



ST TERESA
of **CALCUTTA**
Catholic Academy Trust

Safeguarding and Child Protection Policy

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This policy for St Gregory's RC Primary School sets out:

- Our commitment to Safeguarding and Child Protection.
- Local and contextual contacts.
- Local and contextual issues.
- Practice and procedures in our school.

For those staff who teach Early Years, it is important that they are familiar with the Statutory Framework for early years and Foundation stage.

It includes as an Appendix Part One, Annex B and Part 5 of Keeping Children Safe in Education 2024 which all staff are expected to read, understand and sign for. We also recommend that all staff read What to do if you are worried a child is being abused.

It is a self-contained policy but does link to other policies that staff are expected to read, understand and sign for including:

- Guidance for safe working practice (code of conduct).
- Low-level concern policy.
- Digital Safeguarding Policy.
- Lone working policy.
- Positive handling Policy.
- Behaviour Policy.
- Anti-Bullying Policy.

Our mission at STOC, as a Catholic Academy Trust, is to *Make Christ Known* and ensure we are making lives better for our communities, our children and young people and all of our stakeholders. We have a duty as a Catholic school to follow the Church's teaching care for the poor and educate those who are socially, academically, physically or emotionally disadvantaged. There is a duty to make the person of Jesus Christ known and loved, and to place Him and the teachings of the Catholic Church at the centre. This includes promoting:

- The Search for Excellence
- The Uniqueness of the Individual
- The Education of the Whole Person
- Moral Principles

Our mission as a school is:

St Gregory's is a sanctuary of love and hope where greatness grows.

Purpose of the policy:

1. To ensure that all staff know and understand the importance of Safeguarding within St Gregory's RC Primary School and that promoting the welfare of children in our care is everyone's responsibility. To recognise within this that children may not be ready to talk about their experiences and/or recognise their experiences as harmful and what staff should do to support pupils. To ensure that all staff know how to report a concern and what actions they should take. For staff to know when to provide help and support to meet the needs of children as soon as problems emerge in order to ensure staff can protect children from maltreatment and harm, inside or outside the home, including online. Included within this are procedures for whistleblowing if staff feel their school, or the trust, is not taking Safeguarding seriously.
2. To ensure that all staff within St Gregory's RC Primary School understand the definitions, signs and symptoms of abuse, neglect and exploitation.
3. To ensure that all staff within St Gregory's RC Primary School understands Safeguarding Issues including Child on Child Abuse, Child on Child Sexual Violence and Sexual Harassment, Sharing Nudes and Semi-Nudes, Child Sexual Exploitation, Child Criminal Exploitation, County Lines, Domestic Abuse, FGM, Honour-based Abuse and Forced Marriage and Mental Health and Well Being.
4. Know their responsibilities in relation to the Prevent Duty.
5. Know their responsibility in relation to Children with unexplainable and/or persistent absences from education.
6. Know the Trust's responsibility to effective filtering and monitoring and their responsibility to ensure children are safe online.
7. Know some groups of children who are at risk of greater harm.
8. Understand how we can create a safer culture across our school.
9. Understand the role of the Designated Safeguarding Lead.

Safeguarding is everyone's responsibility.

Disciplinary action may be taken when Safeguarding and Child Protection Policy and Procedure is not followed.

By the end of this policy staff should know the importance of taking appropriate action in a timely manner to safeguard and promote children's welfare.

They should know their statutory responsibility in respect to safeguarding including recognising and reporting safeguarding issues.

Be aware of indicators of abuse and specific types of abuse.

Understand that the child's welfare is paramount.

Introduction and Safeguarding Statement of Intent:

In line with Keeping Children Safe in Education 2024, Safeguarding is:

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

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

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.

No single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

Statement of Intent:

St Gregory's RC Primary School is committed to safeguarding children and young people and we expect everyone who works in our school to share this commitment. We want all our children feel safe and cared for and to know that this is a safe place and there are trusted adults to whom they can turn. We want all the adults who work for us to be fully equipped to fulfil their duty of care towards promoting the safeguarding and welfare of all our children.

As public servants, our responsibility for all staff to safeguard children and promote their welfare is enshrined in law; as practitioners within the Catholic Education Service there is an additional duty on us to care for the poor and educate those who are socially, academically, physically or emotionally disadvantaged. This incorporates safeguarding children so that they are protected from maltreatment; that we take action that prevents impairment of their mental and physical health and development; that we ensure that children grow up in circumstances consistent with the provision of safe and effective care; and that we take action to enable all children to have the best outcomes.

Children at St Gregory's RC Primary School are taught about how they can keep themselves and others safe, including online. We follow the Digital Safeguarding Policy that ensures we filter and monitor our online activity to keep children safe. We teach children how to keep safe in an age-appropriate way with examples given throughout this policy. We are sensitive to the specific needs and vulnerabilities of individual children who are victims of abuse, children with special educational needs or disabilities and children who need a social worker. We adapt our practice to support children in relation to safeguarding.

Our practice includes being alert to those children who have unexplainable and/or persistent absences from education and sporadic attendance, to enable St Gregory's RC Primary School to fulfil our duty to help prevent the risk of a child missing education in the future.

We recognise the impact of wider environmental factors in a child's life that may be a threat to their welfare and/or safety (extra-familial harms)¹ and aim to be outward facing so that we can effectively assess the risks and issues in the wider community when considering the well-being and safety of our pupils. To do this we work across agencies as described in Working Together to Safeguard Children and are responsive to local agendas.

Adults across St Gregory's RC Primary School take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them. In order to help young people achieve this, school leaders will foster an open, honest and transparent culture whereby children and staff feel listened to and that their concerns are acted upon.

All adults across St Gregory's RC Primary School know that Safeguarding is a non-negotiable and we are vigilant to Safeguarding risks.

All adults at St Gregory's RC Primary School will always act in the best interests of the child.

¹ KCSIE 2024 Paragraph 21 states: All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.

Key Staff contacts		
ROLE	NAME	CONTACT DETAILS
Full name of school	St Gregory's RC Primary School	01204 332658
Email contact for Safeguarding concerns	St Gregory's RC Primary School	rashcroft@stgregorys.stoccat.org.uk
Headteacher	Kelly Watson	01204 332658
Designated Safeguarding Lead (DSL)	Rebecca Ashcroft	01204 332658
Deputy Designated Safeguarding Lead(s) (DDSL)	Laura Boothroyd Kelly Watson Catherine Callow	01204 332658
Safeguarding Officer (if applicable)	n/a	Click or tap here to enter text.
Designated PREVENT lead(s)	Rebecca Ashcroft	01204 332658
Designated Operation Encompass lead (where applicable)	Laura Boothroyd	01204 332658
Senior member of Staff responsible for Cared for Children	Rebecca Ashcroft	01204 332658
Headteacher of Virtual School for our Local Authority	Lindsay Nelson	Lindsay.nelson2@bolton.gov.uk
Chair of Local Governing Body	Lee Berry	01204 332658
Local Governor for Safeguarding	Cath Stones	01204 332658
Local Governor for Cared for Children	Cath Stones	01204 332658

Key External contacts		
ROLE	NAME	CONTACT DETAILS
Local Authority Designated Officer (LADO) for allegations against professionals	Lisa Kelly	01204 337474 LADO@bolton.gov.uk
Local Authority Education Safeguarding Officer (if applicable)	Jo Nicholson	set@bolton.gov.uk
Local Authority Officer responsible for Children Missing in Education	Click or tap here to enter text.	01204 334036 onrollgonemissing@bolton.gov.uk
Local Authority Channel or Prevent lead	Click or tap here to enter text.	0161 2273543
MASH ²	Integrated Front Door	01204 331500
Local Safeguarding Partnership Board ³	Shona Green	01204 337964
Local children's centre community hub	Early Help and Safeguarding Hub	
STOC Safeguarding partner's contacts. To report concerns of risk or significant risk of harm	Bolton Bury Rochdale Salford	01204 331500/out of hours 01204 337777 0161 253 5678/out of hours 0161 253 6606 0300 303 0440 0161 206 0604/out of hours 0161 794 8888

Other GM boroughs:

Manchester: 0161 234 5001
 Oldham: 0161 770 7777; out of hours 0161 770 6936
 Stockport: 0161 217 6028
 Tameside: 0161 342 4101; out of hours 0161 342 2222
 Trafford: 0161 912 5125; out of hours 0161 912 2020
 Wigan: 01942 828300

NSPCC Helpline: 0808 800 5000 help@NSPCC.org.uk

If a child is in immediate danger, please call the police on 101 or 999.

² Terminology used for the referral process different across boroughs/local authorities.

³ The following safeguarding partners identified in KCSIE 2024 and Working Together to Safeguard Children 2018 are the local authority; Integrated Care Board for an area, any part of which falls within the local authority; the chief of police for a police area, any part of which falls into the local authority area. Some boroughs in Greater Manchester have a joint adult and children's safeguarding partnership, others have separate. If separate they are identified in this policy.

1. Procedures in recording and reporting for all staff at St Gregory's RC Primary School

- 1.1 As identified in the Introduction and Statement of Safeguarding here at St Gregory's RC Primary School we take the safeguarding children as a non-negotiable. We recognise our duty of care to ***ensure children are protected from maltreatment; that we take action that prevents impairment of their mental and physical health and development; that we ensure that children grow up in circumstances consistent with the provision of safe and effective care; and that we take action to enable all children to have the best outcomes.***
- 1.2 We recognise that we cannot do this alone and that everyone who comes into contact with children and their families has a vital role to play. However, school can be a significant protective factor for children and young people and school is often one of the first frontline services to identify a change in a child's wellbeing or to raise concerns with other agencies. Our work with other agencies is vital. We have a statutory responsibility to support social workers and other agencies following any referral. Staff may be involved in the assessment of a child and be designated actions. Where actions are not met, then staff must follow the escalation policies or seek guidance as to how to escalate concerns in order to ensure we keep children in our care safe.
- 1.3 We know that children 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 may feel embarrassed, humiliated or are being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers.
- 1.4 This should not prevent staff from having a professional curiosity and speaking to [Status] if they have concerns about a child or a nagging doubt.
- 1.5 If there are low-level concerns about a colleague's conduct, they must speak to the Headteacher.

What to do if a child makes a disclosure to you:

- 1.6 If a child **tells** a member of staff they are being abused, exploited, or neglected, staff should:
 - Reassure children that they are being taken seriously and never give the impression that a child is creating a problem.
 - Do not ask questions or take notes. Allow the child to speak.
 - Explain that they have to share the information with key staff who will speak to them.
 - Ideally, invite the DSL/Deputy DSL into the conversation.
 - If this is not possible then the member of staff **MUST** immediately seek out the DSL/Deputy DSL in person as a matter of urgency because the child may be at immediate risk, or the DSL/Deputy DSL may hold further information about the child that you will not have access to.
 - The member of staff must **also record** as soon as possible the conversation on CPOMS. Make a record of your conversation as soon as possible, using the child's own words. Provide facts, **be clear if you are stating your professional opinion**. Include information about impact on the child - e.g., if they are tearful, appear anxious, appear unaffected. Ensure details are precise – date, time, location and give context including what happened prior to the disclosure, was there an identified trigger etc. Your record could be used as part of an assessment, strategy or core group meeting, in court or, in worst case scenarios, part of a national Child Safeguarding Practice Review (CSPR) or a local child case review.
 - The DSL/Deputy DSL will then take action in accordance with their responsibilities.

What to do if you have a concern about a child:

- 1.7 More often than not it may not be a disclosure, it will be a concern about a child. All staff at St Gregory's RC Primary School should know the signs of abuse, neglect and exploitation as outlined in Section 2 and record any concern they have for the child on CPOMS. They should not email, have a corridor conversation or leave it until the following day – any concern about a child's welfare should be recorded on CPOMS so that the DSL and Deputy DSL can triage.
- 1.8 If there is an immediate concern about a child being at risk, the member of staff should record on CPOMS and make sure that they speak to the DSL/Deputy DSL.
- 1.9 If a member of staff becomes aware outside of school hours (i.e., during school holidays) that a child is at risk, they should aim to contact the DSL/Deputy DSL or Headteacher OR Head of Safeguarding at the Trust. They will know of any other statutory service involvement and so may be able to contact, for example, a social worker directly. However, anyone can report a safeguarding concern directly to their Multi-Agency Safeguarding Hub/Early Help and Safeguarding Hub through the numbers shared on Page 5 of this policy. If a child is at immediate risk, the police should be contacted on 101 or, if an emergency, 999.

What to do if you discover that Female Genital Mutilation (FGM) has taken place, or a pupil is at risk of FGM⁴:

- 1.10 The Department for Education's Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".
- 1.11 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', 'female circumcision' or 'initiation'.
- 1.12 Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in Section 3.
- 1.13 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. Staff can obtain support from the DSL, prior to this.
- 1.14 Staff may discover FGM has taken place if a child discloses this to them. **They must never examine pupils.**
- 1.15 Under Section 5B(11) (a) of the Female Genital Mutilation Act 2003, 'teacher' means, in relation to England, a person within section 141A(1) of the Education Act 2002 (persons employed or engaged to carry out teaching work at schools and other institutions in England). The duty for teachers mentioned above in 1.13 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.
- 1.16 In order to report FGM the procedures say it is recommended that you make a report orally by calling 101. Where there is a risk to life or likelihood of serious immediate harm professionals should report the case immediately to police, including dialling 999 if appropriate.
- 1.17 In most cases "reports under the duty should be made as soon as possible after a case is discovered, and best practice is for reports to be made by the close of the next day."

Creating a culture whereby children can learn in a safe environment:

- 1.18 When children feel safe, it opens up opportunities for them to speak and to come forward. When children feel they belong and there is a trusted adult they may be more likely to open up about issues that are bothering them. All staff at St Gregory's RC Primary School

⁴ For more guidance see Home Office and DfE guidance on Mandatory reporting of female genital mutilation: procedural information updated January 2020.

have a responsibility to contribute to the safe environment which safeguards children's wellbeing. For us, this includes:

Learning Mentor providing pastoral support; Worry Monsters in every classroom; Weekly PSHE lessons

What school staff should look out for:

- 1.19 **Any** child may benefit from early help⁵, but all school staff should be particularly alert to the potential need for early help for a child who:
- Is disabled or has certain health conditions and has specific additional 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 into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
 - Is frequently missing/goes missing from education, 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 parent or carer in custody 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 alcohol and other drugs themselves.
 - Has returned to their home to their family from care.
 - Is at risk of so-called 'honour' abuse such as Female Genital Mutilation or Forced Marriage.
 - Is a privately fostered child.
 - Has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or pupil referral unit.⁶

It is better to be professionally curious and record any concerns on CPOMS for triage with DSLs/Deputy DSLs than to have a nagging doubt and not act on it. DSLs may not always return to staff to tell them exactly what has happened with the information provided in line with confidentiality procedures but the practice within schools will mean that all concerns are looked at and DSLs are expected to provide justifications for their actions through our monitoring procedures within schools. DSLs/Deputy DSLs often have a wider picture of the child's circumstances, needs and engagement with other services.

⁵ Early Help means providing support as soon as a problem emerges at any point in a child's life. A problem can emerge at any point in a child's life. Providing early help is more effective in promoting the welfare of children than reacting later. Where a child would benefit from co-ordinated early help, meaning involving different agencies, an early help inter-agency assessment should be arranged. Further details of this are found in Chapter One of Working Together to Safeguard Children 2018.

⁶ Guidance for Safe Working Practice includes the responsibility of all staff in relation to register taking and taking action when children are absent for part of the school day, severely absent and persistently absent alongside the duty on schools in relation to Children Missing in Education.

2 Indicators of abuse, neglect and exploitation:

- 2.1 Types of Abuse, Neglect and Exploitation can be found in Keeping Children Safe in Education 2024 Part One and Annex B. They are also included at Appendix A of Keeping Children Safe in Education and within **Section 2.6 and 2.10** of this policy and repeated in online training. The repetition is important so that all staff are aware of the indicators of abuse and neglect.
- 2.2 It is important that all staff know that children can be at risk of harm inside and outside of school, inside and outside of home, and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse, neglect and exploitation.
- 2.3 Abuse, neglect, exploitation and safeguarding issues are rarely standalone events. In most cases, multiple issues will overlap with one another.
- 2.4 Extra-familial harm refers to situations outside their family. Children can be at risk of abuse or exploitation outside their families. It can take a variety of forms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse⁷ in their own intimate relationships, criminal exploitation, serious youth violence, county lines and radicalisation.
- 2.5 Technology is a significant component in many safeguarding and wellbeing issues. The Trust's Digital Safeguarding outlines the procedures in detail to safeguard our pupils in school through effective filtering and monitoring and expectations are included within this Safeguarding and Child Protection Policy at Section 6. Abuse online can involve an abuse of power and trust it may involve adult on child or child-on-child. It may take the form of abusive, harassing, misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content. Within this policy at Section 3 Child on Child Abuse there are clear guidelines about what to do when children share indecent images. The Guidance for Safe Working Practice that all staff sign for, outlines the expectations around staff and technology.
- 2.6 **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience domestic abuse and its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.
- 2.7 **Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- 2.8 **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing

⁷ Domestic abuse is the correct terminology to use instead of domestic violence as it covers on the fact that it captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviours. Greater Manchester has a ten-year strategy to address Gender Based Violence with strategies being developed to support schools. <https://www.greatermanchester-ca.gov.uk/what-we-do/police-and-fire/gender-based-violence-strategy/>

or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

- 2.9 **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and **all** staff should be aware of it and understand the steps we take at St Gregory's RC Primary School to deal with it. This is outlined in Section 3 Child on Child Abuse.
- 2.10 **Neglect:** 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, for example, 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 caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.
- 2.11 A table summarising types of abuse and possible indicators is included on Pages 17 and 18. Teachers and school staff are well positioned to spot signs of abuse and neglect. Children may experience abuse and neglect at any age, and it may have a profound impact not only on their immediate safety and health but on their long-term development and wellbeing. As the signs of abuse and neglect can be difficult to detect, the information from the Social Care Institute for Excellence⁸ is included here so that all staff have a clear understanding.

⁸ www.scie.org.uk

The Social Care Institute for Excellence identifies that:

The signs of abuse and neglect can be difficult to detect. Children may be seen as easy targets for abuse. Their developing communication and understanding of what constitutes mistreatment means that they may have difficulty alerting others to it. A child's reliance on their parents and family may also mean that it is easier to conceal harm or coerce a child into not disclosing it to others.

Teachers and school staff may be the only adults outside the child's family that have significant contact with them and so it is especially important that all those working with children have a good understanding of abuse and neglect and how to recognise the possible indicators.

Evidence of any one of the indicators in the tables should not be taken on its own as proof that abuse is occurring. How it should alert practitioners to make further assessments and to consider other associated factors. The lists of possible indicators and examples of behaviour are not exhaustive, and children may be subject to a number of abuse types at the same time.

As identified earlier in this policy it is better to be professionally curious and to share concerns on CPOMS rather than leaving a nagging doubt which, in worst case scenarios, can put a child at risk.

Abuse	Type	Possible indicators
<p>Physical abuse: Injuries caused by accidents are not uncommon. Accidents tend to be typically on areas of bony prominence – for example, bones that are close to the surface and so more likely to become injured through falls, slips and trips. They are often on the forehead, knees, elbows, palms of hands, nose. They tend to be less common as the child grows. This can make it more difficult to identify signs of physical abuse in younger children. More often than not accidental injuries will match the account from the child and parent and be in keeping with the child's level of development and activity.</p>	<ul style="list-style-type: none"> • Hitting, slapping, punching, kicking, hair-pulling, biting, pushing. • Rough handling. • Shaking and throwing. • Scalding and burning. • Physical punishments. • Inappropriate or unlawful use of restraining. • Physical harm caused by a parent or carer fabricating the symptoms of, or inducing, illness. 	<p>Abusive injuries tend to involve softer tissue and be in areas that are harder to damage through slips, trips, falls and other accidents. This may include:</p> <ul style="list-style-type: none"> • Upper arm • Forearm (defensive injuries). • Chest and abdomen. • Thighs or genitals. • Facial injuries (cheeks, black eyes, mouth). • Ears, side of face or neck and top of shoulders ('triangle of safety'). • Back and side of trunk. <p>Abusive injuries may be seen on both sides of the body. If you notice any injury, follow the procedures in 1.6, 1.7, 1.8, 1.0. Under no circumstances should a member of staff ask a child to remove their clothing to look at the injury. DSLs are trained at a different level to address the situation.</p>
<p>Sexual abuse: It is important to make sure that staff are very clear around the law relating to consent:</p> <p><i>Consent may be given to one sexual activity but not another.</i></p> <p><i>A child under the age of 13 can never consent to any sexual activity.</i></p> <p><i>The age of consent is 16. Sexual intercourse without consent is rape.</i></p> <p>Staff should be very clear about the practice within school to tackle child-on-child sexual violence and harassment and follow the procedures outlined in Section</p>	<ul style="list-style-type: none"> • Forcing or enticing a child or young person to take part in sexual activities, which may or may not involve violence. • Penetrative acts. • Non-penetrative acts (kissing, masturbation, rubbing or inappropriate touching). • Sexual photography or forced use of pornography or witnessing of sexual acts. • Non-contact (looking at or producing pornography or sexual images, watching sexual activities, grooming in preparation for abuse. 	<ul style="list-style-type: none"> • Bruising, particularly to the thighs, buttocks and upper arms and marks on the neck. • Bleeding, pain or itching in the genital area. • Difficulty in walking or sitting. • Sudden change in behaviour or school performance. • Displays of affection that are sexual or not age appropriate. • Use of sexually explicit language that is not age appropriate. • Alluding to having a secret that cannot be revealed. • Bedwetting or incontinence. • Reluctance to undress around others (i.e., PE lessons). • Infections, unexplained genital discharge, or sexually transmitted diseases. • Unexplained gifts or money. • Self-harming. • Poor concentration withdrawal, sleep disturbance. • Reluctance to be alone with a particular person.

Abuse	Type	Possible indicators
<p>Emotional abuse: Emotional abuse is present in all types of abuse or neglect, or it may also appear alone. It is the persistent mistreatment of a child that has a severe and negative impact on their emotional development.</p> <p>Emotional abuse may also be perpetrated by other young people through serious bullying and cyber-bullying.</p>	<ul style="list-style-type: none"> • Overprotection - preventing someone accessing educational and social opportunities and seeing friends. • Intimidation, coercion, harassment, use of threats, humiliation, bullying, swearing or verbal abuse. • Conveying feeling of worthlessness, inadequacy or that a child is unloved. • Threats of harm or abandonment. • Placing inappropriate expectations on children. • Witnessing or hearing about the abuse or ill-treatment of others, including domestic abuse. 	<ul style="list-style-type: none"> • Concerning interactions between parents or carers and the child (e.g., overly critical or lack of affection. • Lack of self-confidence or self-esteem. • Sudden speech disorders. • Self-harm or eating disorders. • Lack of empathy shown to others (including cruelty to animals). • Drug, alcohol or other substance misuse. • Change of appetite, weight loss/gain. • Signs of distress: tearfulness, anger.
<p>Neglect: Neglect is found to be a factor in 60% of child deaths that are investigated through Serious Case Reviews. However, even though it is often suspected by those who work with children, it is under-reported. Neglect is a persistent failure to meet basic needs (physical or emotional) and it leads to serious harm to the health or development of a child.</p>	<ul style="list-style-type: none"> • Failing to provide adequate shelter, clothing or food. • Failing to protect a child from harm or danger. • Failing to ensure that a child is supervised appropriately. • Failing to access medical care or treatment for a child when it is needed. 	<ul style="list-style-type: none"> • Excessive hunger. • Inadequate or insufficient clothing. • Poor personal or dental hygiene. • Untreated medical issues. • Changes in weight or being excessively under or overweight. • Low self-esteem, attachment issues, depression or self-harm. • Poor relationships with peers. • Self-soothing behaviours that may not be age-appropriate (e.g., rocking, hair-twisting, thumb-sucking). • Changes to school performance or attendance.

3. Safeguarding issues:

- 3.1 All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk.
- 3.2 Below are some safeguarding issues that all staff should be aware of although it is important that we remain alert to **new and emerging risks**.⁹
- 3.3 All staff should make sure they have read Annex B of Keeping Children Safe in Education which details specific forms of abuse. They should know that if they have any concerns about a child, they should act on them immediately as outlined in Section One of this policy.

Child-on-child abuse:

- 3.4 We recognise that children are capable of abusing other children, and that it can happen both inside and outside of school and online. Abuse will never be tolerated or passed off as “banter”, “just having a laugh”, “boys will be boys” or “part of growing up”, as we are aware that downplaying such behaviours can lead to a culture of unacceptable behaviours, an unsafe environment and a culture that normalises abuse. This may lead to children accepting it as normal and not reporting it.
- 3.5 We take a position that at St Gregory's RC Primary School **‘it could happen here.’** We know that just because there are no reports, it does not mean it hasn't happened or will happen.
- 3.6 We recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable.
- 3.7 We also recognise that LGBTQ+ pupils have lower levels of wellbeing and may be more likely to be a victim of child-on-child abuse.
- 3.8 Child-on-child abuse is most likely to include, but may not be limited to:
 - bullying (including cyberbullying, prejudice-based and discriminatory bullying)
 - abuse in intimate personal relationships between children (sometimes known as ‘teenage relationship abuse’)
 - physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
 - sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
 - sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse.
 - causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
 - consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
 - up skirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and

⁹ The communication in relation to new and emerging risks comes from our engagement with the Head of Safeguarding in the Trust who will be engaging with local safeguarding partnerships, training within the school and frontline information – **noticing** and sharing information so that data and intelligence can be gathered, analysed and acted upon.

- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).
- 3.9 Most cases of pupils hurting other pupils will be dealt with under our school's behaviour policy and anti-bullying policy, but this Safeguarding and Child Protection 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, up skirting or sexually inappropriate pictures or videos (including sharing nudes and semi-nudes).
- 3.10 At St Gregory's RC Primary School we teach children to respect each other and to minimise child-on-child abuse. Examples of how we do this are included below.

Ten Ten RHE programme

Digital Safety lessons

The language we use when in relation to Safeguarding is important. We follow the guidance in Keeping Children Safe in Education in relation to victim and alleged perpetrator (s).

The term '**victim**' is a widely recognised and understood term. It is important that we recognise that not everyone who has been subjected to abuse considers themselves a victim or would want to be described in this way. Ultimately, we should be conscious of this when managing any incident and be prepared to use any term with which the individual child is most comfortable.

In line with KCSIE we use the term '**alleged perpetrator(s)**' and where appropriate '**perpetrator(s)**'. These are widely used and recognised terms and the most appropriate to aid our practice. However, we should think very carefully about terminology, especially when speaking in front of children, not least because in some cases the abusive behaviour will have been harmful to the perpetrator as well. We need to make sure that we use the appropriate terminology on a case-by-case basis and that our work is child-centred.

Sexual violence and sexual harassment¹⁰:

- 3.11 If a pupil makes an allegation of abuse against another pupil, it must be recorded on CPOMS. If the allegation relates to sexual abuse, you must also notify the Headteacher.
- 3.12 The DSL will contact the local authority children's social care team where appropriate and follow its advice in relation to the police if the allegation involves a potential criminal offence.
- 3.13 Often, in cases such as this, the outcome may take time to be resolved by external agencies which can lead to some frustration and potential tension within the school. The way this is managed is important to the victim and the (alleged) perpetrator(s) and their families. As a school we will:
- Assure the child coming forward that they are being taken seriously.
 - **Never** give the impression that they are creating a problem or downplaying the issue.
 - Be led by the wishes of the victim.
 - Put in place a risk assessment and support plan for all children involved. This risk assessment will be reviewed regularly.
 - Provide a named person that they can speak to.
 - Consider travel arrangements to and from school and practical actions within school to minimise contact if both children remain in school. This includes children sharing a classroom.
 - Discuss with relevant external agencies and the Head of Safeguarding at the Trust.
 - Notify staff on a 'need to know' basis whilst maintaining confidentiality.
 - Keep the Head of Safeguarding at the Trust up to date so that it can be managed effectively and appropriately.
- 3.14 We can minimise the risk of child-on-child abuse at St Gregory's RC Primary School through:
- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images
 - Recording every instance of sexualised language as such on CPOMS so the DSL can identify patterns.
 - Being vigilant to sexualised or aggressive touching or grabbing, and initiation or hazing type violence
 - Ensuring our response to sexual violence and sexual harassment between pupils of the same sex is equally robust as it is for incidents between pupils of the opposite sex.
 - Ensuring our curriculum helps to educate pupils about respectful behaviour and consent.
 - Ensuring pupils know they can talk to staff confidentially.
 - Ensuring pupils understand that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.
 - Ensuring staff understand that pupils may not find it easy to talk about their abuse verbally, and that staff are aware of signs and behaviours that might indicate abuse. Staff may also overhear conversations that suggest a child has been harmed or receive a report from a friend of the child.
 - Ensuring staff are trained to understand that a pupil harming another child could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.
 - Ensuring we understand intra familial harms and consider any necessary support for siblings following a report of sexual violence and/or harassment.
- 3.15 When we move beyond language to harmful sexual behaviours, Hackett's guide to Harmful Sexual Behaviour is a useful tool for DSLs to consider.

¹⁰ See also KCSIE 2024 Part Five: Child-on-child sexual violence and sexual harassment

NORMAL	INAPPROPRIATE	PROBLEMATIC	ABUSIVE	VIOLENT
Developmentally expected. Socially acceptable. Consensual, mutual, reciprocal. Shared decision-making.	Single instances of inappropriate behaviour. Socially acceptable behaviour within peer group. Context for behaviour may be inappropriate. Generally consensual and reciprocal.	Problematic and concerning behaviours. Developmentally unusual and socially unexpected. No overt elements of victimisation. Consent issues may be unclear. May lack reciprocity or equal power. May include levels of compulsivity.	Victimising intent or outcome. Includes misuse of power. Coercion and force to ensure victim compliance. Intrusive. Informed consent lacking or not able to be freely given by victim. May include elements of expressive violence.	Physically violent sexual abuse. Highly intrusive. Instrumental violence which is physiologically and/or sexually arousing to the perpetrator. Sadism.

- 3.16 Decision making between the relevant members of staff with the Headteacher and DSL (Deputy DSL) will always be recorded.
- 3.17 Where behaviour is considered abusive or violent, a suspension should always be considered and in some cases a permanent exclusion.
- 3.18 Disciplinary action can be undertaken whilst other investigations are going on and cases should be discussed on a case-by-case basis.

Sharing nudes and semi-nudes:

- 3.19 The term 'sharing nudes and semi-nudes'¹¹ to mean the sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums.
- 3.20 The term 'nudes' is used as it is most commonly recognised by young people and more appropriately covers all types of images sharing incidents. Alternative terms used by children and young people may include 'dick pics' or 'pics'.
- 3.21 The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship.
- 3.22 It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:
- children and young people find nudes and semi-nudes online and share them claiming to be from a peer.
 - children and young people digitally manipulate an image of a young person into an existing nude online.
 - images created or shared are used to abuse peers e.g., by selling images online or obtaining images to share more widely without consent to publicly shame.
- 3.23 Producing and sharing nudes and semi-nudes of under 18s is illegal.
- 3.24 At St Gregory's RC Primary School when we find incidents where this has happened, we will:

¹¹ Alternative terminology may refer to youth produced sexual imagery, indecent imagery, sexting. Terms such as 'revenge porn' and 'upskirting' are also used to refer to specific incidents.

- Ensure we deal with this appropriately and by the principle of proportionality.
 - DSLs/Deputy DSLs will utilise the guidance from UKIS, 2024, Sharing nudes and semi-nudes: advice for education settings working with children and young people March 2024 to determine if this is **aggravated** or **experimental**.
 - Decision making will be guided by this document. To summarise the team will assess whether there is an immediate risk to any child or young person.
 - If a referral should 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 child or young person - **in most cases, images or videos should not be viewed. They should never be copied, printed, shared, stored or saved – this is illegal.**
 - 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 children or young people involved which would influence risk assessment.
 - if there is a need to contact another education, setting or individual.
 - whether to contact parents or carers of the children or young people involved - in most cases they should be involved
- 3.25 All members of staff must recognise their duty in reporting the sharing of nudes and semi-nudes, either as a result of a direct disclosure or that of a young person reporting on another person's behalf.

Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE):

- 3.26 Child criminal exploitation and Child Sexual Exploitation is a form of child abuse.
- 3.27 It is a form of abuse that occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Child Criminal Exploitation:

- 3.28 Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.
- 3.29 Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.
- 3.30 It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.
- 3.31 County Lines term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line".

- 3.32 Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.
- 3.33 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.

Child Sexual Exploitation:

- 3.34 CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.
- 3.35 CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge for example through others sharing videos or images of them on social media.
- 3.36 CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited for example they believe they are in a genuine romantic relationship.
- 3.37 **Any child, in any community** is vulnerable to child sexual exploitation.
- 3.38 Children aged 12-15 are most at risk of child sexual exploitation although victims as young as 8 have been identified in relation to online concerns. Equally, those aged 16 or above can also experience child sexual exploitation, and it is important that this is not overlooked due to assumed capacity to consent.
- 3.39 Though child sexual exploitation may be most frequently observed amongst young females, boys are also at risk. Boys may be less likely than females to disclose experiences of child sexual exploitation and less likely to have these identified by others.
- 3.40 Child sexual exploitation affects all ethnic groups.
- 3.41 Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Although these indicators are identified in 'Child Sexual Exploitation February 2017' it is important to recognise that this does not necessarily include the ways that perpetrators can exploit children online. Child sexual exploitation can occur without any of these issues.
- Having a prior experience of neglect, physical and/or sexual abuse.
 - Lack of a safe/stable home environment, now or in the past (domestic abuse or parental substance misuse, mental health issues or criminality, for example).
 - Recent bereavement or loss.
 - Social isolation or social difficulties
 - Absence of a safe environment to explore sexuality.
 - Economic vulnerability.
 - Homelessness or insecure accommodation status.
 - Connections with other children and young people who are being sexually exploited.
 - Family members or other connections involved in adult sex work.
 - Having a physical or learning disability.
 - Being in care (particularly those in residential care and those with interrupted care histories); and
 - Sexual identity.

Here at St Gregory's, we teach children how to keep themselves through a variety of ways. This includes our RHE curriculum that teaches children at an age appropriate level about healthy

relationships and consent. Our Year 5 pupils also have a specific healthy relationships programme delivered by Fort Alice.

3.42 The following are possible indicators of CCE and CSE.

Possible indicators of CCE	Possible indicators of CSE
<ul style="list-style-type: none"> • children who appear with unexplained gifts or new possessions. • children who associate with other young people involved in exploitation. • children who suffer from changes in emotional well-being. • children who misuse drugs and alcohol. • children who go missing for periods of time or regularly come home late; and • children who regularly miss school or education or do not take part in education. 	<p>Acquisition of money, clothes, mobile phones, etc. without plausible explanation.</p> <ul style="list-style-type: none"> • Gang-association and/or isolation from peers/social networks. • Exclusion or unexplained absences from school, college or work. • Leaving home/care without explanation and persistently going missing or returning late. • Excessive receipt of texts/phone calls. • Returning home under the influence of drugs/alcohol. • Inappropriate sexualised behaviour for age/sexually transmitted infections. • Evidence of/suspicious of physical or sexual assault. • Relationships with controlling or significantly older individuals or groups. • Multiple callers (unknown adults or peers). • Frequenting areas known for sex work. • Concerning use of internet or other social media. • Increasing secretiveness around behaviours; and • Self-harm or significant changes in emotional well-being.

Child sexual exploitation and child criminal exploitation is never the victim's fault, even if there is some form of exchange: all children and young people under the age of 18 have a right to be safe and should be protected from harm.

Domestic abuse:

- 3.43 Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.
- 3.44 Operation Encompass is a police and education early information safeguarding partnership enabling schools to offer immediate support to children experiencing domestic abuse across Greater Manchester.
- 3.45 Operation Encompass ensures that there is a simple telephone call or notification the Designated Safeguarding Lead /Officer to the start of the next school day after an incident of police attended domestic abuse where there are children related to either of the adult parties involved. This sharing of information enables appropriate support to be given, dependent upon the needs and wishes of the child.

Female Genital Mutilation (FGM):

- 3.46 Details for how to report Female Genital Mutilation are identified in Section One in detail.
- 3.47 There is an additional duty on staff as outlined in Section One as to what to do if a member of staff discovers FGM has taken place.
- 3.48 Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK.
- 3.49 FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.
- 3.50 Risk factors for FGM include:
- low level of integration into UK society
 - mother or a sister who has undergone FGM.
 - girls who are withdrawn from PSHE
 - visiting female elder from the country of origin
 - being taken on a long holiday to the country of origin
 - talk about a 'special' procedure to become a woman.
- 3.51 FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-school to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM. Staff should not assume that FGM only happens outside the UK.
- 3.52 Indications that FGM may have already taken place may include:
- difficulty walking, sitting or standing and may even look uncomfortable.
 - spending longer than normal in the bathroom or toilet due to difficulties urinating.
 - spending long periods of time away from a classroom during the day with bladder or menstrual problems.
 - frequent urinary, menstrual or stomach problems.
 - prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g., withdrawal or depression) on the girl's return
 - reluctance to undergo normal medical examinations.
 - confiding in a professional without being explicit about the problem due to embarrassment or fear.
 - talking about pain or discomfort between her legs
- 3.53 The Department for Health provides guidance in relation to FGM including local terminology for this and areas in the world where it is practised. It can be accessed at this website.
<https://www.gov.uk/government/publications/safeguarding-women-and-girls-at-risk-of-fgm>

Honour-based abuse:

- 3.54 So-called 'honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage¹², and practices such as breast ironing. All forms of so called HBA are abuse (regardless of the motivation) and should be handled and escalated as such.
- 3.55 Where staff are concerned that a child might be at risk of HBA, they must contact the Designated Safeguarding Lead as a matter of urgency.

Serious violence:

- 3.56 All staff should be aware of the indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include increased absence from school or college, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.
- 3.57 Guidance on support with Serious Youth Violence can be found through contacting the Greater Manchester Combined Authority Violence Reduction Unit. <https://www.greatermanchester-ca.gov.uk/what-we-do/police-and-fire/violence-reduction-unit/>
- 3.58 School leaders and DSLs should be aware of their local contextual situation in relation to serious youth violence and make staff aware through Safeguarding briefings.
- 3.59 The Directors of Safeguarding at the Trust can provide support in engagement with local authority officers and police colleagues in relation to serious youth violence.
- 3.60 At St Gregory's RC Primary School we take the view that if we teach that violence is **not inevitable**, and is in fact **preventable**, and take a strong, considered and proportionate response to any act of violence we can minimise the exposure and normalisation to youth violence in our school.

Mental Health and Wellbeing:

- 3.61 All staff at St Gregory's RC Primary School are aware that 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.
- 3.62 School staff are not expected or trained to diagnose mental health conditions or issues but may notice behaviours that may be of concern.
- 3.63 If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the designated safeguarding lead or a deputy.
- 3.64 At St Gregory's RC Primary School we take our children's mental health and wellbeing seriously. We outline below how we support children's mental health and wellbeing.

St Gregory's supports children's mental health and wellbeing in a variety of ways. We are a named MHST school and work with external agencies to meet out pupils needs. Our school has a designated mental health lead.

Section 3 of this policy includes details about Safeguarding Issues as required by Keeping Children Safe in Education. All staff must read this in conjunction with Part One of Keeping Children Safe in Education and Annex B which includes further detail about these issues and issues related to child abduction and community safety incidents, children and the court system, children with family members in prison, Modern Slavery.

¹² In February 2023 the age of marriage increased to 18. It is now a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used.

- 4.1 All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty.
- 4.2 The information contained within Section 4 of this Safeguarding and Child Protection Policy fulfils our responsibility in ensuring all staff understand Prevent and Channel and are able to identify some indicators that may suggest a propensity for involvement in 4.17. We also strengthen this through training as identified in 4.4. and 4.5.
- 4.3 Where staff are concerned that children and young people are developing extremist views or show signs of becoming radicalised, they should discuss this with the Designated Safeguarding Lead.
- 4.4 At St Gregory's RC Primary School the Designated Safeguarding Lead has received training about the Prevent Duty and tackling extremism and is able to support staff with any concerns they may have. This training took place on 02/09/2024
- 4.5 In addition, the following have also received training:
All staff and governors undertake Prevent training annually.
- 4.6 The Prevent duty is part of our wider safeguarding obligations. The Senior Team in school are familiar with the Revised Prevent duty guidance: for England and Wales April 2021 and The Prevent duty: an introduction for those with safeguarding responsibilities, revised October 2022 and with other related material.
- 4.7 Our Digital Safeguarding Policy identifies how we ensure that children are safe from terrorist and extremist material when accessing the internet in school.
- 4.8 Our DSL is aware of local procedures for making a Prevent referral.
- 4.9 All our staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. If there are any concerns this should be shared on CPOMS.
- 4.10 The DSL should use their judgement in identifying children who might be at risk of radicalisation and act proportionately. This should include discussion with the Headteacher and/or the Head of Safeguarding in the trust before submitting a Prevent referral.

Channel:

- 4.11 Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. Prevent referrals are assessed and may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are at risk of being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual will be required to provide their consent before any support delivered through the programme is provided.
- 4.12 The designated safeguarding lead (or a deputy) will consider on a case-by-case basis if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives.

Protecting children from extremism:

- 4.13 Children may be susceptible to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is part of our safeguarding approach.

- 4.14 **Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- 4.15 **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- 4.16 **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.
- 4.17 There is no single way of identifying whether a child or young person is susceptible to extremism. The process of radicalisation is different for every individual. It can take place over a long period, or it can be very quick.¹³
- 4.18 Children, young people and adult learners who are vulnerable to grooming for sexual exploitation, criminal exploitation or county lines, may also be vulnerable to radicalisation. Factors could include things like being a victim or witness of crime, abuse or bullying, or having personal or emotional difficulties.
- 4.19 Adverse childhood experiences, combined with specific influences from family and peers or online connections, may make someone more vulnerable to radicalisation.
- 4.20 Extremist influences could include, but are not limited to:
- family members having direct contact or involvement with extremist or terrorist groups.
 - staff members of an education or community setting promoting an extremist ideology
 - peers promoting an extremist ideology or sharing extremist material.
 - access or exposure to online extremist material via social media or the internet - for example, propaganda including pictures, videos, blogs and fake news.
 - exposure to extremist, terrorist or other violent activity in overseas settings
 - access or exposure to extremist leaflets, magazines or stickering
 - exposure to extremist groups hosting marches, protests or stalls.
- 4.21 Online radicalisation is a significant threat to children and young people. This could include downloading or sharing terrorist material, which could be a criminal act. Extremist and terrorist groups and organisations use social media (for example, apps, forums, blogs, chat rooms) to identify and target vulnerable individuals.
- 4.22 Any child or young person who uses the internet can be at risk of online abuse. We have clear monitoring and filtering processes in place that flag where material is of an extremist ideology or material. These are flagged to our DSL who will follow normal safeguarding procedures.
- 4.23 Radicalisation is like grooming. Whether this happens online or offline, you should treat it in the same way.
- 4.24 **Push and pull** factors can make a child, young person or adult learner at risk of extremism or radicalisation. Often there are several risk factors present that, seen together, can cause concern.
- 4.25 **Push** factors may include a child, young person or adult learner feeling:
- Isolated
 - they do not belong.
 - they have no purpose.
 - low self-esteem
 - their aspirations are unmet.
 - anger or frustration
 - a sense of injustice
 - confused about life or the world.
 - real or perceived personal grievances
- 4.26 **Pull** factors could include an extremist or terrorist group, organisation or individual:

¹³ The following sections relate to DfE guidance: Understanding and identifying radicalisation risk in your education setting 24 October 2022

- offering a sense of community and a support network
- promising fulfilment or excitement
- making the child, young person or adult learner feel special and part of a wider mission.
- offering a very narrow, manipulated version of an identity that often supports stereotypical gender norms.
- offering inaccurate answers or falsehoods to grievances
- encouraging conspiracy theories
- promoting an 'us vs. them' mentality
- blaming specific communities for grievances
- encouraging the use of hatred and violent actions to get justice.
- encouraging ideas of supremacy

4.27 At St Gregory's RC Primary School we teach a broad and balanced curriculum which promotes the spiritual, moral, cultural, mental and physical development of pupils and prepares them for the opportunities, responsibilities and experiences of life. We promote community cohesion. This is in line with our core values as a Catholic school. Examples of how we teach children to be safe from radicalisation, including online, are included below:

St Gregory's is proud to be a School of Sanctuary; we provide a welcome to all pupils and families, including those who are refugees and asylum seekers. We teach children to look out for each other, respect each other and to celebrate our differences. Children are taught how to keep themselves safe online through computing and PSHE lessons.

The Catholic Education Service identifies that we are committed to promoting: The Search for Excellence; The Uniqueness of the Individual; The Education of the Whole Person; The Education of All; and Moral Principles. The Uniqueness of the Individual is at evident odds with extremist ideology: *“Within Catholic schools and colleges, each individual is seen as made in God’s image and loved by Him. All students are valued and respected as individuals so that they may be helped to fulfil their unique role in creation.”*

5. Children Absent from Education:

- 5.1 Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation – particularly county lines.
- 5.2 At St Gregory's RC Primary School we act quickly to help identify appropriate support and response for persistently absent pupils and children missing education. For those where there are a suspected or known Safeguarding risk this may include submitting a referral or, for children with a social worker this includes contacting their social worker.
- 5.3 If a pupil fails to attend on the agreed or notified dates, we undertake reasonable enquiries to establish the child's whereabouts and notify the local authority at the earliest opportunity.
- 5.4 We monitor children's attendance through the daily register. **Taking a prompt register and notifying the relevant staff in school if a child is absent from a particular session and their whereabouts is unknown, is an expectation of all schools within St Teresa of Calcutta Catholic Academy Trust.**
- 5.5 We make all reasonable efforts to ensure that we have two numbers for children to contact them in an emergency.
- 5.6 We follow the procedures for children missing education for more than 10 days in an authorised absence and 20 days when not authorised as identified in DfE statutory guidance which includes notifying the Local Authority and taking all reasonable steps to determine the whereabouts of the child and notifying that a child is missing from education. We make sure all steps have been taken as per Bolton Local Authority guidance, before any child is moved from roll.
- 5.7 Our day-to-day procedures for ensuring children are attending school and we are alert to prolonged or repeat periods of absence is included below:

St Gregory's has an attendance policy which is known and followed by all staff.

6. Online safety:

- 6.1 We follow the Central Trust policy on Digital Safeguarding which outlines the expectations in greater detail for filtering and monitoring.
- 6.2 Our staff know and understand the responsibility in relation to Safeguarding children online and that it is as important as safeguarding offline.
- 6.3 Our practice as a Trust means that we have implemented the 'Meeting digital and technology standards in schools and colleges.'
- 6.4 There are four areas of risk that all staff are aware of:
- **content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.
 - **contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
 - **conduct:** online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g., consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying, and
 - **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams.
- 6.5 The DSL is responsible for managing any online concerns and for escalating upwards to the Central Trust team via Jenny Bonson jbonsen@stoccat.org.uk if there are any concerns as identified in 6.6.
- 6.6 All staff should report any concerns via CPOMS if:
- See or suspect unacceptable content accessed.
 - Unacceptable content can be accessed.
 - Teaching content that could cause a spike in logs.
 - Failure or abuse of the system.
 - Perceived unreasonable restrictions.
 - Abbreviations or misspellings that allows access to unacceptable content.
- 6.7 Our filtering and monitoring systems¹⁴ is reviewed annually with our Central Trust Team. This includes:
- The risk profile of our pupils.
 - Our current filtering system – for example, why some sites are blocked/not blocked.
 - Specific safeguarding issues.
 - Relevant safeguarding reports.
 - Digital resilience of our pupils.
 - Teaching requirements, for example, our RSE and PSHE curriculum.
 - Any specific use of Bring Your Own Device.
 - Synergy with relevant policies and procedures.
 - What checks are currently made and what happens afterwards.
- 6.8 In relation to Mobile Devices and pupils' use of Mobile Devices, we know that access means that "some children, whilst at school, may use their mobile devices to sexually harass, bully, and control others via their mobile and smart technology, share indecent images consensually and non-consensually (often via large group chats) and view and share pornography and other harmful content." We identify how we address this and the use of mobile devices in school below:

¹⁴ The filtering system will block harmful and inappropriate content, without unreasonably impacting teaching and learning. It should not unreasonably impact teaching and learning or school administration; restrict pupils from learning how to assess and manage risk themselves.

No mobile device is allowed at St Gregory's for any pupil.

- 6.9 All our staff have annual cyber-security training and have to sign our Acceptable User Policies.
- 6.10 All our pupils have an Acceptable User Policy.
- 6.11 We teach pupils to be safe online through the following methods:

Children at St Gregory's are taught to be safe online through the Digital Citizenship aspect of our computing curriculum. This is underpinned by the Education for a Connected World framework.

7. Groups of children who may be at risk of greater harm:

- 7.1 Whilst all children should be protected, it is important that governing bodies and proprietors recognise (and reflect in their policies and procedures) that some groups of children, are potentially at greater risk of harm than others (both online and offline).

Children with special educational needs, disabilities or health issues:

- 7.2 Children with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. 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 condition without further exploration.
 - these children 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, and
 - communication barriers and difficulties in managing or reporting these challenges.
 - cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.
- 7.3 Any reports of abuse involving children with SEND will therefore require close liaison with the designated safeguarding lead (or a deputy) and the SENCO.
- 7.4 At St Gregory's RC Primary School we will provide extra pastoral support and attention for these children, along with ensuring appropriate support for communication.

Children who are lesbian, gay, bisexual or gender questioning (LGBT):

N.B This section remains under review, pending the outcome of the gender questioning children guidance consultation, and final gender questioning guidance document being published.

- 7.5 The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.
- 7.6 Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.
- 7.7 LGBT inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and there is a range of support available at the Central Trust and through counter homophobic, biphobic and transphobic bullying and abuse.

Children who need a social worker (Child in Need and Child Protection Plans):

- 7.8 Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse and/or neglect and/or complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health.
- 7.9 DSLs and some key pastoral leads will know if a child has a social worker and will hold and use this information so that decisions can be made in the best interests of the child's

safety, welfare and educational outcomes. This should be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools and colleges to safeguard and promote the welfare of children.

- 7.10 Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or to a child missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).
- 7.11 If a child has a social worker and the school is considering a suspension or permanent exclusion, the social worker MUST be notified as per the DfE Behaviour in Schools 2022 and School Suspensions and Permanent Exclusions September 2023.

Elective Home Education (EHE):

- 7.12 Many home educated children have an overwhelmingly positive learning experience. We would expect the parents' decision to home educate to be made with their child's best education at the heart of the decision. However, this is not the case for all, and home education can mean some children are less visible to the services that are there to keep them safe and supported in line with their needs.
- 7.13 From September 2016 the Education (Pupil Registration) (England) Regulations 2006 were amended so that schools must inform their LA of all deletions from their admission register when a child is taken off roll.
- 7.14 Where a parent/carers has expressed their intention to remove a child from school with a view to educating at home, we will try to hold a meeting with the LA and other key professionals to coordinate a meeting with parents/carers although there is no duty on the parents to do this. Ideally, this would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has special educational needs or a disability, and/or has a social worker, and/or is otherwise vulnerable. Where a child has an Education, Health and Care plan local authorities will need to review the plan, working closely with parents and carers.

Looked after children and previously looked after children (Cared for Children):

- 7.15 The most common reason for children becoming looked after is as a result of abuse and/or neglect. We can minimise the risk to children being looked after by intervening early as identified in Section One and Two.
- 7.16 In our school the Designated Teacher for Looked After Children and Previously Looked After Children is Rebecca Ashcroft. They have access to the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order) and the child's contact arrangements with birth parents or those with parental responsibility. They also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. They have details of the child's social worker and the name of the Virtual School Head ***in the authority that looks after the child.***
- 7.17 A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, we are proactive in ensuring that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group. Where we find other agencies lacking, we will follow escalation procedures as outlined in Section One.
- 7.18 The Designated Teacher will work with the Local Authority who is the corporate parent of a Looked After Child or previously looked after to promote the educational achievement

of children. They will also promote the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders.

Private fostering:

- 7.19 Private fostering occurs when a child under the age of 16 (under 18 for children with a disability) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home.
- 7.20 A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Such arrangements may come to the attention of school staff through the normal course of their interaction, and promotion of learning activities, with children. If this comes to your attention, please record on CPOMS.
- 7.21 Where the arrangements come to the attention of the school (and the school is not involved in the arrangements), the DSL will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The school itself has a duty to inform the local authority of the private fostering arrangements. notify the local authority to allow the local authority to check the arrangement is suitable and safe for the child. Schools who are involved (whether or not directly) in arranging for a child to be fostered privately must notify local authorities of the arrangement as soon as possible after the arrangement has been made. Notifications must contain the information specified in Schedule 1 of The Children (Private Arrangements for Fostering) Regulations 2005 and must be made in writing.
- 7.22 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.
- 7.23 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.
- 7.24 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.
- 7.25 Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases, privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.

8. Creating a Safer Culture:

Safer recruitment procedures:

- 8.1 In line with our Safer recruitment procedures, we expect that at least one member of the Trust Board is Safer recruitment trained; at least one member of the Central Trust Team; at least one member of each school's local governing body; at least one member of the interview panel.
- 8.2 In line with our Safer recruitment procedures, we outline our commitment to Safeguarding on all our recruitment material, including for governors.
- 8.3 In line with our Safer recruitment procedures, we expect references to be obtained prior to interview. These references ask referees to provide confirmation if they are satisfied with the applicant's suitability to work with children and provide the facts (not opinions) of any substantiated safeguarding concerns/allegations that meet the harm threshold.
- 8.4 In line with our Safer recruitment procedures, prior to taking up post we undertake pre-appointment checks which are recorded on our Single Central Record. These are an enhanced DBS check which includes children's barred list information. In our school, this will also be undertaken for all members of our local governing body.
- 8.5 In line with our Safer recruitment procedures, we ensure that all our staff present their DBS certificate.
- 8.6 In line with our Safer recruitment procedures, we undertake an online check.
- 8.7 Where a decision is made not to appoint somebody based on their conviction (s), this will be discussed with the Head of Safeguarding and Central Trust HR lead. This is documented in line with our policy on the recruitment of ex-offenders.
- 8.8 Where a decision is made to appoint somebody with a conviction(s), this is discussed with the Head of Safeguarding and Central Trust HR lead. This is recorded with a relevant risk assessment undertaken by the Headteacher.
- 8.9 Our single central record includes information on the following, including when the checks have been carried out or certificates obtained, and the date on which each check was completed, or certificate obtained:
 - An identity checks.
 - A standalone children's barred list check
 - An enhanced DBS check (with children's barred list check) requested/certificate provided.
 - A prohibition from teaching check
 - A check of professional qualifications, where required.
 - A check to establish the person's right to work in the UK.
- 8.10 In addition, in line with paragraphs 280-285 on people who have lived or worked outside the UK we undertake the following:
 - Criminal records check for overseas applicants using Home Office guidance.
 - Obtaining a letter from the professional regulating authority confirming they have not imposed any sanctions or restrictions, and/or that they are aware of any reason why they may be unsuitable to teach.
- 8.11 Where this information is not available, we will work with Central Trust HR lead to seek alternative methods of checking suitability and undertake a risk assessment that supports informed decision making on whether to proceed with the appointment.
- 8.12 On induction, we will ensure our new staff will receive specific training in relation to safeguarding children and young people.
- 8.13 We will continue to be vigilant in terms of training for our staff and our training programme is outlined in paragraphs 8.14-8.20

Ongoing training:

- 8.14 In our school, all staff will receive mandatory and Trust policies that will be read, understood and signed for. These include, in addition to this policy, code of conduct, digital safeguarding, low level concerns policy, behaviour policy.
- 8.15 We ensure that our DSL and Deputy DSL will receive advanced training every two years.
- 8.16 We participate in Trust wide training on Safeguarding.
- 8.17 We ensure that all our staff, including governors, fulfil relevant annual training with regular safeguarding and child protection updates.
- 8.18 As identified in 8.1 to 8.13, we ensure that at least one member of staff on every interview panel is Safer Recruitment Trained. This is updated regularly.
- 8.19 We use the Safeguarding Support network for our training and annual reviews.
<https://safeguardingsupport.com/>
- 8.20 The Safeguarding Support network provides supervision for our DSLs.
- 8.21 We undertake an annual audit of our Safeguarding procedures through the Safeguarding Support network.
- 8.22 The Central Executive Team will monitor and review Safeguarding procedures in schools bi-annually and more often if there are Safeguarding concerns. This includes anonymised bi-annual reviews of low-level concerns. Action points and targeted learning will follow from each of these reviews which will enable us to be responsive to concerns.
- 8.23 If any Safeguarding Practice Review involves a child from our school, the Central Executive Team will undertake an internal review.

Managing allegations and Low-Level Concerns:

- 8.24 At our school we follow the Trust allegation policy and low-level concerns policy.
- 8.25 This means that all our staff have read, understood and signed for these policies and understand the definition of harm and low-level concerns.
- 8.26 At our school, we know that all allegations and low-level concerns must be reported to the Headteacher who is the ultimate decision maker. If the allegation or low-level concern is related to the Headteacher, we know to contact the Director for Safeguarding at the Trust , Pauline Baker, and the Local Governing Body Chair, Lee Berry.
- 8.27 We know that where the allegation may reach the harm threshold, the Headteacher will contact the LADO and also the Director for Safeguarding.

Concern or allegation that may meet the harm threshold.

This means that the behaviour in question might indicate that a person will pose a risk of harm if they continue to work in their present position, or in any capacity with children (i.e., in connection with their employment or voluntary activity) if a concern is raised/it is alleged that they have:

- **Behaved in a way that has harmed a child, or may have harmed a child; and/or**
- **Possibly committed a criminal offence against or related to a child; and/or**
- **Behaved towards a child or children in a way that indicates they may pose a risk of harm to children; and/or**
- **Behaved or may have behaved in a way that indicates they may not be suitable to work with children.¹⁵**

Concern or allegation that does not meet the harm threshold: low-level concern.

¹⁵ This includes behaviour outside of school or college, that might make an individual unsuitable to work with children, which is known as transferable risk.

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working with children may have acted in a way that:

- **Is inconsistent with an organisation's staff code of conduct, including inappropriate conduct outside of work; and**
- **Does not meet the harm threshold; or is otherwise not serious enough to merit a referral to the LADO.**

Safeguarding Monitoring:

- 8.28 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. All staff at St Gregory's RC Primary School are advised to read the DfE Data Protection guidance for schools (DfE, 2024b), aimed at school staff, governors and Trustees.
- 8.29 Within our school, we hold our data for children on CPOMS.
- 8.30 We provide information to our local governing body on a termly basis. This includes the following:
- No. of Cared for Children.
 - No. of children on Child Protection Plans.
 - No. of children at Child in Need.
 - No. of children open to Early Help.
 - No. of children referred via Prevent programme.
 - No. of children the school has referred to Children's Social Care.
 - No. of escalations taken place within Children's Social Care and the outcome.
 - Any near risks.
 - No. of staff referred to LADO and (if appropriate) final outcome.
 - Top 3 safeguarding concerns for the school and what the school is doing to address this.

Use of school premises:

- 8.31 In our school, we welcome the use of third-party and volunteers to provide an enriching experience for our children. In order to do this safely, we check that any hirers who are using school premises for out of hours settings or providing provision on site have a DSL who has undertaken safeguarding and child protection training, are aware of the specific safeguarding issues that can put children at risk of harm and undertake appropriate training, regularly review the performance and suitability of staff and volunteers after appointment. Our DSL is familiar with the DfE document Keeping Children safe in out of school settings 2020 (updated April 2022).
- 8.32 We ensure that any hirers using our premises is shared centrally with the Operations Team including the Safeguarding checks in 8.33.
- 8.33 We know that allegations and concerns related to volunteers, contractors and third-party staff will be relayed to the Headteacher.

Physical contact and positive handling:

- 8.34 All pupils have a right to be treated with respect and dignity. Corporal punishment is unlawful in all schools. At St Gregory's RC Primary School staff should not use any form of degrading treatment to punish a pupil. The use of sarcasm, demeaning or insensitive comments towards pupils, or about pupils to others, is not acceptable in any situation.

- 8.35 A 'no touch' approach is impractical for most staff and will in some circumstances be inappropriate. The general culture of 'limited touch' is therefore adopted, where appropriate, to the individual requirements of each child.
- 8.36 It is not possible to be specific about the appropriateness of each physical contact, since an action that is appropriate with one child in one set of circumstances may be inappropriate in another, or with a different child. Staff should, therefore, use their professional judgement at all times.
- 8.37 Where children display difficult or challenging behaviour, staff must follow our behaviour policy and positive handling policy and use strategies appropriate to the circumstance and situation. The use of physical intervention can only be justified in exceptional circumstances and must be used as a last resort when other management strategies have failed. All use of physical intervention should be reasonable, proportionate and necessary. All uses of physical intervention should be recorded and held centrally by the Headteacher. This should be available in a readily held format for monitoring by Director of Primary/Secondary.
- 8.38 Under no circumstances will physical force be used as a form of punishment. The use of unwarranted or disproportionate physical force is likely to constitute a criminal offence. Where we judge that a child's behaviour presents a serious risk to themselves or others, we will always put in place a robust risk assessment which is reviewed regularly and, where relevant, a physical intervention plan.
- 8.39 Similarly, where it can be anticipated that physical intervention is likely to be required, a plan should be put in place which the pupil and parents/carers are aware of and have agreed to. Parental consent does not permit us to use unlawful physical intervention or deprive a pupil of their liberty.
- 8.40 Where a pupil has specific needs in respect of particularly challenging behaviour, a positive handling plan, including assessment of risk, will be drawn up and agreed by all parties, including, for example, other adults involved in their care where appropriate.
- 8.41 Our Behaviour Policy includes clear guidance about the use of isolation and seclusion. The legislation on these strategies is complex and staff should take extreme care to avoid any practice that could be viewed as unlawful, a breach of the pupil's human rights and/or false imprisonment.
- 8.42 There are times when a member of staff may have to make physical contact with a pupil to prevent them harming themselves, others from damaging property or from causing disorder. All instances will be communicated in writing to the Headteacher who will record and monitor all incidents. De-escalation strategies should always be tried in the first instance but there will be times when incidents happen and there are no evident triggers. Our behaviour policy addresses positive ways to de-escalate and positive classroom management techniques. Prior to physical intervention, staff should always try and explain why physical contact is being made. **There are two purposes for permitted reasonable force: to control pupils or to restrain them. Force cannot be used as a punishment – it is always unlawful to use force as a punishment.**

Supporting pupils with medical conditions:

- 8.43 Pupils with medical conditions will be properly supported so that they have full access to education at our school. This includes school trips and physical education.
- 8.44 If a member of staff is concerned or uncertain about the amount or type of medication being given to a pupil, this should be discussed with the appropriate senior colleague at the earliest opportunity. When administering first aid, wherever possible, staff should ensure that another adult is present, or aware of the action being taken. Parents/carers will always be informed when first aid has been administered.
- 8.45 At our school we safeguard children with medical conditions through following our Supporting Pupils with Medical Conditions Policy. Staff receive regular updates at weekly staff briefings, liaise regularly with parents, provide training when required, ensure pupils

have individual Health Plan, involve relevant services such as the School Nurse, and ensure records are maintained and up to date.

9. Role of the Designated Safeguarding Lead:

- 9.1 The Designated Safeguarding Lead is responsible for safeguarding and child protection at St Gregory's RC Primary School. Their name and email are: Rebecca Ashcroft, rashcroft@stgregorys.stoccat.org.uk
- 9.2 The key role of the Designated Safeguarding Lead is to:
- manage referrals from school staff or any others from outside the school.
 - work with external agencies and professionals on matter of safety and safeguarding.
 - undertake training.
 - raise awareness of safeguarding and child protection amongst the staff and parents
 - maintain and store records of concerns, discussions and decisions alongside a record of the rationale for all decisions made; and
 - ensure that child protection information is transferred to the pupil's new school.
 - be aware of pupils who have a social worker.
 - help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues with teachers and school and college leadership staff.
- 9.3 Roles and responsibilities of all staff within the Trust are included at Appendix A.

10. Whistleblowing and complaints:

- 10.1 There is a duty to report (including self-reporting) any incident in which an adult has or may have behaved in a way that is inconsistent with the Central Trust staff code of conduct. This includes inappropriate behaviours inside, outside of work or online.
- 10.2 Our staff recognise their individual responsibility to raise any concerns regarding behaviour or conduct (including low level concerns) that falls short of the expectations outlined in this document, our behaviour policy and our staff code of conduct. Failure to report or respond to such concerns would constitute a failure in professional responsibilities to safeguard children and promote welfare.
- 10.3 Our DSL and Headteacher is aware of the escalation procedures within Children's Social Care and are prepared to escalate where there is evidence that actions taken are not working together to support a child's plan or where the DSL feels action has not been taken.
- 10.4 Whistleblowing is a mechanism by which staff can voice their concerns, made in good faith, without fear of repercussion in circumstances where their concerns have not been dealt with or they do not feel able to follow usual reporting lines for some reason. In relation to Safeguarding, the Headteacher and Director of Education would always be the first point of contact in relation to Whistleblowing. Staff should know that their concerns will be treated seriously. Staff can always escalate up to the Catholic Senior Executive Leader, Chris Foley and the Chair of the Board, Marie Garside.

Safeguarding is everyone's responsibility.

Disciplinary action may be taken when Safeguarding and Child Protection Policy and Procedure is not followed.

Staff should now know the importance of taking appropriate action in a timely manner to safeguard and promote children's welfare.

They should know their statutory responsibility in respect to safeguarding including recognising and reporting safeguarding issues.

Be aware of indicators of abuse and specific types of abuse.

Understand that the child's welfare is paramount.

Know the importance of acting early.

Ask curious questions including if there is anything they are still not clear on as part of this policy.

Appendix A

Roles and responsibilities of staff across the Trust - taken from Trust Central Policy:

4.1 Board of Directors:

- 4.1.1 The Board of Directors hold ultimate accountability for safeguarding across all schools within St Teresa Catholic Academy Trust.
- 4.1.2 The Chair of the Trust ensures that Safeguarding is on the agenda of every Trust Board Meeting with the named Director reporting on this item.
- 4.1.3 At least one member of the Trust Board is Safer Recruitment Trained.
- 4.1.4 There is a named Director for Safeguarding who reports to and acts on behalf of the Board and sources training for the Board in conjunction with the Director for Safeguarding. This training should provide them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding procedures in place with the Central Executive Team are thorough and support the delivery of robust whole school approaches to safeguarding.
- 4.1.5 The named Director meets with the Director for Safeguarding termly to understand trends across phases, localities and national trends and to monitor the Safeguarding Delivery Offer and Strategy.
- 4.1.6 The named Director is aware of the focus from local Safeguarding Partnerships and national issues.
- 4.1.7 The named Director is aware of any focus from Ofsted in relation to Safeguarding and is assured that the Head of Safeguarding is also aware and taking appropriate action
- 4.1.8 The named Director is aware of any Safeguarding risks within St Teresa of Calcutta Catholic Academy Trust and seeks assurances that leadership teams across the Trust, including the Central Executive Team, are taking appropriate action to minimise future risks.
- 4.1.9 The Board of Directors will ensure that all conditions for individual schools and local governing bodies as outlined in Keeping Children Safe in Education 2024 are met. This includes that at St Teresa of Calcutta Catholic Academy Trust:
 - There are procedures and recording mechanisms in place for all staff to have read and understood Part One and Annex B of Keeping Children Safe in Education 2024 and that in this trust this applies to those who do not work directly with children.
 - All governing bodies and The Board of Directors have read and understood Part One and Annex B of Keeping Children Safe in Education.
- 4.1.10 The Board of Directors will ensure that at St Teresa of Calcutta Academy Trust:

- All staff have read and understood Guidance for Safe Working Practice (code of conduct) and that there are procedures and recording mechanisms in place to evidence this.
 - All staff have read and understood each individual school's Safeguarding and Child Protection Policy.
 - That all schools are using the Trust central templates in relation to Safeguarding and Child Protection Policies and the monitoring of incidents.
 - That all schools have access to the same recording of incidents platforms – in this case CPOMS.
 - That when schools are onboarded, they are aware of and become compliant with the procedures.
- 4.1.11 The Board of Directors will ensure, through the Performance function, that Personal Development in each school provides opportunities for pupils to keep safe and to equip them with the skills they need to recognise and be safe from abuse.
- 4.1.12 The Board of Directors will ensure, through the Information function, that effective filtering and monitoring procedures are in place in each school in line with Keeping Children Safe in Education 2024.
- 4.1.13 The Board of Directors will ensure that this central trust policy is coherent with other central trust policies including Digital Safeguarding Acceptable User Policies for Staff and Pupils (including the use of mobile phones and Bring Your Own Devices); Relationships and Sex Education; Equality and Community Cohesion; Guidance for Safe Working Practice (Code of Conduct); Allegations against staff policy; Low-level concerns policy.

4.2 Central Executive Team:

- 4.2.1 The Central Executive Team hold designated responsibility for the strategic Safeguarding responsibilities across St Teresa of Calcutta Catholic Academy Trust. The following conditions will be met:
- That they provide central trust policy and procedure on Child Protection and Safeguarding and low-level concerns.
 - Procurement of training materials that ensure compliance across all adults within the Trust.
 - Procurement of training that addresses new and emerging risks.
 - Appointing a Head of Safeguarding from the Central Executive Team and a Deputy Head of Safeguarding.
 - That these Directors keep abreast of the trends across phases, localities and national trends, including knowledge of the focus from Local Safeguarding Boards.
 - That the Head of Safeguarding provides opportunities for knowledge sharing and group supervision, including reviews of cases for DSLs and that this knowledge and data intelligence feeds back into the Safeguarding Delivery Strategy.
 - That they are kept informed of any immediate critical incidents within each of the schools and address with individual Headteachers.
 - That they take the learning from Local Children's and Adults Safeguarding Boards, the national agenda and incidents within schools and plan for training across the Trust in response to these.
 - That they confirm that schools policies and procedures are following the central templates as provided by the Trust.
- 4.2.2 The Central Executive Team will monitor and review Safeguarding procedures in schools bi-annually and more often if there are Safeguarding concerns. This includes anonymised bi-annual reviews of low-level concerns.

- 4.2.3 If any Safeguarding Practice Review involves a child from any of the schools within STOC Catholic Academy Trust, the Central Executive Team will undertake an internal review.
- 4.2.4 The Central Executive Team will provide central trust policy and procedure on Safer Recruitment and ensure that at least one of the Central Executive Team are Safer Recruitment trained.
- 4.2.5 The Central Executive Team will provide central trust policy and procedure on Digital Safeguarding including providing Acceptable User Policies and templates for pupils and staff including demonstration.
- 4.2.6 The Central Executive Team will work with Headteachers to ensure that effective out of hours contact for DSLs is met and acted upon across all schools across the Trust.
- 4.2.7 That the key function area of Operations hold responsibility for risk management, health and safety, Educational Visits and other related policies, providing relevant training so these policy areas can be met, and taking appropriate action where such breaches of policy and procedure are found and ensuring remedial action is taken so it does not occur again.
- 4.2.8 That the key function area of Operations is responsible for making sure that any hirers who are using school premises for out of hours settings or providing provision on site have a DSL who has undertaken safeguarding and child protection training, are aware of the specific safeguarding issues that can put children at risk of harm and undertake appropriate training, regularly review the performance and suitability of staff and volunteers after appointment. The key function area of Operations will be familiar with the DfE document Keeping Children safe in out of school settings 2020 (updated April 2022).

4.3 Headteachers:

- 4.3.1 Headteachers have responsibility for ensuring their Safeguarding and Child Protection policies and Digital Safeguarding match the Central Trust Policy and include information related to their setting.
- 4.3.2 Headteachers, with the Senior Leadership Team within their school, have responsibility for ensuring a safe learning environment and developing a culture whereby children have a trusted adult to work with.
- 4.3.3 Headteachers, with the Senior Leadership Team, have a responsibility to train and support all adults within their school to appropriately identify and respond to any pupil at risk of harm, to fulfil their duty in response of effectively safeguarding pupils and to ensure the curriculum equips pupils with the knowledge and skills to keep themselves safe. They should pay particular attention and amend where necessary for children with SEND knowing that children with SEND and Physical Disabilities are often more vulnerable and face additional barriers in relation to Safeguarding.
- 4.3.4 Headteachers should ensure that their designated safeguarding lead is from the Senior Leadership Team and that they have responsibility for online safety and understanding the filtering and monitoring processes in place. The DSL should have additional time, funding, training, resources and support needed to carry out the role effectively.
- 4.3.5 Headteachers, in this trust, should ensure that there is a Deputy DSL in place and that both the DSL and Deputy DSL is named in the Safeguarding and Child Protection Policy. They should ensure that the Deputy DSL is trained to the same standard as the DSL.
- 4.3.6 Headteachers, with the relevant staff, have a responsibility to work collaboratively with parents and professionals to safeguard pupils in line with Working Together to Safeguard Children 2018. If the DSL is separate to the Senior Lead for Cared for Children, it is important that the Headteacher provides opportunities for them to liaise so that there is clear strategic oversight. Headteachers have a responsibility to ensure that staff are trained and have the time to do this effectively. As in 4.3.3, Headteachers should make sure appropriate training is available for those staff in relation to information sharing.

- 4.3.7 Headteachers should know the reporting mechanisms within their Local Authority and the escalation procedures.
- 4.3.8 Headteachers should be familiar with the expectations of Working Together to Safeguard Children 2018 so that they can provide challenge and support to their DSLs.
- 4.3.9 Headteachers should aim to source supervision for the DSL/Deputy DSL and enable these staff to attend central Safeguarding knowledge sharing sessions.
- 4.3.10 Headteachers should ensure that they are Safer Recruitment Trained and that at least one other person who is responsible for interviewing has completed Safer Recruitment Training. As a minimum, all other staff who are responsible for recruitment should read Part Three of KCSIE.
- 4.3.11 Headteachers should ensure that the Trust Single Central Record is up to date and is available for checking at any time.
- 4.3.12 Headteachers should ensure that in the case of any critical incident in relation to Safeguarding, outlined in Appendix A, that they notify the Head of Safeguarding and/or Chief Information Officer.
- 4.3.13 Headteachers are the member of staff to deal with allegations against staff. They are the case manager for any allegation whereby it is alleged that anyone in the school, including supply teachers, volunteers and contractors may meet the harm threshold.¹⁶ If in doubt they should seek advice from the Head of Safeguarding and/or local authority designated officer (LADO). This should be on a no-name basis. If it is clear that the harm threshold may have been met, then they should discuss with the LADO **before** undertaking any further fact finding. All schools within the Trust are required to comply with the expectations outlined by the LADO.
- 4.3.14 Headteachers should always be informed about low-level concerns and should be the ultimate decision maker in respect of all low-level concerns. However, it may be appropriate to delegate fact finding to a DSL, Deputy Headteacher or relevant Senior Member of Staff. As per the low-level concerns policy, the Headteacher should ensure that all low-level concerns are recorded, monitored and be prepared to discuss patterns with the Head of Safeguarding.
- 4.3.15 Headteachers should maintain an atmosphere of openness with the Central Team and seek to inform and/or ask if there are any concerns in relation to Safeguarding that they are unsure about.

4.4 Designated Safeguarding Lead:

- 4.4.1 The Designated Safeguarding Lead should be an appropriate senior member of staff and will take lead responsibility for Safeguarding and Child Protection (including online safety and understanding the filtering and monitoring systems and processes in place.
- 4.4.2 This role carries a significant level of responsibility, and they should be given the additional time, funding, training, resources and support they need to carry out the role effectively. DSLs should have their training updated at least every two years and also undertake Prevent awareness training.
- 4.4.3 If the DSL is not the Senior Member of Staff for Cared for Children, they should liaise closely with them if there are any concerns about Cared for Children.
- 4.4.4 If the child has Special Educational Needs, the DSL should ensure that they are confident and comfortable with advice from the SENCO as to how to approach any meeting with the child.

¹⁶ This includes: behaving in a way that has harmed a child, or may have harmed a child and/or; possibly committed a criminal offence against or related to a child, and/or; behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or; behaved or may have behaved in a way that indicates they may not be suitable to work with children.

- 4.4.5 The DSL should be confident and comfortable with the reporting procedures within their borough and know the importance of information sharing as per Working Together to Safeguard Children 2018. Each Local Authority will have their own methods of reporting. The DSL should be aware of and prepared to use the escalation process within their borough.
- 4.4.6 The DSL should provide a termly report to governors as part of the Local Governing Body meetings which contains information outlined in 4.7.7.
- 4.4.7 The DSL should provide an annual report for governors as outlined in 4.7.8.
- 4.4.8 The DSL should provide termly updates for the Head of Safeguarding as required, including top 3 concerns recorded and any concerns in relation to information sharing and the responsibilities of other stakeholders i.e., non-attendance at core group and strategy meetings.
- 4.4.9 The DSL should notify the Head of Safeguarding if there are any concerns and be prepared to develop an open and honest relationship.
- 4.4.10 DSLs should attend Trust knowledge sharing sessions as part of our Safeguarding delivery strategy.

4.5 Deputy Designated Safeguarding Lead:

- 4.5.1 The Deputy Designated Safeguarding Lead (if appropriate) should be trained to the same level as the Designated Safeguarding Lead.
- 4.5.2 The Deputy Designated Safeguarding Lead (if appropriate) should be able to step up in the absence of the DSL.

4.6 All Staff:

- 4.6.1 All staff need to make sure they have read, understood and signed for:
 - Part One and Annex B of Keeping Children Safe in Education 2023.
 - Each individual school's Safeguarding and Child Protection Policy.
 - Guidance for Safe Working Practice (Code of conduct).
 - Digital Safeguarding Policy.
 - Low-Level Concerns Policy.
 - Dignity at work Policy.
 - Each individual school's Behaviour Policy.
 - Each individual school's Positive Handling Policy.
 - Each individual school's Lone working Policy.
- 4.6.2 All staff need to participate in any training provided by the Trust or school as required.
- 4.6.3 All staff need to know their duty in relation to Female Genital Mutilation.
- 4.6.4 All staff need to know how to make a referral to Children's Social Care and when they should do this.
- 4.6.5 All staff need to know how to contact the Local Authority Dedicated Officer (LADO).
- 4.6.6 All staff need to know their Duty of Care to children and young people.
- 4.6.7 All staff need to recognise that Safeguarding is everyone's responsibility and that they have a responsibility to contribute to a safe, calm environment.

4.7 Local Governing Bodies:

- 4.7.1 Local Governing bodies have a strategic leadership responsibility for their school's safeguarding arrangements and **must** ensure that they comply with their duties under the legislation and their obligations under the Human Rights Act 1988, Equality Act 2010 (including the Public Sector Equality Duty 2011) and their local multi-agency safeguarding arrangements.
- 4.7.2 Local Governing Bodies should make sure that they have read and understood Part One and Annex B of Keeping Children Safe in Education 2024.

- 4.7.3 Local Governing Bodies should make sure that there are systems in their schools to ensure that all staff have read and understood and signed for the information outlined in 4.6.1.
- 4.7.4 That at least one governor is Safer Recruitment trained and that when recruitment takes place, they are assured that a member of the panel are Safer Recruitment trained.
- 4.7.5 Local Governing Bodies should appoint a Safeguarding governor from their team alongside a governor for Looked After children and SEND. This governor will take **leadership** responsibility for their school's Safeguarding arrangements.
- 4.7.6 The lead governor as identified in 4.7.5 should ensure their school is using the Trust central templates in relation to Safeguarding and Child Protection Policies and the monitoring of incidents.
- 4.7.7 The Chair should ensure that Safeguarding is an agenda item on each governing body meeting and that they are informed termly of:
- No. of Cared for Children.
 - No. of children on Child Protection Plans.
 - No. of children at Child in Need.
 - No. of children open to Early Help.
 - No. of children referred via Prevent programme.
 - No. of children the school has referred to Children's Social Care.
 - No. of escalations taken place within Children's Social Care and the outcome.
 - Any near risks.
 - No. of staff referred to LADO and (if appropriate) final outcome.
 - Top 3 safeguarding concerns for the school and what the school is doing to address this.
- 4.7.8 The Chair should ensure that there is an annual Safeguarding report which includes training undertaken at the school and any lessons learnt.
- 4.7.9 Local Governing Bodies should ensure that they are adequately trained, including Prevent training and that this training should provide them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding procedures in place across the school are thorough and robust.

Allegations that meet the harm threshold:

- 4.7.10 This is defined in KCSIE 2024 as where an adult may have:
- Behaved in a way that has harmed a child or may have harmed a child and/or.
 - Possibly committed a criminal offence against, or related to a child and/or.
 - Behaved towards a child or children in a way that indicates they may pose a risk of harm to children; and/or.
 - Behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- 4.7.11 The Headteacher will be the Investigating Officer. All instances will be reported to the LADO and decisions made for disciplinary proceedings following guidance from the LADO.
- 4.7.12 If disciplinary proceedings follow, a member of the Governing Body will form part of the Hearing panel in line with the Trust Allegation policy.