to work in partnership with parents and carers. In most situations, we will discuss initial concerns with them. However, the DSL will not share information where there are concerns that if so doing would:

- place a child at increased risk of significant harm;
- place an adult at increased risk of serious harm;
- prejudice the prevention, detection or prosecution of a serious crime;
- lead to unjustified delay in making enquiries about allegations of significant harm to a child, or serious harm to an adult.

When we become aware that a learner is being privately fostered, we remind the carer/parent of their legal duty to notify Wigan Children's Social Care. We follow this up by contacting Children's Social Care directly.

7.5 If you discover FGM has taken place or a learner is at risk of FGM

Keeping Children Safe in Education explains that FGM comprises "all procedures involving 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. It is also known as 'female genital cutting', 'circumcision' or 'initiation'. Possible indicators that a learner has already been subjected to FGM, and factors that suggest a learner may be at risk, are set in *Appendix 3*.

Any teacher who either

- is informed by a girl under 18 that an act of FGM has been carried out on her; or
- observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour/birth; or
- discovers that an act of FGM appears to have been carried out on a learner under 18

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it. Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

Any other member of staff who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a **learner under 18** must speak to the DSL and follow our local safeguarding procedures.

Any member of staff who suspects a learner is *at risk* of FGM or suspects that FGM has been carried out should speak to the DSL and follow our local safeguarding procedures.

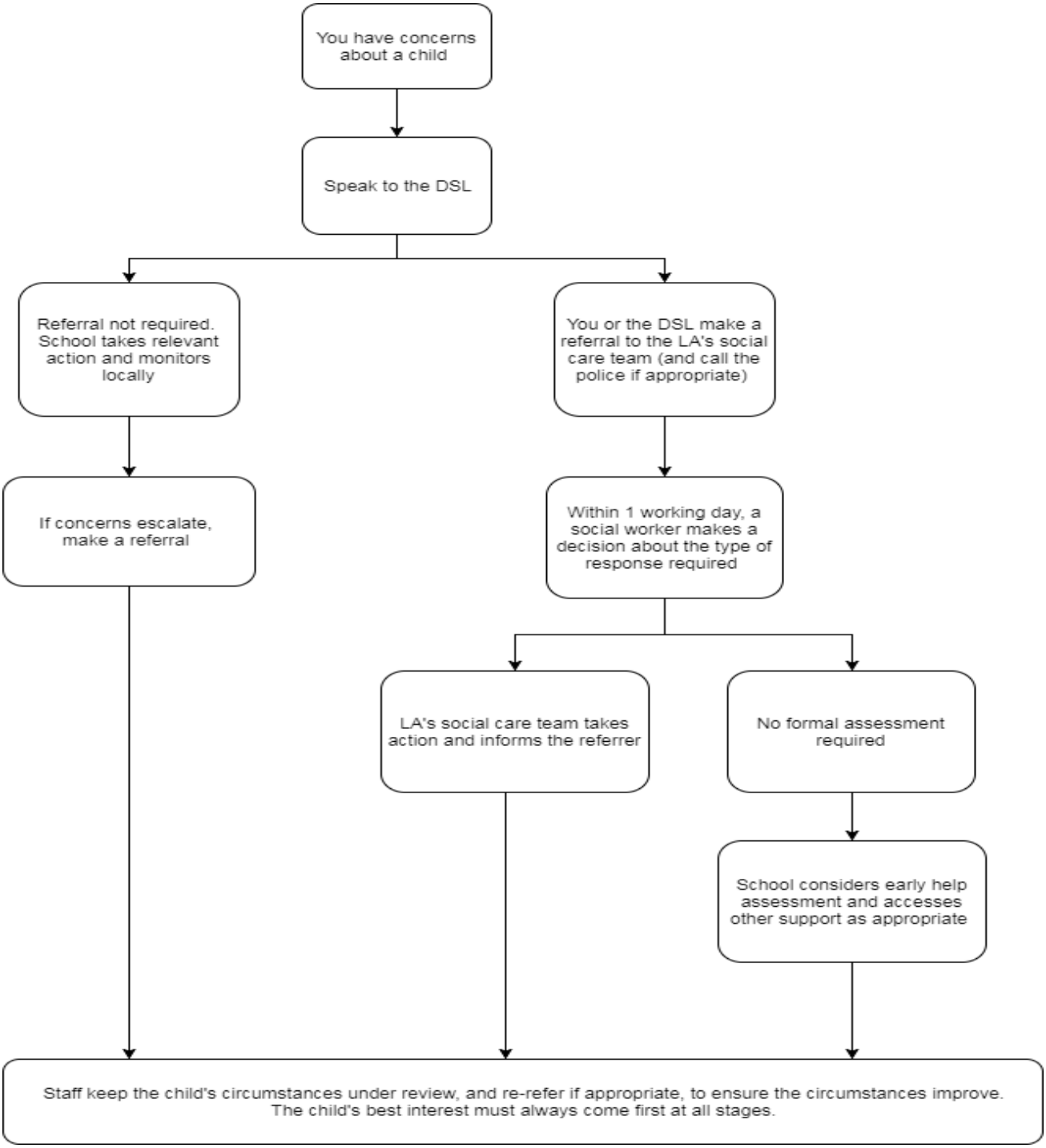
The duty for teachers mentioned above does not apply in cases where a learner is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine learners.

7.6 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm or is in immediate danger)

The following flow chart illustrates the procedure to follow if you have any concerns about a child's welfare. Wherever possible speak to the DSL first to agree a course of action.

In exceptional circumstances or if the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the CLT and/or take advice from the Central Duty Team on 01942 828300.

You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take, including if appropriate making a referral to social care directly, with the DSL as soon as practically possible.



7.6.1 Early Help

TTAPA will consider the need for an Early Help assessment when it is identified that there are low level concerns or emerging needs, with particular concern for non-attendance / persistent/severe absence. Detailed information on Early Help can be found in Chapter 1 of Working Together to Safeguard Children. TTAPA follows the procedures as set out in the local authority's "Threshold of Need" document.

Early help means providing support as soon as a problem emerges, at any point in a child's life. Providing early help is more effective in promoting the welfare of children than reacting later. It is the responsibility of the education setting to initiate Early Help to identify what the

family's strengths and needs are. This will inform whether the setting can support the family or whether a referral to another agency is needed. The process also provides a way of recording support and interventions that have been provided to the learner and also supports a referral for additional support that may be needed from more targeted services where a single agency has been unable to meet that need.

If an early help assessment is appropriate, the lead member of staff will contact the early help hub to ensure there is no current intervention and will generally lead on liaising with other agencies, setting up a multi-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. As part of local arrangements a team around the child meeting (TAC) can be arranged to ensure that a multi-agency action plan can be developed. It is important that the child and parents voice is captured as part of this assessment and that they take ownership of the plan. This plan should be regularly reviewed up to 4 to 6 weeks until outcomes are achieved. Timelines of interventions will be monitored and reviewed.

Any such, cases are kept under constant review and consideration given to a referral to children's social care for assessment for statutory services, if the learner's situation does not appear to be improving or is getting worse. If at any point during the EH process, the risk increases and the education setting becomes concerned that the child or young person is, or is likely to suffer significant harm, then a referral will be made to children's social care. If at any point we become concerned that a learner is at serious risk of harm we will respond appropriately. If we are concerned that a child is at **immediate** or **imminent** risk then we will contact Greater Manchester Police on either 111 or 999. If, however we are concerned that a child is, or is likely to suffer serious harm but it is not imminent we will call Wigan Children's Social Care Referral Team on 01942 828300.

7.6.2 Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support staff to do so.

If staff make a referral directly (section 7.1) they must tell the DSL as soon as possible.

The local authority will decide quickly upon receiving the referral (usually within 1 working day) about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

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

If the DSL or person making the referral is not satisfied about the decision regarding the referral, then the school will follow the local authority's escalation procedures.

7.7 If you have concerns about extremism and/or radicalisation

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

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

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

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

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

- think someone is in immediate danger;
- think someone may be planning to travel to join an extremist group;
- see or hear something that may be terrorist-related.

7.8 If you have a concern about mental health

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL, counsellor, senior mental health lead or one of the heads of house to agree a course of action.

Follow the link for the Department for Education guidance on mental health and behaviour in schools for more information.

7.9 Concerns about an adult (including a staff member, supply teacher or volunteer)

All adults – staff, supply staff, visitors/contractors, governors, volunteers - should take care not to place themselves in a vulnerable position with a child and TTAPA staff, including those on supply, are expected to be aware of safer working practice guidance.

Guidance about conduct and safe practice, including safe use of mobile phones by staff and volunteers, will be given at induction, is in the RLT Staff Code of Conduct, the TTAPA staff handbook, and should be followed alongside information on Safer Working Practices.

We understand that:

- there may be concerns about a member of staff (including a supply teacher, volunteer or contractor);
- an allegation may be made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children;
- a learner may make an allegation against a member of staff.

If such a concern is expressed or an allegation is made, or information is received which suggests that a person may be unsuitable to work with children, the member of staff receiving the allegation or aware of the information, **will immediately inform the Headteacher**. The Head teacher on all such occasions, will discuss the content of the allegation with the LADO[5], the CEO and notify the Trust's Director of People.

If the allegation made to a member of staff concerns the Headteacher, the person receiving the allegation will immediately inform the CEO who will consult LADO and Director of People, without notifying the Headteacher first.

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

If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow our school safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

The school will follow our procedures for managing allegations against staff. We will not send a learner home pending such an investigation unless this advice is given as a result of consultation with the LADO.

Suspension of the member of staff, excluding the Headteacher, against whom an allegation has been made, needs careful consideration, and the Headteacher will seek the advice of the Trust's CEO and Director of people in order to make that decision and informing the LADO at the earliest opportunity. In the event of an allegation against the Headteacher, the decision to suspend will be made by the CEO with advice as outlined above.

We have a procedure for managing the suspension of an SLA in the event of an allegation arising against one of our AP providers.

7.10 Allegations of Abuse made against other learners

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for learners. Victims, perpetrators and any other children affected by child-on-child abuse will be supported through the school's pastoral system and the support will be regularly reviewed.

We also recognise the gendered nature of child-on-child abuse (i.e. that it is more likely that girls will be victims and boys the perpetrators). However, all child-on-child abuse is unacceptable and will be taken seriously.

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

- is serious, and potentially a criminal offence;
- could put learners in the school at risk;
- is violent;
- involves learners being forced to use drugs or alcohol;

[5] DO process can be found on the WSCB website http://www.wiganlscb.com/Professionals/LADO.aspx

- involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, up-skirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes). See *Appendix 3* for child-on-child abuse.

7.10.1 If a learner makes an allegation of abuse against another learner:

- you must record the allegation and tell the DSL, but do not investigate it;
- the DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence;
- the DSL will liaise with other professionals to put a risk assessment and support plan (including any appropriate targeted work for learners that are identified as posing a potential risk too other children) into place for all children involved including the victim(s), the child(ren) against whom the allegation has been made and any others affected, with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s);
- the DSL will contact the children and adolescent mental health services (CAMHS), if appropriate.

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator(s). We will ask the police if we have any questions about the investigation.

The Headteacher, liaising with the DSL will take the lead role in investigating and dealing with allegations including any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident does not (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA children's social care to determine this;
- there are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing.

7.11 Sharing of nudes and semi-nudes (sexting)

This is a suggested approach based on guidance from the UK Council for Internet Safety for all staff and for DSLs and senior leaders.

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

You must **not**:

- view, download, copy, print, share or save the imagery yourself, or ask a learner to share or download it. If you have already viewed the imagery by accident, you must report this to the DSL;
- delete the imagery or ask the learner to delete it;

- ask the learner(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility);
- share information about the incident with other members of staff, the learner(s) it involves or their, or other, parents and/or carers;
- say or do anything to blame or shame any young people involved.

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

Following a report of an incident, the DSL will hold an **initial review meeting** with appropriate school staff – this may include the staff member who reported the incident and the safeguarding/leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- whether there is an immediate risk to learner(s);
- if a referral needs to be made to the police and/or children's social care;
- if it is necessary to view the imagery in order to safeguard the learner (in most cases, imagery should not be viewed);
- what further information is required to decide on the best response;
- whether the imagery has been shared widely and via what services and/or platforms (this may be unknown);
- whether immediate action should be taken to delete or remove images from devices or online services;
- any relevant facts about the learners involved which would influence risk assessment;
- if there is a need to contact another school, college, setting or individual;
- whether to contact parents or carers of the learners involved (in most cases parents should be involved).

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

- the incident involves an adult;
- there is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs);
- what the DSL knows about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent;
- the imagery involves sexual acts and any child in the imagery is under 13;
- the DSL has reason to believe a learner/other child is at immediate risk of harm owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming).

If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care.

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

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

The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the learner at risk of harm. If it is necessary, the DSL will refer an incident to the police using 101 or online.

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

Learners are taught about the issues surrounding sharing nudes and semi-nudes/sexting as part of our PSHE education and e-Safety programmes. Teaching covers the following in relation to sharing nude and/or semi-nude imagery:

- what it is;
- how it is most likely to be encountered;
- the consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment;
- issues of legality;
- the risk of damage to people's feelings and reputation.

Learners also learn the strategies and skills needed to manage:

- specific requests or pressure to provide (or forward) such images;
- the receipt of such images.

Learners are also made aware of the processes the school will follow in the event of an incident.

8 Online safety and the use of mobile technology

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

To address this, TTAPA aims to:

- have robust processes (including filtering and monitoring systems) in place to ensure the online safety of learners, staff, volunteers and governors;
- educate and protect the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones');
- set clear guidelines for the use of mobile phones for the whole school community;
- have clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate;

8.1 Our approach to online safety is based on addressing the following 4 key categories of risk:

- *Content* – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism;

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

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

- educate learners about online safety as part of our curriculum. For example:
  - the safe use of social media, the internet and technology;
  - keeping personal information private;
  - how to recognise unacceptable behaviour online;
  - how to report any incidents of cyber-bullying, ensuring learners are encouraged to do so, including where they are a witness rather than a victim.
- educate and train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training at least once each academic year;
- educate parents/carers about online safety via our website, communications sent directly to them and during parents' meetings. We will also share clear procedures with them so they know how to raise concerns about online safety;
- ensure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
  - staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when learners are not present;
  - staff will not take pictures or recordings of learners on their personal phones or cameras.
- ensure all learners, parents/carers, staff, volunteers and governors are aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology;
- explain the sanctions we will use if a learner is in breach of our policies on the acceptable use of the internet and mobile phones;
- make sure all staff, learners and parents/carers are aware that staff have the power to search learners' phones, as set out in the DfE's guidance on searching, screening and confiscation;
- put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems;
- undertake an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community;

- provide regular safeguarding and child protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively;
- review our suite of safeguarding and child protection policies annually and ensure the procedures and implementation are updated and reviewed regularly.

This section summarises our approach to online safety and mobile phone use. For comprehensive details about our school's policy on online safety and the use of mobile phones, please refer to our online safety policy and mobile phone policy, which you can find on our website www.ttapa.net

8.3 Artificial Intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, learners and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Bard.

We recognise that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard learners. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose learners to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

We will treat any use of AI to access harmful content or bully learners in line with this policy, our Online Safety Policy, Anti-Bullying Policy and our Positive and our Behaviour & Relationships Policy.

Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being used by the school.

9 Notifying Parents/Carers

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

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

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

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

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

10 Children with Special Educational Needs, Disabilities or health issues

TTAPA will use the same considerations for learners with SEND, as detailed above. However, we recognise that learners with special educational needs (SEN) or disabilities or certain health conditions can face additional safeguarding challenges, and are 3 times more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group, including:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration (we consider the child first and foremost, rather than the child's SEND);
- a higher risk of vulnerability due to factors such as - a learning disability, lack of awareness, social isolation, which may contribute to risks such as online vulnerability;
- being more prone to peer group isolation or bullying (including prejudice-based bullying) than other learners;
- potentially being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs;
- communication barriers and difficulties in overcoming these barriers.

Learners with SEND can face a number of challenges to disclosure, which must be recognised and taken into account including - prejudice, negative responses and low expectations.

Any abuse involving learners with SEND will require close liaison between the DSL and the SENDCo. TTAPA will also be alert to the extra vulnerabilities these learners may face due to the nature of our setting.

11 Learners with a social worker

Learners may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health. Senior leaders, the DSL and our pastoral staff know who our most vulnerable children are.

TTAPA works with and supports children's social workers and other connected professionals to help protect vulnerable children. This includes working with and supporting children's social workers and the local authority virtual school head (VSH) for looked-after and previously looked-after children.

Where we are aware that a learner has a social worker, we will always consider this fact to ensure any decisions are made in the best interest of the leaner's safety, welfare and educational outcomes. For example, it will help to inform decisions about:

- responding to unauthorised absence or missing education where there are known safeguarding risks;
- provision of pastoral and/or academic support.

12 Looked-after and previously looked after children

TTAPA staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- key staff have relevant information about learner's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements;
- Heads of House and DSL have details of learner's social workers and relevant virtual school heads.

Mrs Roberts is the designated teacher and is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance. The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role. As part of their role, the designated teacher will:

- work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to;
- work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including how learner premium plus funding can best be used to support looked-after children and meet the needs identified in their personal education plans (PEPs).

13 Young Carers

A young carer is someone under 18 who helps look after someone in their family, or a friend, who is ill, disabled or misuses drugs or alcohol. We recognise the impact that being a Young Carer can have on learners, and the importance of identifying those young people so that appropriate support can be provided.

Wigan Safeguarding Children Board coordinates our local Young Carers Strategy. Where a learner at TTAPA is identified as having additional support needs due to being a young carer, or where a multi-agency approach may be required, we use the Early Help Framework and routes into the StartWell Service.

14 Supporting Staff

TTAPA works with partners in the safeguarding partnership to ensure positive outcomes for children and young people. We recognise that staff working in the school who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting. We support such staff by providing an opportunity to talk through their anxieties with the DSL and to seek further support as appropriate.

14.1 DSL

Due to the demanding and often distressing nature of child protection work we support staff by providing opportunities to talk to the school counsellor. In addition, safeguarding supervision is available from a trained senior member of staff for DSL to talk through the challenges of this role and to seek further support as appropriate.

DSL make use of support available by the Local Authority and the partnerships Safeguarding Team.

DSL will have oversight of Early Help and Child Protection plans with appropriate structure in place to monitor progress and outcomes in partnership with Children's Social Care and other stakeholders (check levels).

15 Physical Intervention & Use of Reasonable Force

We recognise that touch is appropriate in the context of working with children and young people, and all staff are aware of the safer working practice guidance to ensure they are clear about their professional boundary.

The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain a learner. "Reasonable" in these circumstances means using no more force than necessary. All incidents requiring physical intervention and/or restrictive physical intervention are recorded on CPOMS. TTAPA staff only use restrictive physical intervention as a last resort.

All staff are trained in PRICE methods which is an accredited positive handling technique.

We understand that physical intervention of a nature which causes injury or distress to a learner may be considered under child protection or disciplinary procedures.

16 Record keeping

TTAPA will hold records in line with the Rowan Learning Trust's records retention policy.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If staff are in any doubt about whether to record something, it is discussed with the DSL. Records will include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome.

These records will be made and stored electronically using CPOMS which is separate to the child's school file and only accessible to the DSL.

Non-confidential records will be easily accessible and available. Confidential information and records are held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual learners will be retained for a reasonable period of time after they have left TTAPA in line with the Trust's procedures.

If a learner for whom TTAPA has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main learner file.

To allow the new school/college to have support in place when the learner arrives, this should be within:

- **5 days** for an in-year transfer, or within
- **the first 5 days** of the start of a new term.

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

Records specifically concerning recruitment and pre-employment checks and records pertaining to allegations of abuse made against staff are kept in line with Rowan Learning Trust's procedures. In addition:

- our *Procedures for Managing Allegations against Staff* set out our processes on record-keeping with respect to allegations of abuse made against staff;
- out our *Procedures for Safer Recruitment* sets out our processes on record-keeping specifically with respect to recruitment and pre-appointment checks.

17 Training

17.1 All staff and volunteers have read and understood the guidance for safer working practice. They have signed that they have read and understood this policy and the latest KCSIE Part 1 and Annex B.

All staff members undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect.

We ensure training attended meets the minimum standards set out by WSCB in the document 'WSCB recommended minimum standards for child protection training'.

This training is for all staff, is regularly updated and:

- is integrated, aligned and considered as part of our whole-school safeguarding approach and wider staff training and curriculum planning;
- is in line with advice from our 3 safeguarding partners;
- includes online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring;
- has due regard to the Teachers Standards to support the expectation that teachers
    - manage behaviour effectively to ensure a good and safe environment;
    - have a clear understanding of the needs of all learners.

All staff who have contact with learners and their families have access to a range of experienced colleagues to provide them with support and coaching to promote the interests of the child and allow for confidential discussions of sensitive issues.

17.1.1 Induction

The welfare of all our learners is of paramount importance. All staff including volunteers are informed of our safeguarding procedures including whistle-blowing procedures and online safety, at induction to ensure they understand our safeguarding systems and their responsibilities and can identify signs of possible abuse or neglect. Our induction also includes:

- plan of support for individuals appropriate to the role for which they have been hired;
- confirmation of the conduct expected of staff within the school;
- opportunities for a new member of staff to discuss any issues or concerns about their role or responsibilities;
- confirmation of the line management process whereby any general concerns or issues about the person's ability or suitability will be addressed.

17.1.2 Safeguarding training

All staff have statutory safeguarding training at a level appropriate to their role which is updated every 3 years as a minimum to ensure staff understand their role in safeguarding. Any member of staff absent from this whole school session will receive this statutory training requirement on their return. Staff receive regular safeguarding and child protection

updates, including on online safety, as required but at least annually through emails, briefings and staff meetings. In addition, all staff members receive safeguarding and child protection updates (for example, via email usually from Andrew Hall, daily briefings / debriefings and staff meetings) as necessary and at least termly.

17.1.3 Preventing Radicalisation

All staff have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify learners at risk of being drawn into terrorism and to challenge extremist ideas.

17.1.4 Keeping Children safe online

All staff undertake training in online safety and this is updated as necessary. This covers online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring;

17.2 Designated Safeguarding Lead (including deputy DSLs) have additional training which is updated every two years as a minimum. The DSL also attend multi-agency courses relevant to school needs. They update their knowledge and skills at regular intervals and at least annually e.g. via e-bulletins, attending safeguarding networking events with other DSLs or taking time to read and digest safeguarding developments. They or any other designated Prevent Lead, also undertake more in depth Prevent Awareness training, including on extremist and terrorist ideologies.

17.3 Governors receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

- have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge;
- can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding.

They may choose to complete face to face training for governors provided by Wigan Council or online through National College. In addition, governors may choose to attend whole school safeguarding and child protection training. All TTAPA governors except parent governors work in schools and have received statutory child protection training in their role.

17.4 Recruitment - Interview Panels

At least one person on any appointment panel has undertaken Safer Recruitment Training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures. This training is updated every 3 years.
Refer to TTAPA & RLT Safer Recruitment Procedures

17.5 Staff who have contact with learners and families have access to a range of experienced colleagues and supervisions to provide them with support and coaching to promote the interests of the child and allow for confidential discussions of sensitive issues.

17.6 Volunteers receive appropriate training if applicable.

18 Disagreements, Escalations and Resolutions

Effective working together depends on an open approach and honest relationships between colleagues and between agencies. Staff must be confident and able to professionally disagree and challenge decision-making as an entirely legitimate activity; a part of our

professional responsibility to promote the best safeguarding practice. Staff are encouraged to press for re-consideration if they believe a decision to act / not act in response to a concern raised about a child is wrong. In such cases the WSCB Case Resolution Protocol (formerly escalation policy) is used if necessary.[6] If Wigan LA staff are on the receiving end of a professional challenge, it is considered as an opportunity to reflect on their decision making.

19 Complaints and concerns about TTAPA Safeguarding procedures

19.1 Complaints against staff

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

19.2 Other complaints

These will be handled under the TTAPA Complaints Procedures.

19.3 Whistle-blowing

We recognise that children and young people cannot be expected to raise concerns in an environment where staff fails to do so.

All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection which may include concerns about poor or unsafe practice, the attitudes or actions of colleagues and potential failures in the education settings safeguarding regime.

If it becomes necessary to consult outside the school, they can either speak to the CEO, the LADO or a representative of their professional association/union. The Rowan Learning Trust Whistleblowing Policy is available on the website and the whistle-blowing procedures are in place for such concerns to be raised.

If a staff member feels unable to raise an issue within school or the Trust or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them:

- NSPCC whistleblowing helpline - Staff can call: 0800 028 0285 from 08:00 to 20:00, Monday to Friday, or email help@nspcc.org.uk.

It is acknowledged that whistle-blowers have the right to remain anonymous, however identifying yourself may assist with any further investigations.

20 Monitoring Arrangements

Our policy and procedures will be monitored regularly, amended as required and reviewed at least annually, in line with statutory guidance. At every review, the policy will be approved by the local governing committee.

21 Links to other policies

This policy should be read alongside:

- *Anti-Bullying Procedures*
- *Attendance Policy*
- *Behaviour & Relationships Policy*

[6] http://www.wiganlscb.com/Docs/PDF/Professional/Resolution-Policy.pdf

- *Complaints Policy (RLT policy)*
- *CCTV Policy*
- *Designated teacher for looked-after and previously looked-after children*
- *First Aid Policy*
- *Health and Safety Policy*
- *ICT Acceptable Use Agreement*
- *Mobile Phone Protocols*
- *Online Safety Policy*
- *Privacy Notices (various)*
- *Procedures for Managing Allegations against Staff*
- *Procedures for Safer Recruitment*
- *Relationships & Sex Education Policy*
- *SEND Report*
- *Single Equality Scheme*
- *Whistleblowing policy (RLT policy)*

UNICEF - UNCRC

The UN Convention of the Rights of the Child sets out human rights of every person under 18 and applies to every child without discrimination, whatever their ethnicity, gender, religion, language, abilities or any other status, whatever they think or say, whatever their family background (Article 2). Articles directly relating to this policy are:

3 (Best interests of the child)	19 (Protection from violence, abuse and neglect)
5 (Parental guidance and a child's evolving capacities)	28 (Right to education)
6 (Life, survival and development)	31 (Leisure, play and culture)
8 (Protection and preservation of identity)	34 (Sexual exploitation)
9 (Separation from parents)	35 (Abduction, sale and trafficking)
11 (Abduction and non-return of children)	36 (Other forms of exploitation)
12 (Respect for the views of the child)	37 (Inhumane treatment and detention)
13 (Freedom of expression)	38 (War and armed conflicts)
14 (Freedom of thought, belief and religion)	40 (Juvenile justice)
15 (Freedom of association)	41 (Respect for higher national standards)
16 (Right to privacy)	42 (Knowledge of the rights of a child)

Appendix 1 Glossary

A Child	A person who has not yet reached their 18th birthday.
Abuse	A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those who know them or, more rarely by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.
Bullying & Cyberbullying	Behaviour that is: ➢ repeated; ➢ intended to hurt someone either physically or emotionally; ➢ often aimed at certain groups, for example because of race, religion, gender or sexual orientation.
Child-on-Child Abuse	Child-on-child abuse occurs when a young person is exploited, bullied and / or harmed by their peers who are the same or similar age; everyone directly involved in peer on peer abuse is under the age of 18.
Child Protection	Activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.
Child sexual exploitation (CSE)	Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.
Children with Special Educational Needs and/or disabilities	SEN - a child or young person has SEN if they have a learning difficulty or disability which calls for special educational provision to be made for him or her. Disability - a physical or mental impairment which has a long-term and substantial adverse effect on their ability to carry out normal day-to-day activities.
Child-on-child Abuse	Child-on-child abuse occurs when a young person is exploited, bullied and / or harmed by their peers who are the same or similar age; everyone directly involved in child-on-child abuse is under the age of 18.
County Lines	Criminal exploitation is also known as 'county lines' and is when gangs and organised crime networks exploit children to sell drugs. Often these children are made to travel across counties, and they use dedicated mobile phone ‘lines’ to supply drugs
Contextual Safeguarding	Contextual Safeguarding is an approach to understanding, and responding to, young people’s experiences of significant harm beyond their families. It recognises that the different relationships that young

	people form in their neighbourhoods, schools and online can feature violence and abuse.
Criminal Exploitation	Involves young people under the age of 18 in exploitative situations, relationships or contexts, where they may be manipulated or coerced into committing crime on behalf of an individual or gang in return for gifts, these may include: friendship or peer acceptance, but also cigarettes, drugs, alcohol or even food and accommodation.
Domestic Abuse	any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: ➢ emotional; ➢ financial; ➢ physical; ➢ psychological; ➢ sexual.
Early Help (EH)	Intervening early and as soon as possible to tackle problems emerging for children, young people and families with a population most at risk of developing problems. Effective intervention may occur at any point in a child or young person's life.
Elective Home Education (EHE)	When a parent exercise their right to provide their child's education via an alternative to school. This involves the parent working in partnership with the local authority to support the authority meeting their duty to ensure the education is efficient and suitable. In this case the safeguarding duty for the child rests with the parent or guardian. Although safeguarding concerns from schools and professional would continue as with any other case and should follow safeguarding referral routes into the MAST for triage and assessment
Emotional Abuse	The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve ➢ conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person; ➢ seeing or hearing the ill-treatment of another; ➢ serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.

	Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
Female Genital Mutilation (FGM)	Female genital mutilation (FGM) is a procedure where the female genitals are deliberately cut, injured or changed, but where there's no medical reason for this to be done.
Gangs & Youth Violence	Defining a gang is difficult. They tend to fall into three categories; peer groups, street gangs and organised crime groups. It can be common for groups of children and young people to gather together in public places to socialise, and although some peer group gatherings can lead to increased antisocial behaviour and low-level youth offending, these activities should not be confused with the serious violence of a Street Gang. A Street Gang can be described as a relatively durable, predominantly street-based group of children who see themselves (and are seen by others) as a discernible group for whom crime and violence is integral to the group's identity. An organised criminal group is a group of individuals normally led by adults for whom involvement in crime is for personal gain (financial or otherwise).
Hate	Hostility or prejudice based on one of the following things: ➢ disability; ➢ race; ➢ religion; ➢ sexual orientation; ➢ transgender identity.
Homelessness	The definition of homelessness means not having a home. You are homeless if you have nowhere to stay and are living on the streets, but you can be homeless even if you have a roof over your head. You count as homeless if you are: ➢ staying with friends or family; ➢ staying in a hostel, night shelter or B&B; ➢ squatting (because you have no legal right to stay); ➢ at risk of violence or abuse in your home; ➢ living in poor conditions that affect your health; ➢ living apart from your family because you don't have a place to live together. https://safeguarding.network/safeguarding-resources/parental-issues/homelessness/ https://www.gov.uk/guidance/homelessness-code-of-guidance-for-local-authorities
Honour-based violence	Honour based violence is a violent crime or incident which may have been committed to protect or defend the honour of the family or community.
Neglect	Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy

	as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: ➢ protect a child from physical and emotional harm or danger; ➢ ensure adequate supervision (including the use of inadequate care-givers); ➢ ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.
Modern Slavery	Modern slavery is a serious crime being committed across the UK in which victims are exploited for someone else's gain. It can take many forms including trafficking of people, forced labour and servitude. Victims are often hidden away, may be unable to leave their situation, or may not come forward because of fear or shame.
Nudes or semi-nudes (previously called sexting)	Sharing Nudes or semi-nudes is when someone shares sexual, naked or semi-naked images or videos of themselves or others, or sends sexually explicit messages. They can be sent using mobiles, tablets, smartphones, and laptops - any device that allows you to share media and messages.
Physical Abuse	A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
Private Fostering	A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. (Close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.)
Radicalisation & Extremism	Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism. Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.
Relationship Abuse	Teen relationship abuse consists of the same patterns of coercive and controlling behaviour as domestic abuse. These patterns might include some or all of the following: sexual abuse, physical abuse, financial abuse, emotional abuse and psychological abuse.
Safeguarding and promoting the welfare of children	➢ protecting children from maltreatment; ➢ preventing impairment of children's health or development; ➢ ensuring that children grow up in circumstances consistent with the provision of safe and effective care; ➢ taking action to enable all children to have the best outcomes.

Sexual Abuse	Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children
Sexual harassment	Is a type of harassment involving the use of explicit or implicit sexual overtones, including the unwelcome or inappropriate promise of rewards in exchange for sexual favours. Sexual harassment includes a range of actions from verbal transgressions to sexual abuse or assault
Sexual Violence	Is the general term we use to describe any kind of unwanted sexual act or activity, including rape, sexual assault, sexual abuse, and many others.
Trafficking	Trafficking in persons shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control of another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or removal of organs.
Upskirting	Upskirting, typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm

Appendix 2: Types of and Recognising Signs of Abuse

NB: This guidance is provided as a useful reminder of the types and indicators of abuse

When making difficult judgements around possible signs/symptoms of abuse and neglect it is crucial that we consider the available information and presenting injuries/behaviours in context. (We should also consider sources of other information which may be important but to which we do not have immediate access). **It will be the Designated Senior Lead(s) who make judgements about referrals, speaking to parents/carers and what, if any, action is to be taken in respect of concerns.**

What follows must not be considered to be a comprehensive or definitive "checklist"; children may behave strangely or appear unhappy/distressed for a number of reasons as they move through the stages of development, and as their family circumstances and experiences change. Neither does the presence of one or more of the following 'prove' that a child has been or is being abused. We need to be absolutely clear that our role is not to investigate or prove abuse but to observe, gather, record and share/report information where we have concerns. Professionals should remember that all children regardless of age, gender, ethnicity, disability, race or culture are entitled to the same level of protection (*Working Together to Safeguard Children 1999, paras 7.24-7.26)*

Abuse including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues overlap.

Signs of Abuse in Children:

The following *non-specific signs* may indicate something is wrong:

- significant change in behaviour;
- extreme anger or sadness;
- aggressive and attention-seeking behaviour;
- suspicious bruises with unsatisfactory explanations;
- lack of self-esteem;
- self-injury;
- depression;
- age inappropriate sexual behaviour;
- Child Sexual Exploitation (CSE).

Risk Indicators

The factors described in this section are frequently found in cases of child abuse. Their presence is not proof that abuse has occurred, but:

- must be regarded as indicators of the possibility of significant harm;
- justifies the need for careful assessment and discussion with designated / named / lead person, manager, (or in the absence of all those individuals, an experienced colleague);
- may require consultation with and / or referral to Children's Services.

The absence of such indicators does not mean that abuse or neglect has not occurred.

In an abusive relationship the child may:

- appear frightened of the parent/s;

- act in a way that is inappropriate to her/his age and development (though full account needs to be taken of different patterns of development and different ethnic groups).

The parent or carer may:

- persistently avoid child health promotion services and treatment of the child's episodic illnesses;
- have unrealistic expectations of the child;
- frequently complain about/to the child and may fail to provide attention or praise (high criticism/low warmth environment);
- be absent or misusing substances;
- persistently refuse to allow access on home visits;
- be involved in domestic abuse.

Staff should be aware of the potential risk to children when individuals, previously known or suspected to have abused children, move into the household.

Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning/scalding, drowning or suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent/carer feigns the symptoms of or deliberately causes ill health to a child whom they are looking after (formerly known as Munchausen's Syndrome by Proxy and more recently Fabricated or Induced Illness [Dept. of Health 2003])

The following are often regarded as indicators of concern:

- unexplained injuries bruises, bites and/or burns (often recurrent);
- inconsistent explanation / several different explanations provided for an injury;
- improbable excuses to explain injuries;
- refusal to discuss injuries;
- untreated/ Lingering injuries/illnesses;
- unexplained delay in seeking treatment;
- parents / carers are uninterested or undisturbed by an accident or injury;
- parents are absent without good reason when their child is presented for treatment;
- repeated presentation of minor injuries (which may represent a "cry for help" and if ignored could lead to a more serious injury);
- family use of different doctors and A&E departments;
- reluctance to give information or mention previous injuries;
- fear of medical help;
- admission of punishment which is excessive;
- fear of returning home or parents being contacted;
- running away;
- aggression towards others;
- self-destructive tendencies;
- arms and legs covered, even in hot weather;
- bald patches;
- shrinking from physical contact;

- unexplained patterns of absence which may serve to hide injuries;
- overly-compliant behaviour or watchfulness.

Bruising

Children can have accidental bruising, but the following must be considered as non-accidental unless there is evidence or an adequate explanation provided:

- any bruising to a pre-crawling or pre-walking baby;
- bruising in or around the mouth, particularly in small babies which may indicate force feeding;
- two simultaneous bruised eyes, without bruising to the forehead, (rarely accidental, though a single bruised eye can be accidental or abusive);
- repeated or multiple bruising on the head or on sites unlikely to be injured accidentally;
- variation in colour possibly indicating injuries caused at different times;
- the outline of an object used e.g. belt marks, hand prints or a hair brush;
- bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting;
- bruising around the face;
- grasp marks on small children;
- bruising on the arms, buttocks and thighs may be an indicator of sexual abuse.

Bite Marks

Bite marks can leave clear impressions of the teeth. Human bite marks are oval or crescent shaped. Those over 3 cm in diameter are more likely to have been caused by an adult or older child.

A medical opinion should be sought where there is any doubt over the origin of the bite.

Burns and Scalds

It can be difficult to distinguish between accidental and non-accidental burns and scalds, and will always require experienced medical opinion. Any burn with a clear outline may be suspicious e.g.:

- circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine);
- linear burns from hot metal rods or electrical fire elements;
- burns of uniform depth over a large area;
- scalds that have a line indicating immersion or poured liquid (a child getting into hot water is his/her own accord will struggle to get out and cause splash marks);
- old scars indicating previous burns/scalds which did not have appropriate treatment or adequate explanation;
- scalds to the buttocks of a small child, particularly in the absence of burns to the feet, are indicative of dipping into a hot liquid or bath.

Fractures

Fractures may cause pain, swelling and discolouration over a bone or joint. Non-mobile children rarely sustain fractures. There are grounds for concern if:

- the history provided is vague, non-existent or inconsistent with the fracture type
- there are associated old fractures;

- medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain or loss of movement;
- there is an unexplained fracture in the first year of life.

Scars

A large number of scars or scars of different sizes or ages, or on different parts of the body, may suggest abuse.

Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effect on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. It may involve:

- conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person;
- not giving a child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or now they communicate;
- age or developmentally inappropriate expectations being imposed upon children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing a child participating in normal social interactions;
- serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger;
- seeing or hearing the ill-treatment of another (including animals/pets);
- the exploitation/corruption of children.

Emotional abuse may be difficult to recognise, as the signs are usually behavioural rather than physical. The manifestations of emotional abuse might also indicate the presence of other kinds of abuse. The indicators of emotional abuse are often also associated with other forms of abuse. The following may be indicators of emotional abuse:

- developmental delay;
- continual self-deprecation;
- desperate attention seeking behaviour;
- inappropriate emotional response to 'painful' situations;
- abnormal attachment between a child and parent/carer e.g. anxious, indiscriminate or not attachment;
- air of detachment and 'don't care' attitude;
- aggressive behaviour towards others;
- scapegoated within the family;
- frozen watchfulness, particularly in pre-school children;
- low self-esteem and lack of confidence;
- fear of new situations/people, social isolation – doesn't join in;
- drug/solvent abuse;
- eating problems (loss of appetite);
- self-harm, mutilation;
- depression;

- withdrawn or seen as a “loner” – difficulty relating to others.

Sexual Abuse

Sexual abuse involves enticing or forcing a child/young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:

- physical contact, including assault by penetration (for example rape or oral sex) and non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing;
- non-contact activities such as involving children in looking at, or in the production of sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including via the internet).

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Boys and girls of all ages may be sexually abused and are frequently scared to say anything due to guilt and/or fear. This is particularly difficult for a child to talk about and full account should be taken of the cultural sensitivities of any individual child/family. Recognition can be difficult, unless the child discloses and is believed.

There may be no physical signs and indications are likely to be emotional/behavioural.

Some behavioural indicators associated with this form of abuse are:

- sudden changes in behaviour and/or school performance;
- inappropriate displays of affection in a sexual way inappropriate to age;
- tendency to cling or need reassurance;
- regression to younger behaviour e.g. thumb sucking, acting like a baby;
- sexualised/sexually explicit behaviour, play or conversation, inappropriate to the child’s age;
- continual and inappropriate or excessive masturbation;
- depression and withdrawal;
- sleep disturbances, nightmares;
- phobias and panic attacks;
- self-harm (including eating disorder), self-mutilation and suicide attempts;
- involvement in prostitution or indiscriminate choice of sexual partners;
- distrust of a familiar adult or anxiety about being left with a relative, babysitter, older person or lodger;
- unexplained gifts or money;
- apparent secrecy;
- fear of undressing e.g. for sports (not related to cultural norms or physical difficulties).

Some physical indicators associated with this form of abuse are:

- scratches, abrasions or signs of restraint;

- complaints of genital and/or anal itching, bleeding and/or pain;
- blood on underclothes;
- bedwetting, daytime wetting and/or soiling;
- difficulty/pain in passing urine/faeces;
- unexplained pregnancy especially if father is undisclosed (in a younger girl);
- chronic illness e.g. throat infections, water infections, STDs;
- physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs;
- presence of semen on vagina, anus, external genitalia or clothing.

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. It may involve a parent or carer failing to:

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

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. Neglect may occur during pregnancy as a result of maternal substance abuse. Evidence of neglect is built up over a period of time and can cover different aspects of parenting.

Possible indicators include:

- child's basic needs are not by parents/carers e.g. adequate food, clothes, warmth, hygiene and medical care;
- child is seen to be listless, apathetic and irresponsive with no apparent medical cause;
- child does not grow within normal expected pattern, with accompanying weight loss;
- child thrives away from home environment;
- constant hunger / tiredness;
- compulsive stealing and/or scavenging/scrounging;
- emaciation;
- poor personal hygiene / inappropriate clothing;
- frequent lateness or non-attendance at school;
- low self-esteem & poor social relationships/skills;
- neurotic behaviour;
- non-organic failure to thrive;
- destructive tendencies;
- untreated medical problems / failure to attend appointments;
- child left with supervision e.g. adults/carers who are intoxicated or violent;
- child abandoned or left alone for excessive periods;
- running away;
- excessive care/responsibility for caring for siblings.

Appendix 3 Specific Safeguarding Issues

This appendix is based on Department for Education's statutory guidance, Keeping Children Safe in education, in particular Annex B.

Annex B also includes information on further issues to be aware of, including child abduction and community safety incidents, children's involvement in the court system, children with family members in prison, county lines, modern slavery and cybercrime. Each DSL has received training in specific areas of child protection – please speak to them if you are concerned

TTAPA will

- work to establish and maintain an ethos where learners feel secure and are encouraged to talk and are always listened to;
- include regular consultation with learners;
- ensure that all learners know there is a trusted adult whom they can approach if they are worried or in difficulty;
- include safeguarding across the curriculum;
- ensure all staff are aware of school guidance for their use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks.

Bullying

Our school policy on anti-bullying is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. This includes all forms, e.g. Cyber, racist, homophobic and gender related bullying.

All staff are aware that children with SEND and/or differences/perceived differences are more susceptible to being bullied/victims of child abuse.

We keep a record of known bullying incidents including racist incidents.

Children who are absent from education

A child being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- are at risk of harm or neglect;
- cease to attend a school;
- go missing or run away from home or care;
- are at risk of forced marriage or FGM;
- come from Gypsy, Roma, or Traveller families;
- are supervised by the youth justice system;
- come from the families of service personnel;
- come from new migrant families.

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named and adhering to requirements with respect to sharing

information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff are trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Children Missing Education (CME)

TTAPA follows Wigan Council's Procedures for CME which stresses that:

- education settings must:
  - enter learners on the admission register at the beginning of the first day on which the setting has agreed, or been notified, that the learner will attend. If a learner fails to attend on the agreed or notified date, the education setting should undertake reasonable enquiries to establish the child's whereabouts and consider notifying the local authority at the earliest opportunity;
  - must monitor learners' attendance through their daily register. Settings should agree with their local authority the intervals at which they will inform local authorities of the details of learners who fail to attend regularly or have missed ten school days or more without permission. Education settings should monitor attendance closely and address poor or irregular attendance;
  - arrange full-time education for excluded learners from the sixth school day of a fixed period exclusion. This information can be found in the *Exclusion from maintained schools, academies and pupil referral units in England* statutory guidance;
  - have a safeguarding duty in respect of their learners, and as part of this should investigate any unexplained absences. Academies and independent schools have a similar safeguarding duty for their learners. Further information about schools' safeguarding responsibilities can be found in the Keeping Children Safe in Education.
  - make reasonable enquiries for CME
    - The term 'reasonable enquiries' grants education settings and local authorities a degree of flexibility in decision-making, particularly as the steps that need to be taken in a given case will vary. The term 'reasonable' also makes clear that there is a limit to what the school and local authority is expected to do.
    - In line with the duty under section 10 of the Children Act 2004, the expectation is that the education setting, and the local authority will have in place procedures designed to carry out reasonable enquiries. The type of procedures may include the appropriate person checking with relatives, neighbours, landlords – private or social housing providers – and other local stakeholders who are involved. They should also record that they have completed these procedures. If there is reason to believe a child is in immediate danger or at risk of harm, a

referral should be made to children's social care (and the police if appropriate).

Staff report immediately to the D/DSL, if they know of any child who may be:

- missing – whereabouts unknown and unable to make contact (as a result of making reasonable enquiries)
- missing education – (compulsory school age (5-16) with no school place and not electively home educated)

The Local Authority requires Education Settings to complete the **'Children Missing Education'** referral form. **(***Appendix 4***)** This form should be completed once the setting has completed reasonable enquires but failed to locate the child following 10 days of absence. The first part should be completed by school and submitted to the Early Help Hub ehh@wigan.gov.uk . The EHH will then complete further checks to ensure all lines of enquiry have been exhausted, before it is agreed the child is removed from roll.

Making these enquiries may not always lead to establishing the location of the child, but will provide a steer on what action should be taken next, for example, to contact the police, children's social care and, in cases where there may be concerns for the safety of a child who has travelled abroad, the Foreign and Commonwealth Office.

Where a learner has not returned to school for ten days after an authorised absence, or is absent from school without authorisation for twenty consecutive school days they can only be removed from the admission register under regulation 8(1), sub-paragraph (f)(iii) or (h)(iii) if the school and the local authority have failed to establish the learner's whereabouts after **jointly** making reasonable enquiries. Local authorities and education settings should agree roles and responsibilities locally in relation to making joint enquiries. This only applies if the setting does not have reasonable grounds to believe that the learner is unable to attend because of sickness or unavoidable cause.

The designated teacher for CLA and care leavers to discuss any unauthorised / unexplained absence of a Looked After Children with the Virtual School Team, when required.

Children who do not attend school regularly can be at increased risk of abuse and neglect. Where there is unauthorised / unexplained absence, and after reasonable attempts have been made to contact the family, the DSL follows the WSCB procedure and refers to Children's Services as appropriate.

Where there are no known welfare concerns about a learner, follow procedures for recording school absence in line with *DfE School attendance guidance 2021* School attendance: guidance for schools - GOV.UK (www.gov.uk). Should a learner's attendance become a cause for concern it is advisable to intervene early to prevent entrenched non-school attendance. School should make contact with the Early Help Hub (EHH) to initiate an Early Help, if appropriate. This will evidence and identify the barriers impacting on the learner's engagement with school.

Child Criminal Exploitation / County Lines (CCE)

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into 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.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- appearing with unexplained gifts or new possessions;
- associating with other young people involved in exploitation;
- suffering from changes in emotional wellbeing;
- misusing drugs and alcohol;
- going missing for periods of time or regularly coming home late;
- regularly missing school or education;
- not taking part in education.

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

The following list of indicators is not exhaustive or definitive but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of Criminal Exploitation / County Lines:

- returning home late, staying out all night or going missing;
- being found in areas away from home;
- increasing drug use, or being found to have large amounts of drugs on them;
- being secretive about who they are talking to and where they are going;
- unexplained absences from school, college, training or work;
- unexplained money, phone(s), clothes or jewellery;
- increasingly disruptive or aggressive behaviour;
- using sexual, drug-related or violent language you wouldn't expect them to know;
- coming home with injuries or looking particularly disheveled;
- having hotel cards or keys to unknown places.

Child Sexual Exploitation (CSE)

Child sexual exploitation (CSE) is a form of abuse 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 or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- having an older boyfriend or girlfriend;
- suffering from sexually transmitted infections or becoming pregnant.

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

The following list of indicators is not exhaustive or definitive but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of sexual exploitation.

Signs include:

- underage sexual activity;
- inappropriate sexual or sexualised behaviour;
- sexually risky behaviour, 'swapping' sex;
- repeat sexually transmitted infections;
- in girls, repeat pregnancy, abortions, miscarriage;
- receiving unexplained gifts or gifts from unknown sources;
- having multiple mobile phones and worrying about losing contact via mobile;
- having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs);
- changes in the way they dress;
- going to hotels or other unusual locations to meet friends;
- seen at known places of concern;
- moving around the country, appearing in new towns or cities, not knowing where they are;
- getting in/out of different cars driven by unknown adults;
- having older boyfriends or girlfriends;
- contact with known perpetrators;
- involved in abusive relationships, intimidated/fearful of certain people or situations;
- hanging out with groups of older people, or anti-social groups, or with other vulnerable peers;
- associating with other young people involved in sexual exploitation;
- recruiting other young people to exploitative situations;
- truancy, exclusion, disengagement with school, opting out of education altogether;

- unexplained changes in behaviour or personality (chaotic, aggressive, sexual);
- mood swings, volatile behaviour, emotional distress;
- self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders;
- drug or alcohol misuse;
- getting involved in crime;
- police involvement, police records;
- involved in gangs, gang fights, gang membership;
- injuries from physical assault, physical restraint, sexual assault.

Child-on-Child Abuse

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside or outside of school. It can also take place both face-to-face and online and can simultaneously take place between the two. All children have a right to attend school and learn in a safe environment. All child-on-child abuse is unacceptable and will be taken seriously.

We have a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are no reports, that does not mean that this kind of abuse is not happening – we have an attitude of "it could happen here".

Child-on-child abuse is not tolerated, passed off as "banter" or seen as "part of growing up". It is likely to include, but not limited to:

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

Where children abuse their peers online, this can take the form of, for example, abusive, harassing and misogynistic messages; the non-consensual sharing of indecent images

especially around chat groups; and the sharing of abusive images and pornography to those who do not want to receive such content.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in Section 7 of this policy, as appropriate.

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

Domestic Abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have to leave the family home as a result. Older children may also experience domestic abuse and/or violence in their own personal relationships.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that is not physical, as well as witnessing the ill treatment of others – for example, the impact of all forms of domestic abuse on children.

Anyone can be a victim of domestic abuse regardless of gender, age, ethnicity, economic status, sexuality or background, and domestic abuse can take place inside or outside the home. Children who witness domestic abuse are also victims. Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

If police are called to an incident of domestic abuse and/or violence and any children in the household have experienced/witnessed the incident, the police will inform the key adult in school (who is also a DSL) before the child or children arrive at school the following day. This partnership is called *Operation Encompass*, a nationwide system which facilitates the sharing of information relating to domestic incidents where children live or frequent.

We are notified of any incidents of domestic violence involving our learners reported to the police so we can effectively support the learner. The DSL provides support according to the learner's needs and update records about their circumstances.

Elective Home Education (EHE)

TTAPA follows Wigan Council's Policy and Procedures with regards to elective home education. *(See Appendix 5)*

Schools should inform the local authority when a child is being withdrawn to Electively Home Educate (EHE) this allows the local authority EHE team to oversee suitability of education as outlined in Elective Home Education Guidance for local authorities and Elective home education guidance for parents and carers. This guidance is applicable to school practice and safeguarding duty.

Parents have a right to educate their children at home. Section 7 of the Education Act 1996 provides that:

"The parent of every child of compulsory school age shall cause him to receive efficient full-time education suitable –

(a) to his age, ability and aptitude, and

(b) to any special educational needs he may have, either by regular attendance at school or otherwise."

When a parent writes to inform school of their intention to withdraw a child the DfE recommends that the school arrange a meeting with the parent/guardian to discuss the reasons to withdraw. Wigan EHE team would recommend this is a member of senior leadership team, DSL or inclusion manager to support the parent to consider the wider implications of EHE as set out in guidance.

We will contact the local authority EHE team for further information via ehe@wigan.gov.uk

Extremism and Radicalisation – preventing radicalisation

Protecting children from the risk of radicalisation is part of TTAPA's wider safeguarding duties.

Our policy is aligned with and reflect the processes described in the Wigan's Prevent Policy and Procedure and has been written to comply with the schools duty under Section 26 of the Counter Terrorism and Security Act 2015 in accordance with the Department of Education advice for schools specific guidance for schools https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/439598/prevent-duty-departmental-advice-v6.pdf

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

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

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 of terrorism 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.

Schools have a duty to prevent children from being drawn into terrorism. The DSL, or designated Prevent Lead, undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

When necessary, TTAPA will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We ensure that suitable internet filtering is in place and equip our learners to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period. As with managing other safeguarding risks, staff are alert to changes in learner's behaviour that could indicate that they are in need of protection.

The government website Educate Against Hate and charity NSPCC say that signs that a child is being radicalised can include:

- refusal to engage with, or becoming abusive to, peers who are different from themselves;
- becoming susceptible to conspiracy theories and feelings of persecution;
- changes in friendship groups and appearance;
- rejecting activities they used to enjoy;
- converting to a new religion;
- isolating themselves from family and friends;
- talking as if from a scripted speech;
- an unwillingness or inability to discuss their views;
- a sudden disrespectful attitude towards others;
- increased levels of anger;
- increased secretiveness, especially around internet use;
- expressions of sympathy for extremist ideologies and groups, or justification of their actions;
- accessing extremist material online, including on Facebook or X (formerly Twitter)
- possessing extremist literature;
- being in contact with extremist recruiters and joining, or seeking to join, extremist organisations.

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour. Staff use their professional judgement in identifying learners who might be at risk of radicalisation and act proportionately which may include making a referral to the Channel programme.

Staff should always take action if they are worried following the procedures outlined in Section 7.7 of this policy***.***

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

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

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

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to

a learner. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.
In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- think someone is in immediate danger;
- think someone may be planning to travel to join an extremist group;
- see or hear something that may be terrorist-related.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The pastoral staff will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

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

So-called 'Honour-based' abuse (including FGM and Forced Marriage)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

Female Genital Mutilation (FGM)

The Female Genital Mutilation Act 2003 was amended by the Serious Crime Act 2015 where the law was extended to:

- a non-UK national who is 'habitually resident' in the UK and commits such an offence abroad can now face a maximum penalty of 14 years imprisonment. It is also an offence to assist a non-UK resident to carry out FGM overseas on a girl who is habitually, rather than pertinently, resident in the UK. This follows a number of cases where victims were unable to get justice as FGM was committed by those not permanently residing in the UK;
- a new offence is created of failing to protect a girl from the risk of FGM. Anyone convicted can face imprisonment for up to seven years and / or and unlimited fine;
- anonymity for the victims of FGM. Anyone identifying a victim can be subject to an unlimited fine.

TTAPA recognises and adheres to its mandatory duty to report any suspected or known cases of FGM about a female under 18 years old to the police. Our safeguarding and pastoral teams will maintain up to date knowledge of the Greater Manchester Safeguarding Partnership Protocol to Female Genital Mutilation.

It is essential that staff are aware of FGM practices and the need to look for signs, symptoms and other indicators of FGM. It involves procedures that intentionally alter/injure the female genital organs for non-medical reasons. It is also known as female circumcision, but this is incorrect as circumcision means 'to cut' and 'around' (Latin), and it is quite

dissimilar to the male procedure. It can also be known as female genital cutting. The Somali term is 'Gudnin' and in Sudanese is 'Tahur'.

FGM is not like male circumcision – it is very harmful and can cause long-term medical and physical suffering, menstrual and sexual problems, difficulty in giving birth, infertility and even death. The average age for FGM to be carried out is about 14 years old, however it can vary from soon after birth, up until adulthood.

4 types of procedure:

- Type 1 Clitoridectomy – partial/total removal of clitoris;
- Type 2 Excision – partial/total removal of clitoris and labia minora;
- Type 3 Infibulation entrance to vagina is narrowed by repositioning the inner/outer labia;
- Type 4 all other procedures that may include: pricking, piercing, incising, cauterising and scraping the genital area.

Why is it carried out?

Belief that FGM:

- brings status/respect to the girl – social acceptance for marriage;
- preserves a girl's virginity;
- part of being a woman / rite of passage;
- upholds family honour;
- cleanses and purifies the girl;
- gives a sense of belonging to the community;
- fulfils a religious requirement;
- perpetuates a custom/tradition;
- helps girls be clean / hygienic;
- is cosmetically desirable;
- mistakenly believed to make childbirth easier.

Indicators that FGM has already occurred include:

- learner confiding in a professional that FGM has taken place;
- mother/family member disclosing that FGM has been carried out;
- a family/learner already known to social care in relation to other safeguarding issues;
- disclosure;
- repeated absence from school or prolonged absence from school/other activities;
- mentioning something somebody did to them that they are not allowed to talk about;
- a girl:
    - having difficulty walking, sitting or standing or looking uncomfortable;
    - finding it hard to sit still for long periods of time (where this was not previously a problem);
    - spending longer in the toilet/bathroom due to difficulties urinating;
    - having frequent urinary, stomach or menstrual problems including repeated urinal tract infection;
    - reluctance to take part in physical activity;

- demonstrating increased emotional and psychological needs such as withdrawal or depressions or significant behavioural change (particularly on return from a holiday abroad);
- being reluctant to undergo any medical examinations;
- asking for help, but not being explicit about the problem;
- talking/complaining about pain or discomfort between the legs;

➢ secretive behaviour, including isolating themselves from the group;
➢ midwives/GPs/obstetricians may become aware the FGM has taken place when treating a pregnant (young) woman.

Potential Signs that a learner may be at risk of FGM include:

➢ family having a history of practising FGM (this is the biggest risk factor to consider) e.g knowledge that the girl/young woman's mother, older sibling or cousin has undergone FGM;
➢ FGM being known to be practised in the child's community or country of origin - child's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leon, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afghani, Kurdistan, Indonesia and Pakistan) especially if there are elderly women present in the extended family;
➢ parent or family member expressing concern that FGM may be carried out;
➢ family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues;
➢ family request an extended absence from school;
➢ a girl:
- having a mother, older sibling or cousin has undergone FGM;
- having limited level of integration within UK society;
- talking/confiding/expressing anxiety (to a professional) about getting ready for a 'special ceremony/occasion' or 'special procedure' to 'become a woman';
- talking of a long holiday/visit to her country of origin or another country where the practice is prevalent or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period;
- child talks about going abroad to be 'cut' or to prepare for marriage
- requesting help from an adult because she is aware or suspects that she is at risk of FGM (including immediate risk)
- talking about FGM in conversation either in relation to themselves or another female friend/relative;
- being unexpectedly absent from school;
- having sections missing from the 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

The 'One Chance' rule - As with Forced Marriage there is the 'One Chance' rule. It is essential that settings / schools / colleges take action **without delay**.

If you discover FGM has taken place or a learner is at risk of FGM

The Department for Education's Keeping Children Safe in Education explains that FGM comprises "all procedures involving 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. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Any teacher who either

- is informed by a girl under 18 that an act of FGM has been carried out on her; or
- observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour/birth; or
- discovers that an act of FGM appears to have been carried out on a learner under 18

must immediately report this to the police, personally.

This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it. Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

Any other member of staff who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a **learner under 18** must speak to the DSL and follow our local safeguarding procedures.

Any member of staff who suspects a learner is *at risk* of FGM or suspects that FGM has been carried out must speak to the DSL and follow our local safeguarding procedures.
The duty for teachers mentioned above does not apply in cases where a learner is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine learners.

Forced Marriage

This is an entirely separate issue from arranged marriage.

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

Young men and women can be at risk in affected ethnic groups. Whistle-blowing may come from younger siblings. Other indicators may be detected by changes in adolescent behaviours. Never attempt to intervene directly as a school or through a third party.

Key staff will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

If a member of staff suspects that a learner is being forced into marriage, they will speak to the learner about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- speak to the learner about the concerns in a secure and private place;

- activate the local safeguarding procedures and refer the case to the local authority's designated officer;
- seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk;
- refer the learner to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate.

Missing Learners

Our procedures are designed to ensure that a child who goes missing during the day is found and returned to effective supervision as soon as possible. If a learner goes missing from our own site, we will conduct a thorough search of the site, using CCTV footage in the first instance.

If we can see on CCTV footage that the learner has left site we would ring the numbers we have to alert parents/carers their child is not in our care. We would advise parents and carers to contact the police to report that their child had absconded from site. If the child was known to external agencies such as social care we would also alert professionals that the child had absconded.

If the child has not been found within the first 10 minutes of the search or we cannot find the child, even with scrutiny of CCTV footage we will inform the parents/carers their child is not in our care. If after a further search of the entire site, local walking routes and extended CCTV footage, we will contact parents/carers again to keep them informed, as well as ringing the police.

Non-collection of children

If a child is usually collected at the end of the session/day by their parent/carer and this does not happen, we will:

- contact the child's parent/carer;
- if there is no answer, we will contact the next emergency contact detail we have recorded in the learners profile;
- if the child has any agency working with them, such as Social Care, StartWell etc, we will contact the worker;
- conduct a home visit;
- ring the police;
- ring the Children's Central Duty Team.

Sexual Violence & Sexual Harassment between children in school

We recognise that allegations of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made. Decisions will be made on a case by case basis with the DSL taking a leading role, supported by other agencies such as Children's Social Care and the Police as required[7].

Sexual violence and sexual harassment can occur:

- between two children of any age and sex;
- through a group of children sexually assaulting or sexually harassing a single child or group of children;

[7] https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/719902/Sexual_violence_and_sexual_harassment_between_children_in_schools_and_colleges.pdf

- online and face to face (both physically and verbally).

Sexual violence and sexual harassment exist on a continuum and may overlap.

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 and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they 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 any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them;
- regularly review decisions and actions, and update policies with lessons learnt;
- look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns;
- consider if there are wider cultural issues within school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again;
- remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs.

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBTQ+) children are at greater risk.

Staff should be aware of the importance of:

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

The boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred. The determination of whether behaviour is developmental, inappropriate or abusive will hinge around the related concepts of true consent, power imbalance and exploitation. This may include children and young people who exhibit a range of sexually problematic behaviour such as indecent exposure, obscene telephone calls, fetishism, bestiality and sexual abuse against adults, peers or children.

Developmental Sexual Activity encompasses those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional and behavioural relationships with each other. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent.

Inappropriate Sexual Behaviour can be inappropriate socially, in appropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a child or young person. It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry, physical damage, etc. it may also be that the behaviour is "acting out" which may derive from other sexual situations to which the child or young person has been exposed. If an act appears to have been inappropriate, there may still be a need for some form of behaviour management or intervention. For some children, educative inputs may be enough to address the behaviour.

Abusive sexual activity included any behaviour involving coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base.

Assessment

In order to more fully determine the nature of the incident the following factors should be given consideration. The presence of exploitation in terms of:

- **Equality** – consider differentials of physical, cognitive and emotional development, power and control and authority, passive and assertive tendencies
- **Consent** – agreement including all the following:
  - understanding that is proposed based on age, maturity, development level, functioning and experience;
  - knowledge of society's standards for what is being proposed;
  - awareness of potential consequences and alternatives;
  - assumption that agreements or disagreements will be respected equally;
  - voluntary decision;
  - mental competence.
- **Coercion –** the young perpetrator who abuses may use techniques like bribing, manipulation and emotional threats of secondary gains and losses that is loss of love, friendship, etc. Some may use physical force, brutality or the threat of these regardless of victim resistance.

In evaluating sexual behaviour of children and young people, the above information should be used only as a guide. All safeguarding concerns or allegations made against another child/young person should be reported to the Designated Safeguarding Lead(s).

Serious violence

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- increased absence from school;
- change in friendships or relationships with older individuals or groups;
- significant decline in performance;
- signs of self-harm or a significant change in wellbeing;
- signs of assault or unexplained injuries;
- unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above).

Risk factors which increase the likelihood of involvement in serious violence include:

- being male;
- having been frequently absent or permanently excluded from school;
- having experienced child maltreatment;
- having been involved in offending, such as theft or robbery.

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a learner being involved in, or at risk of, serious violence, they will report this to the DSL.

Sharing Nude/Semi-Nude Images and/or Videos

This is a suggested approach based on guidance from the UK Council for Internet Safety for all staff and for DSLs and senior leaders.

If you are made aware of an incident involving the sharing of nude or semi-nude imagery (also known as sexting or 'youth produced sexual imagery'), you must report it to the DSL immediately. You must **not**:

- view, download or share the imagery yourself, or ask a learner to share or download it. If you have already viewed the imagery by accident, you must report this to the DSL;
- delete the imagery or ask the learner to delete it;
- ask the learner(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility);
- share information about the incident with other members of staff, the learner(s) it involves or their, or other, parents and/or carers;
- say or do anything to blame or shame any young people involved.

You should explain that you need to report the incident and reassure the learner(s) that they will receive support and help from the DSL. Refer to Section 7 for further details.

Visitors

All visitors are required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s) in a safe and secure place during the visit.

If a visitor is unknown to our school, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification, including a photograph.

Visitors are expected to sign in using INVENTRY and to wear the printed badge with their name and photograph clearly visible at all times whilst on our sites. Visitors to the school who are here for a professional purpose will be asked to show their official photo ID and:

- will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- the organisation sending the professional will provide prior written confirmation that an appropriate level DBS check has been carried out.

All other visitors, including visiting speakers will be accompanied by a member of TTAPA staff at all times. We will not invite into school any speaker who is known to disseminate extremist views and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise learners and/or staff.

Appendices 6 – 8 confirm DBS checks are in place for Wigan Council, NHS and Rowan Learning Trust staff

For comprehensive details about our school's policy for visitors and statement of provider access please refer to our online safety policy and mobile phone policy, which you can find on our website www.ttapa.net

Appendix 4: Children Missing Education (CME)

CHILDREN MISSING EDUCATION REFERRAL & CHECKLIST
September 2020 v4

As outlined in the statutory guidance for Local Authorities 'Children Missing from Education' are children of compulsory school age who are not a registered pupil at a school or are not receiving suitable education other if they are not registered at a school.

Where a pupil has not returned to school for ten days without authorisation the school and the local authority have a responsibility to jointly make reasonable enquiries to establish the whereabouts of the child. The appropriate completion of this checklist ensures that the Local Authority and school have fulfilled this responsibility.

It is school's responsibility to follow up all unexplained and unexpected absences in a timely manner and every effort should be made to establish the reason for a pupil's absence. If you require advice and guidance please contact the Multi-Agency Safeguarding Team on 01942 828300.

It is important that one checklist is completed for each child within the family, please do not include all children on one.

During the first 10 days of absence (reason unknown), school must complete this referral form and checklist. Once completed if the child's whereabouts remains unknown, please make a referral to the Multi-Agency Safeguarding Team CINdutyteam@wigan.gov.uk

At any point if you feel a child is at risk of significant harm, FGM, human trafficking or sexual exploitation refer immediately to social care please contact 01942 82830

Please note that if the child is residing or located in the Wigan Borough, they are not a CME and should not be removed from school roll. Policies in relation to school attendance should be followed in these cases.

CHILD'S INFORMATION:

Child's Name:		DOB:
Child's Address:		
Previous Address: (if known)		
School:		
Parent/carer's names:		
Parent/carer's address:		
Contact names & numbers: (include emergency)		
Any known siblings & school:		
Reason for CME checks:		
Any other agencies involved:		
Known vulnerability/risk factors Do you feel this child is at risk of harm or neglect **Y/N** please provide detail:		
Is this child Gypsy Roma Traveller? **Y/N**		
Is this child an Asylum Seeker?		
Is this child known to Operation Encompass? **Y/N** Please provide detail		
Is this child parents service personnel? **Y/N**		
Has this child had any Missing from home episodes? **Y/N Please circle** Current or historic		
Is this child known to the Youth Justice System? **Y/N Please circle** current or historic		
Does this child have any SEN/learning needs? **Y/N**		
Are there any other vulnerabilities you are aware of? Please provide detail including whether the child is at risk of criminal exploitation or Child Sexual Exploitation		
Date:		

All boxes must be completed, of not relevant please enter N/A

CHECKLIST:

School checklist	Dates/ Times	Outcomes	Name
School to attempt to contact parent on first day of absence. This includes Truancy Call, First Day calling, Text, Email, all emergency contacts. Please detail all contact methods - whether a message was left, if the phone is working, is there an international dialling tone.			
School to check possible whereabouts with staff and pupils? This should include checking with family friends, all staff members, the child's friends, social media Contact all emergency contact numbers you hold in school.			
Visit to address(es) by school. Leave card if no answer Does the property look empty? Is someone at home but not answering the door? NB if school policy does not permit home visit a police welfare check to be requested			
Contact made with involved agencies within 5 working days (Social Care, EMAS team, School Nurse etc)			
Contact made with agencies to understand when they last had contact/saw the child (no consent needed) - Social care - school nurse (when did health have any contact with the child)			
School to contact the new school or Local Authority the child is believed to have moved to? What were the outcomes? https://www.gov.uk/find-local-council			
NB – Has the child been seen? State when & by whom If not seen, what further action has been taken? (Refer to CME Policy Doc for advice)			

ALL BOXES MUST BE COMPLETED, IF NOT RELEVANT PLEASE ENTER N/A

Please submit this referral to
CINdutyteam@wigan.gov.uk

Contact the MAST team on 01942 828300 for any further advice.

Appendix 5: Elective Home Education (EHE)

Elective Home Education
Information Request Form

The following student's parent/carer has requested they be educated from home. It would be useful if the appropriate member of staff could provide the information requested below, where appropriate.
Please return to Ehe@wigan.gov.uk

Student Name:	**DoB:**
School:	**Year:**
Parent/Carer	**Contact Details (email & phone)**
Address	

Communication with Parents	YES / NO	
Safeguarding	YES / NO	
LAC **Child Protection** **Child in Need** **CAFAS/similar assessment completed/offered?**	YES / NO YES / NO YES / NO YES / NO	
Agency/Service involvement **EAL? If yes, fluency of parent &** **child in English**	YES / NO YES/NO	
Attendance Concerns	YES / NO	
Permanent / Fixed term exclusions	YES / NO	
Medical diagnosis/needs	YES / NO	
SEND: Band K (SEN support) / EHCP? Please give a brief summary of need and support.		
Behaviour Overview.		

Brief description of home circumstances. **.**
Are there considered to be any risks to a lone worker when visiting the home?
Reason given for choosing to home educate (if known)

Completed by:

NAME: **Date:**

POSITION:

Please also send a copy of the withdrawal letter to ehe@wigan.gov.uk

Appendix 6

to: All Schools and Academies

Our reference:	HRESC
Your reference:	
Please ask for:	HR Employment Service Centre
Extension:	2333
Direct line:	01942 827333
Date:	16th September 2021

Dear Colleague

DBS Checks for School Visitors

I write to confirm the situation regarding safeguarding checks for council employees who visit and work within Wigan schools and settings.

I can confirm that any visitor who is employed by Wigan Council will have had their post assessed for eligibility for a DBS check, including an assessment of the work they do directly in schools and settings. I can therefore confirm that council employees would not have been employed without an acceptable clearance being received. Therefore, if your visitor is a current Wigan Council employee you can be assured that they have received the appropriate clearances in line with the national safeguarding guidance and this letter will provide the evidence you will require for your records. You should of course check their Wigan Council badge to confirm their identity.

I hope you find this advice useful. If you have any questions or wish to clarify any areas, please contact me. As lead counter signatory, I am available to provide advice on any DBS issues you may have.

Yours sincerely,

Alison Hibbert
Lead Counter Signatory

Appendix 7

Bridgewater Community Healthcare NHS

NHS Foundation Trust

Human Resources
Bevan House
Beecham Court
Smithy Brook Road
Wigan
WN3 6PR

Tel: 01942 482965

Wigan Borough Head Teachers
9th February 2017

Dear Head Teacher

RE: DBS Checks

Bridgewater Community Healthcare NHS Foundation Trust operates a Disclosure and Barring Service (DBS) Policy based on the requirements of the Police Act 1997 and the mandatory pre-employment checking procedure requirements of the Department of Health. The Policy ensures that enhanced DBS checks are mandatory for every staff member who has access to children or vulnerable adults as part of their normal duties or standard DBS checks for staff who have access to health care records. New staff are not allowed to start in post until their DBS and all other relevant pre-employment checks have been completed. Such checks must be satisfactory and in line with national NHS safe recruitment standards.

In line with the requirements of this Policy, all staff working with children or vulnerable adults are subject to enhanced DBS checks prior to being offered a contract of employment.

All Trust staff are required to display their identification badges on their person at all times to confirm to Schools and other providers that they are subject to this safeguarding process. Where a DBS disclosure provides information about allegations and/or convictions relating to children or an allegation is made about an existing member of staff, the nominated Senior Officer will share that information with the Local Authority Designated Officer in accordance with the requirements of Safeguarding Vulnerable Groups Act 2006.

If you have any further queries, please do not hesitate to contact the Trust's Human Resources Department via the contact details detailed at the top of this letter.

We are more than happy to work with you and members of your Team to confirm/validate our staff members' identification when they present at your premises.

Yours sincerely

Paula Woods

Paula Woods
Assistant Director Workforce

Appendix 8

Three Towers
An Alternative Provision Academy
Expanding Horizons

Dear Colleague

We confirm that, just as in other publicly funded schools, all Three Towers staff are recruited in line with DfE guidance outlined in **Keeping Children Safe in Education (KCSIE).**
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1161273/Keeping_children_safe_in_education_2023_-_statutory_guidance_for_schools_and_colleges.pdf

This includes the following vetting procedures:

- Completion of a comprehensive, standardised application form;
- A face-to-face interview, assessing the candidate's suitability to work with children and young people;
- Interview panel contains at least one member who has completed Safer Recruitment in education training within the last two years;
- A minimum of two satisfactory references;
- Employment history checks – including any gaps or discrepancies;
- Identity checks in-line with the DBS regulations;
- Proof of address;
- Proof of National Insurance number;
- Proof of qualifications (where these are a requirement of the role);
- Prohibition / Interim Prohibition Order check (for teachers employed on/after 02/09/2013);
- Enhanced DBS check (if applicable);
- Overseas police check (if applicable);
- Barred List check (formerly List 99);
- Confirmation of Eligibility to work in the UK (Right to Work check);
- Disqualification Declaration (for certain categories of staff working with children aged 8 years and under) https://www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006/disqualification-under-the-childcare-act-2006;
- Section 128 check for all staff engaged in management positions.

In addition, all staff have completed the required safeguarding training; have read and understand KCSIE part 1 and are aware of their responsibilities set out in Working Together to Safeguard Children
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/942454/Working_together_to_safeguard_children_inter_agency_guidance.pdf

Yours faithfully

A Isherwood

Miss A Isherwood
Headteacher

Mr P Rimmer
CEO The Rowan learning Trust