

Three Towers

An Alternative Provision Academy

Expanding Horizons

Safeguarding Policy

Adopted: December 2021

Review: as required by statutory guidance

Key Contacts

The 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	Miss A Isherwood	01942 932760	safeguarding@ttapa.net
Deputy DSLs	Mrs C Banks		
	Mrs C Higgins		
	Mrs C Lynch		
	Ms G Murphy		
	Mrs A Scott		
	Mrs V Scott		
CLA Lead teacher	Mrs C Arstall		hindleyoffice@ttapa.net
SENDCo			
Chair of Governors	Mr P Smith	c/o e.roberts@hhhs.net	
Safeguarding Governor	Mrs A Foster		
CEO of Rowan Learning Trust	Mr P Rimmer		
Agency Contact Details			
Designated Officer (DO, formerly known as LADO)	Ms Sue Wharton	01942 486042	lado@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
Early Help Hub	StartWell	01942 486262	EHH@wigan.gov.uk
Wigan safeguarding Children's Board		01942 486025	wscb@wigan.gov.uk
School nurses		01942 486	
Channel helpline		020 7340 7264	
<p style="text-align: center;">If you believe a child or young person is at immediate risk of significant harm or injury, contact the Police on 999</p>			

1. Aims

Three Towers (TTAPA) fully recognises the contribution it makes to safeguarding children / young people and supporting / protecting learners in the academy. **Safeguarding underpins all that we do.** All staff believe that our school should provide a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual child. Three Towers recognises it is an agent of referral and not of investigation.

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.

TTAPA aims to ensure:

- all of our learners are safe and protected from harm;
- safeguarding procedures are in place to help learners to feel safe and empower them to stay safe;
- appropriate action is taken in a timely manner to safeguard and promote learners' welfare;
- adults at TTAPA are aware of the expected behaviours and the legal responsibilities in relation to safeguarding and child protection;
- we adopt a multi-agency approach to provide appropriate and timely support to learners through adoption of the early help framework

TTAPA 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;
- 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 TTAPA's 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:
- developing and promoting effective working relationships with external agencies, especially the Police, Health and Social Care;
- ensuring that all TTAPA 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 \(2021\)](#) and [Working Together to Safeguard Children \(2018\)](#), and the [Governance Handbook](#).

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 [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the "2018 Childcare Disqualification Regulations") and [Childcare Act 2006](#), which set out who is disqualified from working with children
- This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#).
- This policy also complies with our funding agreement and articles of association.
- We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

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 ¹Document / Procedure, Wigan's Resolution Policy² and the associated safeguarding policies of The Rowan Learning Trust.

3. Definitions

Safeguarding and promoting the welfare of children means:

- 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 that enables all children to have the best outcomes

The term 'safeguarding children' covers a range of measures including child protection procedures. It encompasses a preventative approach to keeping children safe that incorporates learner health and safety; school behaviour and preventing bullying; supporting learners with medical conditions; personal, health, social economic education; providing first aid and site security. Consequently, this policy is consistent with all other policies adopted by the governors and should be read alongside other school and Trust policies relevant to the safety and welfare of our learners.

Children includes everyone under the age of 18.

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

Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm.

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.

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

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

¹ <https://www.wigan.gov.uk/Docs/PDF/WSCB/Thresholds-of-Need-booklet.pdf>

² Escalation policy recently update to Resolution Policy

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);
- a clinical commissioning group 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.

As outlined above, the term 'safeguarding children' covers a range of measures including child protection procedures. 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.

All staff are aware of the categories of abuse, which are:

- Neglect
- Emotional Abuse
- Physical abuse
- Sexual abuse

The signs and symptoms of the four categories of abuse can be found in [Appendix 2](#) and further details on specific safeguarding issues can be seen in [Appendix 3](#)

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 Impact Statement including Children with SEND

Some children have an increased risk of abuse, 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;
- are looked after or previously looked after
- are missing from education;
- are young carers;
- may experience discrimination due to their race, ethnicity, religion, gender identification or sexuality;
- 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 due to either their own or a family member's mental health needs;
- have English as an additional language;
- are at risk of FGM, sexual exploitation, forced marriage, or radicalisation;
- are asylum seekers;

- 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 staff³, 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.

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;
- TTAPA 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 sections outlines the roles and responsibilities of staff at TTAPA

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;
- be familiar with this safeguarding policy and procedures and have an opportunity to contribute to their review;
- sign a declaration at the start of the academic year to say that they have reviewed the KCSIE guidance.

All staff will be aware of:

- our systems and policies, including this policy, which support safeguarding;
- know who the DSL and dDSLs are;
- be alert to signs and indicators of different types of abuse, as well as specific safeguarding issues such as peer-on-peer abuse, child sexual exploitation (CSE),

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

- child criminal exploitation (CCE), female genital mutilation (FGM), radicalisation and indicators of risk from or involvement in serious violent crime;
- be able to record and report concerns as set out in this policy;
- be able to deal with a disclosure of abuse from a learner;
- the importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe;
- how to maintain an appropriate level of confidentiality while liaising with relevant professionals;
- the early help process and their role in it including sharing information with other professionals to support early identification and assessment;
- be involved in the implementation of individual education programmes, integrated support plans, child in need plans and interagency child protection plans as required;
- be aware of the safeguarding response to children who go missing from education.

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 and are responsible for:

- provide advice and support to other staff on child welfare and child protection matters including supporting staff who make such referrals directly;
- 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;
- keeping written records of concerns about a child even if there is no need to make an immediate referral;
- ensuring 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;
- liaising with other agencies and professionals including taking part in strategy discussions and inter-agency meetings and/or supporting other staff to do so.

The dDSLs will also keep the headteacher informed of any issues, and liaise with local authority case managers and designated officers for child protection concerns as appropriate.

During term time, the DSL and dDSLs are 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 (dDSL) will act as cover. During holidays safeguarding concerns school be reported directly to the Child in Need Team.

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;
- ensuring that staff (including temporary staff) and volunteers understand and follow the procedures included in this policy;
- communicating this policy to parents when their child joins the school and via the school website;
- ensuring that the DSL and dDSLs have appropriate time, funding, training and resources, and that there is always adequate cover if they are absent;
- ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly;
- acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate;
- ensuring the relevant staffing ratios are met, where applicable.

5.4 The Local Governing Committee (LGC) will read Keeping Children Safe in Education 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;
- approve this policy at each review, ensure it complies with the law and hold the headteacher to account for its implementation;
- 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).

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.

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 that 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 in line with the Trustee's safeguarding statement of intent.

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 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 confidential⁴ 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 staff are in any doubt about sharing information, they should speak to the DSL.

4

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

The Government has issued Information Sharing for Safeguarding Practitioners Guidance that included 7 'Golden Rules' of Information Sharing in safeguarding :

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;
- 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/>

7. Recognising Abuse and Taking Action

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

7.1 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. **Anyone can make a referral** using the link below
<https://www.gov.uk/report-child-abuse-to-local-council>

Inform the DSL as soon as possible if you make a referral.

7.2 If a child makes a disclosure to you

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;
- **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;
- **Listen carefully** allowing them time to talk freely and believe them;
- 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 the Safeguarding Module in ClassCharts without delay, using the child's own words sticking to the facts.

Don't:

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

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

During term time, the DSL and / or a DDSL 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/dDSL 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.

7.3 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'.

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 2.

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.

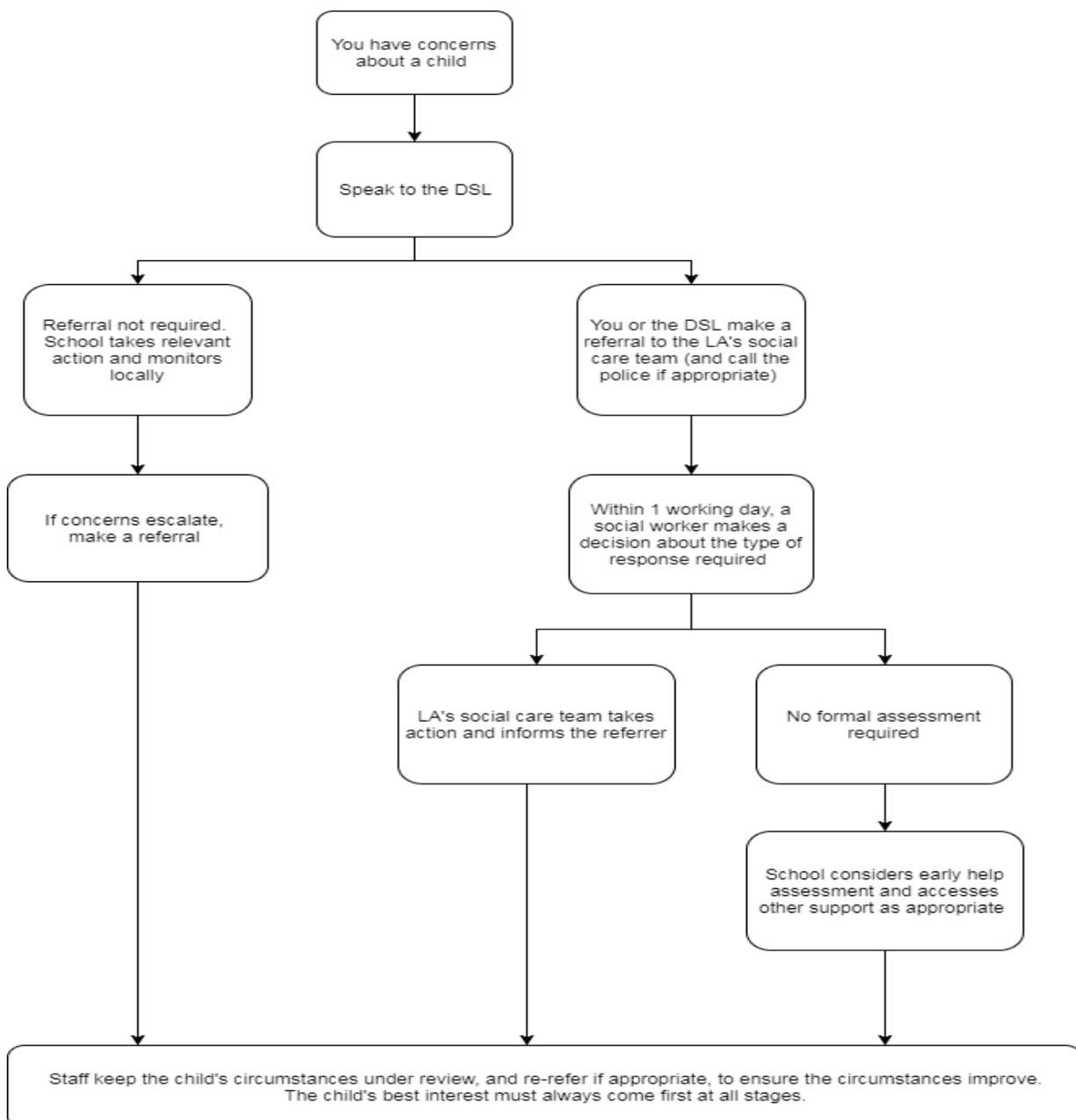
This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it. Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

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.

7.4 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)

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



In exceptional circumstances and the DSL or dDSL 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. 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/dDSL as soon as practically possible.

7.4.1 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 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.

This 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. Timelines of interventions will be monitored and reviewed.

If early help 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 an 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. Such cases will be kept under constant review and TTAPA will consider a referral to social care if the situation does not improve.

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.

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.

7.4.2 Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL/dDSL 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 make a decision quickly upon receiving the referral about what course of action to take and will let the person who made the referral know the outcome. The DSL/dDSL 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/dDSL 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.

7.5 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).

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.

7.6 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 Pastoral Managers 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.

7.7 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, alongside information on Safer Working Practices.

7.7.1 Procedure in the event of an allegation of abuse made against staff

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 Designated Officer (DO)⁵ and notify the Trust's HR Manager.

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 DO, without notifying the Headteacher first.

The school will follow the Rowan Learning Trust's 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 a consultation with the DO. *(See Appendix 4)*

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 HR Manager in order to make that decision and informing the DO 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.

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

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

7.8 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”.

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

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

- is serious, and potentially a criminal offence;
- could put learners in the school at risk;
- is violent;
- involves learners being forced to use drugs or alcohol;
- involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, or sexually inappropriate pictures or videos (including sexting).

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 put a risk assessment and support plan into place for all children involved (including the target(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed;
- the DSL will contact the children and adolescent mental health services (CAMHS), if appropriate.

7.9 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 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.

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff. 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. They will hold interviews with the learner(s) involved (if appropriate) to establish the facts and assess the risks.

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 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.

Learners are taught about the issues surrounding 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;
- 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:

- 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');
- have robust processes in place to ensure the online safety of learners, staff, volunteers and governors;
- have clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate;
- set clear guidelines for the use of mobile phones for the whole school community.

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.

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. 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.

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

9. Safe Setting, safe staff

Our health and safety policy, set out in a separate document, reflects the consideration we give to the protection of our learners both physically within the education setting environment and, for example, in relation to internet use, and when away from the education setting, undertaking off site trips and visits.

School security guidance has been compiled to support staff in the discharge of their responsibilities by ensuring the development and implementation of suitable procedures. In

particular, maintaining the security of the premises in response to potential threats to the staff and learners of the setting.

The Trustees of Rowan Learning Trust and our Local Governing Committee (LGC) take seriously their responsibility under section 175 of the Education Act 2002 to safeguard and promote the welfare of children; and to work together with other agencies to ensure there are adequate arrangements within our school to identify, assess, and support those children who are suffering / at risk of suffering abuse and neglect.

As key strategic decision makers and vision setters for the school, they will make sure that our policies and procedures are in line with national and local safeguarding requirements.

9.1 They will work with leaders to make sure the key actions set out in Safe Setting Safe Staff are in place. These include that:

- there is a Safeguarding, Child Protection and Early Help Policy in place which is reviewed annually;
- safeguarding and child protection procedures are reviewed annually and that a link to Wigan’s Safeguarding, Child Protection and Early Help (Thresholds of Needs) policy is available on the website or by other means;
- any weaknesses in Child Protection processes and procedures are remedied immediately;
- there are procedures for dealing with allegations of abuse against staff and volunteers and to make a referral to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have, had they not resigned;
- a senior leader has Designated Safeguarding Lead (DSL) responsibility;
- on appointment, the DSL and deputy DSLs (dDSL) undertake interagency training and also undertakes DSL “new to role” training and an “update” course every 2 years;
- all staff have access to safeguarding training as appropriate;
- safer recruitment procedures are followed by ensuring that there is at least one person on every recruitment panel that has completed Safer Recruitment training;⁶ (See Appendix 5)
- Disqualification under the Childcare Act 2006, still applies to staff themselves;⁷
- enhanced DBS and section 128 checks are in place for all Governors;

⁶ Safer recruitment training can be accessed through Wigan Safeguarding Children’s Board

⁷ Disqualification by Association now only applies in domestic settings, not schools. Disqualification under the Child Care Act still applies to staff themselves who work in a child care capacity, whether paid, volunteer or are on work placements. Relevant staff are those working in child care, or in a management role because they are: working with reception age children at any time; or working with children older than reception until age eight, outside school hours. Keeping Children Safe in Education (DfE, 2018) paragraph 116 also refers to disqualification: “For staff who work in childcare provision or who are directly concerned with the management of such provision, the school needs to ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the Childcare (Disqualification) Regulations 2009”.

- there is a nominated governor (NG) for Safeguarding who is nominated to liaise with the LA on safeguarding issues and liaises with the headteacher and the D/DSL to complete an annual Section 175 safeguarding audit;
- the CEO will liaise with the LA in the event of an allegation of abuse made against the Headteacher;
- they consider how learners may be taught about safeguarding including online safety.

9.2 Keeping Children Safe in Education (KCSIE) is statutory guidance that education settings in England must have regard to it when carrying out their duties to safeguard and promote the welfare of children applying to:

- Governing bodies of maintained schools (including maintained nursery schools) and colleges;
- proprietors of independent schools (including academies, free schools and alternative provision academies) and non-maintained special schools. In the case of academies, free schools and alternative provision academies, the proprietor will be the academy trust;
- management committees of learner referral units (PRUs).

9.3 The Senior DSL is a member of the Core Leadership Team (CLT) who has, along with the deputy designated safeguarding lead(s), upon appointment undertaken DSL new to role training followed by biannual updates plus any other relevant training.

9.4 The DSL/dDSLs who are involved in recruitment and at least one member of the governing committee / trustees will also complete safer recruitment training to be renewed at every 3 years.

9.5 The name of the designated members of staff for child protection (DSL and dDSLs) will be clearly visible in the school, with a statement explaining TTAPA's role in referring and monitoring cases of suspected abuse.

9.6 All members of staff are trained in, and receive, regular updates in e-safety and reporting concerns.

9.7 All new members of staff will be given a copy of our safeguarding statement and safeguarding, child protection and early help (thresholds of need) policy, with the DSL/dDSLs names clearly displayed, as part of their induction.

9.8 All other staff, volunteers and governors / trustees, have child protection awareness training, updated by the DSL/dDSL as appropriate, to maintain their understanding of the signs and indicators of abuse.

9.9 Child protection and safeguarding concerns or allegations against adults working in the school are referred to the DO⁸ for advice and that any member of staff found not suitable to work with children or young people will be notified to the Disclosure and Barring Service

⁸ DO Designated Officer for allegations against staff. DO threshold document can be found here <https://www.wigan.gov.uk/Docs/PDF/WSCB/LADO-threshold.pdf>

(DBS) for consideration for barring, following resignation, dismissal, or when we cease to use their service as a result of a substantiated allegation, in the case of a volunteer.

9.10 All parents/carers are made aware of the responsibilities of staff members with regard to safeguarding and child protection procedures through publication of our Safeguarding, Child protection and Early Help policy, and reference to it during the induction meetings.

9.11 The Policy is available to the public on our website – www.ttapa.net
Parents / Carer's are made aware of this policy and their entitlement to have a copy of it via the website.

9.12 All visitors sign in to and out of school using INVENTORY, wear a school ID badge and are provided with safeguarding information including the contact details of safeguarding personnel. A separate document outlines our procedures for visitors to our school sites.

9.13 Visitors of a professional role are asked to provide evidence of their role and employment details (usually an identity badge) upon arrival at the education setting. Supporting letters from Wigan Council and the NHS in relation to DBS checks of visitors holding professional ID badges can be found at the end of this document.

9.14 Our SLAs with our AP providers stipulate that they ensure the suitability of adults working with children on all sites at any time and they are aware of our child protection guidelines and procedures.

9.15 Our lettings agreement with Wigan Council for Wigan Music Service will seek to ensure the suitability of adults working with children on school sites at any time.

9.16 Our procedures will be reviewed annually (as a minimum) and updated as required.

9.17 **Mobile Phones and Cameras.** There is a separate mobile phone policy for learners and more detailed guidance provided to staff.

- 9.17.1 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 members' personal phones will remain in their bags/lockers/cupboards during contact time with learners.
- Staff **must not** take pictures or recordings of learners on their personal phones or cameras.
- TTAPA follows the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the school.
- 9.17.2 Visitors, including parents are prohibited from taking photographs or making records of TTAPA staff or learners. If they bring their phones into school premises they must be kept in their bags/pockets.

10. Notifying Parents or Carers

Where appropriate, we will discuss any concerns about a learner with their parents or carers. We will always endeavour to share our intention to refer a child or young person to Social Care with their parent's / carers unless to do so could put the child or young person at greater risk of harm, or impede a criminal investigation in which case we will discuss this with the local authority children's social care team before doing so.

The DSL/dDSL will normally do this in the event of a suspicion or disclosure. Other staff will only talk to parents about any such concerns following consultation with the DSL/dDSL.

In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved.

11. Supporting Learners

11.1 All learners

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 pastoral managers 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.

11.1.1 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:

- ensure learners identify and have access to trusted adults in order to confidently report abuse;
- make it clear to pupils 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.

11.1.2 Creating a supportive environment in school and minimising the risk of abuse including peer-on-peer abuse

We recognise the importance of creating a supportive environment where victims feel confident in reporting incidents and of taking proactive action to minimise the risk of abuse, including peer-on-peer abuse.

To achieve this, we will:

- ensure our curriculum helps to educate learners about appropriate behaviour and consent;
- ensure learners are able to easily and confidently report abuse using our reporting systems;
- ensure staff reassure victims that they are being taken seriously;
- ensure staff are trained to understand:
 - how to recognise the indicators and signs of abuse, including peer-on-peer abuse, and know how to identify it and respond to reports;
 - the important role they have to play in preventing abuse, and in particular peer-on-peer 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 targets/victims of abuse including peer-on-peer 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 in the case of peer-on-peer abuse, even if there are no reports it in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”;
 - that they should speak to the DSL if they have any concerns.
- ensure we 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;

11.1.3 Early Help

Early help means providing support as soon as a problem emerges, at any point in a child's life. Providing early help is more effective in promoting the welfare of children than reacting

later. 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.

This 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.

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 absence. Detailed information on Early Help can be found in Chapter 1 of Working Together to Safeguard Children.

If early help 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 an inter-agency assessment as appropriate.

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.

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.

11.2 Children with Special Educational Needs, Disabilities or health issues

TTAPA will use the same considerations for learners with SEND, as detailed above. However, we also take into consideration that additional barriers can exist when recognising abuse and neglect in this group of children and young people. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's SEND 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 children;

- potentially being disproportionately 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.

11.3 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. 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.

Wigan Safeguarding Children Board coordinates our local Young Carers Strategy.

11.4 Learners with a social worker

Children 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, especially the DSL and dDSLs 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 learner'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.

11.5 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;
- Pastoral managers and DSL/dDSL have details of learner's social workers.

The SENDCo 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/dDSL 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).

12. Supporting Staff

12.1 All 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/dDSL and to seek further support as appropriate. DSL/dDSL make use of support available by the Local Authority and the partnerships Safeguarding Team.

DSL/dDSL 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).

12.2 DSL/dDSL

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/dDSL to talk through the challenges of this role and to seek further support as appropriate.

13. Physical Intervention & Use of Reasonable Force

TTAPA recognises that touch is appropriate in the context of working with children and young people, and all staff are aware of the safer working practice guidance⁹ to ensure they are clear about their professional boundary.

⁹ Available to view on the WSCB website

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 TTAPA are trained in Team Teach methods which is an accredited positive handling technique. TTAPA staff only use restrictive physical intervention as a last resort. All incidents requiring physical intervention are recorded on a serious incident form and signed by a witness.

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.

14. Record keeping

TTAPA will hold records in line with the Rowan Learning Trust's records retention schedule/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. These records will be made using the Safeguarding Module of ClassCharts.

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.

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. 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.

15. Training

15.1 All staff

All members of 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.

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 and is regularly updated. It is integrated, aligned and considered as part of our whole-school safeguarding approach and wider staff training and curriculum planning. It is in line with advice from our 3 safeguarding partners and has due regard to the Teachers Standards to support the expectation that teachers manage behaviour effectively to ensure a good and safe environment; and 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.

15.1.1 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.

15.1.2 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 not present at 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.

15.1.3 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.

15.1.4 Keeping Children safe online

All staff undertake training in online safety and this is updated as necessary.

15.2 DSL training

The DSL/dDSL have additional training which is updated every two years as a minimum. The DSL/dDSL 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 or safeguarding networking events with other DSLs.

15.3 Governors

All TTAPA governors, except parent governors work in schools and have received statutory child protection training in their role. All governors undertake the school's induction programme which includes training about safeguarding to ensure they have the knowledge and information needed to perform their function and understand their responsibilities. They may choose to complete face to face training for governors provided by Wigan Council. In addition, governors may choose to attend whole school safeguarding and child protection training.

15.4 Recruitment Panels

At least one person on any appointment panel has undertaken Safer Recruitment Training. This training is updated every 3 years.

15.5 Volunteers

Volunteers receive appropriate training if applicable.

16. 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.¹⁰ 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.

17. Complaints and concerns about TTAPA Safeguarding procedures

17.1 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 (see Section 13).

17.2 Other complaints

These will be handled under the TTAPA Complaints Procedures.

17.3 Whistleblowing

¹⁰ <http://www.wiganlscb.com/Docs/PDF/Professional/Resolution-Policy.pdf>

All staff can raise concerns about poor or unsafe practice and potential failures in the education settings safeguarding regime. The Rowan Learning Trust Whistleblowing Policy is available on the website and the whistleblowing 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.

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 the attitudes or actions of colleagues. 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.

Whistleblowing regarding the Headteacher should be made to the CEO whose contact details are readily available to staff.

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

18. Monitoring & Evaluation

Our policy and procedures will be monitored regularly, amended as required and reviewed at least annually, in line with statutory guidance. Monitoring will include:

- CLT drop ins and discussions with children, young people and staff
- Consideration of feedback from learners, parents & staff
- Governing Body visits to the education setting
- Reviewing logs of bullying / racist / behaviour incidents
- Scrutiny of exclusion and attendance data

This policy should be read in alongside the following documents relevant to the safety and welfare of our learners:

- Anti-Bullying Procedures
- Attendance Policy
- Complaints Policy (RLT policy)
- CCTV Policy
- Health and Safety Policy
- Positive Discipline Policy
- Privacy Notices (various)
- Relationships & Sex Education Policy
- SEND Report
- Single Equality Scheme
- Whistleblowing policy (RLT policy)

Appendix 1 Glossary

A Child	A person who has not yet reached their 18 th 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: <ul style="list-style-type: none"> ➤ 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 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.
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	<p>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:</p> <ul style="list-style-type: none"> ➤ emotional; ➤ financial; ➤ physical; ➤ psychological; ➤ sexual.
Early Help (EH)	<p>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.</p>
Emotional Abuse	<p>The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve</p> <ul style="list-style-type: none"> ➤ 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. ➤ <p>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.</p> <p>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.</p> <p>Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.</p>
Female Genital Mutilation (FGM)	<p>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.</p>
Gangs & Youth Violence	<p>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.</p>

	<p>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.</p> <p>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).</p>
Hate	<p>Hostility or prejudice based on one of the following things:</p> <ul style="list-style-type: none"> ➤ disability; ➤ race; ➤ religion; ➤ sexual orientation; ➤ transgender identity.
Honour-based violence	<p>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.</p>
Neglect	<p>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:</p> <ul style="list-style-type: none"> ➤ 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. <p>It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.</p>
Peer on Peer Abuse	<p>Peer on peer 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.</p>
Physical Abuse	<p>A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child.</p> <p>Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.</p>
Private Fostering	<p>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.)</p>

<p>Radicalisation & Extremism</p>	<p>Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.</p> <p>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.</p>
<p>Relationship Abuse</p>	<p>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.</p>
<p>Safeguarding and promoting the welfare of children</p>	<ul style="list-style-type: none"> ➤ 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.
<p>Sexting</p>	<p>Sexting is when someone shares sexual, naked or semi-naked images or videos of themselves or others, or sends sexually explicit messages.</p> <p>They can be sent using mobiles, tablets, smartphones, and laptops - any device that allows you to share media and messages.</p>
<p>Sexual Abuse</p>	<p>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</p>
<p>Trafficking</p>	<p>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.</p>

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/ Lingered 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 how 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 irresponsible 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 is based on Department for Education's statutory guidance, Keeping Children Safe in education.

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 Missing Education (CME)

A child going missing 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;
- are supervised by the youth justice system;
- come from the families of service personnel;
- come from Gypsy, Roma, or Traveller families;
- 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.

TTAPA follows Wigan Council's Procedures for CME.

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.

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 and child/adolescent to parent violence and abuse. 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.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.

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). 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.

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/prev-ent-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 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 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.

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 Managers 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 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;
- prolonged absence from school and other activities;
- mentioning something somebody did to them that they are not allowed to talk about;
- demonstrating increased emotional and psychological needs such as withdrawal or depressions or significant behavioural change (particularly on return from a holiday abroad);
- 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);
- reluctance to take part in physical activity;
- frequent urinary, stomach or menstrual problems including repeated urinal tract infection;
- spending longer in the toilet/bathroom due to difficulties urinating;
- complaining about pain or discomfort between the legs;
- secretive behaviour, including isolating themselves from the group;
- reluctance to undergo any medical examinations;
- midwives/GPs/obstetricians may become aware the FGM has taken place when treating a pregnant (young) woman.

Circumstances and occurrences that may point to FGM happening include:

- family having a history of practising FGM (this is the biggest risk factor to consider);
- 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 request an extended absence from school;
- child has limited level of integration within UK society;
- child refers to FGM in conversation either in relation to themselves or another female friend/relative;
- child talking/confiding/expressing anxiety about getting ready for a 'special ceremony/occasion' or 'special procedure' to 'become a woman';
- child talks of a long holiday/visit to relatives in their country of origin or another country where the practice is prevalent;
- child talks about going abroad to be 'cut' or to prepare for marriage
- family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues;
- Having sections missing from the 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication
- child requests help from an adult because she is aware or suspects that she is at risk of FGM (including immediate risk).

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'. 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 2.

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: it is a human rights abuse and falls within the Crown Prosecution Service definition of domestic violence. 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.

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 fm@fco.gov.uk;
- refer the learner to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate.

Peer on Peer Abuse

Peer-on-peer abuse is when children abuse other children. This type of abuse can take place inside or outside of school and online.

All children have a right to attend school and learn in a safe environment. All peer on peer abuse is unacceptable and will be taken seriously.

Peer on peer 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;
- 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 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.

Consequently, peer on peer abuse is dealt with as a safeguarding concern, recorded as such and not managed through the systems set out in the school behaviour policy.

Victims, perpetrators and any other child affected by peer on peer abuse will be supported through the school’s pastoral system and the support will be regularly reviewed.

We minimise the risk of peer on peer abuse by providing

- a relevant curriculum, that helps children to develop their understanding of acceptable behaviours, healthy relationships and keeping themselves safe;
- established / publicised systems for learners to raise concerns with staff, knowing they will be listened to, supported and valued, and that the issues they raise will be taken seriously.

The DSL liaises with other professionals to develop robust risk assessments and appropriate specialist targeted work for children that are identified as posing a potential risk to other children.

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”.

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

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

- is serious, and potentially a criminal offence;
- could put learners in the school at risk;
- is violent;
- involves learners being forced to use drugs or alcohol;
- involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, or sexually inappropriate pictures or videos (including sexting).

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 put a risk assessment and support plan into place for all children involved (including the target(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed;
- the DSL will contact the children and adolescent mental health services (CAMHS), if appropriate.

We recognise the importance of taking proactive action to minimise the risk of peer-on-peer abuse, and of creating a supportive environment where targets/victims feel confident in reporting incidents. We will minimise the risk of peer-on-peer abuse by:

- challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images;
- being 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;
- ensuring our curriculum helps to educate learners about appropriate behaviour and consent;
- ensuring learners are able to easily and confidently report abuse;
- ensuring staff are trained to understand 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.

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 required¹¹.

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex;
- Through a group of children sexually assaulting or sexually harassing a single child or group of children;
- 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 sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

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

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

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).

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.

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff. 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. They will hold interviews with the learner(s) involved (if appropriate) to establish the facts and assess the risks. 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 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.

Learners are taught about the issues surrounding 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;
- 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.

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.

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 INVENTORY 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.
(see pages of this policy for Wigan Council and WWL NHS Trust).

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.

This section summarises our approach to online safety and mobile phone use. 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: Procedures for Managing Allegations against Staff

1. Allegations that may meet the harms threshold

This section is based on 'Section 1: Allegations that may meet the harms threshold' in part 4 of Keeping Children Safe in Education.

This section applies to **all** cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

- behaved in a way that has or may have harmed a child; and/or
- possibly committed a criminal offence against or related to a child; and/or
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school.

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation. This will be the headteacher, or the CEO of our trust where the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

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

Procedure for dealing with allegations

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

- conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below;
- discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police);
- inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies;

- inform the Trust's CEO and Director of HR of the concerns or allegations and discuss the likely course of action as soon as possible after speaking to the designated officer;
- where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate;
- where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care.
- If immediate suspension is considered necessary, agree and record the rationale for this with the CEO, Director of HR and the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details;
- If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation;
- If it is decided that further action is needed, take steps as agreed with the CEO, Director of HR and the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate;
- provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. This includes but is not limited to trade union representatives, or a colleague, a named member of CLT and the Trust Employee Assistant offer;
- inform the parents/carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents/carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent/carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice;
- keep the parents/carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member);
- make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child.

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible, the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Additional considerations for supply teachers and all contracted staff

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

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

Timescales

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

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

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

Suspension of the accused until the case is resolved

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

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

- redeployment within the school so that the individual does not have direct contact with the child or children concerned;

- providing an assistant to be present when the individual has contact with children;
- redeploying the individual to alternative work in the school so that they do not have unsupervised access to children;
- moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted;
- temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the Trust.

If in doubt, the case manager will seek views from the Trust's Director of HR and CEO, as well as the designated officer at the local authority, plus the police and children's social care where they have been involved.

Definitions for outcomes of allegation investigations

Substantiated: there is sufficient evidence to prove the allegation

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

False: there is sufficient evidence to disprove the allegation

Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

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

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

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

Unsubstantiated, unfounded, false or malicious reports

If a report is:

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

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

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

Confidentiality and information sharing

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

The case manager will take advice from the designated officer, Director of HR, CEO, police and children's social care services, as appropriate, to agree:

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

Record-keeping

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

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

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

- a clear and comprehensive summary of the allegation;

- details of how the allegation was followed up and resolved;
- notes of any action taken, decisions reached and the outcome;
- a declaration on whether the information will be referred to in any future reference.

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

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

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

Learning lessons

After any cases where the allegations are **substantiated**, the case manager will review the circumstances of the case with the CEO, Director of HR and the designated officer to determine whether there are any improvements that can/need to be made to our procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

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

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

Non-recent allegations

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

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

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

Section 2: concerns that do not meet the harm threshold

The section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education

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

Concerns may arise through, for example:

- suspicion;
- complaint;
- disclosure made by a child, parent or other adult within or outside the school;
- pre-employment vetting checks.

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

Definition of low-level concerns

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

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

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

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

Sharing low-level concerns

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

We will create this culture by:

- ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- empowering staff to share any low-level concerns as per section 7.7 of the Safeguarding Policy;
- empowering staff to self-refer;
- addressing unprofessional behaviour and supporting the individual to correct it at an early stage;
- providing a responsive, sensitive and proportionate handling of such concerns when they are raised;
- helping to identify any weakness in the school's safeguarding system;

- maintaining an open-door where staff can discuss issues with the DSL/dDSL and/or members of CLT.

Responding to low-level concerns

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

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

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's safeguarding policies and procedures.

Record keeping

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

Records will be:

- kept confidential, held securely and comply with the DPA 2018 and UK GDPR;
- reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the CEO, Director of Hr and designated officer at the local authority;
- retained at least until the individual leaves employment at the school.

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

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

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

Appendix 5: Procedures for Safer Recruitment & DBS Checks

Recruitment and selection process

The recruitment steps outlined below are based on part 3 of Keeping Children Safe in Education.

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

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

Advertising

When advertising roles, we will make clear:

- TTAPA and the Rowan Learning Trust's commitment to safeguarding and promoting the welfare of children;
- that safeguarding checks will be undertaken;
- the safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children;
- whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account.

Application forms

Our application forms will:

- include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity);
- include a copy of, or link to, our safeguarding policy.

Shortlisting

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

- consider any inconsistencies and look for gaps in employment and reasons given for them;
- explore all potential concerns.

Once we have shortlisted candidates, we will ask shortlisted candidates to:

- complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
 - if they have a criminal history;
 - whether they are included on the barred list;
 - whether they are prohibited from teaching;
 - information about any criminal offences committed in any country in line with the law as applicable in England and Wales;

- any relevant overseas information.
- sign a declaration confirming the information they have provided is true

Seeking references and checking employment history

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

When seeking references we will:

- not accept open references;
- liaise directly with referees and verify any information contained within references with the referees;
- ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations;
- obtain verification of the candidate's most recent relevant period of employment if they are not currently employed;
- secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children;
- compare the information on the application form with that in the reference and take up any inconsistencies with the candidate;
- resolve any concerns before any appointment is confirmed.

Interview and selection

When interviewing candidates, we will:

- probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this;
- explore any potential areas of concern to determine the candidate's suitability to work with children;
- record all information considered and decisions made.

Pre-appointment vetting checks

We will record all information on the checks carried out in our single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

New staff

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- verify their identity;
- obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken;
- obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available;

- verify their mental and physical fitness to carry out their work responsibilities;
- verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards;
- verify their professional qualifications, as appropriate. For teaching and educational support positions candidates must produce original certificates of qualifications;
- ensure they are not subject to a prohibition order if they are employed to be a teacher (or for certain other roles in school);
- carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. Where available, these will include:
 - For all staff, including teaching positions: [criminal records checks for overseas applicants](#);
 - For teaching positions: obtaining a letter of professional standing from the professional regulating authority in the country where the applicant has worked.
- check that candidates taking up a management position* are not subject to a prohibition from management (section 128) direction made by the secretary of state **Management positions are most likely to include, but are not limited to, headteachers, principals and deputy/assistant headteachers.*
- ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Regulated activity means a person who will be:

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

Existing staff

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

- there are concerns about an existing member of staff's suitability to work with children; or
- an individual moves from a post that is not regulated activity to one that is; or
- there has been a break in service of 12 weeks or more.

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

- we believe the individual has engaged in [relevant conduct](#); or
- we believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or

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

Agency and third-party staff

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

Contractors

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

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

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

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

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

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

For self-employed contractors we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Trainee/learner teachers

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

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

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

Volunteers

We will:

- never leave an unchecked volunteer unsupervised or allow them to work in regulated activity;
- obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity;
- carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity and retain a record of this risk assessment;
- ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Governors

All governors will have an enhanced DBS check without barred list information. They will have an enhanced DBS check with barred list information if working in regulated activity. The chair of the board will have their DBS check countersigned by the secretary of state.

Staff working in alternative provision settings

Where we place a learner with a vocational provider, we will ensure that policies and procedures are in place to protect children from harm. We obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

Adults who supervise learners on work experience

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

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a learner under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Positive Disclosures

All positive disclosures, regardless of the seriousness of the offence/conviction/charge, are subject to an objective assessment. The Headteacher will consider the magnitude of any DBS disclosures.

- Major disclosures will be discussed with the Director of HR and CEO of the Trust, who will be asked for clearance for the candidate to be rejected;
- Serious disclosures, those that do not pose a risk to learners, will also be discussed with the Director of HR and CEO of the Trust. The headteacher will endeavour to ascertain the relevant facts from the individual and to bring the matter to a conclusion. The candidate will be sent a rejection or acceptance letter in keeping with the Trust and school's procedures.
- Minor disclosures will be dealt with in a discussion between the candidate and the headteacher who will then decide whether to reject or accept the applicant.

The following considerations will be taken in relation to positive DBS disclosures:

- the relevance of the disclosure in relation to the position applied for;
- the nature of the offence or other matters revealed;
- the length of time elapsed since the offence or other matters occurred;
- whether there is a pattern of offending behaviour;
- whether the candidate's circumstances have changed since the offending behaviour or other matters occurred;
- any extenuating circumstances surrounding the offence or other matters and explanations offered.

In exceptional circumstances, if an offer is made following a positive disclosure, an employment risk assessment may be completed.

A record of all recruitment decisions following positive DBS disclosures will be kept by the school business manager using the form provided in Appendix 1. Depending on the circumstances of each case, the Director of HR and/or CEO may be asked to countersign the form.

The recruitment of ex-offenders

Under the Protection of Children Act 1999 and the Criminal Justice and Courts Service Act 2000, schools cannot employ persons who may have regular contact with children who are:

- included on the barred list (a list maintained by the Secretary of State of people judged to be unsuitable to work with children);
- subject to a disqualifying order made on being convicted or charged with the following offences against children: murder, manslaughter, rape, other serious sexual offences, grievous bodily harm and/or other serious acts of violence.

TTAPA also consider it high risk to employ persons, who may have regular contact with learners, if they have been convicted of or charged with any of the offences above or serious drug-related offences. The CES Model Rehabilitation of Offenders Act 1974 – Disclosures Form is available on request from the school.

To : All Schools and Academies

Our reference: HRESC
Your reference:
Please ask for: HR Employment Service Centre
Extension: 2333
Direct line: 01942 827333
Date: 8th May 2017

Dear Colleague

DBS Checks for School Visitors

I have been asked to confirm the situation regarding schools asking visitors to provide copies of their DBS certificate or DBS number. It is unlikely that visitors will carry their certificate with them and in many cases it will not be necessary for them to do so.

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 in schools. They 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 satisfactory clearance and you do not need to see it. You should of course check their Wigan Council badge to confirm their identity.

Further guidance on DBS checks for other visitors to school will follow.

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 issue you may have.

Yours sincerely

Claire O'Sullivan
Lead Counter Signatory

Human Resources

Bevan House
Beecham Court
Smithy Brook Road
Wigan
WN3 6PR

Wigan Borough Head Teachers
9th February 2017

Tel: 01942 482965

Dear Head Teacher

RE: DBS Checks

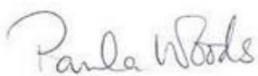
Bridgewater Community Healthcare NHS Foundation Trust operates a Disclosure and Barring Service (DBS) Policy based on the requirements of the Police Act 1997 and the mandatory pre-employment checking procedure requirements of the Department of Health. The Policy ensures that enhanced DBS checks are mandatory 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
Assistant Director Workforce