



St Paul's CE Primary School

Safeguarding Policy
September 2023

SAFEGUARDING POLICY

St Pauls CE Primary School		
The Headteacher who has the ultimate responsibility for safeguarding is Miss A Lee		
In their absence, the authorised member of staff is Ms J Power		
KEY SCHOOL STAFF & ROLES		
Name	Role	Location and/or Contact Phone Number
Ms J Cyprys	TA/Family	01613595316
Ms J Power	SAH/SENDco/DSL	
Miss M Bailey	DSL	
Miss E Tilzey	DSL –AH	

NAMED GOVERNOR for Safeguarding & Prevent	Contact Phone Number/Email
Doctor R Belton	01613595316

Summary of safeguarding procedures

Our procedure if there is a concern about child welfare or safeguarding is:-
‘Never Do Nothing – Do the basic things well’

- All staff have a responsibility to respond to disclosures by children or other concerns and pass these concerns on to the DSL immediately as outlined in 5.3.
- Complete a note of concern either immediately or asap depending on level of need and discuss with a DSL . This information will be recorded on CPOMS by a DSL. – do not leave the building without this being shared.
- Concerns relating to marks or injuries should be recorded on a ‘Body Map’ outline which should be scanned and uploaded to CPOMS.

It is vital that staff do not:

- dismiss concerns or disclosures as insignificant, they may provide a vital link to other information.
- keep such concerns to themselves.
- promise secrecy to children or adults making disclosures but reassure them that information will be shared appropriately and confidentially

Staff are made aware that it is unacceptable for any member of staff to keep such concerns to themselves, including concerns about the conduct of another member of staff.

Passing on concerns

Each case will be considered by the DSL who will decide what information to share with which staff.

- Early Help Hubs: North 0161 234 1973, Central 0161 234 1975, South 0161 234 1977
- Social Care Advice & Guidance Service: 0161 234 5001
- Complex Safeguarding Hub Advice Line: 0161 226 4196
- MCC Safeguarding in Education Team: 0161 245 7171

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

All staff are made aware that if they receive an allegation of inappropriate or abusive behaviour by a colleague, or feel required to make such an allegation, they should pass the information, without delay, to the Headteacher.

If the allegation concerns the Headteacher the referrer should contact the Chair of governors, a senior Member of staff or the LADO immediately. It is unacceptable for any member of staff not to refer such concerns.

- Manchester LADO (sometimes known as DOLA or LA Designated Officer): 0161 234 1214

Our procedure for whistleblowing if there is an urgent concern about child welfare or safeguarding that cannot be dealt with through our usual systems is:-

1. All staff are made aware that if they receive an allegation of inappropriate or abusive behaviour by a colleague, or feel required to make such an allegation, they should pass the information, without delay, to the Headteacher.
2. If the allegation concerns the Headteacher the referrer should contact the Chair of governors, a senior Member of staff or the LADO immediately. It is unacceptable for any member of staff not to refer such concerns.
3. All staff are made aware of their responsibilities in this and the procedure to follow.
4. Any such matters will be dealt with in the strictest confidence.
5. The head teacher (or other in 2) will, on the same day, contact the LA Designated Officer and follow the statutory guidance contained in MSCB Guidance & 'Dealing with Allegations of Abuse Against Teachers & Other Staff.' DfE 2011 6. All involved will attempt to deal with any allegation is dealt with fairly, quickly and consistently in a way that provides effective protection for the child and at the same time supports the person who is subject to the allegation.

Numbers for advice and contact

- Whistleblowing Helpline: 0800 028 0285

- Manchester LADO: 0161 234 1214
- NSPCC Whistleblowing Helpline: 0800 028 0285 or email help@nspcc.org.uk

Our procedure for investigating and dealing with any complaints or concerns about our safeguarding practice that are brought to our attention is detailed in our Complaints Policy.

Additionally, we will co-operate with officers from the Education Department if they are aware of concerns which have been raised with Ofsted, the Regional Commissioner or the DfE.

This policy will be reviewed at annually unless an incident or new legislation or guidance suggests the need for an interim review

The effectiveness of our safeguarding arrangements are monitored by SLT and the Governing Body through updates at Full governing body meetings and monitoring visits from the Governor responsible for safeguarding. (KCSiE Part 2.78)

Review Date	Changes made	By whom
March 21	Policy created	Ms J Sorohan
March 22	Policy reviewed	Miss A Lee
September 22	Policy review to link with KCSiE	Miss A Lee
March 23	Policy reviewed	Miss A Lee / OFSTED/R.Belton
September 23	Policy created	A.Lee

Ratification by Governing Body

Academic year	Date of ratification	Chair of Governors
20/21	3 rd March 2021	Mr M Shanahan
22/23	21 st September 2022	Mr A Djemal
23/24	20 th September 2023	Mr A Djemal

CONTENTS:-

- 1. Introduction & Legislation and statutory guidance**
- 2. Roles & Responsibilities**
- 3. Training & Awareness Raising**
- 4. Safeguarding/Child Protection Policy & Procedures**
- 5. Case Management, Record Keeping & Multi-agency Working**

6. The Curriculum
7. Online safety
8. Safe Recruitment
9. Managing Allegations
10. Safety On & Off-Site
11. Complex safeguarding
12. Allegations of abuse made against other pupils
13. Sharing of nudes and semi-nudes ('sexting')

14. Part 1 & Annex A and Annex B of 'Keeping Children Safe in Education (KCSIE), September 2023 - statutory guidance to be read by staff as determined by the headteacher/principal and Governing Body

APPENDICES: -

- A. Key Legislation, Statutory Guidance & Ofsted Framework
- B. Other Government & National Guidance
- C. Local Policies & Guidance (MCC, Greater Manchester & Manchester Safeguarding Partnership)
- D. Other Relevant School Policies/Procedures
- E. Other Relevant MCC Education Department Policies/Guidance F. Abbreviations

1. INTRODUCTION

Through this policy we aim to create and maintain a safe learning environment where all children and adults feel safe, secure and valued and know they will be listened to and taken seriously.

This policy has been developed to ensure that all adults in our school, including regular staff, supply staff, volunteers and visitors, are working together to safeguard and promote the welfare of children and young people and to identify and address any safeguarding concerns and to ensure consistent good practice.

Our approach is child-centred.

'Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child.' (KCSIE, Part 1.2)

Safeguarding and promoting the welfare of children and young people goes beyond implementing basic child protection procedures. The aims of this policy are in accordance with both our Mission Statement and our Equal Opportunities Policy and it is an integral part of all of our activities and functions.

'Safeguarding and promoting the welfare of children is defined ... as:-

- **protecting children from maltreatment;**
 - **preventing impairment of children’s mental health or development;**
 - **ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and**
 - **taking action to enable all children to have the best outcomes.’**
- (KCSiE 1.4)**

See KCSiE Part 1, Part 5 & Annexes A and B for definitions and further information about: -

- Abuse & Neglect - including physical, emotional & sexual abuse and neglect
- Channel
- Child Abduction and Community Safety Incidents
- Child on Child Abuse – including sexual harassment, upskirting & sharing of nude and semi-nude images
- Child Criminal Exploitation
- Child Sexual Exploitation
- Children and the Court System
- Children Missing from Education
- Children who are lesbian, gay, bi or trans (LGBT)
- Children with Family Members in Prison
- County Lines
- Cybercrime
- Domestic Abuse
- Early Help
- Elective Home Education
- Homelessness
- Human Rights Act, Equality Act 2010 & Public Sector Equality Duty
- Looked After Children and children open to or who have been open to a Social Worker
- Mental Health
- Modern Slavery & the National Referral Mechanism
- Online Safety, including Education at Home
- Prevent Duty
- Preventing Radicalisation
- Serious Violence
- Sexual Violence and Sexual Harassment between children in schools and colleges
- So-called ‘Honour-Based Abuse’ including Female Genital Mutilation & Forced Marriage & Breast Ironing

Our ethos and aims

Our mission at St Paul’s is:

- To create the opportunity for every pupil to achieve their full potential in a safe ,welcoming and vibrant learning environment

- Within the context of Christian values, to encourage and support all children in becoming confident, independent and caring.

Aims

- To give everyone the opportunity to achieve to the best of their ability
- To create an atmosphere where we all support, care and respect each other
- To provide a safe, welcoming and exciting place in which to learn and play
- To foster an awareness of the spiritual dimension of life
- To provide a relevant broad, balanced curriculum that will be interesting, exciting and imaginative
- To work together as a whole school community to provide the best education possible

Ethos

The ethos at St Paul's CE Primary School is one where we welcome everyone into a caring, nurturing environment providing an education of the highest quality within the context of Christian belief and practice. We encourage an understanding of the meaning and significance of faith and promote Christian values through the experience we offer our pupils. Our chosen values are love, hope, forgiveness, thankfulness, respect and Justice/peace. We enjoy a close relationship with St Paul's church; children are actively involved in worship and celebrations in church and in school.

Legislation and statutory guidance

See appendix A for documents this policy is based on and links

Under the Education Act 2002, schools/settings/colleges have a duty to safeguard and promote the welfare of their pupils and are committed to the guidance set out in 'Working Together to Safeguard Children 2018' (in process of review) and 'KCSiE 2023'. Our policy ensures that we comply with our Statutory Duties (Appendices A & B)

Our policy takes account of non-statutory guidance issued by the DfE and other relevant organisations (Appendix C) in addition to guidance issued by the Greater Manchester Combined Authority), the Manchester Safeguarding Partnership (MSP) and Manchester Local Authority, especially Education, Children's Services and Community Safety (MCC)

Our policy ensures that we work in partnership with other organisations, where appropriate, to identify any concerns about child welfare and take

action to address them and that we comply with local policies, procedures and arrangements (Appendix E)

Our policy complements and supports other relevant school policies (Appendix D).

Our policy is regularly reviewed and we are responsive to new guidance and legislation and to promoting the safety of our staff and pupils in crisis situations.

2. ROLES & RESPONSIBILITIES

LEADERSHIP & MANAGEMENT

2.1 OUR GOVERNING BODY

Our Governing Body have a strategic leadership responsibility for our school's/college's safeguarding arrangements and **will** ensure that they comply with their duties under legislation. They **will** have regard to KCSiE 2023, ensuring policies, procedures and training in their schools/colleges are effective and comply with the law at all times.

Our Governing Body are fully aware of our role in multi-agency safeguarding arrangements, of Manchester Safeguarding Partnership (MSP) arrangements and of the Child Death Review partnership arrangements and will ensure that we work together with appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs.

The Governing Body will ensure that: -

- All members of the Governing Body have read the most recent publication of Keeping Children Safe in Education in its entirety
- All members of the Governing Body have received appropriate training to enable them to provide strategic challenge and assure themselves that there is a robust whole school approach to safeguarding (KCSiE Part 2.81, 2.95-97)
- A named member is identified as the designated governor for Safeguarding.
- Governors facilitate a whole school approach to safeguarding and that all systems, processes and policies operate with the best interests of the child at heart.
- Where there is a safeguarding concern, they and school/college leaders will ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide.

- The systems in place are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.
- Policies and procedures allow for appropriate action to be taken in a timely manner to safeguard and promote children's welfare.
- The school/college has an effective Child Protection Policy
- The school/college has a Behaviour Policy which includes measures to prevent bullying, cyberbullying, prejudice-based and discriminatory bullying.
- Child protection files are maintained as required
- More than one emergency number is held on file for each pupil/student
- The identified governor will provide the governing body with appropriate information about safeguarding and will liaise with the designated member of staff. They will complete link visitor audits and will feedback at full governing body meetings.
- Our safeguarding policy and our staff Code of Conduct are reviewed at least annually, and staff are given opportunities to contribute to and shape our safeguarding arrangements and policies. Addenda or appendices may be added during periods of crisis to reflect changes of circumstance. Code of conduct is shared with staff and union lead and they sign they have read and received this. Both these documents are reviewed annually at governing meetings.
- We operate safer recruitment and selection practices in accordance with Part Three of KCSiE.
- We have procedures in place for dealing with allegations of abuse against members of staff, including supply teachers, volunteers and contractors and these are in line with KCSiE and Local Authority procedures. We will work with the LADO and other relevant agencies to support any investigations.
- All staff and volunteers who have regular contact with children and young people and contractors who are in contact with children and young people receive appropriate training and information about the safeguarding processes.
- There is appropriate challenge and quality assurance of the safeguarding policies and procedures.
- Our governors regularly review the effectiveness of online safety arrangements, including filters and monitoring, preparation for any online challenges or hoaxes and information shared with parents.

2.2 OUR HEADTEACHER

Our Headteacher will ensure that the policies and procedures, adopted by the governing body or proprietor particularly those concerning referrals of cases of suspected abuse and neglect, are understood and followed by all staff.

Our Headteacher is fully aware of our role in multi-agency safeguarding arrangements, of the new Safeguarding Partnership (MSP) arrangements and of the Child Death Review partnership arrangements. We will ensure that we work together with appropriate relevant agencies to safeguard and promote the welfare of local children, identifying and responding to their needs, including:-

‘Schools and colleges should work with local authority children’s social care, the police, health services and other services to promote the welfare of children and protect them from harm. This includes providing a co-ordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans’. (KCSiE 2.113)

‘All schools and colleges should allow access for children’s social care from the host local authority and, where appropriate, from a placing local authority, for that authority to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment.’ (KCSiE, 2.114)

Our Headteacher is fully aware of statutory guidance in KCSiE and will ensure that:-

- The policies and procedures adopted by the Governing Body to safeguard and promote the welfare of pupils are fully implemented and followed by all staff, including supply teachers and volunteers and that they are regularly updated in response to local practice or national changes in legislation.
- All staff including supply teachers, volunteers, visitors and contractors understand and comply with our Code of Conduct.
- We evaluate our safeguarding policies & procedures at least on an annual basis and return our completed Safeguarding Self Evaluation (SEF) using the S175 online tool to the LA as requested (bi-annually).
- We share the Safeguarding Self Evaluation and Action Plan with governors at least annually.
- We work with the LA to ensure that our policies and procedures are in line with DFE and LA guidance.
- A senior member of staff, known as the DSL, is appointed with a clear job description. They have lead responsibility for Child Protection and Safeguarding and receive appropriate on-going training, supervision and support as well as sufficient time and resources to enable them to discharge their responsibilities.
- Parents/carers are aware of and understand our responsibilities to promote the safety and welfare of our pupils by making our statutory obligations clear.

- The Safeguarding and Child Protection policy is available on our website and is included in the staff handbook and volunteers' handbook.
- Child friendly information of how to raise a concern/make a disclosure has been developed through our PSHE curriculum/assemblies and one voice activities and is accessible to all children. We use an ELKLAN approach to support the understanding of pupils with SEND.
- We co-operate fully with MCC and MSP multi-agency safeguarding procedures and arrangements are in place to monitor the quality of referrals and interventions and the processes for escalation of concerns during half termly safeguarding meetings of the DSL team.
- We create a culture whereby all staff, volunteers and visitors feel confident and have knowledge of how to raise a concern about poor or unsafe practice in regard to the safeguarding and welfare of the children and young people and such concerns are addressed sensitively and effectively.
- We have systems in place to ensure that any staff who are carrying out both regulated activities and other roles commissioned from external agencies/ organisations have been DBS checked and their employing organisations have safeguarding policies in place, including safer recruitment and annual safeguarding training appropriate to roles and we are compliant with legislation relevant to our setting.
- We ensure a risk assessment takes place to establish that the appropriate checks take place on volunteers.
- We have appropriate procedures to ensure that there is no risk to children from visitors and we exercise diligence and prevent any organisation or speaker from using our facilities to disseminate extremist views or radicalise pupils and staff. All visitors are in the presence of St Paul's staff and all supply staff have DBS and level 1 safeguarding training.

There are suitable arrangements for visitors coming onto the premises which may include an assessment of the educational value, the age appropriateness of what is going to be delivered and whether relevant checks will be required

2.3 OUR DESIGNATED SAFEGUARDING LEAD (DSL)

Most DSL's are members of our Senior Leadership Team and each has a specific responsibility for championing the importance of safeguarding and promoting the welfare of children and young people. They take lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes in place. Some activities may be delegated as appropriate to a DDSL but they take the ultimate lead for child protection. (DDSL/s are trained to the same standard as the DSL).

The DSL team will:

- Act as the first point of contact with regards to all safeguarding matters.
- Encourage a culture of listening to children and taking account of their wishes and feelings, and also understand the difficulties some children may have in approaching staff about their circumstances.
- Work closely with the school's lead for mental health.
- Help promote educational outcomes by working closely with their teachers and sharing information about their welfare, safeguarding and child protection concerns.
- Attend specialist DSL training every two years.
- Keep up to date with changes in local policy and procedures and be aware of any guidance issued by the DfE, MSP and LA concerning Safeguarding, e.g., through DSL Networks, Safeguarding Newsletters and Circular Letters
- Provide/commission support and training for staff and volunteers.
- Liaise with the three safeguarding partners and work with other agencies in line with 'Working Together to Safeguard Children'.
- Ensure that all referrals made to Children's Services are effective and in line with MSP procedures, and follow escalation process if necessary. Understand the assessment process for providing early help.
- Have a working knowledge of how local authorities conduct a child protection case conference and review conference, and be able to attend and contribute to these effectively.
- Ensure that all staff with specific responsibility for safeguarding children, including the named DSL, receive the appropriate funding, training, resources and support needed to undertake this role. Access to professional supervision is recommended practice.
- Know when to call the police if a crime may have been committed following the National Police Chiefs' Guidance. (Annex C.p 165)
- Be aware of the requirement for children investigated by the police to be supported by an appropriate adult (PACE Code C 2019). (Annex C, p165)
- Refer cases to the Disclosure and Barring Service where a person is dismissed or has left due to risk/harm to a child.
- Ensure that all staff and volunteers understand and are aware of our reporting and recording procedures and are clear about what to do if they have a concern about a child.
- Create and maintain child protection files and keep them up to date.
- Keep information confidential and store securely with a separate file for each child.
- Help promote educational outcomes for vulnerable children, including those with, or who have had, a social worker, in conjunction with other appropriate colleagues (KCSiE, 191-196)
- Share and transfer safeguarding and child protection information as appropriate using the CYPOMS system
- Always be available during school/college/setting hours during termtime, and at other times as designated by the Headteacher/Principal/Proprietor. During the breaks the headteacher will check weekly e-mails to ensure the

school are aware of any strategy meetings and will attend if possible. If the headteacher is away the SAH will check the e-mails during this time.

- Understand and support the school/college with regards to the requirements of the Prevent Duty and be able to provide advice and support to staff on protecting children from risk of radicalization.
- Promote supportive engagement with parents/carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- Understand the lasting impact that adversity and trauma can have on children and young people.
- Ensure the child protection policy is available publicly and parents/carers are made aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school/college in this. This information is available on our school website.
- Activate the escalation process where plans, partners or processes are not improving the situation or outcome for a child.

2.4 ALL STAFF

All staff in the school, including supply staff and volunteers have responsibility for safeguarding, according to their roles and under the guidance of the DSL.

All staff will:-

- Follow our agreed Code of Conduct and 'Safer Working Practices' guidance.
- Read Part One/Annex A/Annex B of KCSiE 2023 as directed by senior leaders and appropriate to individual roles.
- Attend training sessions/briefings as required to ensure that they are aware of the signs of Abuse, Neglect, Complex Safeguarding concerns and key LA approaches including Early Help, Signs of Safety, Safe & Together and ensuring that the voices of children are listened to and taken account of.
- Attend training sessions/briefings as required to ensure that they follow relevant policies.
- Provide a safe environment where children can learn.
- Be aware of specific vulnerabilities of some children, including those with poor attendance and those with a Social Worker.
- Understand the concept of 'it could happen here' in respect of child sexual violence or sexual harassment and be proactive in response to a whole school approach to the issue.
- Be approachable to children and respond appropriately to any disclosures.
- Be aware that there are a range of reasons why some children may not feel ready or know how to tell someone that they are being abused,

exploited or neglected, be professionally curious and actively build trusted relationships which facilitate communication.

- Never promise a child that they will not tell anyone about an allegation, as this may not ultimately be in the best interest of the child.
- Know what to do if they have a concern and follow our agreed procedures for recording concerns, sharing information and making referrals.
- Attend multi-agency meetings as required, if appropriate to their role.
- Be aware of the local early help processes and understand their role in it.
- Contribute to the teaching of safeguarding in the curriculum as required, if appropriate to their role.
- Provide targeted support for individual and groups of children as required, if appropriate to their role.

Teaching staff have additional statutory duties, including to report any cases of known or suspected Female Genital Mutilation.

3. TRAINING AND AWARENESS RAISING

- 3.1 In accordance with KCSiE 2023, all new staff and regular volunteers will receive appropriate safeguarding information during induction (including online safety and their responsibilities in relation to filtering and monitoring) and be made aware of the systems within the school/college which support safeguarding e.g. the Behaviour Policy. This will be during the whole staff briefing and team meetings. This training will be regularly updated
- 3.2 All staff must ensure that they have read and understood KCSiE: Part One/Annex A and/or Annex B. On the first training days in September, staff will sign to say they have read and understood the document.
- 3.3 All staff will receive regular child protection training at least every 2 years and at least an annual update which includes basic safeguarding information about our policies and procedures, signs and symptoms of abuse (emotional and physical), indicators of vulnerability to exploitation and radicalisation, how to manage a disclosure from a child as well as when and how to record a concern about the welfare of a child, with regular updates in relation to local and national changes. This will be in the form of reading documents and an overview from the headteacher on day one on the procedures and their roles.
- 3.4 All staff members will receive regular safeguarding and child protection training and updates, including online safety and their role and responsibility in relation to filtering and monitoring as required, providing

them with relevant skills and knowledge to safeguard children effectively. This will be in briefings/e.mails and in team meetings.

- 3.5 To recognise the expertise built within staff by training and managing concerns on a daily basis, staff will be provided with the opportunity to contribute to and shape safeguarding arrangements and the child protection policy. During policy reviews and PSHE planning and as part of our one voice work and well being group.
- 3.6 All interview panels will include at least one member that has completed up to date Safer Recruitment training within the last 3 years.
- 3.7 All staff need to understand the impact mental health problems may have on all aspects of safeguarding including the relevance of Adverse Childhood Experiences (ACEs) and the impact of trauma on children and young people and this is included in our training programme.

4. SAFEGUARDING/CHILD PROTECTION POLICY & PROCEDURES

4.1 PUPIL VOICE

Children are encouraged to contribute to the development of policies and share their views. During our One Voice hubs/our leadership groups and during PSHE lessons.

- 4.1.2 We support the LA in its progress towards UNICEF Child Friendly City status and participate in the UNICEF Rights Respecting School programme and are accredited at Gold Level.

4.2 POOR ATTENDANCE (references to 'absent' children throughout KCSiE 2023)

We adopt MCC Attendance Policy and Attendance Strategy and reflect these in our own policies. We attend targeted support meetings related to attendance when required.

- 4.2.1 We view poor attendance as a safeguarding issue and in accordance with our Attendance Policy, absences are rigorously pursued and recorded. This includes missing individual lessons, as well as being absent or late at Registration. Any concerning patterns are reviewed in partnership with the appropriate agencies, we take action to pursue and address all unauthorised absences in order to safeguard the welfare of children in our care.
- 4.2.2 Our Attendance Policy identifies how individual cases are managed and how we work proactively with parents/carers to ensure that they understand why attendance is important. In certain cases this may form part of an Early Help Assessment (EHA) or a Parenting Contract.

- 4.2.3 We implement the statutory and LA requirements in terms of monitoring and reporting children to the CME Team (named unchanged.)
- 4.2.4 We will follow the Anxiety Based School Avoidance guidance (MCC, updated version May 2023) to assist with strategies for supporting children and young people experiencing anxiety to return to school.
- 4.2.5 We will alert the relevant team or authority if a new child who has been expected to attend, does not arrive on the due date. (This is in response to learning from local serious case reviews.)

4.3 ALTERNATIVE PROVISION (AP)

- 4.3.1 We will only place children in AP which is a registered provider and has been quality assured e.g. is on the MCC approved provider list or has been judged by Ofsted to be Good or better.
- 4.3.2. Children who require access to AP will have a personalised learning plan designed to meet their needs. Our DSL will work together with the DSL at the AP to ensure effective sharing of information and that any safeguarding concerns are followed up appropriately.

4.4 EXCLUSIONS

- 4.4.1. We comply with statutory regulations and with the LA Inclusion Policy (Appendix C).
- 4.4.2. The DSL will be involved when a fixed term or permanent exclusion is being discussed and any safeguarding issues will be considered. If there is an open EH, CiN or CP, the EH Practitioner or Social Worker will be informed.
- 4.4.3 We will work with the MCC Weapon Carrying in Schools and Colleges guidance (Appendix C) to assist in decision making around exclusion and other responses to carrying or using weapons in school.
- 4.4.4 Where it is felt that a child or young person is likely to be permanently excluded a multi-agency assessment will be instigated to ensure that there is improved understanding of the needs of the young person and their family and that the key agencies are involved.

4.5 VULNERABLE GROUPS

- 4.5.1 We ensure that all key staff work together to safeguard vulnerable

children. This includes those children causing concern but not yet reaching statutory intervention level as well as those children who are in receipt of statutory support.

4.5.2 Any child may benefit from early help at times, but all staff will be particularly alert to the potential need for early help for a child who:

- Is disabled or has certain health conditions and has specific needs.
 - Has special educational needs (whether or not they have a statutory Education, Health and Care Plan.)
 - Has a mental health need.
 - Is a young carer.
 - Is showing signs of being drawn in to anti-social or criminal behavior, including gang involvement and association with organised crime groups or county lines.
 - Is frequently missing/goes missing from care or from home.
 - Is at risk of modern slavery, trafficking, sexual or criminal exploitation.
 - Is at risk of being radicalised or exploited.
 - Has a family member in prison, or is affected by parental offending.
 - Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse.
 - Is misusing drugs or alcohol themselves.
 - Has returned home to their family from care.
 - Is at risk of 'honour'- based abuse such as Female Genital Mutilation or Forced Marriage.
 - Is a privately fostered child.
 - Is persistently absent from education, including persistent absences for part of the school day.
- Additionally, these children will also be considered:
- International new arrival, refugee or asylum seeker.
 - Looked after, previously looked after or under a special guardianship order.
 - Has or has had a social worker.
 - LGBT children. (KCSiE, Part 2:203-205)
 - Has the potential for adultification.

4.5.3. Children with special educational needs and disabilities (SEND) can face additional safeguarding challenges. All staff are aware that additional barriers can exist when recognising abuse and neglect in this group of children. These can include:-

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration.
- Being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children.
- The potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Communication barriers and difficulties in managing or reporting these challenges.
(KCSiE, Part 2:199)

4.5.4 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. We have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems. (KCSiE, Part 2:180-186)

4.5.5. We ensure that staff consider the context in which incidents occur and whether wider environmental factors (extra-familial harm) are present in a child's life that are a threat to their safety and/or welfare.

4.5.6. We ensure that appropriate staff have the information they need in relation to a child's looked after legal status and regarding a child who was previously looked after. We work with relevant social workers and the Virtual School. (KCSiE, 187-196)

4.5.7 Where children have or have had a social worker, we will work alongside the social worker to ensure there is a clear education focus in the Plan for the child.

4.6 CHILD ON CHILD ABUSE (KCSiE, Part 5 & Part2,156)

4.6.1 All our staff recognise that children are capable of abusing their peers, including online.

4.6.2 Our separate Child on Child Abuse Policy clearly outlines our procedures and approach to this issue which are summarised below:-

- The procedures to minimise the risk of child-on-child abuse.
- The systems in place to ensure that children understand that the law is there to protect them not to criminalise them and for children to confidently report abuse, knowing their concerns will be taken seriously.
- How allegations of child-on-child abuse will be recorded, investigated and dealt with.

- Recognition of the importance of understanding inter-familial harms and our processes as to how victims, perpetrators and any other children affected by child-on-child abuse will be supported.
- Recognition that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and simply not be reported.
- Our clear zero-tolerance approach to abuse, never passing it off as 'banter', 'just having a laugh', 'part of growing up' or 'boys being boys'.
- Recognition that it is more likely girls will be victims and boys' perpetrators, but that all child-on-child abuse is unacceptable and will be taken seriously.
- Recognition of the different forms child on child abuse can take.
- Our response to reports of sexual violence and sexual harassment as guided by Part Five of KCSiE 2022.

4.7 ELECTIVE HOME EDUCATION

- 4.7.1 We understand the variety of reasons why some parents/carers would wish to home educate their child/ren and support this where the child's best education is at the heart of the decision.
- 4.7.2 We also understand that by being educated at home, some children are less visible to the services that are there to keep them safe and supported in line with their needs.
- 4.7.3 If a parent/carer informs us of their **intention** to remove their child/ren from school, we will aim to co-ordinate a meeting between ourselves, parents/carers (and other key professionals if relevant) to ensure that the best interests of the child have been considered, especially if the child has SEND, is vulnerable or has a social worker, **before** the final **decision** is made.
- 4.7.4 We will inform Manchester LA of all deletions from the admission register when a child is taken off-roll and we understand that a child may be removed from roll as soon as the parent has informed us of their decision.
- 4.7.5 We are familiar with the guidance from DfE outlining the roles and responsibilities of the LA in relation to Elective Home Education.

4.8 COMMUNITY SAFETY

4.8.1 Serious violence

We are aware of the indicators and risk factors which may signal that children are at risk from, or are involved with, serious violent crime.

- 4.8.2 We update our awareness training for staff based on new information regarding trends, modes of operation and language/slang when provided by partner agencies.

4.8.3 Child abduction and community safety incidents

We will support children by building on their confidence and ability to deal with challenging situations to enable them to keep themselves safe. Using our PSHE plans and visits from support groups.

- 4.8.3** Our response to children carrying knives or other weapons in school and in situations out of school is aligned to the Manchester Knife and Weapon Carrying in Schools and Colleges Guidance (Knife Crime Protocol) in which we take a holistic and measured approach on a case-by-case basis to such incidents in and out of school. (See Appendix C)

5 . CASE MANAGEMENT, RECORD KEEPING & MULTI-AGENCY WORKING

- 5.1 KEEPING RECORDS** We use CPOMS an electronic system to record all actions in regards to safeguarding children. This includes incidents relating to any child on child incidents.

5.1.1 We keep and maintain up to date information on children on the school roll including where and with whom the child is living, attainment, attendance, referrals to and support from other agencies. The record will also include a chronology of any other significant event in a child's life and up to date contact details for adults who have day to day care of the child.

5.1.2 We keep copies of all referrals to Children and Families Services, the Early Help Hub and any other agencies related to safeguarding children.

5.1.3 We keep our safeguarding records secure.

5.1.4 We send a pupil's child protection or safeguarding file separately from the main file to a new establishment if they leave as soon as we are informed of the new school. We keep a copy of the file in accordance with our Records Policy (See Appendix E) and statutory and LA Guidance (See Appendices A, B & D).

5.2 RECORDING AND REPORTING CONCERNS

- 5.2.1 All staff, volunteers and visitors have a responsibility to report **any** concerns about the welfare and safety of a child and all such concerns must be taken seriously. If a concern arises all staff, volunteers and visitors must:

- Speak to the DSL or the person who acts in their absence.
- Record the concern using our safeguarding recording system.

5.3 Procedure

- Complete a note of concern immediately where physically possible and discuss with a DSL. All information will be recorded on CPOMS by a DSL.
- Concerns relating to marks or injuries should be recorded on a 'Body Map' outline which should be scanned and uploaded to CPOMS.

It is vital that staff do not:

- dismiss concerns or disclosures as insignificant, they may provide a vital link to other information.
- keep such concerns to themselves.
- promise secrecy to children or adults making disclosures but reassure them that information will be shared appropriately and confidentially.

Staff are made aware that it is unacceptable for any member of staff to keep such concerns to themselves, including concerns about the conduct of another member of staff.

Passing on concerns

Each case will be considered by the DSL who will decide what information to share with which staff.

Further action

Decision Making

The DSL will decide, taking advice from the MSCB First Response Team (through the contact centre), if needed, which of the following actions is appropriate:

- If it is considered that a pupil has suffered or is at risk of significant harm, or that the concern might constitute a criminal offence, an immediate CP referral should be made.
- If the child is already 'Open to' a Social Worker an initial contact should be made with that Social Worker or if unavailable, the duty team member.
- If a child is considered to be potentially a Child In Need consent and advice for a Early Help Assessment should be sought.
- If the DSL decides that no further action should be taken at that time a record of the reasons for that decision will be noted. The DSL will keep a record of all information collected and any subsequent decisions and action taken, including details of other persons involved in the decision-making.

If the school makes a CP referral/contact, the Manchester Safeguarding Children Board Procedure will be followed by the DSL.

After a telephone contact to the Contact Centre the DSL will email a written 'Safeguarding Children Referral Form' to the Contact Centre as soon as

possible and ideally immediately after initial referral and at the latest within 24 hours.

Feedback

Within 24 hours the Children's Social Care Team (via the contact centre) should acknowledge a written contact. If no response is received the DSL should contact Children's Social Care (via the Contact Centre) to seek information. If this fails to get a response the DSL should contact the MSCB for advice. Whatever the outcome of reported concerns the DSL will report back to the member of staff involved and appraise them of the situation as appropriate, under the 'Need to Know' policy.

Vulnerable children - supporting pupils at risk

Children may be vulnerable because, for example, they have additional or Special Educational Needs, are Looked After, have experienced or are experiencing some form of neglect or other abuse.

We will seek to provide such children with the necessary support and to build their self-esteem and confidence.

Staff in contact with such children will be made appropriately aware of the child's needs and circumstances in order to maximise the effectiveness of support.

CP implications will be considered when individual support plans are reviewed in the case of children who require, for example, medication, some form of intimate care, help with changing or physical support or physical intervention. If a child, who is the subject of a Child Protection Plan, is missing from school without a verified valid reason the DSL will contact the assigned social worker. In the same way if a child that the school has concerns about, is missing the school will consider making a CP referral or contacting the police.

5.4 WORKING WITH PARENTS/CARERS

- 5.4.1 Our responsibility is to safeguard and promote the welfare of all the children in our care. We aim to do this in partnership with our parents/carers and would expect them to provide up-to-date contact details, including at least 2 emergency contacts.
- 5.4.2 In most cases parents/carers will be informed when concerns are raised about the safety and welfare of their child and given the opportunity to address any concerns raised.
- 5.4.3 We aim to engage with parents/carers through the LA Early Help processes, including holding strength-based conversations.
- 5.4.4 We will inform, and gain consent from parents/carers if possible, if a referral is to be made to Children's Social Care or any other agency **unless it is believed that by doing so would put the child at risk** eg in cases of suspected sexual abuse. We will record the reasons if consent is not gained.

5.4.5 In such cases the DSL or Headteacher will seek advice from Children's Social Care.

5.4 MULTI-AGENCY WORKING

5.4.1 We will develop effective links with other relevant agencies and co-operate as required with any enquiries regarding child protection issues.

5.4.2 We will develop effective links with the Early Help Hubs and carry out an Early Help Assessments (EHA), as appropriate.

5.4.3 We will notify the named Social Worker if:

- A child subject to a child protection plan is at risk of permanent exclusion.
- There is an unexplained absence of a child who is subject to a child protection plan.
- It has been agreed as part of any child protection plan or core group plan.

5.4.4. We will regularly review concerns if necessary, as detailed in KCSIE and will follow LA and MSP procedures if there is a need to re-refer or to escalate.

5.5 CONFIDENTIALITY & INFORMATION SHARING

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

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

5.5.3 All staff and volunteers understand that they have a professional responsibility to share information with other agencies, in the best interests of the child's safety, welfare and educational outcomes. This is a matter of routine.

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

5.5.5 We understand that the Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children

safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children. (KCSiE Part 2:115-123)

5.6 CHILD PROTECTION (CP), CHILD IN NEED (CiN) & TEAM AROUND THE CHILD/FAMILY MEETINGS AND CONFERENCES

- 5.6.1 A child protection conference will be held by Social Care if it is considered that the child is suffering or at risk of significant harm.
- 5.6.2 We will attend and contribute to initial and review CP conferences, CiN conferences and relevant multi-agency meetings, including core groups. Where staff are not available to attend in the holidays Manchester Safeguarding will be informed. Emails will be checked every 3 days during holiday times. Scheduled meetings arranged prior to holidays will be attended or notes sent to the case worker prior to the meeting.
- 5.6.3 Members of staff who are asked to attend a child protection conference or other core group meetings (either in person or virtually) about an individual pupil/family will need to have as much relevant updated information about the child as possible and will send a report, using the most up-to-date proforma to the Chair within the required timescales, at least 48 hours before the meeting.
- 5.6.4 Our reports will always include the voice of the child, which is especially important where there may be barriers to communication.
- 5.6.2 We will discuss and share reports with the parents/carers before the conference.
- 5.6.3 All relevant staff will be confident in using the tools which are part of the Signs of Safety approach, including refreshed and updated versions.

5.7 CONCERNS/DISCLOSURES BY CHILDREN, STAFF & VOLUNTEERS

- 5.7.1 Any concern, disclosure or expression of disquiet made by a child will be listened to seriously and acted upon as quickly as possible to safeguard his or her welfare.
- 5.7.2 All staff and volunteers must be clear with children that they cannot promise to keep secrets.

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

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

5.8 LEARNING FROM SERIOUS CASES

5.8.1 The MSP will always undertake a child practice review or serious case review (SCR) when a child dies (including death by suicide) and abuse or neglect is known or suspected to be a factor in their death. The purpose of the SCR is to:

- Find out if there are any lessons to be learnt from the case about how local professionals and agencies work together to safeguard and promote the welfare of children and young people.
- Identify what those lessons are, how they will be acted on and what is expected to change as a result of the serious case review.
- Improve inter-agency working to better safeguard and promote the welfare of children and young people.

5.8.2. If required we will provide an individual management report for a SCR and will cooperate fully with implementing outcomes of the review including reviewing policy, practice and procedures as required.

5.8.3 Our DSL will keep up to date with the findings from SCRs and other learning reviews nationally and in Manchester, share the learning and review our safeguarding procedures if relevant.

6. THE CURRICULUM

We are committed to promoting emotional health and wellbeing and to supporting the development of the skills needed to help keep children safe and healthy. This includes face to face teaching, blended learning and online learning as needed in response to any crisis situation that may arise.

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

6.2. This enables them to develop the necessary skills to build self-esteem,

respect others, support those in need, resolve conflict without resorting to violence, questions and challenge and to make informed choices in later life.

- 6.3 We take account of the latest advice and guidance provided to help address specific vulnerabilities and forms of grooming and exploitation e.g. Domestic Abuse, Child Sexual Exploitation, Peer on Peer/Child on Child Abuse, Radicalisation, 'Honour-based' Abuse, including Forced Marriage, Female Genital Mutilation & breast ironing, Modern Slavery and County Lines.

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

- 6.4 All children know that there are adults in our school/setting/college whom they can approach in confidence if they are in difficulty or feeling worried, and that their concerns will be taken seriously and treated with respect. We use worry boxes (or equivalent) and staff ensure pupils know they are available if they need to talk about anything. Where pupils are of concern for vulnerabilities, staff are allocated to monitor and check in with pupils. Our PSHE / One Voice and RRS work consistently reminds pupils to Speak Out.

- 6.5 Children are encouraged to contribute to the development of policies during 'leaderships groups/one voice and during working groups that are created where appropriate.

6.6 Children are taught about safeguarding including online safety and for some children, this will take a more personalised or contextualised approach, such as more vulnerable children, victims of abuse and some SEND children. (KCSiE Part 2,129)

- 6.7 We have a clear set of values and standards, upheld and demonstrated throughout all aspects of school/college life.

6.8 We have a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence or harassment

7 . ONLINE-SAFETY (KCSiE, Part 2, 135-148)

- 7.1 Online safety is a safeguarding issue and we understand that children must be safeguarded from potentially harmful and inappropriate online material. Our whole school/college approach empowers us to protect and educate pupils/students and staff in their use of technology and establishes mechanisms to identify, intervene in and escalate any concerns where appropriate. The purpose of Internet use in our school/setting/college is to help raise educational standards, promote pupil achievement, and support the professional work of staff as well as enhance our management information and business administration.
- 7.2 The checklist to ensure compliance with Filtering and Monitoring standards is included as Appendix B
- 7.3 We consider the 4C areas of risk to inform our online safety policy and ensure this is a running and interrelated theme when developing other relevant policies and procedures.
- 7.4 The Internet is an essential element in 21st century life for education, business and social interaction and we have a duty to provide children with quality access to it as part of their learning experience.
- 7.5 Our policy on the use of children's personal mobile phones and smart technology is clearly outlined in our acceptable use policy but in summary, we only allow year 6 to bring phones to school and these must be stored in the office and turned off, pupils must not have smart watches linked to the internet in school time. If there are any times that pupils do not follow this procedure parents will be called into school .
- 7.6 We will ensure that appropriate filtering methods (without 'over-blocking') are in place to ensure that pupils are safe from all types of inappropriate and unacceptable materials, including terrorist and extremist material. At St Paul's we use Smoothwall to filter our use and alerts are sent directly to the headteacher (DSL), computing lead and MGL support. These are investigated and appropriate action taken. Staff are trained on policy and procedures using acceptable use policy and e- safety policy. This is on an annual basis.
- 7.7 We use an appropriate level of security protection in order to safeguard our systems, staff and learners from evolving cyber-crime technologies and periodically review its effectiveness.
- 7.8 We will encourage children to use Social Media safely, including opportunities for them to think and discuss the issues and to check their sources of information. We will keep abreast of new developments that may potentially harm our children.

7.9 We have separate acceptable use policies (AUPs) for both staff and children. This covers the use of all technologies and platforms used, both on and offsite. This is shared at the annual start of year meeting and staff would also use the code of conduct to update themselves on expected behavior.

7.10 We will complete online safety audits as appropriate to our needs and know where to access recommended models.

7.11 We work with parents to promote good practice in keeping children safe online, including to support their children learning at home. Parents are offered advice on our website and in workshops.

7.12 We ensure that all staff adhere to safe and responsible online behaviours when providing home learning and communicating with families.

7.13 As technology, and the risks and harms associated with it, evolve and change rapidly, we will carry out an annual review of our approach to online safety supported by an annual risk assessment that considers and reflects the risks our children face. (KCSiE Part 2, 135-148)

8. SAFER RECRUITMENT & SELECTION OF STAFF

8.1 Our recruitment and selection policies and processes adhere to the DfE guidance, KCSiE and the LA model policy for Safer Recruitment (Appendices A & D)

8.2 Our safeguarding culture and vigilance, in conjunction with our policies and processes, will deter and prevent people unsuitable to work with children from applying or securing employment or volunteering opportunities at our school/college. These measures are outlined below and expanded in our Safer Recruitment Policy.

- All those involved with the recruitment and employment of staff to work with children have received appropriate safer recruitment training and at least one of the persons who conducts an interview has completed safer recruitment training.
- Our job adverts will include safeguarding requirements and the schools /colleges commitment to safeguarding and promoting the welfare of children.
- Our job adverts will make clear that safeguarding checks will be undertaken, including online checks for shortlisted candidates.
- We understand the process around filtering offences.
- Our application form will include the statement that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity.
- We do not accept CVs in place of an application form. 31

- Shortlisted applicants will be asked to complete a self-declaration of their criminal record or information that would make them unsuitable to work with children.
- Applicants must sign a declaration confirming information given is true.
- References are obtained by the school/college before interview and open references are not acceptable.
- Our selection techniques are pre-arranged and questions structured to understand suitability, skills and motivation for the role
- We will investigate at interview if any concerns have come to light about the candidate through the self-declaration or online checks.
 - We involve pupils/students in the process in a meaningful way
- All information in the decision-making process is recorded along with the decisions made.
- Correct pre-employment checks are carried out and appropriately stored on the single central record.
- We understand and complete appropriate processes to determine if there are any prohibitions, directions, sanctions disqualifications or restrictions related to the candidate.
- We understand the check which needs to be made for individuals who have lived or worked outside the UK.
- We adhere to duties which must be performed in relation to agency and third party staff, contractors, trainees or student teachers, visitors and volunteers.
 - We remain vigilant about safeguarding beyond the recruitment process and ensure commitment is evident to the safety and welfare of our children as enshrined in our ethos.

8.3 The Headteacher and Governing body will ensure that all external staff and volunteers, including out of hours organisations using our school site have been recruited safely, including DBS checks as appropriate.

- When our school is used for non-school activities, we ensure that arrangements are made to keep the children safe through our letting contracts. We specify that we expect providers to meet the guidance in Keeping Children Safe in Out of School Settings (KCSIE, Part 2, 167). 32

- If we receive an allegation related to an incident that happened when an individual or organisation was using our premises for the purposes of running activities for children, we will follow our own safeguarding policies and procedures, including informing the LADO if relevant. (KCSIE Part 4, 377)

8.4 The school maintains a single central record of all recruitment checks, updated and monitored at least termly, by senior leadership and governor.

8.5 Trainee teachers will be checked either by the school or by the training provider, from whom written confirmation will be obtained.

8.6 Written notification will be requested from any agency or third party organisation used by us to confirm that the organisation has carried out the statutory recruitment checks.

8.7 We will not routinely keep copies of DBS certificates, either electronically or in paper files but if we have good reason to do so, these will not be kept for longer than six months 8.7 Risk assessments are carried out on all volunteer activities as required.

9. MANAGING ALLEGATIONS AND CONCERNS AGAINST STAFF, SUPPLY STAFF, VOLUNTEERS AND CONTRACTORS

9.1 We follow the DfE guidance KCSiE, Section 4, when dealing with allegations made against staff, supply staff, volunteers and contractors applying the appropriate level of concern criteria and managing accordingly.

9.2 We follow the DfE guidance KCSiE, Section 4, when dealing with allegations made against staff, supply staff, volunteers and contractors applying the appropriate level of concern criteria and managing accordingly.

9.3 We work closely with the police, children's social care and MCC LADO when a risk of harm is indicated.

9.4 The welfare of the child/ren is paramount when considering an allegation and before contacting the LADO we make careful enquiries to help 33 determine facts and foundation to the allegation, aware of not jeopardising any future police investigation.

9.5 We consider allegations that may meet the harms threshold and those allegations/concerns that do not, referred to as 'low level concerns'. These are outlined in our Low Level Concerns Policy.

9.6 The harms threshold indicates that a person would pose a risk of harm if they have-

- Behaved in a way that has harmed a child or may have harmed a child.
- Possibly committed a criminal offence against or related to a child.
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children (including behavior that may have happened outside school/college, known as transferable risk)

9.7 Our Managing Allegations Policy details the processes and responses to reporting harm threshold cases and also managing their conclusions.

9.8 Concerns that do not meet the harm threshold may include

- Suspicions or nagging doubts about a member of staff.
- Complaints.
- Disclosures made by child, parent/carer or another adult within or outside of school/college.
- Inappropriate conduct outside of work.
- Those raised during recruitment and vetting processes.

9.9 Our open and transparent culture enables us to identify concerning, problematic or inappropriate behavior early thus minimising the risk of abuse.

9.10 Although low level concerns may not meet the harm threshold, they are not insignificant.

9.11 All low level concerns are reported to the headteacher/principal and may also be self-referred (KCSiE provides further clarity on processes. 423-440) 34

9.12 Our Low Level Concerns Policy details the processes and conclusion of low level concerns and guidance about including information in references.

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

9.14 We ensure that all staff are aware of how to raise a concern, including anonymously as a whistleblower. Describe procedure.

9.15 Historic allegations will be referred to the police.

10.SAFETY ON & OFF SITE

10.1 Our site is secure with safeguards in place to prevent any unauthorised access and also to prevent children leaving the site unsupervised.

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

- 10.3 All visitors, including visiting speakers, are subject to our safeguarding protocols while on site. We will undertake an assessment of the education value, age appropriateness and content of the visitors itinerary.
- 10.4 Visitors who are in school/college in a professional capacity will have their ID checked and assurance sought that they have an appropriate DBS check.
- 10.5 We will ensure that any contractor, or any employee of a contractor, who is to work in our school, has been subject to the appropriate level of DBS check. We are responsible for determining the appropriate level of supervision depending on the circumstances and set out our safeguarding requirements in any contracts between school/college and the contractor's organisation. We will always check the identities of contractors and their staff on arrival.
- 10.6 We operate a responsible booking protocol and will carry out appropriate checks on all organisations which request to hire our facilities.
- 10.7 When the school/college is let, if services or activities are provided by the governing body or proprietor, under the direct supervision or management of school/college staff, the school/college arrangements for child protection will apply.
- 10.8 When the school/college is let and services or activities are provided by another body, we seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed) and ensure there are arrangements in place to liaise with school/college on these matters where appropriate.
- 10.9 Should we receive an allegation relating to an incident that happened when an individual or organisation were using our premises for the purpose of running activities for children, we will follow our safeguarding policies and procedures including informing the LADO.
- 10.10 Safeguarding arrangements should be included in any lease or hire agreement as a condition of use and occupation of the school/college premises – failure to comply with this will lead to termination of the agreement.
- 10.11 We exercise due diligence to prevent any organisation or speaker from using our facilities to disseminate extremist views or radicalise pupils or staff. All visitors have completed checks and school staff stay with any

speaker during their time on the premises and would be expected to stop any presentation that felt inappropriate or not following St Paul's procedures.

10.12 We have a work experience placement policy and procedures in place. We will ensure that any person supervising a child on a placement has been subject to the appropriate level of DBS check.

10.13 All school visits are fully risk-assessed and no child will be taken offsite without parental permission.

10.14 For international exchanges, we will liaise with our partner schools abroad to establish a shared understanding of the arrangements in place both before and during the visit. We will ensure we are satisfied that these are appropriate and sufficient to safeguard effectively every child who will take part in the exchange. We may also feel it necessary to contact the relevant foreign embassy or High Commission of the country in question to discuss what checks may be possible in respect of those providing homestay outside the UK.

10.15 We have a Health & Safety policy e.g. for contacting parents and for reporting to the emergency services, including police and hospitals. 36

10.16 We have read and considered the MCC/One Education Critical Incident guidance, the DfE Emergency planning and response for education, childcare and children's social care settings and School and College Security GOV.UK and we have a Critical Incident policy in place.

11. COMPLEX SAFEGUARDING

Serious violence

11.1. We are aware of the indicators and risk factors which may signal that children are at risk from, or are involved with serious violent crime

11.2. We will support referrals to Engage panels by providing information about concerns and worries for children involved in ASB and on the edge of criminality, including whether interventions have already been put in place and their success or not. Child Criminal Exploitation and Child Sexual Exploitation.

11.2.1 Children's Social Care will refer cases of child exploitation, criminal or sexual, to the Complex Safeguarding Hub and we will contact the professionals' advice line for further support to hasten this process or seek guidance, as appropriate.

11.2.2 We understand that schools are one of many locations where children can be targeted and recruited into county lines and recognise additional specific indicators that may be present when a child is criminally exploited through involvement in county lines. (KCSiE, Annex B)

11.2.3 We are aware of the significantly low numbers of reported CCE/CSE cases for girls locally and remain vigilant in recognising the signs of involvement for both boys and girls.

11.2.4 We are mindful of the language and descriptors used when discussing or referring CCE and CSE instances and avoid all victim blaming language.

11.2.5 We consider the use of the term 'gang' and only apply it to Organised Crime Gangs, not urban or street groups, although our children may perceive that they belong to, or associate with, a named 'gang'.

11.2.6 We will seek help, support or recommendations from statutory partners with finding suitable outside presenters to deliver awareness and resilience 37 programmes to help our children make good choices in the near and long term and have used a variety of organizations including police, social team, prevent team, NSPCC, Manchester Helathy schools team and school nurse service.

11.2.7 We are familiar with My Safety Planning approach for Child protection in extra-familial harm circumstances.

12.00 Allegations of abuse made against other pupils

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”, as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils 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 pupils in the school at risk
- › Is violent
- › Involves pupils being forced to use drugs or alcohol

- › Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

See KCSIE for more information about child-on-child abuse.

Procedures for dealing with allegations of child-on-child abuse

If a pupil makes an allegation of abuse against another pupil:

- › 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 victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s.)
- › The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate.

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

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

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

To achieve this, we will:

- › Challenge any form of derogatory 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 pupils, and initiation or hazing type violence with respect to boys.
- › Ensure our curriculum helps to educate pupils about appropriate behaviour and consent.
- › Ensure pupils are able to easily and confidently report abuse using our reporting systems (tell a trusted adult.)
- › Ensure staff reassure victims that they are being taken seriously.
- › Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners.

- › Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed.
- › Consider intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment.
- › Ensure staff are trained to understand:
 - How to recognise the indicators and signs of different types of abuse, and know how to identify them and respond to reports.
 - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here.”
 - That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims 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 pupil 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.
 - The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it.
 - That they should speak to the DSL if they have any concerns.
 - That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side.

The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

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

- › Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA children’s social care to determine this.

- › There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing.

13 Sharing of nudes and semi-nudes ('sexting')

Staff responsibilities when responding to an incident

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

You must **not**:

- › View, copy, print, share, store or save the imagery yourself, or ask a pupil 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 pupil to delete it.
- › Ask the pupil(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 pupil(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 pupil(s) that they will receive support and help from the DSL.

Initial review meeting

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

- › Whether there is an immediate risk to pupil(s.)
- › If a referral needs to be made to the police and/or children's social care.
- › If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed.)
- › What further information is required to decide on the best response.
- › Whether the image(s) 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 or videos from devices or online services.
- › Any relevant facts about the pupils 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 pupils involved (in most cases parents/carers 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 images or videos 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 pupil in the images or videos is under 13.
- › The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (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. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

They will hold interviews with the pupils involved (if appropriate).

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

Informing parents/carers

The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

Referring to the police

If it is necessary to refer an incident to the police, this will be done through a police community support officer, local neighbourhood police, dialling 101 or 999 if deemed appropriate.

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 5 of this policy also apply to recording these incidents.

Curriculum coverage

Pupils are introduced to the issues surrounding the sharing of pictures as part of our PSHE and computing programmes. Pupils are taught about safety on line and how to report any concerns.

14. Part 1 & Annex A and Annex B – must be read by all staff and governing body

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1181962/Keeping_children_safe_in_education_2023_-_part_one.pdf

Please see link above or website for full document

APPENDICES

Below are a number of links and documents that are referred to in the policy above.

A (1) Legislation & statutory guidance

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education \(2022\)](#) and [Working Together to Safeguard Children \(2018\)](#), and the [Governance Handbook](#).

This policy is also based on the following legislation:

- › Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- › [The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to be trained in safer recruitment techniques
- › [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- › Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- › [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- › [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- › Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- › [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- › [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)

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

Our policy complements and supports other relevant school policies (Appendix E).

OFSTED elements linked to Safeguarding- this is not an exhaustive list but key points

Safeguarding in the EYFS – see link below for details

<https://www.gov.uk/government/publications/inspecting-safeguarding-in-early-years-education-and-skills/inspecting-safeguarding-in-early-years-education-and-skills>

Documents to support safeguarding

- 'Keeping Children Safe in Education', in full - latest update, currently September 2022
- Ofsted Section 5 Inspection Framework for Schools
- 'Inspecting Safeguarding in Early Years, Schools & Skills Settings'
- 'Working Together to Safeguard Children'
- Prevent Duty, Section 26 Counter Terrorism & Security Act
- FGM Duty, Multi-agency Statutory Guidance on FGM April 2016, Section 74 Serious Crime Act 2015
- Serious Case Reviews & Domestic Homicide Reviews (SCRs & DHRs)
- DFE Statutory Policies for Schools
- DFE Children Missing Education, Stat Guidance
- DFE Designated Teacher for LAC Guidance

- DFE Supervision of Regulated Activity
- Disqualification under the Childcare Act 2006, update 31st August 2018
- Alternative Provision, Stat guidance
- Teachers' Standards
- Governors' Handbook
- 'Listening to & involving children & young people', stat guidance
- Health & Safety Legislation

B.Non-statutory Guidance

- DFE 'What to do if you are worried a child is being abused - Advice for practitioners'
- 'Safer Working Practices'
- DFE National Standards of Excellence for Headteachers,
- DFE 'Use of Reasonable Force in Schools',
- United Nations Convention on the Rights of the Child, Article 2,3 6 & 12
- NSPCC Whistleblowing Adviceline

C.MCC, MSP & GM Policies, Procedures&Guidance

Links to:-

- MSP Website:-
- MSP & GM Policies
- MSP Multi-agency Levels of Need & Response Framework,
- Safeguarding Concerns, Guidance & Proformas, including escalation process
- MSP LADO Referral Process
- MSP Learning From Serious Case Reviews
- Help & Support Manchester Website:-
- Early Help Strategy, Guidance, Assessments & Referrals
- Signs of Safety Strategy, Guidance & Resources
- National Police Chiefs' Guidance

D. Links to Other Relevant School Policies/Procedures

- Health and Safety
- Physical Interventions/Restraint
- Work Experience and Extended work placements
- Sex and Relationships Education
- Equal Opportunities
- E-Safety
- Extended Schools Activities
- Behaviour Management including fixed and short term exclusions
- Trips and Visit
- Special Educational Needs

- Toileting and Intimate Care
- Disability Discrimination
- Looked After Children
- Anti-bullying
- Administration of Medicines
- Letting to external organisations
- External visitors/speakers
- Whistle blowing
- Code of conduct
- Grievance policy

E. Links to Other Education Department Policies/Guidance

Schools Hub

- 'Safeguarding' model policy & guidance
- 'Safer Recruitment' model policy
- Safeguarding Children with SEND
- Manchester Governors' Handbook MCC
- Attendance Guidance
- CME Guidance
- Inclusion Strategy

UKIS Governors' Guidance for Online Safety

F. Abbreviations

- | | |
|--------|--|
| • CiN | Child in Need |
| • CP | Child Protection |
| • CSC | Children's Social Care |
| • DSL | Designated Safeguarding Lead |
| • EH | Early Help |
| • EHA | Early Help Assessment |
| • GM | Greater Manchester |
| • LADO | Local Authority Designated Officer |
| • MASH | Multi Agency Safeguarding Hub |
| • MCC | Manchester City Council |
| • MSCB | Manchester Safeguarding Children's Board |
| • SOS | Signs of Safety |