

TEENAGE KICKS

• ENGAGEMENT • PROGRESS • OUTCOMES

Child Protection & Safeguarding Policy & Procedures

Approved by:	Colin Phillips (Proprietor)
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Headteacher's Signature:	

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3. Definitions

Safeguarding and promoting the welfare of children means:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment, whether that is within or outside the home, including online.
- Preventing the impairment of children's mental and physical health or development.
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best outcomes

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. Appendix 1 explains the different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

Children includes everyone under the age of 18.

1. Aims

The school aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues

2. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance, [Keeping Children Safe in Education 2024](#) and [Working Together to Safeguard Children 2018](#), and the [Governance Handbook](#). We comply with this guidance and the procedures set out by Oldham Safeguarding Partnership.

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 one person on a school interview/appointment panel 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 CounterTerrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The [Childcare \(Disqualification\) Regulations 2009](#) and [Childcare Act 2006](#), which set out who is disqualified from working with children
- [The Human Rights Act 1998 \(HRA\)](#) sets out the fundamental rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (ECHR) (the Convention) that are deemed to apply in the UK. It compels public organisations to respect and protect an individual's human rights when they make individual decisions about them. Under the HRA, it is unlawful for schools and colleges to act in a way that is incompatible with the Convention. The specific Convention rights applying to schools and colleges are:
 - Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)
 - Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity
 - Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination,²⁵ and
 - Protocol 1, Article 2: protects the right to education. Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances

[Equality Act 2010](#). Schools have obligations under the Equality Act 2010 (the Equality Act). According to the Equality Act, schools and colleges must not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics). Whilst all of the above protections are important in the context of safeguarding, this guidance and the legal duties placed on schools and colleges, in relation to safeguarding and promoting the welfare of children, governing bodies and proprietors should carefully consider how they are supporting their pupils and students with regard to particular protected characteristics - including disability, sex, sexual orientation, gender reassignment and race. Provisions within the Equality Act allow schools and colleges to take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting pupils or students with a particular protected characteristic in order to meet their specific need. This includes a duty to make reasonable adjustments for disabled children and young people, including those with long term conditions. A school or college, could, for example, consider taking positive action to support girls if there was evidence they were being disproportionately subjected to sexual violence or sexual harassment

- [Public Sector Equality Duty](#) (PSED) is found in the Equality Act. Compliance with the PSED is a legal requirement for state-funded schools and colleges, advice on this – including on specific duties, is

set out in the advice linked in paragraph. The PSED places a general duty on schools and colleges to have, in the exercise of their functions, due regard to the need to eliminate unlawful discrimination, harassment and victimisation (and any other conduct prohibited under the Equality Act), to advance equality of opportunity and foster good relations between those who share a relevant protected characteristic and those who do not. The duty applies to all protected characteristics and means that whenever significant decisions are being made or policies developed, specific consideration must be given to the equality implications of these such as, for example, the need to eliminate unlawful behaviours that relate to them, such as sexual violence and sexual harassment, misogyny/misandry and racism. This is one reason why good recordkeeping and monitoring of all forms of abuse and harassment is essential. The PSED helps schools and colleges (which are subject to it) to focus on key issues of concern and how to improve pupil and student outcomes. Some pupils or students may be more at risk of harm from specific issues such as sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination. Such concerns will differ between education settings, but it is important schools and colleges are conscious of disproportionate vulnerabilities and integrate this into their safeguarding policies and procedures. For further information please see Technical Guidance on the Public Sector Equality Duty: England | Equality and Human Rights Commission (equalityhumanrights.com)

- [Data Protection Act 2018 and the UK GDPR](#). It is important that governing bodies and proprietors are aware that among other obligations, the Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. See ICO guidance 'For Organisations' which includes information about your obligations and how to comply, including protecting personal information, and providing access to official information

4. Equality statement

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 or disabilities
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic abuse or poor mental health.
- Are at risk of FGM, sexual/criminal exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are looked after or have previously been looked after
- Are privately fostered

5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff and volunteers in the school and is consistent with the procedures of Oldham Safeguarding Children Partnership. Our policy and procedures also apply to extended school and off-site activities.

5.1 All staff

All staff will read and understand part 1 of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education 2024](#), and review this guidance at least annually.

All staff will be aware of:

- Safeguarding Issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, deliberately missing education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude 12 images and/or videos can be signs that children are at risk.
- Our systems which support safeguarding, including the staff code of conduct and the role of the designated safeguarding lead (DSL), the behaviour policy, and the safeguarding response to children who go missing from education

The Early Help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment

- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including statutory duties such as reporting FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), FGM and radicalisation. All staff are aware that safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone.
- How to raise a safeguarding concern or allegation in relation to a member of staff, volunteer or supply staff

Section 12 and Appendix 3 of this policy outline in more detail how staff are supported to do this.

5.2 The Designated Safeguarding Lead (DSL)

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns, when out of working hours they can be contacted as per details below. Any of the designated leads/officer can be contacted on their school mobiles if off site.

Responsibility	Name	Safeguarding training
Senior Designated Safeguarding Lead – (SDPL) Has lead responsibility for dealing with all safeguarding & PREVENT issues/ referrals in our school.	James Docherty Executive Head Teacher -DSL 0161 243 3868 07825736471	NSPCC- DSL training Safeguarding and Child Protection essentials Safeguarding young people Safer Recruitment Prevent KCSIE Child Exploitation
Designated Safeguarding Lead - (DSL) DSL takes lead responsibility for child protection and wider safeguarding	Chris Valentine Headteacher - DSL 0161 243 3868	DSL level 3 – Oldham Council Saefeguarding Board Safeguarding young people Safer Recruitment Prevent KCSIE Child Exploitation Child protection
Deputy Safeguarding Lead - (DSL)	Amy Lewis Curriculum Lead DSL 0161 243 3868	DSL Level 3 Calderdale Safeguarding Board Safeguarding young people Safer Recruitment Prevent KCSIE Child Exploitation
Deputy Safeguarding Lead (DSL) DSL	Sheree Horn Assistant Head 0161 243 3868	DSL level 3- High Speed Training. Safeguarding young people Safer Recruitment Prevent KCSIE Child Exploitation

It is the responsibility of the Designated Safeguarding Lead (DSL) and Designated Officers to ensure that all safeguarding issues raised in school are effectively responded to, recorded and referred to the appropriate agency.

The DSL will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters

Take part in strategy discussions and inter-agency meetings and/or support other staff to do so

- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children’s social care, Channel programme or police), and support staff who make such referrals directly
- Link with the three local safeguarding partners and other external agencies as required. In relation to the Police, this will include consideration for “When to call the Police”

The DSL 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.

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

5.3 The Proprietor

The Proprietor will approve this policy at each review, and hold the Headteacher to account for its implementation.

The Proprietor or Executive Headteacher will act as the ‘case manager’ in the event that an allegation of abuse is made against the Headteacher, where appropriate (see appendix 3).

The Proprietor will ensure that they are trained in relevant and current guidance regarding safeguarding. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in our school are effective and support the delivery of a robust and whole school approach to safeguarding. Their training should be regularly updated.

5.4 The Headteacher

The Headteacher, or where appropriate her/his deputy, is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers are informed of this policy as part of their induction
- Communicating this policy to parents when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is 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 (see appendix 3)

6. Confidentiality

Teenage Kicks have a confidentiality agreement which all staff will be asked to sign and forms part of our induction;

This includes the following:

- Timely information sharing is essential to effective safeguarding
- Information must be shared on a ‘need-to-know’ basis, but you do not need consent to share information if a child is suffering, or at risk of, serious harm

- Staff should never promise a child that they will not tell anyone about an allegation, as this may not be in the child's best interests
- Confidentiality is also addressed in this policy with respect to record-keeping in section 11, and allegations of abuse against staff in appendix 3

7. Preventative Education

We recognise that schools play a crucial role in preventative education. Preventative education is most effective in the context of our whole-school approach that prepares pupils and students for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual. As a school we have a clear set of values and standards, upheld and demonstrated throughout all aspects of school life. These are underpinned by the school behaviour policy and pastoral support system, as well as by a planned programme of evidence-based RSE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum. This programme is inclusive and developed to be age and stage of development appropriate (especially when considering the needs of children with SEND and other vulnerabilities). This program tackles, at an age-appropriate stage, issues such as: healthy and respectful relationships, boundaries and consent, stereotyping, prejudice and equality, body confidence and self-esteem, how to recognise an abusive relationship, including coercive and controlling behavior, the concepts of, and laws relating to - sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so called 'honour'-based violence such as forced marriage and Female Genital Mutilation (FGM), and how to access support, and what constitutes sexual harassment and sexual violence and why these are always unacceptable.

8. Recognising abuse and taking action

Staff and volunteers must follow the procedures set out below in the event of a safeguarding issue.

8.1 Children may not feel ready or know how to tell someone they are being abused

All staff should be aware that children and young people may not feel ready, or know how to tell someone that they are being abused, exploited or neglected and/ or they may not recognise their experiences as harmful. For example, children and young people may feel embarrassed, humiliated or are being threatened. This could be due to their vulnerability, disability and/ or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to their DSL if they have concerns about a child or young person. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

8.2 If a child is in immediate danger

Make a referral to children's social care and/or the police **immediately** if a child is in immediate danger or at risk of harm. **Anyone can make a referral.**

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

We work in partnership with other agencies in the best interests of the children. Teenage Kicks will, where necessary, liaise with Police, any relevant external agency including GP, school nurse, and make a referral to Children's Social Care. Where a child has a social worker, the request for service should go to them immediately, or in their absence to their team manager.

To report a safeguarding concern contact MASH on 0161 770 7777 or email child.mash@oldham.gov.uk

<https://www.gov.uk/report-child-abuse-to-local-council>

8.3 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them.
- Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you.
- Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on.
- Do not promise to keep it a secret
- Speak directly to the DSL/Safeguarding officers immediately. Contact a member of SLT if you are unable to find a member of the safeguarding team
- Record on CPOMS the conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it. The record must include dates and times to ensure accurate record; alternatively, if appropriate and there is immediate risk of harm, make a referral to children's social care and/or the Police directly, and tell the DSL as soon as possible that you have done so.

8.4 If you discover that FGM has taken place or a pupil is at risk of FGM

So called honour based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including FGM, forced marriage (see 7.4), and practices such as breast ironing (see 7.5).

The Department for Education's (DFE 2024) Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Any member of staff who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must immediately report this to the police, personally. This is a statutory duty, and staff will face disciplinary sanctions for failing to meet it.

The duty above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff must inform the DSL if they have concerns that a pupil may be having FGM surgery in the future in the UK or abroad. Staff should not examine pupils.

The DSL will ensure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out

- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
 - Having difficulty walking, sitting or standing, or looking uncomfortable
 - Finding it hard to sit still for long periods of time (where this was not a problem previously)
 - Spending longer than normal in the bathroom or toilet due to difficulties urinating
 - Having frequent urinary, menstrual or stomach problems
- Avoiding physical exercise or missing PE
- Being repeatedly absent from school, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs Potential signs that a pupil may be at risk of FGM include:
 - The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
 - FGM being known to be practised in the girl's community or country of origin
 - A parent or family member expressing concern that FGM may be carried out
 - A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
 - Having a mother, older sibling or cousin who has undergone FGM
 - Having limited level of integration within UK society
 - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
 - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period
 - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
 - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
 - Being unexpectedly absent from school
 - Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

8.5 Forced Marriage

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

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 pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

Speak to the pupil 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 pupil to the appropriate support within school

8.6 Breast ironing

Breast Ironing is practiced in some African countries, notably Cameroon. Girls aged between 9 and 15 have hot pestles, stones or other implements rubbed on their developing breast to stop them growing further. In the vast majority of cases breast ironing is carried out by mothers or grandmothers and the men in the family are unaware. Estimates range between 25% and 50% of girls in Cameroon are affected by breast ironing, affecting up to 3.8 million women across Africa. Further information in relation to breast ironing can be found at www.nationalfgmcentre.org.uk

The practice of breast ironing is seen as a protection to girls by making them seem 'child-like' for longer and reduce the likelihood of pregnancy. Breast ironing is more prevalent in cities. Cameroon has one of the highest rates of literacy in Africa and ensuring that girls remain in education is seen as an important outcome of breast ironing

Breast ironing is a form of physical abuse that has been condemned by the United Nations and identified as Gender-based Violence

Staff worried about the risk of breast ironing in school should speak to the Designated Safeguarding Lead as soon as possible.

8.7 If you have concerns about extremism and radicalisation

- Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. 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.

- Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause'
- Schools have a duty to prevent children from being drawn into terrorism. All staff will undertake Prevent awareness training and the DSL make sure that all staff have access to appropriate training to equip them to identify children at risk.
- The DSL 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
- If a child is not at immediate risk of harm, where possible, speak to the DSL first to agree a course of action. Alternatively, make a referral to the local authority children's social care directly if appropriate
- Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral. 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. If there are concerns that the child is at risk of harm, then a referral must be made to children's social care regardless of whether a Channel referral is deemed appropriate

The Department for Education (DfE) also has a dedicated telephone helpline, 020 7340 7264, that school staff can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk **Note 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
- We will ensure that suitable internet filtering is in place and equip our pupils 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 of time.
- Staff will be alert to changes in pupils' behaviour.
- The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a pupil 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 should have confidence in their instincts and seek advice if something feels wrong. Staff should **always** take action if they are worried

8.8 Serious Violence

As included in KCSIE 2024, all staff should be aware of indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include:

Increased absence from school

A change in friendships or relationships with older individuals or groups

A significant decline in performance

Signs of self-harm or significant change in well-being

Signs of assault or unexplained injuries

Unexplained gifts or new possessions

These could indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs

All staff should be aware of the associated risks and understand the measures in place to manage these. Further advice can be provided in the Home Office's 2018 guidance documents Preventing Youth Violence and Gang Involvement and "Criminal exploitation of children and vulnerable adults: county lines guidance.

8.9 Child Exploitation

A form of abuse that occurs where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual (CSE) or criminal (CCE) activity

Child sexual exploitation (CSE) is where children are sexually exploited for money, power or status. This can involve violent, humiliating and degrading sexual assaults, but does not always involve physical contact and can 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.

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.

Child criminal exploitation (CCE) is where children are used to complete criminal activity (a) in exchange for something they need (i.e. food/money), (b) for the financial or other advantage of the perpetrator, or (c) through violence or the threat of violence. This can also occur through the use of technology

CCE can include county lines (see below) or children being forced to work in cannabis factories, forced to shoplift or pickpocket or to threaten other young people.

County lines is a form of CCE that refers to gangs or organised criminal networks exploiting children to transport illegal drugs/drug money into one or more importing areas (within the UK) using 'deal lines' (dedicated mobile phone lines). Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

If a member of staff suspects CSE or 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.

Indicators of child exploitation can include a child:

Appearing with unexplained gifts or new possessions

Associating with other young people involved in exploitation

Having older boyfriends or girlfriends

Suffering from sexually transmitted infections or becoming pregnant

Displaying inappropriate sexualised behavior

Suffering from changes in emotional wellbeing

Misusing drugs and/or alcohol

Going missing for periods of time, or regularly coming home late

Regularly missing school or education

Sexting

- There is no accepted definition of 'sexting' but most professionals agree that it refers to the sending or posting of sexually suggestive images, including nude or semi-nude photographs of a person under 18 years of age, via mobile phone or over the internet. The [UKCCIS advice](#) document refers to this as 'youth produced sexual imagery'.
- All incidents involving youth produced sexual imagery will be responded to as follows:
- The incident will be referred to the DSL immediately and the DSL and/or a member of the Safeguarding team will hold an initial review meeting with appropriate staff. If appropriate, there will be subsequent interviews with the young people involved.
- Parents will be informed at an early stage and involved in the process, unless there is good reason to believe that involving parents would put the young person at risk of harm.

- At any point in the process, if there is a concern a young person has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately in accordance with this policy.
- In some instances, it may be necessary to refer the matter to the police. Once a report is made to the police, the report must be recorded and the police will investigate it. This may include seizure of devices and interviews with the young people involved.

8.10 Domestic Abuse

Domestic abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass but is not limited to: psychological; physical; sexual; financial; and emotional

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Children can themselves be victims of domestic abuse in their own relationships (teenage relationship abuse).

8.11 Online Safety

The prevalence of issues arising through children's access to the online world is significant and all staff should be aware of associated risks and signs/symptoms. These are categorised within KCSIE 2024 as:

Content

Contact

Conduct

Commerce

This includes non-age-appropriate content, self-harm and suicide, sexting, cyberbullying, grooming, radicalisation and gaming (now identified by the World Health Organisation as a disorder).

KCSIE 2024 makes specific reference to keeping children safe online including when they are online at home. This is partly in response to the significant impact of COVID-19 in relation to children's use of the online world and the challenges as a result.

Teenage Kicks will have appropriate filters for all its online access and monitor students' online use when using the school networks.

All online contact with children and their families (i.e remote learning, counselling and meetings) includes the use of reinforcement around the importance of children being safe online and families are likely to find it helpful what systems our school uses to filter and monitor online use. It is especially important that families are aware of what their children are being asked to do online including the sites they will be asked to access and who from the school (if anyone) they will have contact with.

8.12 Mental Health

KCSIE 2024 has the inclusion of mental health within its definition of safeguarding. Supporting all children's mental health is a key priority for Teenage Kicks and this includes preventing/acting on abuse caused by impairment of a child's mental health or development. All staff will be trained in the signs/symptoms of

poor mental health and will record their concerns on CPOMS as well as informing the DSL immediately if they perceive that the child is at risk of harm (including through self-harm or suicide).

Poor mental health is an indicator of potential harm and potential adverse childhood experiences

Specific reference to safeguarding in relation to mental health can be found in the school's Mental Health and Wellbeing Policy.

8.13 Children missing from education

A child going missing from education is a potential indicator of abuse or neglect, and such children are at risk of being victims of harm, exploitation or radicalisation.

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
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- 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 will be 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 in immediate danger or at risk of harm.

8.14 Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will contact parents/carers and any relevant agencies involved with the family i.e. social care. We will liaise with the family and recommend they notify the police. If a pupil goes missing during the school day we will contact the family and the police. A note of all calls made and contact with relevant agencies will be logged and retained in school.

8.15 Extra-Familial Harms

Safeguarding concerns can be associated with factors outside the home environment and all staff (but especially safeguarding staff) should be aware of the context that such concerns can occur. This includes issues that arise in school, between peers, within the local community or online. Children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation and serious youth violence.

The school will consider all potential harms when assessing the risk to a pupil

8.16 Private Fostering

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more

A 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

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

Whilst most privately fostered children are appropriately supported and looked after, they are potentially vulnerable group who should be monitored by the local authority.

Teenage Kicks has a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. Teenage Kicks will make it clear who has parental responsibility

School staff will notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the LA.

On admission to Teenage Kicks, we will take steps to verify the relationship of the adults to the child who is being registered

8.17 If you have concerns about a child (as opposed to a child being in immediate danger)

Figure 1 illustrates the procedure to follow if you have concerns about a child's welfare and the child is not in immediate danger.

Where possible, speak to the DSL first to agree a course of action. Alternatively, make a referral to local authority children's social care directly (see 'Referral' below).

You can also contact the charity NSPCC on 0808 800 5000 if you need advice on the appropriate action.

Early help

If early help is appropriate, the DSL will support you in liaising with other agencies and setting up an interagency assessment as appropriate.

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

Referral

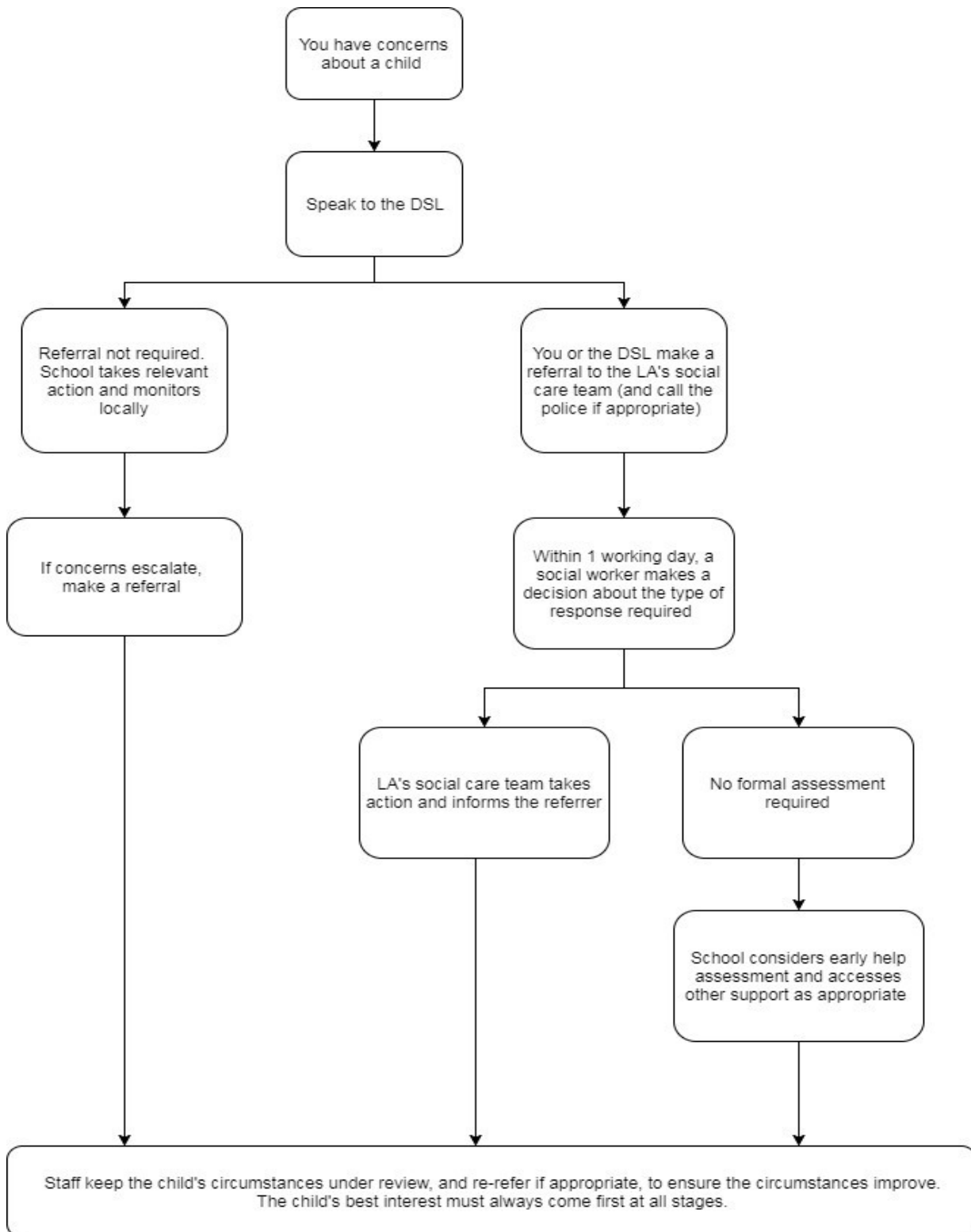
If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

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

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must contact the local authority and make sure the case is reconsidered to ensure the concerns have been addressed and the child's situation improves.

Figure 1: procedure if you have concerns about a child's welfare (no immediate danger)



8.18 Concerns about a staff member, volunteer, contractors or supply staff

If there is a safeguarding concern or allegation that may meet the harm test, then this should be addressed in line with Part 4 of KCSIE 2024.

If there is a concern that does not meet the harm threshold. This is considered a 'low level' concern. Whether a concern meets the harm threshold or not, staff are expected to follow the same procedures for any other concern.

Members of staff must comply with the requirements of the Department for Education (DFE) Teachers' Standards;

<https://www.gov.uk/government/publications/teachers-standards> Members

of staff must comply with the schools Code of Conduct.

In line with the school's Whistleblowing Policy, if you have a concern about a member of staff, volunteer or supply staff, speak to the Headteacher. If you have concerns about the Headteacher, speak to the Proprietor. You can also discuss any concerns about any staff member, volunteer or supply staff with the DSL

The Headteacher/DSL will then follow the procedures set out in Appendix 3, if appropriate. The DSL (or the Proprietor, in the case of a concern about the Headteacher) will also inform the designated officer for the local authority (LADO)

In relation to allegations against supply staff, KCSIE states 'the school or college will usually take the lead because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process'. Therefore, the school will act as lead professional for these allegations and communicate regularly with the LADO and supply agency. Supply agencies will be informed of the school process for managing allegations.

If you have concerns about a member of staff or volunteer, speak to the Headteacher. If you have concerns about the Headteacher, speak to the Proprietor.

You can also discuss any concerns about any staff member or volunteer with the DSL.

The Headteacher/Proprietor/ DSL will then follow the procedures set out in Appendix 3, if appropriate.

8.19 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", "part of growing up", "boys being boys" and "just having a laugh". All staff should understand that even if there are no reports in our school, it does not mean it is not happening. It may be the case that child on child abuse is not being reported. As such, it is important that if staff have any concerns regarding child on child abuse, they will speak to DSL.

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 (both in school or outside of school, including online):

- 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 criminal exploitation, such as threatening other children into criminal activity
- Involves sexual exploitation or sexual abuse, such as indecent exposure, sexual assault, or sexually inappropriate pictures or videos (including sexting)

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

- You must tell the DSL and record the allegation, 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 – both the victim(s) and the child(ren) against whom the allegation has been made – with a named person they can talk to if needed
- The DSL will contact the children and adolescent mental health services (HYM), if appropriate.
- Child on child abuse takes many forms, including;
Physical abuse; such as biting, hitting, kicking or hair pulling.
- Sexually harmful behaviour/sexual abuse; such as inappropriate sexual language, touching, sexual assault, touching themselves sexually, or to engage in sexual activity with a third party. This includes sexual harassment such as comments, remarks, jokes and online harassment. This may be stand alone or part of a broader pattern of abuse.
- Sexting; including pressuring another person to send a sexual imagery video content.
- Upskirting, typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence
- Teenage relationship abuse; defined as a pattern of actual or threatened acts of physical, sexual or emotional abuse, perpetrated against a current or former partner.
- Initiation/ hazing; used to induct newcomers into an organisation such as sports team or school groups by subjecting them to series of potentially humiliating, embarrassing or abusing trials which promote a bond between them.
- Prejudiced behaviour; a range of behaviours which causes someone to feel powerless, worthless or excluded and which relates to prejudices around belonging, identity and equality, in particular prejudices linked to disabilities, special educational needs, ethnic, cultural and religious backgrounds, gender and sexual identity.
- Consensual and non-consensual sharing of nude and/ or semi-nude images and/ or videos also known as 'sexting' or 'youth produced sexual imagery'.

We will minimise the risk of child on child abuse by:

- Challenging any form of derogatory or sexualised language or behaviour
- Being 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
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent

- Ensuring pupils know they can talk to staff confidentially by regularly remind them during assemblies, form time and during PHSE lessons
- Ensuring staff are trained to understand 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.
- Support is offered to pupils who experience or have experienced child on child abuse by the following means:
 - One to One session with the school counsellor
 - Allocated time with key members of staff.
 - Pupils are encouraged to support each other in school, this in turn helps build relationships and builds their confidence in sharing experiences.
- All incidents involving child on child abuse will be dealt with as follows;
 - The incident will be referred to the DSL immediately and dealt with using the same response to incidents of sexting (detailed above).
- Refer to Appendix 4 (Oldham guidelines)

9. Notifying parents

Where appropriate, we will discuss any concerns about a child with the child's parents. The DSL 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.

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

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

10. Mobile phones and cameras

Staff are allowed to bring their personal phones to school for their own use, but will limit such use to noncontact time when pupils are not present. Staff members' personal phones will remain in their bags or cupboards during contact time with pupils.

Staff will not take pictures or recordings of pupils on their personal phones or cameras.

We will follow the Data Protection Act 2018 & the recent update in the data protection law (UK GDPR) when taking and storing photos and recordings for use in the school.

Please refer to the Mobile Phone & Camera Policy.

11. Complaints and concerns about school safeguarding practices

10.1 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 Appendix 3).

All allegations made against an adult in a position of trust, including members of staff, agency supply, contractors or volunteers, will be treated seriously and must be brought to the immediate attention of the Head Teacher (SDPL).

In the case of the allegation being made against the Headteacher, this must be brought to the attention of the Proprietor and the Local Authority Designated Officer (LADO).

A brief summary of procedures is detailed below. The school/LA will:

Discuss the nature of the allegations with the LADO (Local Authority Designated Officer) in order for the appropriate action to be taken.

Contact the parent/carer of the child if advised to do so by the LADO

Depending on the allegation being made, organise an initial evaluation meeting or strategy discussion if advised to do so by the LADO

Consider the rights of the staff member for a fair and equal process of investigation

Ensure that the appropriate disciplinary procedures are followed including whether suspending a member of staff from work until the outcome of any investigation is deemed necessary Act on any decisions made in any strategy meeting

11.2 Other complaints

Please refer to the School complaints statement / policy.

11.3 Whistle-blowing

Please refer to the School Whistleblowing Policy

12. Record-keeping

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

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

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded on CPOMs. Staff can choose to upload a hand-written record on CPOMs if required.

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks.
- Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff.

13. Training

13.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from Oldham Safeguarding Partnership.

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

Staff will also receive regular safeguarding and child protection updates (for example, through emails, e-bulletins and staff meetings) as required, but at least annually.

Volunteers will receive appropriate training, if applicable.

13.2 The DSL and DSO

The DSL and DSO will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake Prevent awareness training.

13.3 Recruitment – interview/appointment panels

At least one person on any interview/appointment panel for a post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, Keeping Children Safe in Education, and be in line with local safeguarding procedures.

13.4 Staff who have contact with pupils and families

All staff who have contact with children and families will be provided with support, coaching and training, to promote the interests of children and allow for confidential discussions of sensitive issues.

14. Monitoring arrangements

This policy will be reviewed **annually** by the Headteacher, DSL & SLT. At every review, it will be approved by the Proprietor.

15. Links with other policies

This policy links to the following policies and procedures:

- Accident procedures
- Anti-bullying
- Attendance

- Behaviour Policy
- Curriculum
- Critical Incident (lockdown)
- Code of Conduct (Staff)
- Confidentiality Procedures
- Complaints
- Data Protection Policy
- Equal opportunities & Diversity
- Health and safety
- E-Safety & Acceptable use Policy
- Prevent procedures
- First aid
- Sex and relationship education
- Safer recruitment & Selection
- SEND Policy
- Whistleblowing
- These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education 2024.

Appendix 1: Types of Abuse

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

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects 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.

Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- 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
- 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

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

- Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- 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.

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:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Appendix 2: Safer Recruitment and DBS checks – policy and procedures

We will record all information on the checks carried out in the school's 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.

Appointing new staff

When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months
- 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
- Ensure they are not subject to a prohibition order if they are employed to be a teacher

- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent

We will seek references on all short-listed candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments.

Teenage Kicks do not have primary aged pupils on role. However, we ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the Childcare Disqualification (Regulations) 2009 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
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children

Existing staff

If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

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

- Where the 'harm test' is satisfied in respect of the individual (i.e. that no action or inaction occurred but the present risk that it could was significant)
- Where the individual has received a caution or conviction for a relevant offence
- If there is reason to believe that the individual has committed a listed relevant offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#)
- If 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. If they work on site whilst pupils are in school or if they are to be unsupervised at any times, there 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.

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.

Trainee/student 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.

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
- Obtain an enhanced DBS check without barred list information for all volunteers who are not in regulated activity, but who have an opportunity to come into contact with children on a regular basis, for example, supervised volunteers
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check for any volunteers not engaging in regulated activity
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the Childcare Disqualification (Regulations) 2009 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


Adults who supervise pupils 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 pupil 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.

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff.



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

Visitors are expected to sign the visitors' book and wear a visitor's sticker.

All visitors to our setting, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the 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 pupils or staff.

Appendix 3: Allegations of Abuse Made Against Staff

This section of this policy applies to all cases in which it is alleged that a current member of staff or volunteer has:

- Behaved in a way that has harmed a child, or may have harmed a child, or
- Possibly committed a criminal offence against or related to a child, or
- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children

It applies regardless of whether the alleged abuse took place in the school. Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the police.

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

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

Suspension

Suspension 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 it 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 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 Local Authority.
- 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
- **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)

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the Headteacher (or Proprietor where the Headteacher is the subject of the allegation) – the ‘case manager’ – will take the following steps:

- Immediately 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
- 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
- If immediate suspension is considered necessary, agree and record the rationale for this with 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 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 consider what other support is appropriate. Support is available through union representatives and HR.
- Inform the parents or 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 or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice

- Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
- 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 National College for Teaching and Leadership.

Where the police are involved, wherever possible the Local Authority 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.

Timescales

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, we will institute appropriate action within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, we will hold this within 15 working days
-

Specific actions Action following a criminal investigation or prosecution

The case manager will discuss with the 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 case manager and the school's personnel adviser will discuss with the designated officer whether to 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 case manager and personnel adviser will discuss with the designated officer whether to refer the matter to the NCTL 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 or malicious allegations

If an allegation is shown to be deliberately invented, or malicious, the Headteacher, or other appropriate person in the case of an allegation against the Headteacher, will consider whether any disciplinary action is appropriate against the pupil(s) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a pupil.

Confidentiality

The school 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 local authority's designated officer, 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. Such records will include:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken and decisions reached (and justification for these, as stated above)

If an allegation or concern is not found to have been malicious, the school will retain the records of the case on the individual's confidential personnel file, and provide a copy to the individual. We will retain these 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.

The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

References

When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

Learning lessons

After any cases where the allegations are *substantiated*, we will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's 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.

Appendix 4 – Child on child Abuse (Oldham Guidelines)

Guidance and pathway for Identification and assessment of Peer on Peer Abuse in Oldham

Introduction

In Oldham and nationally it has been recognised the number of children who are harmed by their peers. The 2013 Crime Survey in England and Wales estimated that children aged 10- to 15-years-old experienced 465,000 incidents of violent crime, 79% of which was perpetrated by someone aged 10–15. A third of young women have reported experiencing sexual violence from a partner before they turn 18 (Barter et al., 2009), and two thirds of adult survivors of child sexual abuse have said that they were abused by another young person and not an adult (Radford et al., 2011)

The purpose of this guidance is to

- Assist practitioners in the identification and assessment of peer-on-peer abuse incidents
- Ensure that Oldham's response to peer-on-peer abuse addresses the contextual aspects of the phenomenon as well as the individual children affected

The Greater Manchester Safeguarding Children Procedures recognises that "significant harm" can occur when child causes harm to another (which can be a single event or a range of ill treatment). This is generally referred to as "peer on peer abuse"

Keeping children Safe in Education (2016) states that "All staff should be aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but may not be limited to, bullying (including cyber bullying), gender based violence/sexual assaults and sexting."

There is no clear definition of peer on peer abuse but is included in the following areas of work, which Greater Manchester Safeguarding Children Procedures provides guidance on.

Domestic Abuse: relating to young people aged 16 and 17 who experience physical, emotional, sexual and / or financial abuse, and coercive control in their intimate relationships; (GM procedures 4.16 Domestic Violence and Abuse)

Child Sexual Exploitation: captures young people aged under-18 who are sexually abused in the context of exploitative relationships, contexts and situations by a person of

any age - including another young person; (GM procedures 4.5 Safeguarding Children and Young People Abused through Sexual Exploitation)

Harmful Sexual Behaviour: refers to any young person, under the age of 18, who demonstrates behaviour outside of their normative parameters of development (this includes, but is not exclusive to abusive behaviours); (GM procedures 4.12 Harmful Sexual Behaviours Presented by Children and Young People)

Serious Youth Crime / Violence: reference to offences (as opposed to relationships / contexts) and captures all those of the most serious in nature including murder, rape and GBH between young people under-18. (GM procedures 4.27 Safeguarding Children and Young People Who May be affected by Gang Activity)

Peer on peer abuse can often have an issue specific response, for example a young person is a victim of child sexual exploitation and interventions are focused on reducing risk in this area, however the young person may also be experience domestic abuse from a partner and be at risk of gang related violence.

County Lines

In addition to these areas there is also growing evidence relating to the issue of the exploitation of young people across geographical areas, commonly referred to as 'county lines' (although branded 'trapped' in Greater Manchester initiatives <http://www.itsnotokay.co.uk/professionals/trapped1/>). This often relates to adolescents and young people being exploited by older criminals, but may also incorporate peer on peer abuse and criminal exploitation, dependant on status and structures of criminal gangs

Criminal exploitation of children and vulnerable adults is a geographically widespread form of harm that is a typical feature of county lines activity. It is a harm which is relatively little known about or recognised by those best placed to spot its potential victims. Like other forms of abuse and exploitation, county lines exploitation:

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

There are a range of useful resources relating to county lines available here:

<https://www.csepoliceandprevention.org.uk/sites/default/files/Exploitation%20Toolkit.pdf>

The purpose of this guidance is to support practitioners by;

- Highlighting that young people can be perpetrators or victims to all the above forms of abuse and they are not mutually exclusive and can occur simultaneously.
- The use of a contextual safeguarding model based on the work of Firmin (2016a, 2016b, 2017) to challenge traditional safeguarding children practice in the identification, assessment and interventions where young people are victims and perpetrators of peer on peer abuse by consideration of;
 - vulnerable adolescents vs. vulnerable children –
 - Assessing risk outside the home vs. risk within the home
 - Abuse by young people vs. Abuse by adults
 - Unsafe social spaces vs. unsafe individuals

It is essential to consider the influence of peers and community during assessments of adolescents. Assessments often focus on individual and familial characteristics and can miss the vulnerabilities and risk to adolescents outside of the family from peers and social spaces. A focus on individual risk factors can lead to the vulnerabilities of some young people being under-identified by the multi-agency partnership.

Process

Agency identifies risk factors associated with peer on peer violence (see figure 1)

Referral to MASH

MASH - request information gathering across the social context, (Appendix 1) as a focus on individual risk factors can lead to some young people being under-identified by multi-agency partnership in relation to peer on peer abuse.

Information sharing takes place with key partner agencies to determine risks and plans. *This list is not exhaustive*

- Police
- Education
- Health
- Social Care
- Drug and alcohol services
- Probation
- YJS
- Housing
- Community Safety

Matrix populated (Appendix 1)

The Matrix is not a risk assessment but a framework to document discussions and concerns alongside other assessments and to capture contextual factors. It is designed to plan and review interventions in all contexts where abuse may be occurring, rather than exclusively focusing on the individual child and family.

All agencies should complete the tool before the meeting to assist collation of information during the meeting. The tool may also help support identification and risk to a young person

A lead professional identified to take forward any identified actions and co-ordinate next reviews etc.

The following link may be used as an online tutorial for filling in a similar style assessment framework to ensure that practitioners fully understand how to complete the following information

<https://www.contextualsafeguarding.org.uk/publications/contextual-assessment-framework>

References

- Barter, C., McCarry, M., Berridge, D., & Evans, K. (2009). Partner exploitation and violence in teenage intimate relationships, London: NSPCC.
- Firmin (2016) "Sexual Exploitation and Its Impact on Developing Sexualities and Sexual Relationships: The Need for Contextual Social Work Intervention. *British Journal of Social Work* (Vol) 46, 2318–2337
- Firmin (2017) Contextual Risk, Individualised Responses: An Assessment of Safeguarding Responses to Nine Cases of Peer-on-Peer Abuse. *Child Abuse Review*
- Radford, L., Corral, S., Bradley, C., Fisher, H., Bassett, C., Howat, N., & Collishaw, S. (2011). *Child abuse and neglect in the UK today*, London: NSPCC