

Safeguarding Policy

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This policy is for Bury Grammar Schools
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This policy has been written to meet the standards as set out in the Education (Independent Schools Standards) Regulations 2014 (ISSR) as amended under section 94 of the Education and Skills Act 2008 and has particular regard for the interpretation of these as set out in paragraphs 183 to 288 of the Commentary on the Regulatory Standards September 2020.

Policy Statement

At Bury Grammar School, we are committed to safeguarding and promoting the physical, mental, emotional, and moral safety and welfare of each pupil in our care and we expect all staff and volunteers to share this commitment. We recognise our duty as a safeguarding agency and seek to form positive working relationships with partner agencies and Local Safeguarding Partnerships from where our pupils live. We aim to intervene at an **early stage** when concerns about a pupil are identified to try to prevent the situation for a pupil worsening. All staff and volunteers take all welfare concerns seriously and encourage pupils to talk to them about anything that worries them. The School will always act in the best interest of the child.

This policy is aligned with policies and inter-agency procedures set out by the **Bury Integrated Safeguarding Partnership (BISP)** and the DSLs are members of this partnership.

This Safeguarding Policy is available to all staff, parents and pupils via the school website and printed copies are available upon request from the School offices. Safe recruitment procedures operate as set out in the Recruitment Policy and the Headteacher and other members of SLT are trained in Safe Recruitment.

Scope of Policy

This policy is applicable to the whole school community, including the Headteacher, Governors, teaching staff (including peripatetic Music teachers and Sports coaches) non-teaching staff, volunteers and temporary non employed staff.

This policy is a stand-alone document, but should be read together with policies in the following areas, where more specific safeguarding arrangements are detailed:

- Anti-Bullying
- Attendance
- Behaviour (including Rewards, Sanctions, Use of Force)
- Complaints
- Data Protection Policy and all associated policies aligned with GDPR
- Educational Visits
- Esafety
- Health and Safety
- Intimate Care (EYFS)
- Looked After Child
- Mental Health and Wellbeing
- Mobile Devices
- Prevent Strategy
- Safer Recruitment
- Special Educational Needs and Disabilities (SEND)
- Whistleblowing
- Youth Produced Sexual imagery (Sharing nudes and semi nudes images/videos)
- Code of Conduct
- Low Level Concerns Policy
- Peer on Peer Abuse Policy

Aims of Policy

The aims of this policy are to:

- Ensure that all staff know that safeguarding is everyone's responsibility and that the school should consider at all times what is in the **best interests of the pupil**.
- Ensure staff are aware that anyone can make a referral to social care if it is in the **best interests of the pupil**.
- Raise awareness of specific types of abuse such as female genital mutilation (FGM), so-called honour based violence, forced marriage and child sexual exploitation. In particular that an individual teacher must report directly to the police if they discover that an act of FGM has been carried out.
- Raise awareness of vulnerable groups of children such as those with special educational needs and disabilities (SEND).
- Provide pupils, parents and staff with clear guidance concerning procedures when safeguarding concerns are raised and know who to speak to should a pupil disclose to them an allegation of abuse.
- Ensure that the school has clear procedures in place to reduce the risk of a **child going missing in education**.
- Emphasise the importance of having procedures for listening to children to ensure early help and intervention. This may including inter-agency working in order to support children and families, making use of such procedures as the Early Help Family Support Plan (EHFSP, formerly CAF) or Team Around the Family Meeting (TAF, formerly TAC), as well as the School's own systems of pastoral support.
- Raise awareness that safeguarding incidents could happen anywhere, and staff should be alert to possible concerns being raised in school.
- Raise awareness and provide guidance about different types of abuse.

- Ensure that there is a clearly understood procedure, following an allegation being made against the Principal, or a member of staff.
- Foster an open environment in which all members of the community should feel free to raise concerns in good faith and be assured that such concerns will be responded to in an appropriate manner.
- Ensure that the curriculum includes activities and opportunities which equip our pupils with the skills they need to stay safe from abuse, including e-safety, and to know to whom to turn for help, if necessary.

A Safer School Culture

The governing body will ensure that the following appropriate policies and procedures are in place and shared with staff at the point of induction, in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare:

- Employee handbook, including the Staff Code of Conduct
- Whistle Blowing policies (guidance to staff and volunteers on how they can raise concerns and receive appropriate feedback on action taken when staff have concerns about any adult's behaviour)
- School's procedures for managing children who are missing education
- Guidance on Safer Working Practices
- Safeguarding and Child Protection policy
- Esafety policy
- School behaviour policy
- Use of Force policy
- Mental Health Policy
- Acceptable User Policy
- The names, roles and responsibilities of the designated safeguarding lead and any deputies.

Members of staff are expected to abide by the Staff Code of Conduct at all times.

Introduction

- a. This policy has regard to legislation including:
 - Keeping Children Safe in Education (Sept 2021) (KCSIE)
 - including Disqualification under the Childcare Act 2006 and 3
 - What to do if you're worried a child is being abused 2015
 - Working Together to Safeguard Children (2018) (WT)
 - WT refers to non-statutory advice: Information Sharing (March 2015)
 - The Prevent Duty Guidance: for England and Wales (April 2021)
 - including The Prevent Duty: Departmental Advice for schools and childminders 2015 and
 - The Use of Social Media for Online Radicalisation (2015).
- b. This policy follows local and national guidance produced by the Bury Integrated Safeguarding Partnership (BISP) and will operate safeguarding procedures in line with locally agreed multi agency safeguarding arrangements put in place by the safeguarding partners, although it should

be noted that many of our pupils live in areas outside Bury. Local procedures can be obtained from BISP: <https://burysafeguardingpartnership.bury.gov.uk/>

- c. In line with the Every Child Matters (ECM) agenda we aim to ensure that every pupil:
- is safe;
 - is healthy;
 - has the opportunity to enjoy and achieve;
 - makes a positive contribution; and
 - achieves economic well being.

When one or more of the above outcomes for children are unmet children may become vulnerable. We seek to promote these outcomes as an integral part of our responsibility to ensure the safeguarding and protection of all those entrusted to our care. Staff should be mindful of these outcomes and must be prepared to refer concerns.

- d. There are three main elements to our safeguarding:
- i. **Prevention** (e.g., positive school atmosphere, a school culture where staff refer any **concern** at an **early** stage, where safeguarding has a high priority, effective PSHE, E-safety and pastoral support available to pupils and effective safeguarding 'umbrella' policies, a belief that anyone can harm a child and a vigilant culture to staff conduct.)

Listening to pupils: having effective systems in place and people to whom pupils can speak with about problems. Pupils are encouraged to speak to any adult. Pupils are informed of the identities of the DSLs which are displayed around school and any pupil can self-refer to the counselling service which the school provides. Other ways in which we listen to children and give them a voice in school include the School Council.

The School seeks to give its pupils an age-appropriate understanding of how to promote both their own safety, including online and well-being and that of other children. This is through various teaching and learning opportunities, as part of a broad and balanced curriculum, including PSHE, SRE, tutor periods and assemblies. Depending on the age group different areas are taught, our aim is to help children to adjust their behaviours in order to reduce risks, including the safe use of electronic equipment and access to the internet, utilising guidance from The UK Safer Internet Centre and CEOP's Thinkuknow website amongst others. Other relevant issues are covered through Relationships Education for all Primary Pupils and Relationships and Sex Education for all secondary pupils and Health Education for all pupils. Pupils are taught to recognise when they are at risk and how to get help when they need it. The statutory guidance can be found here: [Statutory guidance: relationships education, relationships and sex education \(RSHE\) and health education](#)

The School participates in annual events, such as Anti-bullying week and makes use of restorative justice methods to resolve pastoral incidents in an effort to ensure that children fully understand their rights and responsibilities and secure a longer lasting resolution.

- a) **Protection** (e.g., by following agreed procedures when a child is in immediate danger, ensuring staff are trained and supported appropriately and sensitively in safeguarding matters and ensuring the school has robust recruitment procedures)

- b) Support** (to pupils and staff, including those who are survivors of abuse). This includes reassessing situations and taking action when things fail to improve.

Policy Review

The Governing Body undertakes an annual review of the School's Safeguarding Policy and Procedures and of the efficiency with which the related duties have been discharged. The Nominated Governor with Responsibility reviews the safeguarding files and the efficiency of implementation of the policy. The school will ensure that any deficiencies or weaknesses in safeguarding arrangements are remedied without delay once identified.

Recruitment and Selection

All staff appointed to the school will be subject to an enhanced DBS with barred list check. In addition, a prohibition from teaching check, a check to establish a person's right to work in the UK, proof of identity and academic qualifications will be required. Volunteers in regulated activity will be subject to an enhanced DBS with barred list check. Volunteers not in regulated activity will be subject to an enhanced DBS check. For appointments to relevant roles (including the board of Governors) the school will comply with the duty to check for prohibitions from the management of independent schools through the DBS and TRA routes as appropriate.

For full details of recruitment procedures including: selection procedure, pre-employment checks, policy on the recruitment of ex-offenders, assessment criteria and the retention and security of disclosure information please see the Recruitment Policy.

The school will comply with statutory guidance about direct disqualification from childcare. The school will inform relevant staff of the legislation and make staff aware of what information will be required of them and how it will be used to make decisions about direct disqualification. The school will take steps to gather sufficient and accurate information about whether any member of staff covered by the statutory guidance is directly disqualified and will keep a record of the date disqualification checks were completed, on the Single Central Register (SCR).

With regard to the Childcare Act 2006 (as amended, 2018), 'Relationships and associations' that staff have in school and outside (including online), may have an implication for the safeguarding of children in school. Where this is the case, the member of staff must disclose such information to ensure appropriate action is taken to safeguard the duty of care that the school has towards its staff and employees' welfare. In addition, such a disclosure will identify whether any additional arrangements are needed to support the member of staff. The school will consider whether there are measures that need to be put in place to safeguard children. Additionally, if the circumstances of a member of staff changes they must inform the school immediately.

The School will also require relevant staff to complete a self-declaration form. For new staff the School will ask for this information as part of the pre-employment checks that it carries out. The School will notify Ofsted within 14 days of any significant event which is likely to affect the suitability of any person who is in regular contact with children where childcare is being provided.

Safeguarding induction is carried out for all new staff/volunteers and all staff are required to undergo Child Protection training which is updated regularly in line with BISP requirements and includes information and advice relating to Prevent and online safety. There will be regular, informal updates

throughout the school year for all staff to provide them with relevant skills and knowledge to safeguard children effectively.

Key Personnel and Cover Arrangements for the DSL

All disclosures of abuse must be discussed with the Designated Safeguarding Lead (DSL) or a Deputy Designated Safeguarding Lead (DDSL). Pupils, staff and parents should feel at ease to discuss any concerns relating to the welfare of a child with one of the DSLs no matter how trivial they may appear.

Name	Job Title	Contact details
Mrs Rachel Newbold	Designated Safeguarding Lead (DSL) (Deputy Head Pastoral) <u>Overall lead responsibility BSGS</u>	<u>rnewbold@burygrammar.com</u> 0161 696 8600
Mr Rob Lees	Designated Safeguarding Lead (DSL) (Deputy Head Pastoral) <u>Overall lead responsibility BGSB</u>	<u>rlees@burygrammar.com</u> 0161 696 8600
Mrs Chrissy Howard	Deputy Designated Safeguarding Lead (DDSL) (Head of Co-educational Infants and of Girls' and Boys' Junior Schools) and DDSL with responsibility for safeguarding at EYFS (Head of EYFS)	<u>choward@burygrammar.com</u> 0161 696 8600
Mrs Holly Hammond	Deputy Designated Safeguarding Lead (Head of Sixth Form)	<u>hhammond@burygrammar.com</u> 0161 696 8600
Mrs Rachel Hartley	Deputy Designated Safeguarding Lead (DDSL) (Head of Lower School BSGS)	<u>rhartley@burygrammar.com</u> 0161 696 8600
Mrs Sarah Howard	Deputy Designated Safeguarding Lead (DDSL) (Head of Lower School BGSB)	<u>showard@burygrammar.com</u> 0161 696 8600
Mrs Samantha Aylin	Deputy Designated Safeguarding Lead (DDSL) ((Senior Primary School Teacher))	<u>saylin@burygrammar.com</u> 0161 696 8600
Mrs Kay Robinson	Deputy Designated Safeguarding Lead (DDSL) (Senior Health Support Worker)	<u>landerson@burygrammar.com</u> 0161 696 8600
Miss Lindsay Carey	Deputy Designated Safeguarding Lead (DDSL) (Senior Health Support Worker)	<u>landerson@burygrammar.com</u> 0161 696 8600
Mrs Sarah McMahon	Deputy Designated Safeguarding Lead (DDSL) (Kindergarten Manager, Wrap Around Care Manager)	<u>smcmahon@burygrammar.com</u> 0161 696 8600
Mrs Jo Anderson	Principal, Headmistress	<u>headmistress@burygrammar.com</u> 0161 696 8600
Mr Devin Cassidy	Vice Principal, Headmaster	<u>dcassidy@burygrammar.com</u> 01616968600

Mr Tim McDougall	School Governor with Safeguarding, Online Safety and bullying oversight	0161 696 8600
Mrs Gillian Winter	Chair of Governors	0161 696 8600
Mr Malcolm Edge	Deputy Chair of Governors	0161 696 8600

The School will ensure that there is a duty DSL available in school at all times during a normal school working day. It is also always possible for staff to contact the DSL and DDSLs to raise safeguarding concerns out of hours (including weekends) and during holidays using CPOMS, emailing the DSL directly, emailing the specific safeguarding email address or by contacting the school offices.

However, if it is not possible to contact the DSL or one of the DDSLs and there is a genuine feeling that a child is at risk of suffering significant harm, this should not delay appropriate action being taken. Staff should consider speaking to a member of the SLT and/or take advice from the local children's social care and/ or police. Any member of staff can make a referral.

Contact details:

The Bury Multi-Agency Safeguarding Hub (MASH) Team
Telephone: 0161-253 5678
Emergency Number: 0161-253 6606
Police: 0161-872 5050

Safeguarding meetings

The DSLs meet regularly with key safeguarding personnel in order to discuss each live case and new and on-going welfare concerns to ensure that sound and well-judged decisions are taken, to ensure consistency of approach and support for DSLs and to review safeguarding practices.

Mobile Phone Technology/ Online Safety

It is essential that children are safeguarded from potentially harmful and inappropriate online material. At Bury Grammar School, we recognise the need for a whole school approach to online safety to protect and educate pupils and staff in their use of technology and the need to establish mechanisms to identify, intervene in, and escalate any concerns when appropriate.

The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- **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:** personal 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. The School will report to the Anti-Phishing Working Group (<https://apwg.org/>) If it feels pupils, or staff are at risk.

The School has active councils which include pupil representation, and which amongst other duties, considers online safety incidents and lessons that can be learnt to improve the safety of pupils.

The School is aware of the risk posed by access to the internet by unmonitored or unfiltered 3G, 4G and 5G devices. The School recognises that this access means some children, whilst at school, sexually harass their peers via their mobile and smart technology, share indecent images: consensually and non-consensually (often via large chat groups), and view and share pornography and other harmful content. Such risk is kept under review.

When children use the School's network to access the internet, they are protected from inappropriate content by our monitoring and filtering systems and reports are regularly analysed. The School has clear policies pertaining to mobile phone/devices and clear sanctions are in place for digital or cyber misconduct, recognising pupils are able to access the internet using their own data plan.

The School's Online Policy explains how we try to keep pupils safe in School. Cyber-bullying by pupils, via texts and emails, is treated as seriously as any other type of bullying and is managed through our Anti-Bullying Policy. All e-safety incidents are logged using CPOMS and the DSL has overall responsibility for Online Safety in school.

Further guidance: [Teaching online safety in schools](#)

How pupils are kept safe when they are accessing 'online learning' whilst out- of school

Online Safety for remote teaching and learning

The school will ensure that any use of online learning tools and systems is in line with privacy and data protection/ GDPR requirements. Staff should raise any safeguarding concerns regarding pupil IT use to the DSLs and record on CPOMS. It is the responsibility of the staff member to act as a moderator; raise any issues of suitability (of dress, setting, behaviour) with the child and / or parent immediately and end the online interaction if necessary. Recording lessons does not prevent abuse. If a staff member believes that a child or parent is recording the interaction, the lesson should be brought to an end or that child should be logged out immediately.

Staff Code of Conduct for remote teaching and learning

Staff engaging with pupils and / or parents online have a responsibility to model safe practice at all times. Staff and pupils must abide by the Acceptable Use Policies. Staff and pupil/ student communications must remain professional at all times and pupils must adhere to the remote learning expectations and guidelines. Staff must use only official BGS provided communication tools and should avoid the use of social media or personal email accounts to contact pupils or parents. Where members of staff have been asked to speak directly to children to help identify any concerns staff should make calls from the school site via school phones and devices if possible. If personal phones are used to make calls, staff need to make sure that they withhold their personal number. When staff are teaching online, their dress and appearance must be similar to the clothing they would wear on a normal school day. Ideally, when teaching online, the background should be blurred and staff and pupils should be in

living/ communal areas, no bedrooms. In some cases, staff will be teaching online in school whilst their class are learning remotely at home. Staff recognise that filters at a child's home may be set at a threshold which is different to the school and resources and videos used must be age appropriate- pupils may not have support immediately to hand at home if they feel distressed or anxious about content.

One to One Situations Online

Staff are permitted to work one to one with a pupil only where necessary and with the knowledge and consent of a senior leaders and parents/carers. Staff need to ensure that wherever possible there is visual access and/or an open door in a one-to-one situation and avoid the use of 'engaged' or equivalent signs wherever possible. Such signs may create an opportunity for secrecy or the interpretation of secrecy. Staff must always report any situation where a pupil becomes distressed, anxious, or angry and consider the needs and circumstances of the pupil involved. Where possible, it is preferable that another teacher joins the meeting/online lesson.

Online safety away from school

It is important that all staff who interact with pupils, including online, continue to look out for signs a child may be at risk. Any such concerns should be dealt with as per the Safeguarding Policy and where appropriate referrals should continue to be made to children's social care and as required the police.

Guidance on online learning can be found in Guidance for Safer Working Practices (April 2020)

[Guidance for Safer Working Practice for those working with children and young people in education settings](#)

Records

Child Protection Records

The DSLs keep accurate and up to date records of child protection concerns and ensure the security of information. The chronology and all associated documents are maintained on CPOMS. Every child who has a historic or current Child Protection concern has an electronic marker placed on them on CPOMS, and this is cross referenced with a marker on the pupil's open file. Safeguarding/Child Protection information accumulated prior to our introduction of CPOMS, as well as more bulky paper documents pertaining to the above, are held in the hard files in the Child Protection filing cabinet, which is kept locked and secure at all times. Again, such pupils have an electronic marker placed on their CPOMS entry to indicate this.

The child protection files, both hard copies and electronic, are confidential and are not accessible by pupils, parents or staff. The DSLs and the Heads are the only staff members with access to these records.

These records may be made available to the safeguarding Governor to enable him to carry out his annual review during which the identity of the child is protected. In addition, such records are also made available to the Independent Schools Inspectorate when inspecting the school for regulatory compliance.

Welfare Concerns

Welfare concerns are raised by any staff using the paperless CPOMS system and they are an essential part of the early identification of safeguarding concerns and unmet needs. If any member of staff cannot access CPOMS, speak directly to the DSL.

- The incident is entered onto CPOMS and the relevant staff member is alerted (eg. Head of Year or Section, Class teacher, etc)
- The DSLs are alerted to every CPOMS referral and read and assess each case and may intervene where necessary.
- Pupils for whom there are significant welfare concerns are discussed at weekly safeguarding meetings, and subsequent actions and decisions are added to CPOMS.
- In keeping with confidentiality, only DSLs and staff with significant remits in terms of pastoral responsibility (such as Heads of Year/Section, or Class teachers in the Junior schools) have access to welfare concerns and other records (where appropriate) within CPOMS. The DSLs will ensure that information is only shared when necessary.

Pupil Transfer Records

The Headteacher writes to the Headteacher of any school from where a pupil transfers, to request that the school is alerted to any child protection issues relating to a pupil. This is to ensure that records are not lost, and concerns are passed on upon transfer between schools. The Registrar will alert the DSL to concerns and where no reply has been received from a feeder school, arrangements will be made to confirm if such a file about a child exists. The SENCO will also be made aware of any concerns as required.

In cases where a pupil for whom we hold a child protection file transfers to a different school, the child protection file will only be forwarded to the pupil's new school within 5 working days once confirmation has been received that the pupil has started at the school. In such cases the file will be forwarded by recorded delivery and separate to any other forwarded records. In all cases where records are transferred a receipt of records will be issued when records are received or will be requested when records are transferred.

In addition to the child protection file, the DSLs consider if it is appropriate to share any information with the new school or college in advance of a pupil leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for them when the child arrives.

Information sharing guidelines:

GDPR and human rights law are not barriers to justified information sharing but provide a framework to ensure that personal information about living individuals is shared appropriately. The following 'golden rules' for information sharing should be followed:

- i. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.

- ii. Seek advice from other practitioners if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
- iii. Share with informed consent where appropriate and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, there is good reason to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case.
- iv. When you are sharing or requesting personal information from someone, be certain of the basis upon which you are doing so. Where you have consent, be mindful that an individual might not expect information to be shared.
- v. Consider safety and well-being: Base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
- vi. Necessary, proportionate, relevant, adequate, accurate, timely and secure: Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up to date, is shared in a timely fashion, and is shared securely.
- vii. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

As stated in KCSIE (2021), 'The Data protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe.' This includes allowing practitioners to share information without consent where there is good reason to do so and that the sharing of information will enhance the safeguarding of a child in a timely manner, but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place the child at risk.

Attendance and Admission Register

Pupils are placed on the admissions register at the beginning of the first day that is agreed by the school, or when the school has been notified that the pupil will first be attending. The school will notify the LA within five days of when a pupil's name is added to the admissions register. The school will ensure that the admissions register is kept up-to-date and accurate at all times.

Form Tutors, Heads of Year, and Class teachers (in the Infant and Junior schools), are required to monitor attendance closely and contact parents where attendance is a cause for concern. Such cases would normally be raised with the DSLs. Cases of truancing must always be taken seriously in recognition that children become vulnerable when they are not in school and such cases must always be referred to the DSLs.

Any pupil whose attendance falls below 90% during the course of a full school term may be referred to the Education Welfare Unit of the Local Authority in which the pupil resides. Such action will be taken by the DSLs following consultation with the Head. Clearly each case will be judged on individual circumstances as there may be a reasonable explanation for such absence and it may be an indication that the child or family are in need of some degree of early help intervention.

The admission register must be maintained and compliant with the requirements of **KCSIE 2021**.

Child Missing in Education (CME)

Knowing where children are during school hours is an extremely important aspect of safeguarding. A child going missing from education is a potential indicator of abuse or neglect and may also raise concerns about other safeguarding issues. CME are at significant risk of underachieving, being the victims of harm, exploitation, or radicalisation, and becoming NEET (not in education, employment, or training) later in life. Children missing education are often amongst the most vulnerable children in our society.

Bury Grammar School monitors attendance carefully and addresses poor or irregular attendance without delay. The school will always follow up with parents/carers when pupils are not at school. Action will always be taken if any absence of a pupil gives rise to concerns about their welfare. The school has at least two up to date contact numbers for parents and carers (in accordance with KCSIE, September 2021) in order to facilitate contacting parents or carers if a pupil is not at school when they are expected to be here. Parents should remember to update school as soon as possible if the numbers change.

The school will inform the local authority of any pupil who fails to attend school regularly, or who has been absent without the school's permission for a continuous period of 10 days or more. School will inform the local authority of any pupil deleted from the admission register under circumstances as outlined in Keeping Children Safe in Education (September 2021).

In response to the guidance in Keeping Children Safe in Education (2021) the school has:

- Staff who understand what to do when children do not attend regularly
- Appropriate policies, procedures and responses for pupils who go missing from education (especially on repeat occasions).
- Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.
- Staff who understand the importance of effective information sharing between parents, the School and local authorities which is critical to ensuring that all children of compulsory school age are safe and receiving suitable education.
- Procedures to inform the Local Authority when we plan to take pupils off roll when they:
 - a. Leave school to be home educated
 - b. Move away from the school's location
 - c. Remain medically unfit beyond compulsory school age
 - d. Are in custody for four months or more (and will not return to school afterwards) or
 - e. Are permanently excluded

This should be done as soon as the grounds for deletion are met, but no later than deleting the pupil's name from the register.

- All staff are aware of the School's procedures that are used for searching for and reporting any pupil missing from school. The procedure includes the requirement to record any incident, the action taken, and the reasons given by the pupil for being missing; and to help prevent the risks of their going missing in future.
- Children with Family Members in Prison: Such children are at risk of poor outcomes including poverty, stigma, isolation, and poor mental health.

Bury Grammar School will ensure that pupils who are expected to attend school but fail to take up the place will be referred to the local authority following reasonable enquiries to establish the child's

whereabouts. When a pupil leaves the school, we will record the name of the pupil's new school and their expected start date.

Further guidance: [Children Missing Education 2016](#) and [Children Missing Education Protocol 2019 2020](#)

Home Elective Education

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.

Where a parent/carers has expressed their intention to remove their child from school with a view to educating at home, the School will coordinate a meeting with parents/carers and other key professionals where possible, ideally before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of the child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker.

Visitors, identity Checks and ID Badges

All visitors during the school day are required, on arrival, to sign in at the appropriate School Office. Visitors will be issued with an appropriate visitor's badge which contains further instructions for the safety of the visitor. Visitors should remain under the supervision of a member of staff at all times and be escorted back to the appropriate School Office where the badge must be returned.

Any person who is visiting the school to work directly with young people on a 'one off' activity should have his/her identity checked or verified by the person hosting the event and may not be left unsupervised with children.

All staff on the BGS campus wear ID badges. In the case of a forgotten badge a temporary badge should be signed out from the School Offices.

Foreign Exchange Visits

When organising Foreign Exchange visits, the organiser must ensure that reasonable steps have been taken to safeguard pupils at BGS and visiting pupils (including checking that we have no concerns about BGS host families and requiring that foreign exchange schools give similar assurances). UK host families are DBS checked. Such steps should be made explicitly clear in the risk assessment and discussed with the DSL who must subsequently authorise the risk assessment.

Of particular importance here is that parents should feel that they have the right to object to their child staying with a particular host family if they so wish, ie a host family should not be forced upon a child. For further guidance please refer to the Singleton Report 2009 (paragraph 46-54).

Private Fostering

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other

than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins. Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

Whilst most privately fostered children are appropriately supported and looked after, they are 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.

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

BGS staff should notify the DSLs when they become aware of private fostering arrangements. The DSLs 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. On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered.

Third party groups

The Safeguarding Policy will be brought to the attention of organisers of third party groups using the School facilities and applies to them. Voluntary sector groups that operate within the School, provide off-site services to our pupils, or use the School facilities, will be expected either to adhere to this Safeguarding Policy or to operate a policy which is compliant with the requirements of the Bury Integrated Safeguarding Partnership (BISP)

Use of Mobile Devices in Early Years Foundation Stage Setting

A 'mobile device' may be a phone, iPad, iPod or iPhone, Blackberry or any form of handheld phone, tablet or laptop with the facility to take photographs and transmit them electronically and/or to hold conversations or personal video recorders and cameras.

Staff may bring personal mobile devices for their own use, but these may not be used to contact parents or carers. Staff must ensure that their personal devices do not contain inappropriate or illegal content. All mobile devices must be kept in safe areas outside the setting throughout contact time with children. This includes all staff, parent helpers and students. Parents are not allowed to use their mobile devices within the EYFS setting and there are notices informing visitors of this on all the entry points.

Personal mobile devices cannot be used to record classroom activities – only school property can be used for this purpose. Photographs are taken for the purpose of recording a child or group of children participating in activities or celebrating their achievements. These form an effective record of a child's progression in the Early Years Foundation Stage. However, it is essential that photographs are taken and stored appropriately to safeguard the children in our care. Images can only be transferred to and

stored on a school computer to be printed. Parental consent is sought for photographs to be taken or published i.e. on the school website or in publications.

During trips and visits - school provided mobile phones and cameras should be used. A member of staff may take his/her personal device but only for the purposes of contacting school.

Child Abuse and how to recognise it

Recognising child abuse is not easy and it is not our responsibility to decide whether or not a pupil has been abused.

All staff should be aware that abuse, neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

Staff members have a responsibility to pass on any concerns they may have and if they are not happy with the action taken to raise such a concern with the DSLs. If staff continue to remain dissatisfied, then they should raise the concern with the Headteacher.

Definition of abuse

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or another child or children.

Types of Abuse and Neglect can be found in KCSIE 2021 (Part 1 and Annex B)

- a. **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.
- b. **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 participating in normal social interaction. It may involve seeing 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.
- c. **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 (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

- d. **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 as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

e. **Physical Abuse – signs**

Although these signs do not necessarily indicate that a child has been abused, they may help adults recognise that something is wrong. If a child shows a number of these symptoms, or any of them to a marked degree, they should immediately inform the DSLs who may make a referral to children's social care:

- unexplained recurrent injuries or burns
- improbable excuses or refusal to explain injuries
- wearing clothes to cover injuries, even in hot weather
- refusal to undress for gym
- bald patches
- chronic running away
- fear of medical help or examination
- self-destructive tendencies
- aggression towards others
- fear of physical contact – shrinking back if touched
- admitting that they are deservedly punished, but the punishment is excessive (such as a child being beaten every night to 'make him study')
- fear of suspected abuser being contacted.

f. **Emotional Abuse – signs**

Although these signs do not necessarily indicate that a child has been abused, they may help adults recognise that something is wrong. If a child shows a number of these symptoms, or any of them to a marked degree, they should immediately inform the DSLs who may make a referral to children's social care:

- physical, mental, and emotional development delay
- sudden speech disorders
- continual self-deprecation ('I'm stupid, ugly, worthless, etc')
- over-reaction to mistakes
- extreme fear of any new situation
- inappropriate response to pain ('I deserve this')
- neurotic behaviour (rocking, hair twisting, self-mutilation)
- extremes of passivity or aggression

- running away

g. **Neglect – signs**

Although these signs do not necessarily indicate that a child has been abused, they may help adults recognise that something is wrong. If a child shows a number of these symptoms, or any of them to a marked degree, they should immediately inform the DSLs who may make a referral to children's social care:

- constant hunger
- poor personal hygiene
- constant tiredness
- poor state of clothing
- emaciation
- untreated medical problems
- no social relationships
- compulsive scavenging
- destructive tendencies.

Note: A child may be subjected to a combination of different kinds of abuse. It is also possible that a child may show no outward signs and hide what is happening from everyone

h. **Sexual abuse – signs**

Although these signs do not necessarily indicate that a child has been abused, they may help adults recognise that something is wrong. If a child shows a number of these symptoms, or any of them to a marked degree, they should immediately inform the DSLs, who may make a referral to children's social care:

- being overly affectionate or knowledgeable in a sexual way inappropriate to the child's age
- medical problems such as chronic itching, pain in the genitals, venereal diseases
- other extreme reactions, such as depression, self-mutilation, suicide attempts, running away, overdoses, anorexia
- personality changes such as becoming insecure or clinging
- regression to younger behaviour patterns such as thumb sucking
- sudden loss of appetite or compulsive eating
- being isolated or withdrawn
- inability to concentrate
- lack of trust or fear of someone they know well, such as not wanting to be alone with a babysitter or child minder
- starting to wet again, day or night/nightmares
- become worried about clothing being removed
- suddenly drawing sexually explicit pictures
- trying to be 'ultra-good' or perfect; over-reacting to criticism.

Serious Violence

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, 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.

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

Under no circumstances should a dangerous weapon be brought into the School or carried in the wider community, nor should any pupil be involved in violent criminal conduct inside or outside of School. In most circumstances, if a pupil were discovered to have been involved in this type of behaviour, it will be necessary for the School to consult the police and other statutory agencies. The involvement of any pupil in carrying a weapon or engaging in violent conduct would be treated as a serious disciplinary issue and considered under the School's exclusion policy and procedures.

Further Guidance: [Preventing Youth Violence and Gang Involvement- Practical Advice for Schools and Colleges](#)
[Criminal Exploitation of Children and Vulnerable Adults: County Lines Guidance](#)

Contextual Safeguarding

Staff recognise the importance of considering wider environmental factors in a child's life that may be a threat to their safety and/or welfare. Contextual safeguarding is an approach to understanding, and responding to, children's experiences of significant harm beyond their families. It recognises that the different relationships that children form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers sometimes have little influence over these contexts, and children's experiences of extra-familial abuse can undermine parent-child relationships.

The School assesses the risks and issues in the wider community and works with external agencies and sectors when considering the well-being and safety of pupils in recognition that children are vulnerable to abuse in a range of social contexts.

Child Abduction and Community Safety Incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) the School ensures that pupils are given practical advice on how to keep

themselves safe and that sessions focus on confidence building activities and developing personal abilities.

Child Sexual Exploitation

Staff should be aware of signs of students being vulnerable to child sexual exploitation. Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyber-bullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse. Staff should be especially vigilant to signs and other evidence that a child is or is at risk of becoming a victim of CSE and report their concerns immediately to the DSL. The DSL will then make a referral to the relevant authorities in accordance with agreed inter-agency procedures.

Indicators of child sexual exploitation may include:

- Acquisition of money, clothes, mobile phones, etc. without plausible explanation;
- 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/suspicions 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.

Potential vulnerabilities include:

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. 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 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).
- Sexual identity
- Gang association either through relatives, peers or intimate relationships (in cases of gang associated CSE only).
- Lacking friends from the same age group.
- Living in a gang neighbourhood.
- Living in hostel, bed and breakfast accommodation or a foyer.
- Low self-esteem or self-confidence.
- Young carers.

More information can be found in: [Child sexual exploitation: Definition and a guide for practitioners \(DfE 2017\)](#)

Staff should also be aware that many children and young people who are victims of sexual exploitation do not recognise themselves as such. Members of staff who suspect that a child is at risk of child sexual exploitation should share these concerns with the DSLs.

Child Criminal Exploitation

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence.

CCE does not always involve physical contact; it can also occur through the use of technology. The coercion may be achieved through grooming, intimidation, acts of violence or debt bondage. The individuals involved may not identify themselves as being exploited as such, but it is clearly to their detriment that they are involved in this type of activity

Staff should be aware of signs of pupils being vulnerable to Child Criminal Exploitation. Some of the following can be indicators of CCE:

- 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
- Children who regularly miss school or education or do not take part in education

Children, young people or adults who are exploited, coerced or trafficked into committing crimes are victims who require a safeguarding response and access to support. As such, any member of the School who has concerns about an individual who is being exploited, or is at risk of criminal exploitation, should contact the DSL who will follow local safeguarding guidance and share this information with the relevant services. The School will cooperate with statutory agencies to facilitate a coordinated safeguarding response to protect and support children and young people involved in, or at risk of, criminal exploitation.

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of 'deal line'. This activity will happen locally, as well as across the UK. Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move, store, and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children are increasingly being targeted and recruited online using social media. 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.

Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including cognitive ability, physical strength, status, and access to economic or other resources.

A number of the indicators for CSE and CCE as detailed above may be applicable where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing and are subsequently found in areas away from their home;
- have been the victim or perpetrator of serious violence (e.g., knife crime);
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity;
- owe a 'debt bond' to their exploiters;
- have their bank accounts used to facilitate drug dealing.

If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services who offer support to victims of county lines exploitation.

Any member of staff or parent who has concerns relating to the potential criminal exploitation of a child should contact the DSL as a matter of urgency.

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home office (2018)- [Criminal Exploitation of children and vulnerable adults: County Lines guidance](#)

Modern Slavery and the National Referral Mechanism

Slavery is not an issue confined to history or an issue that only exists in certain countries – it is something that is still happening today. It is a global problem, and the UK is no exception. It is a growing issue, affecting men, women and children. Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Reporting modern slavery

The School will work with First Responder Organisations to make referrals where potential victims of modern slavery are identified.

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and the referral process to the National Referral Mechanism is available in the Modern Slavery Statutory Guidance: [Modern Slavery: how to identify and support victims- GOV.UK](#)

Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include;

- Unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;
- Denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources;
- Making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the Designated Safeguarding Lead (or a Deputy), will consider referring into the Cyber Choices programme, aiming to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Additional advice can be found at: [Cyber Choices](#), [NPCC- When to call the police](#) and [National Cyber Security Centre- NCSC.GOV.UK](#)

Female Genital Mutilation (FGM)

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. 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.

Staff should be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. Victims of FGM are likely to come from a community that is known to practise FGM. Girls at risk of FGM may not be aware of the practice or that it might be conducted on them, so sensitivity should always be shown when approaching the subject. From October 2015 it is a statutory **duty** on teachers to report cases of FGM in under 18s to the police and discuss any such cases with the DSLs and children's social care.

In school, this will usually come from a disclosure (unlike in the medical profession where an observation may have been made) The local police number is **0161 872 5050**. The duty does not apply in relation to at risk or suspected cases.

Risk factors for FGM include: (Updated)

- Low level of integration into UK society
- Mother or a sister who has undergone FGM
- Girls who are withdrawn from PHSE
- 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.

Symptoms of FGM

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.

Indications that a pupil has already been subjected to FGM might 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

Staff members that believe a girl is at risk of suffering or suspect they have suffered FGM must report this to the police. They should also discuss the case with the DSLs and involve children's social care as appropriate. The DSLs will always refer to Police and Social Care, cases where FGM is known to have happened or is suspected as may have happened.

Bullying

In certain circumstances bullying can be considered a child protection issue. Detailed guidance for dealing with bullying and how the school promotes an anti-bullying environment is published in the school's Anti-bullying policy, the staff handbook and in the school planner for pupils. A bullying incident should be treated as a child protection concern when there is reasonable cause to suspect that a child is suffering (or likely to suffer) significant harm. BGS staff members are required to raise any concerns pertaining to bullying using CPOMS. On the whole, Heads of Year or Section, or class teachers at Infant/Junior School level manage bullying incidents and all bullying incidents are raised with the DSLs.

Peer-on-peer/child on child abuse

All staff should be alert to the risk of peer-on-peer abuse and understand their role in preventing, identifying and responding to it. Staff should know that children are capable of abusing other children and that it can happen both inside and outside of school and online. Staff should never dismiss abusive behaviour as a normal part of growing up, or 'just banter,' just having a laugh,' 'part of growing up,' or 'boys being boys,' and should not develop high thresholds before taking action, as this can lead to a culture of unacceptable behaviours and an unsafe environment for children. Peer-on-peer abuse should be taken as seriously as abuse by adults, and it is important that all staff recognise the indicators and signs of peer-on-peer abuse and know how to identify it and respond to reports.

All staff need to be aware, that even if there are no reports at school, it does not mean it is not happening; it may be the case that it is just not being reported. As such it is important that if staff have any concerns regarding peer-on-peer abuse, they should speak to the DSL.

What is Peer-on-peer Abuse?

Peer-on-peer abuse is any form of abuse perpetrated by a child towards another child. This is most likely to include, but not limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse which can include 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); (to be responded to in accordance with the detailed guidance in part 5 of KCSIE, 2021)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse; (to be responded to in accordance with the detailed guidance in part 5 of KCSIE, 2021)
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;

- consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery);
- upskirting, 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
- 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).

These categories of abuse rarely take place in isolation and often indicate wider safeguarding concerns. For example, a teenage girl may be in a sexually exploitative relationship with a teenage boy who is himself being abused by a family member or by older boys. Equally, while children who abuse may have power over those who they are abusing, they may be simultaneously powerless to others.

What role does gender play?

Abuse is abuse and should never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”. Peer-on-peer abuse often manifests itself differently for boys than it does for girls. For example, girls seem to be at greater risk of sexual assault and/or exploitation, whereas boys seem to be at greater risk of physical gang-related violence and serious youth violence.

The School recognises that it is more likely that girls will be victims and boys' perpetrators, but that all peer-on-peer abuse is unacceptable and will be treated seriously.

When does behaviour become abusive?

It can be difficult to distinguish between abusive behaviour which should be dealt with in accordance with the procedure set out below, and behaviour which does not constitute abuse, such as low-level bullying (where the School's Anti-bullying Policy should be followed) or age-appropriate sexual experimentation. Factors which may indicate that behaviour is abusive include (a) where it is repeated over time and/or where the perpetrator intended to cause serious harm; (b) where there is an element of coercion or pre-planning; and (c) where there is an imbalance of power, for example, as a result of age, size, social status or wealth. This list is not exhaustive, and staff should always use their professional judgment and discuss any concerns with the DSL. Staff should always be alert to possible signs of abuse.

Signs that a child may be suffering from peer on-peer abuse overlap with those relating to other types of abuse. They may include (a) failing to attend school, disengaging from classes or struggling to carry out school related tasks to the standard you would ordinarily expect; (b) physical injuries; (c) having difficulties with mental health and/or emotional well-being; (d) becoming withdrawn, shy, experiencing headaches, stomach aches, anxiety, panic attacks, suffering from nightmares or lack of sleep or sleeping too much; (e) drugs and/or alcohol use; (f) changes in appearance and/or starting to act in a way that is not appropriate for the child's age. Again, this list is not exhaustive and the presence of one more of these signs does not necessarily indicate abuse.

Are some children particularly vulnerable to abusing or being abused by their peers?

Any child can be affected by peer-on-peer abuse and staff should be alert to signs of such abuse amongst all children. Research suggests that (a) peer-on-peer abuse is more prevalent amongst children aged 10 and older although it also affects younger children, including by way of harmful sexual

behaviour; (b) children who are particularly vulnerable to abuse or to abusing others include those who have (i) witnessed or experienced abuse or violence themselves; (ii) suffered from the loss of a close family member or friend; (iii) experienced considerable disruption in their lives.

What to do if a member of staff suspects a pupil is being abused by another pupil

If a member of staff has reasonable cause to suspect that a pupil is being abused by another pupil or that they are suffering, or likely to suffer significant harm, they should immediately record their concerns on CPOMS and discuss their concerns with the DSLs who will then ensure a co-ordinated approach and refer any abuse to the relevant agencies. This includes the electronic circulation of inappropriate images of pupils e.g., images shared via a mobile phone, handheld device or social website. Details of acceptable use of ICT and measures taken to promote e-safety can be found in the school's Online Safety Policy. If a child is in immediate danger or at risk of harm, a referral to Children's Social Care and/or the police will be made immediately.

All staff should understand that even if there are no reports in their schools or colleges it does not mean it is not happening; it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding peer-on-peer abuse, they should speak to the Designated Safeguarding Lead.

DSL response to concerns of peer-on-peer abuse?

The DSL will discuss the behaviour with the member of staff and will where necessary take any immediate steps to ensure the safety of the victim(s) or any other child. Where the DSL considers or suspects that the behaviour might constitute abuse, children's social care should be contacted immediately and in any event within 24 hours of the DSL becoming aware of it.

The DSL will discuss the incident with children's social care and agree on a course of action, which may include:

- (a) taking any steps to ensure the safety and well-being of any children affected
- (b) further investigation
- (c) referral to other agencies such as the police (where a crime may have been committed).

Any response will be decided in conjunction with children's social care and other relevant agencies and will:

- investigate the incident and the wider context and assess and mitigate the risk posed by the perpetrator(s) to the victim(s) and to other children
- consider that the abuse may indicate wider safeguarding concerns for any of the children involved
- treat all children (whether perpetrator or victim) as being at risk – while the perpetrator may pose a significant risk of harm to other children, the child may also have considerable unmet needs and be at risk of harm themselves
- take into account the complexity of peer-on-peer abuse and of children's experiences and consider the interplay between power, choice and consent. While children may appear to be making choices, if those choices are limited they are not consenting.
- take appropriate action in respect of the perpetrator – any action should address the abuse, the causes of it and attitudes underlying it. Factors to consider include: the risk the perpetrator(s)

poses and will continue to pose to other children, their own unmet needs, and the severity of the abuse and the causes of it. Disciplinary action may be appropriate, including (a) to ensure that the perpetrator takes responsibility for and realises the seriousness of his or her behaviour; (b) to demonstrate to the perpetrator and others that abuse can never be tolerated; and (c) to ensure the safety and well-being of the victim and other children in the School. Permanent exclusion will only be considered as a last resort and only where necessary to ensure the safety and well-being of the victim(s) and other children in the School.

- in the case of a concern about or an allegation against a pupil, the School may suspend the pupil where it deems it appropriate while an investigation takes place
- provide on-going support to victim(s) including by (a) ensuring their immediate safety; (b) responding promptly and appropriately to the abuse; (c) assessing and addressing any unmet needs; (d) following the procedures set out in the safeguarding policy (including where the child is in need of early help or statutory intervention); (e) monitoring the child's well-being closely and ensuring that support is provided by all relevant staff members within the School; (f) offer counselling with the school counsellor (g) engaging with the child's parents and any external agencies to ensure that the child's needs are met in the long-term.
- consider what support is most appropriate and seek advice where required.
- consider the lessons that can be learnt from the abuse and put in place measures to reduce the risk of such abuse recurring. This may include, for example: gender and equalities work, work around school safety, security and supervision, awareness raising for staff, pupils and parents about a particular form of abuse, training for staff on handling certain types of incidents or abuse.
- All incidents, actions taken and decisions made will be recorded on CPOMS.

How does the School raise awareness of and reduce the risk of peer-on-peer abuse?

At Bury Grammar School we believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the School and other students. The School actively seeks to prevent all forms of peer-on-peer abuse by educating pupils and staff, challenging the attitudes that underlie such abuse, encouraging a culture of tolerance and respect amongst all members of the school community, and responding to all cases of peer-on-peer abuse and any cases of bullying (no matter how trivial) promptly and appropriately. Pupils are educated about the nature and prevalence of peer-on-peer abuse within the School's PSHE programme, pastoral programme and assemblies. Clear expectations regarding acceptable pupil behaviour are reinforced in the pupil planners and by form tutors. The School's Anti-Bullying Policy is discussed regularly with pupils and posters appear in all form rooms in which they are reminded of School's zero tolerance approach towards all forms of bullying and peer-on-peer abuse.

In addition, staff are trained on the nature, prevalence, and effect of peer-on-peer abuse, and how to prevent, identify and respond to it. Staff understand the role they play in challenging abusive behaviours between peers. Further information on how the School deals with incidents between pupils can be found in the school's Behaviour Policy, Anti-bullying Policy and Approaches to Peer-on-peer Abuse Policy. Such policies ensure that both the victim and perpetrator are supported fully.

Sexual violence and sexual harassment between children in schools

In instances of peer-on-peer abuse where pupils are involved in harmful or abusive sexual behaviour the School will follow the advice given in Part 5 (KCSIE, 2021) and the separate guidance [Sexual Violence and Sexual Harassment between children in schools and Colleges \(Sept 2021\)](#) which sets out how schools and colleges should respond to reports of sexual violence and sexual harassment.

Sexual violence and sexual harassment can occur between children of any age and sex from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. As set out in Part one of Keeping children safe in education (KCSIE), all BGS staff working with children are advised to maintain an attitude of 'it could happen here'. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) is important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

Children who are victims of sexual violence and sexual harassment, wherever it happens, will likely find the experience stressful and distressing. BGS staff are aware that safeguarding incidents and/or behaviours can be associated with factors outside the school, including intimate personal relationships.

Any report of sexual violence or harassment will be taken seriously. BGS staff are aware that it is more likely that girls will be the victims of this type of abuse and it is more likely it will be perpetrated by boys.

BGS staff will always reassure young people reporting issues of sexual violence and harassment that they are being taken seriously and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Neither will they ever be made to feel ashamed for making a report. Along with providing support to children who are victims of sexual violence or sexual harassment, BGS will seek to provide the alleged perpetrator(s) with an education, safeguarding support as appropriate and implement any disciplinary sanctions. BGS staff are alert to the possibility that a child abusing another child may be a sign they have been abused themselves or a sign of wider issues that require addressing within the culture of the school. Taking disciplinary action and providing appropriate support, can, and should, occur at the same time if necessary.

The School will respond appropriately to all reports and concerns about sexual violence and harassment, including those outside the school and or online (and incidents that also involve pupils from other schools.)

The school is aware of the importance of:

- making it clear to pupils and staff that there is a zero-tolerance approach to sexual violence and sexual harassment, and it is never acceptable, it will not be tolerated and never be passed off as "banter", "just having a laugh", "part of growing up" or "boys being boys".
- challenging abusive behaviour (potentially criminal in nature) in any context, such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them
- recognising, acknowledging or understanding the reality of sexual harassment and abuse. It is important not to downplay behaviours related to abuse as this will lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it

- understanding that all of the above can be driven by wider societal factors beyond the school, such as everyday sexist stereotypes and everyday sexist language.

Sexual violence

The School is aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way and that it can happen both inside and outside of school. When referring to sexual violence, this is in the context of child-on-child sexual offences under the Sexual Offences Act 2003 as described below:

- Rape
- Assault by Penetration
- Sexual Assault: Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault
- Causing someone to engage in sexual activity without consent

Sexual harassment

When referring to sexual harassment, this means 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature;
- online sexual harassment which may be standalone or be part of a wider pattern of sexual harassment. It may include: consensual and non-consensual sharing of nude and semi-nude images, sharing of unwanted sexually explicit content, sexualized online bullying, unwanted sexual comments and messages on social media platforms, sexual coercion and threats and attempts at sexual exploitation;
- It can include sexually harmful and aggressive behaviour involving the use of mobile phones, such as 'upskirting'.

Harmful sexual behaviour

Children's sexual behaviour exists on a wide continuum, from normal and developmentally expected, to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour" (HSB). When considering HSB, ages and the stages of development of the children are critical factors.

Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power

over them, for example, if the older child is disabled or smaller in stature. Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive.

Responding to reports of sexual violence and sexual harassment

- Reports of sexual violence are often complex and require difficult decisions to be made to appropriately safeguard children. Decisions will be made by the School on a case-by-case basis, with the DSL taking a leading role, whilst being supported by other agencies such as children's social care and/or the police.
- Some situations are, however, statutorily clear: a child under the age of 13 can never consent to sexual activity (the age of consent is 16); sexual intercourse without consent is rape (as defined in law); creating or sharing sexual images or videos of under 18s is illegal, including children making or sharing these themselves.

The immediate response to a report of sexual violence or sexual harassment

- The School's initial response to a report from a child is incredibly important. How the School responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward. It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward and that they will be supported and kept safe. Abuse that occurs online or outside of the School will not be downplayed and will be treated equally seriously. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment, nor should a victim ever be made to feel ashamed for making a report or have their experience minimised.
- It is important to note that children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report, a member of staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong.
- If staff have any concerns about a child's welfare, they should act on them immediately. Staff should always discuss with the DSL concerns about sexually harmful behaviour involving pupils. Where an incident between two pupils takes place away from the School, the School's safeguarding duties remain the same.
- The starting point regarding any report should always be that there is a zero-tolerance approach to sexual violence and sexual harassment, and it is never acceptable and will not be tolerated.
- Important immediate factors to consider will include; Has a crime been committed and is there emerging evidence of a pattern of harmful sexual behaviour? What are the developmental ages of the children involved? Are there increased vulnerabilities with a victim such as a disability or learning difficulties? Is this incident a one-off or a sustained pattern? Is it accompanied by other forms of abuse such as bullying? Are there ongoing risks to the victim, other children, or school staff? Is there a wider safeguarding context? Have the victim or perpetrator been exposed to child sexual exploitation or child criminal exploitation?
- The School will take reasonable measures to protect the anonymity of any pupils involved in any report of sexual violence or sexual harassment, including considering the impact of social media.

- The School will make a risk assessment in any case of a report of sexual violence, considering the victim, alleged perpetrator and other pupils at the School. At all times, the School will actively consider the risks posed to young people by sexually harmful behaviour and what measures need to be put in place to safeguard them. Risk assessments will be kept under review. In cases of sexual violence, a professional risk assessment by external specialists may be required and will be used to inform the School's own risk assessment.
- While the facts are being established, the School will remove the alleged perpetrator from any classes shared with the victim and consider how best to keep them a reasonable distance apart, in the best interests of both pupils. The School will also consider carefully when to inform the alleged perpetrator, and this may be discussed with relevant agencies.
- The wishes of the victim will always be taken into consideration. They will be given as much control as is reasonably possible over decisions about how an investigation will be progressed and any support that will be offered. This will however be balanced with School's duty to take appropriate safeguarding measures and protect other children from harm.
- Ultimately, all decisions will be made on a case-by-case basis, with the DSL taking a leading role and using their professional judgement, supported by other agencies, such as children's social care and the police as required.

Routes to consider when managing a report of sexual violence or sexual harassment

Managing internally: in some cases of sexual harassment (such as one-off incidents) the School may manage the incident internally

Early help: this is particularly useful in addressing non-violent, harmful sexual behaviour and may prevent escalation

Referrals to Children's Social Care: in cases where there has been harm, or there is an immediate risk, a referral will be made to Children's Social Care

Reporting to the police: in cases where rape, assault by penetration or sexual assault is reported, the School will not wait for the outcome of a police investigation before protecting the victim, perpetrator and other pupils in the School.

The DSL will work closely with the police to ensure that the School's actions do not jeopardise the police investigation. If a child is convicted or cautioned, the School will update the risk assessment and consider suitable action through its Behaviour, Rewards and Sanctions Policy.

The School is mindful of the importance of ensuring that the victim and perpetrator remain protected, especially from bullying or harassment. Where no further action is taken by the police, or a pupil found not guilty, the School will continue to support the victim and perpetrator.

Safeguarding and supporting the victim

- The needs and wishes of the victim will be paramount (along with protecting the child) in any response. It is important they feel in as much control of the process as is reasonably possible. Wherever possible, the victim, if they wish, should be able to continue in their normal routine. Overall, the priority will be to make the victim's daily experience as normal as possible, so that the School is a safe space for them. Consideration will be given to age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse.
- Support will be tailored on a case-by-case basis. The support required regarding a one-off incident of sexualised name-calling is likely to be vastly different from than for a report of rape. Sexual assault can result in a range of health needs, including physical and mental health problems. Children and young people that have a health need arising from sexual assault or abuse can access specialist NHS support from a Sexual Assault Referral Centre (SARC).

SARCs provide medical, practical, and emotional care and advice to all children and adults, regardless of when the incident occurred. Other avenues of support can include Early Help Children's Social Care and Child and Adolescent Mental Health Services (CAMHS).

Safeguarding and supporting the alleged perpetrator(s)

- The School may be in a position where it had a difficult balancing act to consider. On one hand, they need to safeguard the victim (and the wider community) and on the other hand provide the alleged perpetrator(s) with an education, safeguarding support as appropriate and implement any disciplinary sanctions. Taking disciplinary action and still providing appropriate support are not mutually exclusive actions. They can, and should, occur at the same time if necessary.
- There needs to be careful consideration to the age and the developmental stage of the alleged perpetrator(s), the nature of the allegations and frequency of allegations. Any child will likely experience stress as a result of being the subject of allegations and/or negative reactions by their peers to the allegations against them.
- The proportionality of the response is extremely important. Support (and sanctions) will be considered on a case-by-case basis. The alleged perpetrator(s) may potentially have very significant unmet needs as well as potentially posing a risk of harm to other children. Harmful Sexual Behaviour in children and young people is often a symptom of either trauma caused by abuse or exposure to abusive practices and material. Advice will be taken, as appropriate, from children's social care, specialist sexual violence services and the police. School can be a significant protective factor for children who have displayed HSB, and continued access to school, with a comprehensive safeguarding management plan in place, is an important factor to consider before final decisions are made.

If an alleged perpetrator moves to another educational institution (for any reason), the DSL will ensure that the new educational institution is made aware of any ongoing support needs and where appropriate, potential risks to other children and staff as well as ensuring the transfer of the Child Protection File.

Unsubstantiated, unfounded, false or malicious reports

If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the School will consider whether any disciplinary action is appropriate against the individual who made it in line with the School's Behaviour Policy.

The Role of Education

The School plays an important role in preventative education on the issues of harmful sexual behaviour and sexual harassment. The School has a clear set of values and standards concerning personal conduct and emphasises that sexual violence and sexual harassment is always wrong. This will be upheld and demonstrated throughout all aspects of school life. This will be underpinned by the School's Behaviour Policy and pastoral support system, and by a planned programme of PSHE and Relationships and Sex Education that seeks to prepare our pupils for life in modern Britain. This programme has developed to be age and stage of development appropriate and tackles such issues as:

- healthy and respectful relationships

- modelling respectful behaviour
- understanding the nature of consent
- challenging gender stereotyping and prejudicial behaviour
- addressing cultures of sexism and sexual harassment

Multi-agency working

The School actively engages with the Local Safeguarding Partnership in relation to peer-on-peer abuse, and works closely with organisations including children's social care, the police and other schools. The relationships which the School has built with these partners are essential to ensuring that it is able to prevent, identify early and appropriately handle cases of peer-on-peer abuse.

They help the School to:

- develop a good awareness and understanding of the different referral pathways that operate in its local area, as well as the preventative and support services which exist
- ensure that its pupils are able to access the range of services and support they need quickly
- support, where appropriate, the local community's response to peer-on-peer abuse
- increase its awareness and understanding of any concerning trends and emerging risks in its local area, enabling it to take preventative action to minimise the risk to pupils.

Where necessary, the School actively refers concerns and allegations of peer-on-peer abuse to children's social care, the police, and/or other relevant agencies, in accordance with the Local Safeguarding Partnership's procedures. This is particularly important because peer-on-peer abuse can be a complex issue, and even more so where wider safeguarding concerns exist. It is sometimes not appropriate for a single agency (where the alleged incident cannot appropriately be managed internally by the School itself) to try to address the issue alone – it requires effective partnership working.

Youth produced Sexual Imagery (sharing nudes and semi nudes images/videos)

Sharing nudes and semi-nudes is 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. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The term 'nudes' is used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents.

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. It is also possible for a young person in a consensual relationship to be coerced into sharing an image.

Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal, which makes responding to incidents involving children and young people complex. As it is a criminal offence to possess, distribute, show and make indecent images of children, any disclosure of information about an incidence of YPSI will always be taken very seriously by the School.

Staff should be aware that incidents of pupils being sent or receiving nudes and semi nudes are increasingly common and that when a child sends (distributes) such images, they may be breaking the

law and leaving themselves vulnerable to exploitation by third parties. In addition, there is increasing evidence that such activity may result in depression, self-harm and, in extreme cases, suicide.

When an incident involving youth-produced sexual imagery comes to the School's attention:

- the incident should be referred to the DSL as soon as possible
- the DSL will hold an initial review meeting with appropriate school staff
- there will be subsequent interviews with the young people involved (if appropriate)
- parents will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm. At any point in the process if there is a concern that a young person has been harmed or is at risk of harm, a referral will be made to Children's Social Care and/or the police immediately.

An immediate referral to police and/or Children's Social Care will also be made if at this initial stage:

- the incident involves an adult
- there is reason to believe that a young person has been coerced, blackmailed, or groomed, or if there are concerns about their capacity to consent (for example, owing to special educational needs)
- what is known about the imagery suggests violent content
- the imagery involves sexual acts and any pupil in the imagery is under 13
- there is reason to believe a young person is at immediate risk of harm because of the sharing of the imagery, e.g., the young person is presenting as suicidal or self-harming.

If none of the above applies, then the School may decide to respond to the incident without involving the police or Children's Social Care. However, the School can choose to escalate the incident at any time if further information/concerns come to light.

In all such cases, the BGS policies pertaining to indecent images will be followed and a risk assessment conducted. Such incidents will always be treated as a safeguarding concern unless there is very good reason not to, such as an element of intimidation, bullying or exploitation. In any case where nudes or semi-nudes have been shared, the School will follow guidance given to schools and colleges by the UK Council for Internet Safety (UKCIS): [Sharing nudes and semi nudes: advice for education settings working with children and young people \(December 2020\)](#)

Upskirting

The Voyeurism (Offences) Act 2019 criminalises the act of 'Upskirting.' This typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual

gratification, or cause the victim humiliation, distress, or alarm. It is not only confined to victims wearing skirts or dresses and equally applies when men or women are wearing kilts, cassocks shorts or trousers. It is often performed in crowded public places, for example on public transport or at music festivals, which can make it difficult to notice. It is now a criminal offence. Anyone of any gender, can be a victim. Perpetrators could face up to two years in prison if convicted.

Trafficking: Trafficking of persons means the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Children are trafficked for many reasons, including sexual exploitation, domestic servitude, labour, benefit fraud and involvement in criminal activity such as pick-pocketing, theft and working in cannabis farms. Trafficking is a crime and where suspected, will always be reported to the police and social care.

Forced Marriage: A forced marriage is a crime in England. It is where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. The pressure put on people to marry against their will can be physical (including threats, actual physical violence and sexual violence) or emotional and psychological (for example, when someone is made to feel like they're bringing shame on their family). Financial abuse (taking your wages or not giving you any money) can also be a factor.

So Called 'Honour-Based' Abuse: So-called 'honour-based' abuse 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 marriage, 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. If in any doubt, staff should speak to the DSL. Staff need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

There are a range of potential indicators that a child may be at risk of HBA. Guidance on the warning signs that FGM or forced marriage may be about to take place, or may have already taken place, can be found on pages 38-41 of the Multi agency statutory guidance on FGM, (pages 59 – 61 focus on the role of schools) and pages 13 – 14 of the Multi-agency guidelines: Handling case of forced marriage.

[Multi-agency statutory guidance on female genital \(April 2016\)](#)

[Multi-agency practice guidelines: Handling cases of forced marriage \(June 2014\)](#)

Domestic Abuse

In April 2021, the Domestic Abuse Act 2021 received Royal Assent and introduced a statutory definition for the first time.

The Domestic Abuse Act 2021 (Part 1 and Annex B) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other:

- (a) physical or sexual abuse

- (b) violent or threatening behaviour
- (c) controlling or coercive behaviour
- (d) economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services) and
- (e) psychological, emotional, or other abuse.

People are 'personally connected' when they are or have been married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibility for the same child, or they are relatives.

The definition of Domestic Abuse applies to children if they see or hear, or experience the effects of, the abuse; and they are related to the abusive person.

(The definition can be found here: <https://www.legislation.gov.uk/ukpga/2021/17/part/1/enacted>)

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

Young people can also experience domestic abuse within their own intimate relationships. This form of peer-on-peer abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, the School's safeguarding procedures will be followed and both young victims and young perpetrators will be offered support.

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Operation Encompass is a Police and Education early intervention safeguarding partnership that supports children and young people exposed to domestic abuse. Operation Encompass is the reporting to schools before the start of the next school day when a child or young person has been involved or exposed to a domestic abuse incident the previous evening. This information will be shared on school days during the school term. When incidents occur on a Friday, Saturday or Sunday, the Police will make contact with the school on the following Monday. The information is given in strict confidence to the school's Key Adult to enable support to be given dependent on the needs and wishes of the child.

Key Adults: Rachel Newbold and Robert Lees

The Key adults will be able to take appropriate steps to support pupils during what could be an emotionally difficult day.

The National Domestic Abuse helpline can be called free of charge and in confidence, 24 hours a day on 0808 2000 247.

Particularly Vulnerable Children: Staff and volunteers need to be particularly vigilant with regard to certain children:

[Pupils with Special Educational Needs and disabilities \(SEND\)](#)

Children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges. Staff should understand and be mindful of additional barriers that can exist in recognising abuse and neglect in this group of children such as:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability 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 bullying, without outwardly showing any signs
- communication barriers and difficulties in managing or reporting these challenges.

At Bury Grammar School we provide extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place.

[Children Subject to a Child Protection Plan including a Child in Need or a Child at Risk](#)

Any incidents or concerns involving these children must be reported immediately to the DSL who will contact the allocated Social Worker and/or Police if a crime has been committed

[Looked After Children](#)

Any incidents or concerns must be brought to the notice of the DSL who is also the designated teacher for LAC.

[Domestic Violence](#)

Children living in a household where **violence** is an issue: any pastoral concerns must be referred to the appropriate DSL.

Remember: Anyone can make a referral and referrals to statutory agencies do not require parental consent.

In addition, extra support and protection may be required for children who are vulnerable by virtue of:

- disability,
- mental health issues,
- homelessness,
- refugee/asylum seeker status,
- alcoholism or substance abuse within the family,
- young carers
- children who have English as an additional Language.

[Mental Health- Links to Safeguarding and Child Protection](#)

All staff 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.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Nevertheless, staff are well-placed to observe pupils day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Staff and pupils receive on-going educational guidance on recognising signs of mental health problems in young people. Where children have suffered abuse, neglect, or other potentially traumatic adverse childhood experiences (ACEs), this can have a lasting impact throughout childhood, adolescence and into adulthood. Staff are made aware of how these children's experiences can impact on their mental health, behaviour, and education.

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 DSLs or a Deputy DSL.

Children with Social Workers

The School recognises that when a child has a social worker, it is an indicator that the child is more at risk than most pupils. This may mean they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health. The Local Authority should share the fact a child has a social worker with school. The school takes these needs into account when making plans to support pupils who have a social worker so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes.

The School's admissions form asks if the child has, or has had a social worker and asks for contact details.

Incel Movement

Involuntary celibates, known as incels, are members of an online subculture who define themselves as unable to find a romantic or sexual partner despite desiring one. Incels are mostly male and heterosexual. Because of this they often hold particularly hostile and violent views not only towards women but also towards men who are sexually active. While many are simply lonely and use the community for support in an age of digital isolation, some radicals advocate for social and sexual rebellion. These extremist incels seek revenge through violent attacks against people they call "Chads and Stacys", a reference to men and women they perceive as very successful when it comes to sex.

Discussions in incel forums are characterised by resentment, misogyny, misanthropy, self-pity and self-loathing, racism, a sense of entitlement to sex, and the endorsement of violence against sexually active people.

Slang is a big part of how incels communicate online and it is finding its way into common language, owing to social media and the prominence of memes. This means that children and young people are being exposed to this kind of language and rhetoric and may take it on board without really thinking about it. Alternatively, they may be drawn into the incel mindset.

The School plays a crucial role in helping pupils understand the world around them, both through PSHE/SRE, the curriculum, assemblies and the pastoral programme. This allows for a whole school approach to teaching pupils about a range of current issues, including Incel culture. It is important that staff are able to recognise, challenge and identify incel views and identify pupils most at risk and recognise where early intervention is needed.

Any behaviour or comments which give cause for concern should be referred to the DSLs using CPOMS. An in-school assessment will then take place prior to deciding to refer to Child Services. In any case the pupil will be monitored for an agreed period of time following the initial referral. The DSLs will support staff with any concerns that they may have.

Practical safeguarding procedures for staff

The following procedures must be followed in all cases:

It is important to remember that:

- **it is not a member of staff's responsibility to carry out any form of investigation.**
- **any person can make a referral to social care should the need arise and this policy should not constrain a person from exercising such judgement.**

If BGS staff have a concern about a pupil it should be reported to a DSL without delay.

a) If you have a general welfare concern about a pupil

A general welfare concern can be defined as being where a pupil is failing to achieve one or more of the outcomes for children as outlined by the Every Child Matters agenda and where child protection is unlikely to be an immediate issue. It includes where a child may be failing to achieve at school owing to an unmet learning need.

Staff must be prepared to report **any** concerns, no matter how small these concerns may appear because providing early help is more effective in promoting the welfare of children than reacting later. All welfare referrals will be discussed by the DSLs at the weekly safeguarding meeting.

Such a welfare concern may result in an early help assessment and staff should be aware that children may be at increased need of early help if they are a child who:

- is disabled and has specific additional needs;
- has special educational needs;
- is a young carer;
- is showing signs of engaging in anti-social or criminal behaviour;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems and domestic violence;
- has returned home to their family from care and/or
- is showing early signs of abuse and/or neglect.

The school adopts a **WARM** approach when dealing with each welfare referral:

- **W**elfare concern raised on CPOMS or directly to DSL
- **A**ssessment by DSL
- **R**esponse (No action; continued monitoring; pastoral support; EHFSP/TAF; referral to the Early Help panel or referral to MASH)
- **M**onitoring (until it is deemed that the referral can be closed).

Usually, welfare issues are resolved quickly and sensitively through discussion with the pupil and/or parent.

Procedure:

- i. If you have a welfare concern about a pupil, no matter how small, you should report these concerns at the earliest opportunity using CPOMS or directly to the DSL.
- ii. The DSLs will review the concern and will assess it according to Bury Integrated Safeguarding Partnership guidelines:
 - **Level 1** - represents children with no identified additional needs. Their needs are met through universal services.
 - **Level 2** - represents children with additional needs that can be met by targeted support by a single agency or practitioner e.g., SALT, school or Children Centre Outreach.
 - **Level 3** - represents children with additional needs that can be met by targeted support by a Multi-agency Support Package (Team around the Family).
 - **Level 4** - represents children with significant needs that persist and have not been met by targeted support, such as the Early Help Family Support Plan, CIN.
 - **Level 5** - represents children with complex and enduring needs at the highest level of vulnerability that will be met by multi-agency support from specialist services led by Social Care (Safeguarding/Looked after Children).

Children may enter any level at any age or stage of development and may move between levels as their circumstances and needs change.

- iii. In most cases it is anticipated that following the assessment a single agency approach will be sufficient to resolve the concern and the school will normally aim to contact the parents/guardians at an early stage in an attempt to work together to address the concern.
- iv. Where a welfare issue remains unresolved or where it is clear that there are additional unmet needs or that a multi-agency approach will be required, the School will consider working with the family using an **Early Help Family Support Plan**. This may result in a **Team Around the Family Meeting (TAF)** at a later stage involving professionals from additional agencies to ensure that all agencies are fully aware of the unmet needs, share appropriate information and decide upon how best to proceed. The use of an EHFSP will usually require consent and cooperation from parents and the pupil and a member of staff acting as the **lead professional**. Where consent is not obtained to an EHFSP being carried out the school will continue to monitor and support the pupil and family.
- v. Consent to share information with other professionals is guided by policies set out by BGS and should be gained from a parent or a Gillick competent child unless:
 - There is evidence that a child is suffering or likely to suffer significant harm.
 - There is reasonable cause to suspect that a child is suffering or likely to suffer significant harm.
 - There is a need to share information to prevent significant harm from arising to a child.

Applying this to the threshold model above means that consent to share information and to undertake an assessment should be gained from a parent or a Gillick competent child when working at level 1–3. At level 4 it is important to assess carefully whether there is sufficient reason to share confidential information without consent and that the reason for doing so is fully documented. If at levels 1–3 a parent does not give consent this may, in itself and depending on circumstances, demonstrate that a referral to Children's Social Care is required.
- vi. Where on balance, the assessment is that the situation is not improving despite the use of a Common Assessment or other such early help assessments (failing TAF), then a referral to the Early Help panel may be deemed necessary which should be made through the Multi-agency Safeguarding Hub (MASH). Consent of the parents is required for referral to the

Early Help. If consent is withheld, then the school will refer to MASH as a Child in Need with a view to a section 17 assessment being conducted by Social Care.

- vii. Where on balance, the assessment is that the concern no longer exists because steps have been taken to successfully address the concern, the welfare log will be endorsed on CPOMS. The concern could be opened again should the situation worsen.

b) If you notice physical injuries in areas associated with non-accidental injury (see Appendix 1), and these injuries were not sustained during school time/activities

- i. Most injuries sustained by pupils will have a perfectly adequate explanation, but they must be investigated.
- ii. Colleagues should be vigilant to any noticeable physical injuries which a pupil sustains and discretely question the pupil in order to discover their cause.
- iii. The injury should be referred using CPOMS and the explanation for the cause of the injury triangulated with parents. The body map on CPOMS should be used to locate the injuries.
- iv. The DSL will decide whether or not further action is required and, if so, what action to take.
- v. If the situation develops into a child protection issue, then a marker is placed on the child's open record.
- vi. If referral is considered appropriate, the referral will be made through the Multi-agency Safeguarding Hub (MASH) for where the child lives.
- vii. If referral is not considered appropriate, the DSL will monitor the situation and ensure that CPOMS records are kept.
- viii. In cases which are not clear-cut the DSL will contact the Multi-agency Safeguarding Hub (MASH) for a consultation. This can be done without disclosing the identity of the pupil.
- ix. All records are strictly confidential and will only be disclosed to colleagues on a need-to-know basis.
- x. If it comes to light that a pupil has been physically assaulted by a parent/guardian, even if there are no obvious or visible injuries, then this information must be passed directly to the DSL who will seek advice from the Multi-agency Safeguarding Hub (MASH).

c) If a pupil makes an allegation of abuse

- i. If a pupil volunteers information to you about abuse, the most important aspect of your response is to be willing to listen to and to believe what the pupil is saying.
- ii. Staff is advised that interviews with pupils should take place in rooms with visual access.
- iii. You may ask if the pupil wishes to have someone else present. If the pupil insists on speaking with you alone then let a colleague know that the interview is taking place.
- iv. It is important that you do not ask questions which might convey to the pupil your own ideas about what might have happened (e.g., 'Did he/she do x to you?'). The only questions which you should ask are: 'What do you wish to say to me?' and 'Is there anything further you wish to say to me?'
- v. It is also important that you explain with sensitivity that action may be required, that other adults (e.g., the DSL) will need to be informed and that you are not able to promise that your conversation with the pupil will be confidential to you and to him.
- vi. You should immediately make a written note of the discussion, using the actual words of the pupil where possible. These notes should record date, time and place and should be referred to the DSL as soon as possible.
- vii. If referral is considered appropriate, such referral will be made through the Multi-agency Safeguarding Hub (MASH) for where the child lives.
- viii. Before such a referral is made, the parents of the pupil would usually be informed; it must also be explained to them their consent for referral is **not** being sought. In the case of suspected sexual abuse, fabricated or induced illness, or when a pupil is believed to be in

danger of significant harm the parents **must not be informed** that a referral is being made. In the case of serious harm, the police will be informed from the outset.

- ix. If an incident occurs outside of school hours, but while the pupil is in the care of the school (e.g., a school trip), then the DSL should be contacted as soon as possible.

d) If you suspect abuse by one or more pupils against another pupil (peer-on-peer abuse)

- i. In the event of disclosures about child-on-child abuse, all children involved, whether perpetrator or victim, will be treated as being 'at risk'.
- ii. A bullying or youth produced sexual imagery incident for example will be treated as a child protection concern when there is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm'. Other examples may include gender issues which may be prevalent when dealing with peer-on-peer abuse, for example girls being sexually touched/assaulted or pupils being subject to initiation/hazing type violence.
- iii. Any such abuse which puts children at significant risk will be referred to local agencies and will not be passed off as 'banter' or 'part of growing up'.
- iv. A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation of such allegations and the appropriate school or setting's Anti bullying policy, Behaviour and discipline policies, including sanctions, will apply:
 - i. In the event of physical or emotional abuse of one pupil by another it will be taken seriously and dealt with through the school's Anti-Bullying Policy.
 - ii. If there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm as a result of such abuse, the school will refer its concerns to the Multi-agency Safeguarding Hub (MASH).
 - iii. In the case of suspected abuse by siblings the relevant Designated Safeguarding Lead should be informed. An assessment will be made, and advice may be sought from the Multi-agency Safeguarding Hub (MASH), often without the need to disclose details of the child.
 - iv. The child's parents will be informed at the earliest opportunity.
 - v. In all matters of sexual abuse then the school will refer its concerns to the Multiagency Safeguarding Hub (MASH).
 - vi. Staff should be aware that such abuse mentioned above may include sexting, banter, sexual assaults and gender-based issues.
 - vii. Staff should be aware that certain groups of children may be especially vulnerable e.g., children who are young carers or who have SEND including children with Autistic Spectrum Disorder.

e) If you become aware that a pupil may be privately fostered

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

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.

People become private foster carers for all sorts of reasons. Private foster carers can be a friend of the child's family or be someone who is willing to care for a child of a family they do not know. It is not a private fostering arrangement if the placement was made by a social worker who has intervened on behalf of the local authority.

Examples include:

- A child from overseas who is sent to live with a family in this country for health care or education.
- A teenager living with a friend's family because of a breakdown in relationship with their own family.
- Teenagers living with the family of a pupil friend or girlfriend.
- A child staying with friends because their parent is in hospital and there is no one else to look after them.
- Children living with a family as a result of parental separation or divorce.

The duties of local authorities (LA) in relation to privately fostered children are laid out in Part IX of the Children Act 1989. The Act places a duty on parents and private foster carers to notify the local authorities of a private fostering arrangement at least six weeks before the arrangement is due to start; not to do so is a criminal offence. It also states that the local authority has a responsibility to satisfy itself that the child is being safeguarded and their welfare promoted, and that their carers are given appropriate advice and support.

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.

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

If an adult is aware that a child may be privately fostered, then they must inform the DSL. 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. On admission to the school, we verify the relationship of the adults to the child who is being registered.

f) If you suspect a pupil may be vulnerable to radicalisation

Children are vulnerable to extremist ideology and radicalisation. As with other forms of harms and abuse, protecting children from this risk is part of the School's Safeguarding approach and procedures.

- i. The Counter-Terrorism and Security Act 2015 places a duty on the school to have due regard to the need to prevent people from being drawn into terrorism (the Prevent duty).
- ii. **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.
- iii. **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

- iv. **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.”
- v. The school has a separate Prevent Strategy which should be followed.
- vi. The school risk assesses the threat of pupils being drawn into extremism and uses the local area profile to help inform this risk assessment. Bury is classed as Low Priority when assessing threats, risks, and vulnerabilities with Greater Manchester as a whole
- vii. However, this is not straight forward since our pupils do not only come from Bury but also come from other areas such as Manchester (Prevent priority area).
- viii. Staff should be aware of national and local threats including International Terrorism, Northern Ireland-related terrorism, and Extreme right-wing terrorism.
- ix. Currently, the most significant terrorist threat that we face in the UK comes from Al Qa’ida and the so called ‘Islamic State’ which has seen young people travel to war zones in areas such as Syria and Iraq. Such organisations and like-minded terrorist organisations are inspired by violent Islamism and make good use of social media to reach out to young people.
- x. Much of the media which these organisations have posted on-line contain scenes of horrific brutality. Staff should be aware that children may have watched such postings and may be profoundly affected by the contents and must refer concerns in this respect.
- xi. Channel is a national Home Office Safeguarding project which aims to prevent children and adults from being drawn into violent radicalisation or becoming involved in terrorist related activity. It is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school may be asked to attend the Channel panel to help with this assessment. An individual’s engagement with the programme is entirely voluntary at all stages.
- xii. Any behaviour or comments which may give cause for concern should be referred to the DSLs using CPOMS and the **Prevent Policy** must be followed. (This includes potential early indicators of radicalisation and/or extremism)
- xiii. An in-school assessment would normally then take place prior to deciding to refer to Channel although advice may be sought from Channel prior to deciding whether to make a referral. In any case the pupil would be monitored for an agreed period of time following the initial referral.
- xiv. Channel will find any information useful which establishes:
 - Engagement with a group, cause, or ideology
 - Intent to cause harm and
 - Capability to cause harm.

All staff complete Prevent Training as part of their induction about prevent and tackling extremism and the DSLs are able to support staff with any concerns they may have.

We use the curriculum to ensure that pupils understand how people with extreme views share these with others, especially using the internet.

Staff should be alert to changes in pupil’s behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of

radicalisation and act proportionately which may include the DSLs (or deputies) making a prevent referral.

The school is committed to ensuring that our pupils are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the school's core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just, and civil society.

Channel Coordinator(s)

Central Park HQ
Greater Manchester Police
Northampton Road
Newton Heath
M40 5BP
Tel - 0161-856 6103
Tel 101 or in an emergency Tel 999

DfE Helpline

If you are concerned about extremism in a school or organisation that works with children, or if you think a child might be at risk of extremism, contact the DfE helpline.

Open Monday to Friday from 9am to 6pm (excluding bank holidays).

Email counter.extremism@education.gsi.gov.uk

Telephone 020 7340 7264

Statutory guidance on Channel is available at: [Channel Guidance](#)

In all cases, if you have a concern about poor or unsafe practice or you feel that the safeguarding policies and procedures are not working then you must speak with the DSL or the Head.

You should expect your concerns to be taken seriously.

If you continue to have concerns, then you should follow the school's Whistle Blowing Policy.

g) One to one tuition/meetings arrangements

- h) Where one to one tuition needs to occur, staff need to ensure that they safeguard themselves and the pupil by placing a barrier (desk) between them and the pupil and that the door is open or there is visual access. Staff need to consider the best place to sit in the room and avoid being tucked away in corners.
- i) One to one music tuition presents a hazard which music teachers and VMTs must risk assess. Physical contact should not take place and 'playing positions' should be demonstrated but not physically assisted.
- j) Sports tuition should also be risk assessed, it may be that physical contact is necessary and proper to aid coaching, but this should always occur in a way that would not lead a reasonable observer to question conduct, intentions or suitability to care for other people's children.

See Staff Code of Conduct (Appendix 2) for further advice on safeguarding staff and pupils

Allegations against a member of staff, volunteer or the Principal

Allegations or concerns about an adult working in the school whether as a teacher, supply teacher, other staff, volunteers, or contractors

At Bury Grammar School we recognise the possibility that adults working in the school may harm children, including governors, volunteers, supply teachers and agency staff. Any concerns about the conduct of other adults in the school should be taken to the principal without delay; any concerns about the principal should go to the Chair of Governors.

Any concerns about the conduct of a member of staff, supply teachers, volunteers or contractors should be reported to the principal.

Concerns may come from various sources, for example, a suspicion; complaint; or disclosure made by a child, parent, or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

The principal will decide whether the concern is an allegation or low-level concern. The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold for referral to the Local Authority Designated Officer (LADO).

Allegations

It is an allegation if the person has:

- 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 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 (also includes behaviour outside the school).

A Person can be anyone working in the school or a college that provides education for children under 18 years of age, including supply teachers, volunteers and contractors.

Allegations should be reported to the LADO 'without delay'.

Before contacting the LADO, the School will conduct basic enquiries in line with local procedures to establish the facts to determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation.

The LADO's role is not to investigate the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police, children's social care, the school, or a combination of these.

School Procedures

- i. The guidance in Part 4 of KCSIE (2021) will be followed when allegations of abuse arise against anyone working in the school that provides education for children under 18 years of age.
- ii. The school will ensure allegations are dealt with properly. The school will take the lead because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process. The school will ensure that agencies are involved in the process. Agencies should be fully involved and co-operate in any enquiries from the LADO, police and/or children's social services.

- iii. Allegations of abuse may involve a member of the school staff, the DSL, volunteer or contractor. In these circumstances the allegation must be reported immediately and directly to the **Principal**, or in the absence of the Principal, the Chair of Governors.
- iv. Where the allegation of abuse is against the Principal, it must be reported immediately and directly to the **Chair of Governors** and without notifying the Principal.
- v. If you receive an allegation or witness abusive behaviour then you should report it immediately to the Principal or if the allegation or behaviour concerns the Principal, to the Chair of Governors. You must not attempt to address it with the person whom the concern relates to.
- vi. On receipt of such an allegation these persons will immediately contact the Designated Officer (DO formally LADO) and seek advice on the way forward before any form of investigation takes place. If the DO is not available, then a senior member of the MASH team or a police officer (Bury Public Protection Investigation Unit) should be contacted. This must happen within one working day of the report being made to the Principal or Chair of Governors.
- vii. Consent from parents is not required before reporting a matter to the DO.
- viii. In case of serious harm or a crime being committed the Police will be informed from the outset. If for any reason a member of staff cannot contact the BGS persons detailed above, then the matter must be referred directly to the DO.
- ix. The School will not undertake its own investigation of allegations without prior consultation with the DO, or, in the most serious cases, the police so as not to jeopardise statutory investigations.
- x. Where the allegation is against a former member of staff, it will be referred directly to the police.
- xi. When immediate contact is made with the DO to discuss an allegation, consideration will be given to the nature, content and context of the allegation and a course of action agreed including any involvement of the police. Discussions will be recorded in writing, and communication with both the individual and the parents of the child/ children agreed.
- xii. School will consider carefully whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place. School will give due weight to the views of the DO and the police when making a decision about suspension.
- xiii. From 1st October 2012, there have been restrictions on the reporting or publishing of allegations against teachers and so School will make every effort to maintain confidentiality and guard against unwanted publicity. These restrictions apply up to the point where the accused person is charged with an offence, or the DfE/TRA publish information about an investigation or decision in a disciplinary case.
- xiv. Where an investigation leads to the dismissal of a member of staff (paid or unpaid) because s/he is considered unsuitable to work with children or where someone resigns in circumstances where s/he would have been dismissed, the school will promptly make a report, including as much evidence about the circumstances of the case as possible, to the DBS and at least within one month. Ceasing to use a person's services includes: dismissal; non-renewal of a fixed-term contract; no longer engaging/refusing to engage a supply teacher provided by an employment agency; terminating the placement of a student teacher or other trainee; no longer using staff employed by contractors; no longer using volunteers; resignation; and voluntary withdrawal from supply teaching, contract working, a course of initial teacher training, or volunteering. School will also make such a report where a compromise agreement has been reached or where an individual fails to cooperate with an investigation.
- xv. The School will also consider making a referral to the Teacher Regulation Agency (TRA) where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate. The reasons such an order would be considered are: "unacceptable professional conduct", "conduct that may bring the profession into disrepute" or a "conviction, at any time, for a relevant offence". Where a referral has been made to the DBS, it will not be necessary for a referral also to be made to TRA, as information is shared between the two bodies.

- xvi. Where a dismissal does not reach the threshold for DBS referral, separate consideration will be given to a TRA referral.
- xvii. If there has been a substantiated allegation against a member of staff, the school will work with the DO to determine whether there are any improvements to be made to its procedures or practice to help prevent similar events in the future.
- xviii. In line with Government Procedures in dealing with allegations of abuse against teachers and other staff (DfE 2012), allegations found to be malicious will be removed from personnel records. Records will be kept of all other allegations but any that are not substantiated, are unfounded or malicious will not be referred to in employer references.
- xix. The School will make every effort to manage and minimise the stress arising from the allegations and ensuing processes. An individual will be informed of an allegation as soon as possible and the likely course of action explained, unless there is an objection from the LADO, Children's Social Care Services, or the police. Any member of staff subject to an allegation will be offered support throughout the process. S/he will be encouraged to seek advice and support at the earliest opportunity from a professional association or trade union if s/he is a member, or from a colleague. Wherever possible, the member of staff will be given a full opportunity to answer the allegation and make representations about it. The member of staff, or her/his representative, will be given the name of a named representative who will then keep her/him up to date regarding the progress of the case and consider what other support is appropriate. This named representative would normally be the Senior Deputy Head. Social contact with colleagues will not be prevented unless there is evidence to suggest that such contact is likely to prejudice the collection of evidence. The need for help and support is equally applicable when considering a suspended person's return to work. A phased return and the provision of a mentor to provide assistance and support in the short term will be provided, if appropriate.
- xx. If the child has suffered injury, the Health Support Worker will provide emergency assistance if required. The DSL will accompany the child to hospital to ensure professional assessment and immediate treatment of the injury. In this case, parents will be informed immediately. There will be no communication about the alleged abuse with the child who is the subject of the allegation. Parents will be informed about the allegation as soon as possible unless a strategy discussion is required or police and/or Children's Social Care are involved. In this case, there will be discussion and agreement on what can be disclosed. Unless there is a criminal prosecution, parents will be informed about the progress of a case (though not any details of a disciplinary hearing) and the outcome, in confidence. Parents will also be informed of the prohibition on reporting or publishing allegations against teachers in section 141F of the Education Act 2002.

Low-level Concerns

Concerns may be graded low-level if the concern does not meet the criteria for an allegation; and the person has acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work. Example behaviours include, but are not limited to:

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

If the concern has been raised via a third party, the Principal will collect as much evidence as possible by speaking:

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

Reports about supply staff and contractors will be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

Staff are encouraged and should feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Low-level concerns will be recorded in writing, including:

- the name of individual sharing their concerns
- details of the concern
- context in which the concern arose
- action taken

Records will be kept confidential, held securely and comply with the Data Protection Act 2018. Records are reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. If a concerning pattern of behaviour is identified and now meets the criteria for an allegation, then the matter will be referred to the LADO.

Reports of low level concerns will be recorded in writing, with details of the concern, the context in which it arose and action taken. The name of the person reported will be noted, whilst respecting wishes to remain anonymous as far as reasonably possible. **The rationale for all decisions and actions taken will be recorded.**

Low level concerns should be reported to the same persons as set out in relation to concerns and allegations that meet the harms test. Reports about supply staff and contractors should be notified to their employers so any potential patterns of inappropriate behaviour can be identified.

When a pattern of behaviour is identified, the school will decide on a course of action. This might be internal disciplinary procedures, or referral to the LADO if the harms threshold is met.

The records' review might identify that there are wider cultural issues within the School that enabled the behaviour to occur. If this is the case, policies or processes will be revised and extra training delivered to minimise the risk of it happening again.

The School has a separate Low Level Concerns Policy which provides more information on how low-level concerns are monitored, recorded and dealt with appropriately to create a safer culture for all staff, students and visitors. The purpose of the policy is to embed a culture of openness, trust and transparency in which the School's values and expected behavior which is set out in the staff code of conduct are constantly lived, monitored and reinforced by all staff.

Visiting Speakers

Prevent requires that all visiting speakers, whether invited by staff or pupils are suitable and are suitably supervised. Whenever it is proposed to use the services of a visiting speaker, they should be risk assessed and permission should be sought from the DSL in his/her capacity as Single Point of Contact for Prevent. This is done using the **Visiting Speaker Proposal Form** which contains a risk assessment.

Training

All staff and volunteers are reminded of their responsibilities and procedures relating to safeguarding issues at the September staff meeting each year and at suitable times throughout the year, for example, if there is a change to procedure. In addition, the school will survey the staff from time to time to check

on their understanding of specific safeguarding issues. This training provides them with the relevant skills and knowledge to safeguard children effectively.

The school records the date of last safeguarding training on the single central record. Training certificates are placed in personnel files.

All staff complete on-line training covering the prevent duty and additional training appropriate to their role.

The DSL and Deputy DSLs will be trained specifically in DSL duties every two years and receive inter-agency training through BISP in specific areas every year to develop and refresh their knowledge and skills.

The Headteacher and whole staff receive regular safeguarding training in line with BISP regulations (currently every three years). Courses are also arranged each year for colleagues with specific responsibilities (eg Form Tutors/Heads of Year).

New staff, including temporary staff and volunteers, will receive induction training on safeguarding issues from a Designated Safeguarding Lead before they have contact with pupils. Such training must include:

- a) Keeping Children Safe in Education (2021) [Part One];
- b) A copy of the School's Employee handbook;*
- c) A copy of the School's safeguarding policy;*
- d) The staff code of conduct;*
- e) The behaviour policy
- f) The safeguarding response to children who go missing in education
- g) The role of the Designated Safeguarding Lead (including the identity of the designated safeguarding lead and any deputies). (See KCSIE 2021)
- h) A copy of Part 1 and Annex B of Keeping Children Safe in Education (September 2021)*
- i) Whistleblowing procedures;*
- j) Acceptable User Policy
- k) School Visitor Policy.*
- l) Prevent Duty*
- m) E Safety Policy

All staff must have also read the above documents, as well as receiving training on them.

This information may be provided electronically but should be explained at induction

Individual training on safeguarding issues is available through the CPD budget and staff should approach the DSL regarding such training needs. The Bursar will ensure appropriate guidance and training is given to the support staff, who come under her responsibility, by one of the DSLs from BGSB or BGSG since members of the support staff often carry out their roles in both schools.

The Safeguarding Policy is available to all staff electronically in the 'Policies' area of Staff Public, the school website or in hard copy from the DSLs.

Safer Recruitment training is available to all relevant staff and governors who are involved in the recruitment process.

Whistleblowing

The school has a separate Whistleblowing Policy. At Bury Grammar School, we recognise the possibility that adults working in the school may harm children, including governors, volunteers, supply teachers and agency staff. Any concerns about the conduct of other adults in the school should be reported at once to the Principal (or to the Chairman of Governors where the concern relates to the Principal). Any concern will be thoroughly investigated under the school's whistle-blowing procedures. Where there are allegations of criminal activity, the statutory authorities will always be informed. Wherever possible, and subject to the rights of the pupil, the member of staff will be informed of the outcome of the investigation. No one who reports a genuine concern in good faith needs to fear retribution. Under the Public Interest Disclosure Act 1998 the member of staff may be entitled to raise a concern directly with an external body where the circumstances justify it.

Where there are concerns about the way that safeguarding is carried out in the school, staff should refer to the Whistleblowing Policy.

A whistleblowing disclosure must be about something that affects the general public such as:

- a criminal offence has been committed, is being committed or is likely to be committed
- an legal obligation has been breached
- there has been a miscarriage of justice
- the health or safety of any individual has been endangered
- the environment has been damaged
- information about any of the above has been concealed.

The NSPCC runs a whistleblowing helpline on behalf of the government, the number is **0808 800 5000**.

Further guidance: [NSPCC Support for professionals who are worried about children in the workplace](#)

Management and Accountability for Safeguarding and Child Protection at BGS

The Principal is ultimately accountable for Safeguarding and Child protection at BGS.

The Deputy Heads (Pastoral) at BGS and BGSB are the Designated Safeguarding Leads (DSL) for their respective school and have delegated responsibility for all safeguarding and child protection matters across the that school. The DDSLs deputise in the absence of a DSL.

The job description for the DSL and DDSL is at appendix 3 and this forms part of the DSLs' and DDSLs' overall job description.

The nominated School Governor with responsibility for monitoring safeguarding is **Mr Tim McDougall**. He conducts an annual check of arrangements for safeguarding within the school. All governors receive basic induction training in safeguarding and receive annual updates. In addition, The Governing Body receives and interrogates the annual report on safeguarding matters from the DSLs in which no names of pupils are disclosed, enabling it to review how effectively the school is fulfilling its obligations under current legislation.

The Governing Body approve the Safeguarding Policy each year although changes and working amendments may be made without the need to receive further approval within the year.

Contact numbers:

Name	Job Title	Contact details
Mrs Rachel Newbold	Designated Safeguarding Lead (DSL) (Deputy Head Pastoral) <u>Overall lead responsibility BGSB</u>	rnewbold@burygrammar.com 0161 696 8600
Mr Rob Lees	Designated Safeguarding Lead (DSL) (Deputy Head Pastoral) <u>Overall lead responsibility BGSB</u>	rlees@burygrammar.com 0161 696 8600
Mrs Chrissy Howard	Deputy Designated Safeguarding Lead BGS (DDSL) (Head of Co-educational Infants and of Girls' and Boys' Junior Schools) and DDSL with responsibility for safeguarding at EYFS (Head of EYFS)	choward@burygrammar.com 0161 696 8600
Mrs Holly Hammond	Deputy Designated Safeguarding Lead BGS (Head of Sixth Form)	hammond@burygrammar.com 0161 696 8600
Mrs Rachel Hartley	Deputy Designated Safeguarding Lead (DDSL) (Head of Lower School BGSB)	rhartley@burygrammar.com 0161 696 8600
Mrs Sarah Howard	Deputy Designated Safeguarding Lead (DDSL) (Head of Lower School BGSB)	showard@burygrammar.com 0161 696 8600
Mrs Samantha Aylin	Deputy Designated Safeguarding Lead (DDSL) ((Senior Primary School Teacher)	saylin@burygrammar.com 0161 696 8600
Mrs Kay Robinson	Deputy Designated Safeguarding Lead BGS (DDSL) (Senior Health Support Worker)	landerson@burygrammar.com 0161 696 8600
Mrs Lindsay Carey	Deputy Designated Safeguarding Lead BGS (DDSL) (Senior Health Support Worker)	lcarey@burygrammar.com 0161 696 8600
Mrs Sarah McMahon	Deputy Designated Safeguarding Lead (DDSL) (Kindergarten Manager, Wrap Around Care Manager)	smcmahon@burygrammar.com 0161 696 8600
Mr Tim McDougall	School Governor with Safeguarding, Online Safety and Bullying oversight	0161 696 8600
Mrs Gillian Winter	Chair of Governors	0161 696 8600
Mr Malcolm Edge	Deputy Chair of Governors	0161 696 8600

The Bury Multi-Agency Safeguarding Hub (MASH) Team

Telephone: 0161-253-5678

Emergency Number: 0161-253 6606

Police: 0161-872 5050

Bury Integrated Safeguarding Partnership (BISP)

18-20 St Mary's Place,
Bury,
BL9 0DZ.

Tel: 0161-253 6153

All referrals – Multi-Agency Safeguarding Hub (MASH Team): Tel: 0161-253 5678, 9.00am – 5.00pm

Out of hours/Emergency Duty Team: Tel: 0161-253 6606

Advice and Assessment: Tel: 0161-253 5454 for children already undergoing a Child and Family Assessment

Higher Lane Children's Services: Tel: 0161-253 6868 for children who are Looked After, Child in Need or on a Child Protection Plan

www.safeguardingburychildren.org

Local Authority Designated Officer (DO)

Bury Integrated Safeguarding Partnership
18–20 St Mary's Place
Bury
BL9 0DZ

Tel: 0161-253 6153

The current DO for Bury is Mr Mark Gay. His direct line is 0161-253 5342

Or Donna Green donna.green@bury.gov.uk Tel: 0161-253 5582/5342

NSPCC Child Protection helpline: 0800 800 5000

NSPCC Whistle-blowing helpline: 0800 0280285

Text 88868

help@nspcc.org.uk

Disclosure and Barring Service (DBS)

P O Box 181

Darlington

DL1 9FA

email: customerservices@db.s.gsi.gov.uk

Tel: 0870 900 0811

Telephone for referrals: 01325 953 795

National College for Teaching and Leadership

Helpline Tel: 0345 6090009

Channel Coordinator(s) (DC Muj Hussain & DC Jane Wilcock)

Central Park HQ

Greater Manchester Police

Northampton Road

Newton Heath

M40 5BP

Tel - 0161-856 6103

Tel 101 or in an emergency Tel 999

DfE Helpline

If you are concerned about extremism in a school or organisation that works with children, or if you think a child might be at risk of extremism, contact the DfE helpline.

Open Monday to Friday from 9am to 6pm (excluding bank holidays).

Email counter.extremism@education.gsi.gov.uk

Telephone 020 7340 7264

Report Abuse in Education

The Department for Education has commissioned the NSPCC to launch a new helpline called Report Abuse in Education. The helpline comes after numerous anonymised testimonials of sexual harassment and abuse in schools and colleges were shared to the Everyone's Invited website

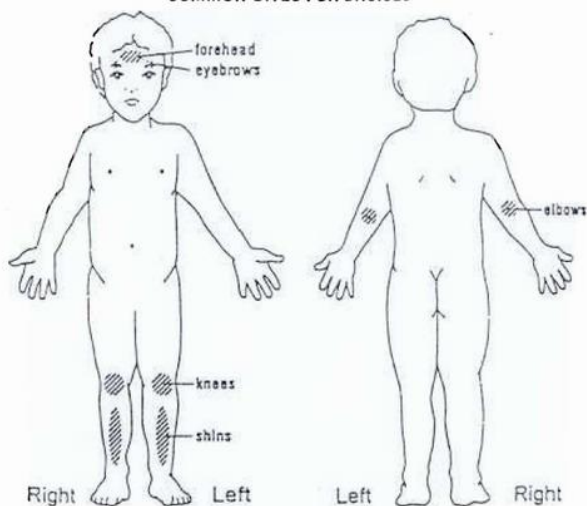
The newly launched helpline will provide support to:

- children and young people who want to share current and non-recent experiences of sexual abuse and harassment
- children and young people who want to talk about being involved in or witnessing any incidents
- anyone who works or volunteers in a school setting and needs support and guidance
- adults who have experienced non-recent abuse
- parents and carers who are concerned about their own child or other children.

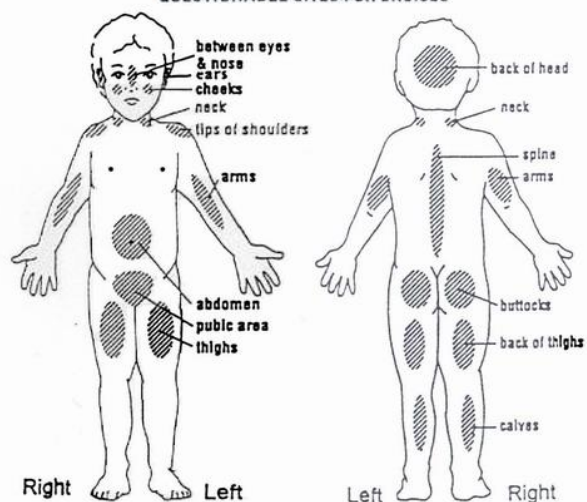
Young people and adults can contact Report Abuse in Education on [0800 136 663](tel:0800136663) or email help@nspcc.org.uk

Appendix 1: Common sites and questionable sites for bruises

COMMON SITES FOR BRUISES



QUESTIONABLE SITES FOR BRUISES



Appendix 2: Staff Code of Conduct (see Employee Handbook)

1. INTRODUCTION

- The school is required to set out a Code of Conduct for all school employees. In addition to this policy, all staff employed under Teachers' Terms and Conditions of Employment have a statutory obligation to adhere to the 'Teachers' Standards 2012' and in relation to this policy, Part 2 of the Teachers' Standards - Personal and Professional Conduct. Employees should be aware that a failure to comply with the following Code of Conduct could result in disciplinary action including dismissal. The School's Staff Code of Conduct is also included in the School's Safeguarding Policy.

2. PURPOSE, SCOPE AND PRINCIPLES

- A Code of Conduct is designed to give clear guidance on the standards of behaviour all school staff are expected to observe, and the school should notify staff of this code and the expectations therein. School staff are role models and are in a unique position of influence and must adhere to behaviour that sets a good example to all the pupils/students within the school. As a member of a school community, each employee has an individual responsibility to maintain their reputation and the reputation of the school, whether inside or outside working hours. This Code of Conduct applies to all staff who are employed by the school, including the Heads and Bursar.

3. SETTING AN EXAMPLE

- All staff set examples of behaviour and conduct which can be copied by pupils/students. Staff must therefore avoid using inappropriate or offensive language at all times and abide by the school dress code (see below). All staff must, therefore, demonstrate high standards of conduct in order to encourage our pupils/students to do the same. All staff must also avoid putting themselves at risk of allegations of abusive or unprofessional conduct.

4. SAFEGUARDING PUPILS/STUDENTS

- Ensure that relationships with pupils remain on a professional footing. [Particular attention is drawn to the provisions of the Sexual Offences Act 2003 which creates a criminal offence of abuse of a position of trust (when a person aged 18 or over is in a position of trust with a person under 18 and engages in sexual activity with or in the presence of that child or causes or incites that child to engage in or watch sexual activity)].
- Do not act in a discriminatory manner, favourably or unfavourably, towards any pupil. All pupils should be treated equally. Staff should never build a 'special' relationship with, or confer particular favours on, a pupil.
- Establish professional boundaries between yourself and the pupils – **they are not friends** even when they have left the school.
- Do not behave in a way that could lead a reasonable observer to question conduct, intentions or suitability to care for other people's children.
- Wear your staff ID at all times when on the BGS campus
- Challenge persons who are not staff or pupils who are on site without a visitors' badge or alert the School Office.
- Alert the School Office if you notice an external door is insecure.
- Be aware of what policies are in place especially safeguarding 'umbrella' policies. This will be explained to you at your induction and all are available in the Teaching Handbook.
- Work in an open and transparent way with children.
- Seek advice promptly from a member of the SMT about any incident which could give rise for concern.
- Apply the same professional standards regardless of race, gender or sexuality.
- Staff have a duty to safeguard pupils from physical abuse, sexual abuse, emotional abuse and neglect.
- The duty to safeguard pupils includes the duty to report concerns about a pupil to the School's Designated Safeguarding Lead.
- Staff are provided with personal copies of the school's Safeguarding Policy and made aware of the location of the Whistleblowing Procedure (included later in this document) and staff must be familiar with these documents.
- Staff must not seriously demean or undermine pupils, their parents or carers, or colleagues.
- Staff must take reasonable care of pupils under their supervision with the aim of ensuring their safety and welfare.

- Staff must ensure that they safeguard themselves and pupils in instances where one to one tuition occurs. This may be in the form of placing a barrier such as a desk between the staff member and the pupil and ensuring that the door is open with visual access.
- Do not use your mobile phone in public areas open to children around the school campus. The use of such devices should be restricted to private areas and offices.
- Do not use your own digital camera/video for work unless you have sought permission. Further information is included in the section entitled “Cameras, Videos and Other Photographic Devices” in this handbook under the title section “Safeguards.”

5. PUPIL DEVELOPMENT

- Staff must comply with school policies and procedures that support the well-being and development of pupils. Staff must co-operate and collaborate with colleagues and with external agencies where necessary to support the development of pupils. Staff must follow reasonable instructions that support the development of pupils (such as Pupil Profiles).

6. HONESTY AND INTEGRITY

- Staff must maintain high standards of honesty and integrity in their work. This includes the handling and claiming of money and the use of school property and facilities. All staff must comply with the Bribery Act 2010. A person may be guilty of an offence of bribery under this act if they offer, promise or give financial advantage or other advantage to someone; or if they request, agree or accept, or receive a bribe from another person. If you believe that a person has failed to comply with the Bribery Act, you should refer to the Whistleblowing procedure for schools. Please see sections below for additional information on bribery and the School’s Whistleblowing Policy.
- Gifts from suppliers or associates of the school must be declared to the Head, with the exception of “one off” token gifts from students or parents which are less than £25 in value. Personal gifts from individual members of staff to students are inappropriate and could be misinterpreted. Please see the section in Anti-Bribery Section below “Gifts and Hospitality” for further information.

7. USE OF SOCIAL NETWORKING SITES

- Any work-related issue or material that could identify an individual who is a pupil, parent, guardian or work colleague, which could adversely affect the School, a pupil, parent or guardian or our relationship with any pupil, parent or guardian must not be placed on a social networking site. This means that work related matters must not be placed on any such site at any time either during or outside of working hours and includes access via any computer equipment or mobile device.
- Any work content or material, or contacts or connections list, created by the Employee during the course of their employment, on any of their authorised social networking sites (ownership of which vests in the School) shall remain, at all times, the property of the School. Accordingly, upon termination of your employment, you shall hand over to the School, the access rights to your accounts, together with any work content or material, and any contacts or connections list.

8. COMMUNICATIONS WITH PUPILS

- Staff should not disclose their personal mobile telephone numbers, personal e-mail addresses or other personal details to any pupils at the school. This includes sixth form

students. Safeguarding young people is a priority and therefore you should not enter into any discussions of this nature with them. Reasonable sense should be applied when and if there is a family link between staff and pupil. Please refer to Point 11 in “Staff Code of Conduct” within the section entitled “Standards” below.

- Staff should only communicate with pupils by email using their School account through the school email server. Staff must not be ‘friends’ with any child at the school through Facebook, Instagram, Twitter, or through ANY social networking sites, unless the social networking site has been registered with the school as a departmental site. This rule extends to all emerging social media.
- Staff must not be friends with any child that has left the School, until the pupil reaches 21 years of age. Staff are not permitted to make contact with pupils, or former pupils who were pupils at the same time that the staff member was in employment at the school, through any dating websites or social media dating platforms e.g. Tinder.
- If in doubt, please ask the Designated Safeguarding Lead in your School.
- Staff must be aware of the E-safety Policy and abide by this policy. This policy is available from the relevant Designated Safeguarding Lead or your Line Manager and is included within the Teachers Handbook.

9. CONDUCT OUTSIDE WORK

- Staff must not engage in conduct outside work which could seriously damage the reputation and standing of the school or the employee’s own reputation or the reputation of other members of the school community. In particular, if the school is in receipt of information that the staff member is involved in any type of criminal activity this may result in disciplinary action being taken. Do not make arrangements to socialise, contact, communicate or meet with pupils outside school unless engaged in an authorised school activity. Social media - Staff must exercise caution when using information technology and be aware of the risks to themselves and others. In particular, they should not be ‘friends’ on social networking sites with current pupils or pupils who have not yet reached the age of 21; nor should they be friends with the parents of pupils. They should not store images of pupils at the school on their electronic equipment. It is strongly recommended that staff who are parents of pupils at the school do not join parental social media forums/groups. It may be more preferable for a partner to join these instead where possible. If a member of staff chooses to be a member of a parent group on social media they should endeavour to minimise comments. If staff do comment, they must realise that they are commenting as a parent, not a staff member and not on behalf of the school.
- Staff should notify the Head and seek permission where appropriate, but may undertake charitable or voluntary work if the hours do not conflict with the School’s working hours without notifying the School. (The conflict of hours includes evenings and weekends where necessary please see point K “Staff meetings, training and other activities” within the section “Joining our School”).

10. Low Level Concerns

- The School has a separate Low Level Concerns Policy which provides more information on how low-level concerns are monitored, recorded and dealt with appropriately to create a safer

culture for all staff, students and visitors. Concerns may be graded low-level if the concern does not meet the criteria for an allegation; and the person has acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work. If the concern has been raised via a third party, the Principal will collect as much evidence as possible. Reports about supply staff and contractors will be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

- Staff are encouraged and should feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.
- Records will be kept confidential, held securely and comply with the Data Protection Act 2018. Records are reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. If a concerning pattern of behaviour is identified and now meets the criteria for an allegation, then the matter will be referred to the LADO.
- The records' review might identify that there are wider cultural issues within the School that enabled the behaviour to occur. If this is the case, policies or processes will be revised and extra training delivered to minimise the risk of it happening again.

11. CONFIDENTIALITY

- Where staff have access to confidential information about pupils or their parents or carers, staff must not reveal such information except to those colleagues who have a professional role in relation to the pupil. All staff are likely at some point to witness actions which need to be confidential. For example, where a pupil is bullied by another pupil (or by a member of staff), this needs to be reported and dealt with in accordance with the appropriate school procedure. It must not be discussed outside the school, including with the pupil's parent or carer, nor with colleagues in the school except with a senior member of staff with the appropriate role and authority to deal with the matter. However, staff have an obligation to share with their manager or the School's Designated Safeguarding Lead, any information which gives rise to concern about the safety or welfare of a pupil. Staff must never promise a pupil that they will not act on information that they are told by the pupil.

12. Acceptable/Unacceptable Use of technologies

- a. The Schools have an Acceptable Use Policy (within the E-safety Policy) in place which lists the acceptable usage of School IT equipment and software and internet usage. You will be required to read and sign this policy from time to time.
- b. Unauthorised or inappropriate use of the internet system may result in disciplinary action which could result in summary dismissal.
- c. The internet system is available for legitimate business use and matters concerned directly with the job being done. Employees using the internet system should give particular attention to the following points:
 - i. Comply with all of our internet standards;
 - ii. Access during working hours should be for School business use only;
 - iii. Private use of the internet should be outside of your normal working hours.
- d. The School will not tolerate the use of the Internet system for unofficial or inappropriate purposes, including:

- i. Accessing websites which put our internet at risk of (including but not limited to) viruses, compromising our copyright or intellectual property rights;
- ii. Non-compliance of our social networking policy;
- iii. Connecting, posting or downloading any information unrelated to their employment and in particular pornographic or other offensive material;
- iv. Engaging in computer hacking and other related activities, or attempting to disable or compromise security of information contained on the School's computers.

You are reminded that such activities (iii. and iv.) may constitute a criminal offence.

Email:

- The use of the e-mail system is encouraged as its appropriate use facilitates efficiency. Used correctly it is a facility that is of assistance to employees. Inappropriate use however causes many problems including distractions, time wasting and legal claims. The procedure sets out the School's position on the correct use of the e-mail system.

Authorised Use:

- a) Unauthorised or inappropriate use of the e-mail system may result in disciplinary action which could include summary dismissal.
- b) The e-mail system is available for communication and matters directly concerned with the legitimate business of the School. Employees using the e-mail system should give particular attention to the following points:
 - i. all comply with School communication standards as set out in the School's Online Safety Policy.
 - ii. e-mail messages and copies should only be sent to those for whom they are particularly relevant.
 - iii. e-mail should not be used as a substitute for face-to-face communication or telephone contact. Abusive e-mails must not be sent. Hasty messages sent without proper consideration can cause upset, concern or misunderstanding.
 - iv. if an e-mail is confidential, the user must ensure that the necessary steps are taken to protect confidentiality. The School will be liable for infringing copyright or any defamatory information that is circulated either within the School or to external users of the system; and
 - v. offers or contracts transmitted by e-mail are as legally binding on the School as those sent on paper.
- c) The School will not tolerate the use of the e-mail system for unofficial or inappropriate purposes, including:
 - i. any messages that could constitute bullying, harassment or other detriment;
 - ii. personal use (e.g. social invitations, personal messages, jokes, cartoons, chain letters or other private matters);
 - iii. on-line gambling;
 - iv. accessing or transmitting pornography;
 - v. transmitting copyright information and/or any software available to the user; or
 - vi. posting confidential information about other employees, the School, its pupils, parents, guardians or suppliers.

Monitoring

- We reserve the right to monitor all e-mail/internet activity by you for the purposes of ensuring compliance with our policies and procedures and of ensuring compliance with the relevant regulatory requirements and you hereby consent to such monitoring. Information acquired through such monitoring may be used as evidence in disciplinary proceedings.

13. Online Safety for Remote Teaching and Learning

- The school will ensure that any use of online learning tools and systems is in line with privacy and data protection/GDPR requirements. Staff should raise any safeguarding concerns regarding pupil IT use to the DSLs and record on CPOMS.
- Staff and pupils must abide by the Acceptable Use Policies. Staff and pupil / student communications must remain professional at all times and pupils must adhere to the remote learning expectations and guidelines. Staff must use only official BGS provided communication tools and should avoid the use of social media or personal email accounts to contact pupils or parents. Where members of staff have been asked to speak directly to children to help identify any concerns, staff should make calls from the school site via school phones and devices if possible. If personal phones are used to make calls, staff need to make sure that they withhold their personal number to ensure that the pupil / parent is not able to identify their personal contact details.
- It is important that all staff who interact with pupils, including online, continue to look out for signs a child may be at risk. Any such concerns should be dealt with as per the Safeguarding Policy and where appropriate referrals should continue to be made to children's social care and as required the police.

14. WHISTLEBLOWING

- The school has a separate Whistleblowing Policy which is included later in the Handbook. If a teacher or member of staff has concerns about the behaviour of another member of staff towards a pupil, he or she should report it at once to the relevant Head or Bursar or to the Chairman of Governors where the concern relates to the Head or Bursar. Any concern will be thoroughly investigated under the school's whistleblowing procedures. Where there are allegations of criminal activity, the statutory authorities will always be informed. Wherever possible, and subject to the rights of the pupil, the member of staff will be informed of the outcome of the investigation. No one who reports a genuine concern in good faith needs to fear retribution. Under the Public Interest Disclosure Act 1998 the member of staff may be entitled to raise a concern directly with an external body where the circumstances justify it.

15. DISCIPLINARY ACTION

All staff need to recognise that failure to meet these standards of behaviour and conduct may result in disciplinary action, including dismissal.

There may be circumstances where a member of staff is also a parent or close relative of a pupil at the school, where reasonable adjustments to the above may be permissible. Under such

circumstances do not behave in a way that could lead a reasonable observer to question conduct, intentions or suitability to care for other people's children.

Appendix 3: Job Description for the Designated Safeguarding Lead

The Designated Safeguarding Lead takes lead responsibility for safeguarding and child protection (including online safety) at Bury Grammar School. In the absence of the DSL, the DDSLs have responsibility. The key role of the Designated Safeguarding Lead is:

Managing referrals

The DSL is expected to refer cases:

- of suspected abuse and neglect to the local authority children's social care as required and support staff who make referrals to local authority children's social care;
- where a person is dismissed or left due to risk/ harm to a child to the Disclosure and Barring Service as required;
- to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme
- Where a crime may have been committed to the Police as required. [NPCC- When to call the police](#) should help understand when to consider calling the police and what to expect when working with the police
- Contact the LADO on any matters that the DSL feels cannot be dealt with internally
- Act as a source of support, advice, and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.

Working with others

The Designated Safeguarding Lead is expected to:

- act as a source of support, advice and expertise to staff;
- act as a point of contact with the three safeguarding partners;
- liaise with the Headteacher to inform him/her of issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- as required, liaise with the 'case manager' (as per Part four) and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff;
- liaise with staff (especially teachers, pastoral support staff, school health team, school nurses, IT Technicians and SENCOs on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically;

- liaise with external agencies, the school health team and the three safeguarding partners where safeguarding concerns are linked to mental health;
- promote supportive engagement with parents and/or carers in safeguarding and promote the welfare of children, including where families may be facing challenging circumstances;
- work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement, and achievement at school. This includes:
 - ensuring that the School knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and
 - supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.

Information sharing and managing child protection file

The Designated Safeguarding Lead is responsible for ensuring that child protection files are kept up to date.

Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

Records should include:

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

They should ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice as set out in Part one and Part two of this guidance.

Where children leave the School (including in year transfers) the Designated Safeguarding Lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as Designated Safeguarding Leads and SENCOs are aware as required.

Lack of information about their circumstances can impact on the child's safety, welfare, and educational outcomes. In addition to the child protection file, the Designated Safeguarding Lead should also consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help

the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

Raising Awareness

The Designated Safeguarding Lead should:

- ensure each member of staff has access to, and understands, the school's Safeguarding Policy and procedures, especially new and part-time staff;
- ensure the school's policies are known, understood, and used appropriately;
- ensure the school's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies regarding this.
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this;
- link with the safeguarding partner arrangements (Bury Integrated Safeguarding Partnership) to make sure staff are aware of training opportunities and the latest local policies on safeguarding arrangements;
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school and college leadership staff.

Training, Knowledge and Skills

The Designated Safeguarding Lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The Designated Safeguarding Lead should undertake Prevent awareness training. Training should provide designated safeguarding leads with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures, and responsibilities of other agencies, particularly children's social care, so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements;
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;

- understand the importance of the role the Designated Safeguarding Lead has in providing information and support to children social care in order to safeguard and promote the welfare of children;
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes;
- are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers;
- understand the importance of information sharing, both within the school and college, and with the safeguarding partners, other agencies, organisations and practitioners;
- understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college;
- can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses; and,
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

Providing Support to Staff

Training should support the Designated Safeguarding Lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

- ensure that staff are supported during the referrals processes; and
- support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

Understanding the views of children

It is important that children feel heard and understood. Therefore, designated safeguarding leads should be supported in developing knowledge and skills to:

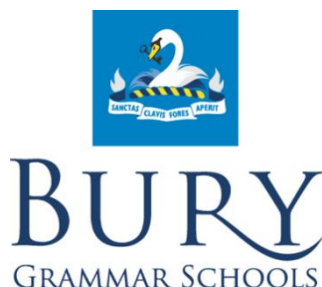
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school or college may put in place to protect them; and
- understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

Holding and Sharing information

The critical importance of recording, holding, using and sharing information effectively is set out in Parts one, two and five of this document, and therefore the Designated Safeguarding Lead should be equipped to:

- understand the importance of information sharing, both within the school and college, and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners;
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR); and
- be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping.

Appendix 4: Safeguarding and Child Protection Annual Checklist for Staff



Name Position

- I have received the Bury Grammar School Safeguarding Policy and know how to access the most up to date version of it on the BGS website
- I have received Keeping Children Safe in Education 2021(Part 1 and Annex B) and I have read them and understand them.
- I have received the Staff Code of Conduct (contained within the Employee Handbook), have read it and agree to abide by it and understand that I may be the subject of disciplinary action should I fail to do so.
- I have read and have an understanding of the principles outlined in the above documents and agree to abide by the contents of these documents
- I have an understanding of the current guidelines and legal contexts regarding Child Protection
- I have an understanding of the definition of abuse, the different types of abuse and what hurts children
- I fully understand the correct procedures regarding the reporting of a disclosure of abuse or a welfare concern to the relevant members of staff at BGS
- I understand that I must be prepared to identify children who may benefit from early help.
- I fully understand the correct procedures regarding the reporting of an allegation against a member of staff including the Head Teacher and DSL
- I am aware of the name of the Designated Safeguarding Lead and of staff members who are deputy DSLs at Bury Grammar School
- I am aware of the Prevent Duty and understand my obligation under this duty.
- I am aware of the school's Whistleblowing policy and where to access it on the BGS Network
- I confirm that I have not been involved in any activity/incident since my last DBS check or within the last 12 months which might result in a change to my DBS status, should a new check be requested. (If you are unable to confirm this, please detail any changes in writing to the Headteacher immediately. This information is given in the strictest confidence.)

Signature

Date

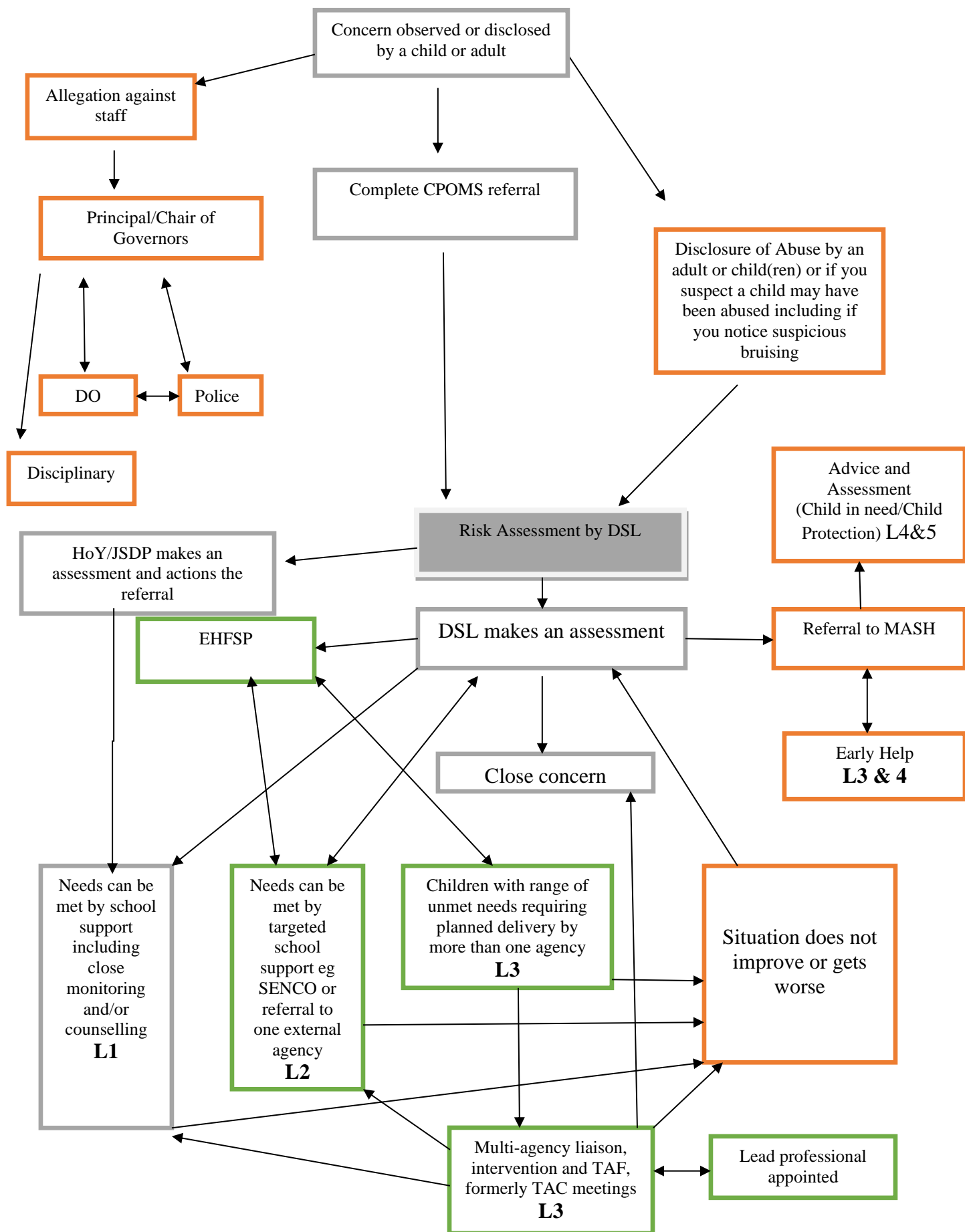
Appendix 5: Quick Guide to Record Keeping and CPOMS

CPOMS is a highly secure online paperless pastoral management information system. Meritec's unique MeriLock security system is a world-class approach to data protection and security. Augmenting an email address and password with a CPOMS Authenticator app on an electronic device and encompassing 128-bit SSL security with all sensitive data encrypted, MeriLock ensures the information held in CPOMS is secure. CPOMS also allows control of access inside the system, ensuring that at every level, sensitive information remains protected. Using CPOMS, staff access is controlled based on individual students, classes, year groups, categories, or system functionality.

- From any internet enabled computer log onto <https://burygrammar.cpoms.net>
- If it is your first time, then choose '**reset password**' and follow that procedure
- To add a referral, click '**add incident**'
- Complete the boxes and ensure you choose the correct **category** for the incident.
- **Submit** the incident to the DSL/Senior Safeguarding Team
- CPOMS is configured so that incidents can be viewed by relevant members of the pastoral team- HOY/Health team etc
- The DSL/SST/System Manager may require you to carry out further actions, you will be alerted that further actions are required and should log back into the system to see what is required.

Members of staff (such as maintenance or Office staff) without access to CPOMS should raise concerns directly with the DSL or DDSLs.

Appendix 6: BGS Model for Safeguarding and Child Protection



Appendix 7: Visiting Speaker (not in regulated activity)

Appendix 7: Risk Assessment Form

Name of Speaker:			
Purpose of engagement:			
Topic of discussion:			
Date of engagement:			
Age of pupils to be addressed:			
Name(s) of supervising staff:			
Will the speaker be discussing political issues, religious issues or issues relating to terrorism? If so, what is the context?			
Risk:	No formal vetting checks carried out so <u>unknown</u> safeguarding risk to pupils		
Hazard:	Safeguarding risk to pupils Pupils exposed to extremist views		
Control Measures to reduce risk:	Essential (if yes ✓)	Desirable (If yes ✓)	
Will the speaker be supervised at <u>all</u> times?			
Has consideration been given to the action plan should the speaker begin to discuss inappropriate content?			
Is the SPoC satisfied that there is no Prevent related concern about this speaker?			
Will the speaker be made aware of the need to avoid promoting partisan political views?			
Has a Google name search been conducted about this speaker and returned a negative result for concerns?			

KEY: To qualify as an acceptable risk all 5 ESSENTIAL boxes must be ticked. Anything less will constitute an UNACCEPTABLE RISK.

Does the individual hold a current DBS	Yes <input type="checkbox"/>	No <input type="checkbox"/>
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Acceptable Risk

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Unacceptable Risk

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Assessed by:		Member of staff submitting	Date:	
Authorised by:		DSL	Date:	

Appendix 8: Covid-19 arrangements for safeguarding and child protection



Date Approved: May 2020
Policy Reviewed: August 2021
This policy is for Bury Grammar School
Author: R Newbold/ R Lees

Temporary Policy Addendum:

COVID-19 school closure arrangements for Safeguarding and Child Protection at
Bury Grammar School

Context

To support public health efforts to arrest the rising cases of Covid-19 (Coronavirus), on 4th January 2021, the Prime Minister announced a new national lockdown for England, with people instructed to "stay at home" as they did during the first lockdown in March 2020.

All primary schools, secondary schools and colleges were instructed to move to online learning.

This addendum of the BGS Safeguarding Policy contains details of our individual safeguarding arrangements in the following areas:

Key Safeguarding Personnel

Remain as per the School Safeguarding Policy.

Vulnerable children

Vulnerable children and young people include those who:

- are assessed as being in need under section 17 of the Children Act 1989, including children and young people who have a Child in Need plan, a child protection plan or who are a looked-after child;
- have an education, health and care (EHC) plan;

- have been identified as otherwise vulnerable by educational providers or local authorities (including children's social care services), and who could therefore benefit from continued full-time attendance, this might include:
 - children and young people on the edge of receiving support from children's social care services or in the process of being referred to children's services
 - adopted children or children on a special guardianship order
 - those at risk of becoming NEET ('not in employment, education or training')
 - those living in temporary accommodation
 - those who are young carers
 - those who may have difficulty engaging with remote education at home (for example due to a lack of devices or quiet space to study)
 - care leavers
 - others at the provider and local authority's discretion including pupils and students who need to attend to receive support or manage risks to their mental health.

Senior leaders, especially the Designated Safeguarding Leads (and deputies) know who our most vulnerable pupils are. There is the flexibility to offer a place to those on the edge of receiving children's social care support.

BGS will continue to work with and support pupil's social workers to help protect vulnerable children. This includes working with and supporting children's social workers and the local authority virtual school head (VSH) for looked-after and previously looked-after children. The lead persons for this will be: Rachel Newbold and Robert Lees.

There is an expectation that vulnerable children who have a social worker will attend an education setting, so long as they do not have underlying health conditions that put them at increased risk. Where vulnerable pupils are engaging with remote learning at home, and the School, parent and social worker believe this is in the best interests of the child, the School will monitor closely the pupil's progress and keep the situation under review.

In circumstances where a parent does not want to bring their child to an education setting, and their child is considered vulnerable, the social worker and Bury Grammar School will explore the reasons for this directly with the parent.

Where parents are concerned about the risk of the child contracting COVID19, the School or the social worker will talk through these anxieties with the parent/carer following the advice set out by Public Health England.

Bury Grammar School will encourage our vulnerable children and young people to attend school.

Critical workers

Parents whose work is critical to the coronavirus (COVID-19) and EU transition response include those who work in health and social care and in other key sectors outlined in the following sections.

Attendance monitoring

The attendance of pupils for whom on-site provision is being provided will be recorded in line with the normal School attendance requirements. Pupils who are learning from home will also be registered in

line with the School's normal registration requirements. Form Tutors and Heads of Year will monitor attendance of lessons carefully and follow up on any pupil who is not engaging with learning if no prior reason is given or made known. The School's Registration codes to be used during this period of remote learning can be found in Annex 8a.

Shielding advice is currently in place. All children deemed clinically extremely vulnerable are advised not to attend school.

Bury Grammar School and social workers will agree with parents/carers whether children in need should be attending school – the School will then follow up on any pupil that they were expecting to attend, who does not.

Bury Grammar School will also follow up with any parent or carer who has arranged care for their child(ren) and the child(ren) subsequently do not attend.

Phone calls will be made to the parents/carers in these circumstances.

In all circumstances where a vulnerable child does not take up their place at School, or discontinues, the School will notify their social worker.

Designated Safeguarding Lead

The Designated Safeguarding Leads at Bury Grammar School are: Rachel Newbold and Rob Lees. The Deputy Designated Safeguarding Leads are: Chrissy Howard, Samantha Aylin, Kay Robinson, Lindsay Carey, Rachel Hartley, Sarah Howard, Sarah Mahon and Holly Hammond.

The optimal scenario is to have a trained DSL (or deputy) available on site. Where this is not the case a trained DSL (or deputy) will be available to be contacted via email, phone or online video via teams - for example when working from home.

Where a trained DSL (or deputy) is not on site, in addition to the above, a senior leader will assume responsibility for co-ordinating safeguarding on site.

This might include updating and managing access to child protection online management system, CPOMS and liaising with the offsite DSLs (or deputies) and as required liaising with children's social workers where they require access to children in need and/or to carry out statutory assessments at the school or college. On each day, staff in school will be made aware of who the DSL is and how to speak to them.

Bury Grammar School staff and volunteers will have access to a trained DSL (or deputy).

The DSL will continue to engage with social workers, and attend all multi-agency meetings, which can be done remotely. The DSLs will continue to provide support to teachers and pastoral staff to ensure that contact is maintained with children (and their families) who are not in school. Where appropriate, staff will speak directly to pupils to help identify any concerns.

Reporting a concern

Where staff have a concern about a child, they should continue to follow the process outlined in the School's Safeguarding Policy. This includes making a report via CPOMS, which can be done remotely. In the unlikely event that a member of staff cannot access their CPOMS from home, they should email the Designated Safeguarding Leads. This will ensure that the concern is received. If a response is not received, staff must continue to exhaust all contacts in the key contact section of the School's Safeguarding Policy.

Staff are reminded of the need to report any concern immediately and without delay.

Where staff are concerned about an adult working with children in the school, they report the concern to the Principal. If there is a requirement to make a notification to the Principal whilst away from school, this should be done verbally. Concerns around the Principal should be directed to the Chair of Governors, Mrs Gillian Winter, which is in line with the principles set out in part 4 of KCSIE.

Safeguarding Training and induction

All existing School staff have had safeguarding training and have read Part 1 and Annex B of Keeping Children Safe in Education (2021). The School will ensure that all staff are aware of any new safeguarding arrangements and updated advice from the local safeguarding partners and local authorities which is relevant to their role and responsibilities. The School will provide a safeguarding induction for any new staff (including volunteers or any staff temporarily deployed to the School).

In the event of staff being deployed from another education or children's workforce setting to Bury Grammar School, we will consider the DfE supplementary guidance on safeguarding children during the COVID-19 pandemic and will accept portability as long as the current employer confirms in writing that: -

- the individual has been subject to an enhanced DBS and children's barred list check
- there are no known concerns about the individual's suitability to work with children
- there is no ongoing disciplinary investigation relating to that individual

Upon arrival, they will be given a copy of the School's Safeguarding Policy, DSL arrangements, Staff Handbook which includes the Staff Code of Conduct and Staff Acceptable User Policy.

Designated Safeguarding Lead training

It is acknowledged that face to face DSL training is unlikely to take place during this period. For the period coronavirus measures are in place, a DSL (or deputy) who has been trained will continue to be classed as a trained DSL (or deputy) even if they miss their refresher training and should continue to do what they reasonably can to keep up to date with safeguarding developments.

Safer recruitment/volunteers and movement of staff

It remains essential that people who are unsuitable are not allowed to enter the School's workforce or gain access to children.

When recruiting new staff, the School will continue to follow the relevant safer recruitment processes, including, as appropriate, relevant sections in part 3 of Keeping Children Safe in Education (2021) (KCSIE). This will be done in coordination with the Head of Staff, HR and the DSLs.

If staff are deployed from another education or children's workforce setting to our School, we will take into account the DfE supplementary guidance on safeguarding children during the COVID-19 pandemic and will accept portability as long as the current employer confirms in writing that: -

- the individual has been subject to an enhanced DBS and children's barred list check
- there are no known concerns about the individual's suitability to work with children
- there is no ongoing disciplinary investigation relating to that individual

If at any point Bury Grammar School uses volunteers, we will continue to follow the checking and risk assessment process as set out in KCSIE (2021). Under no circumstances will a volunteer who has not been checked be left unsupervised or allowed to work in regulated activity.

The School will continue to follow the legal duty to refer to the DBS anyone who has harmed or poses a risk of harm to a child or vulnerable adult.

Bury Grammar School will continue to consider and make referrals to the Teaching Regulation Agency (TRA) as set out in KCSIE(2021) and the TRA's 'Teacher misconduct advice for making a referral.

Whilst acknowledging the challenge of the pandemic, on any given day, the School will know which staff are in school and that appropriate checks have been carried out, especially for anyone engaging in regulated activity.

As such, Bury Grammar School will continue to keep the single central record (SCR) up to date.

Volunteers

Under no circumstances will a volunteer in respect of whom no checks have been obtained be left unsupervised or allowed to work in regulated activity.

Existing volunteers in regulated activity do not have to be re-checked if they have already had a DBS check (which includes barred list information).

Supervision must be:

- by a person who is in regulated activity
- regular and day to day; and
- reasonable in all the circumstances to ensure the protection of children.

Online safety in schools

The School will continue to provide a safe environment, including online. The principles of online safety are more important than ever given the likely increase in screen time for both pupils and staff. The School will continue to make use of appropriate filtering and monitoring and allow access only to reputable and safe sites. Where pupils are using computers in school, appropriate supervision will be in place. If IT staff become unavailable, any IT related concerns should be directed to Vicky Leaver or Claire Lynskey. A helpline for professionals is also available from the UK Safer Internet Centre. Key online safety resources, advice and information e.g. CEOP, Thinkuknow will be relayed to staff, parents and children via staff briefings, Satchel:One and newsletters and the Schools' social media platforms.

Online safety away from school

It is important that all staff who interact with children, including online, continue to look out for signs a child may be at risk. Any such concerns should be dealt with as per the Safeguarding Policy and where appropriate referrals should continue to be made to children's social care and as required, the police.

Bury Grammar School will ensure any use of online learning tools and systems is in line with privacy and data protection/GDPR requirements.

Staff Code of Conduct for remote teaching and learning

Staff and pupils must abide by the Acceptable Use Policies. Staff and pupil/ student communications must remain professional at all times and pupils must adhere to the remote learning expectations and guidelines. Staff must use only official BGS provided communication tools and should avoid the use of social media or personal email accounts to contact pupils or parents. Where members of staff have been asked to speak directly to children to help identify any concerns staff should make calls from the school site via school phones and devices if possible. If personal phones are used to make calls, staff need to make sure that they withhold their personal number to ensure the pupil / parent is not able to identify their personal contact details.

Below are some things to consider when live video lessons are taking place:

- No 1:1s, groups only (unless permission sought from a member of the Senior Leadership Team)
- Staff and pupils must wear suitable clothing for all live video lessons
- Any computers used should be in appropriate areas and the background should be blurred
- Language must be professional and appropriate
- Staff must only use platforms specified by Bury Grammar School and approved by our IT network manager / provider to communicate with pupils
- Staff should record the attendance of pupils in all live video lessons

Supporting children not in school

Bury Grammar School is committed to ensuring the safety and wellbeing of all of its pupils.

Where the DSLs have identified a child to be on the edge of social care support, or who would normally receive pastoral-type support in school, they should ensure that a robust communication plan is in place for that child or young person.

Details of this plan must be recorded on CPOMS, as should a record of contact that has been made.

The communication plans can include remote contact, phone contact and potentially door-step visits. Other individualised contact methods should be considered and recorded.

Bury Grammar School and its DSLs will work closely with all stakeholders to maximise the effectiveness of any communication plan.

This plan will be reviewed regularly and where concerns arise, the DSLs will consider any referrals as appropriate.

The School will share any necessary and appropriate safeguarding messages via the parent and pupil portals as well as on the school website and social media pages. Bury Grammar School recognises that school is a protective factor for children and young people, and the current circumstances, can affect the mental health of pupils and their parents.

Teachers at Bury Grammar School need to be aware of this in setting expectations of pupils' work where they are at home. The School will ensure that where we care for children of critical workers and vulnerable children on site, we ensure appropriate support is in place for them. This will be bespoke to each child and recorded on CPOMS.

Home visits

The necessity for these home visits will be assessed by the DSLs/SLT through monitoring the vulnerable pupil calls, CPOMS and non-engagement. Home visits are likely to take place where no contact can be made for a particular pupil or where deep concerns were in place.

DSLs will continue to dynamically risk assess any home visit and seek advice from the Principal if concerns arise around the safety of staff making the visit. Any home visit will require two members of staff, whilst adhering to the measures in place to minimise the risk of the spread of COVID-19.

Supporting children in school

Bury Grammar School is committed to ensuring the safety and wellbeing of all its pupils.

The School will continue to be a safe space for all children to attend and flourish. The Senior Leadership Team will ensure that appropriate staff are on site and staff to pupil ratio numbers are appropriate, to maximise safety.

Bury Grammar School will refer to the Government guidance for education and childcare settings on how to implement social distancing and continue to follow the advice from Public Health England on handwashing and other measures to limit the risk of spread of COVID19.

The School will ensure that where we care for children of critical workers and vulnerable children on site, appropriate support is in place for them. This will be bespoke to each child and recorded on CPOMS.

Peer-on-peer Abuse/Child on Child Abuse

Bury Grammar School recognises that during the closure, a revised process may be required for managing any report of such abuse and supporting victims.

Where a school receives a report of peer-on-peer abuse, they will follow the principles as set out in the School's Safeguarding Policy which is in line with the principles set out in part 5 of KCSIE. The School will listen and work with the young person, parents and any multiagency partner required to ensure the safety and security of that young person.

Concerns and actions must be recorded on CPOMS and appropriate referrals made.

Mental Health

Bury Grammar School recognises that negative experiences and distressing life events, such as the current circumstances, can affect the mental health of children and their parents. The School will ensure that appropriate support is in place for them during this period of remote provision.

The School has identified pupils who may require additional support due to prior mental health concerns and will be in regular communication with these pupils whilst they are learning at home. Support for pupils in the current circumstances will include existing provision at Bury Grammar School (although this may be delivered in different ways, for example over the phone and signposting pupils via appropriate channels to health professionals).

Mental health issues can bring about changes in a child's behaviour or emotional state which can be displayed in a range of different ways, all of which could be an indication of an underlying problem. This can include for example being fearful or withdrawn; aggressive or oppositional; or excessive clinginess.

Mental Health problems can be a sign or indicator of abuse, neglect or exploitation.

Teachers should be aware of the impact the current circumstances can have on the mental health of pupils (and their parents) who are working from home, including when setting expectations of pupils' work. The school has provided clear pupil guidelines and expectations to support them in their remote learning which have also been communicated to staff and parents.

Key Worker Provision for BGS Staff

Bury Grammar School staff are welcome to use the key worker provision available in school if they are required in school or are assisting with the Key Worker Childcare Provision. Staff's children need to be dropped off at the Infant Reception and are required to bring a packed lunch if they are staying beyond the morning. Staff must complete an emergency contact form providing two emergency contacts and also provide information on their own child's educational setting which will be included in the online

Educational Setting Status form which gives the Department for Education daily updates on how many children and staff are attending school.

Appendix 8a: Remote Learning and Key Worker Attendance on ISAMS

Remote Learning

- Please continue to register remote learning attendance in the same way as during periods of remote learning last term.
- Register your class (via the 'Take a Register' wizard or the 'School Register' tab in Registration Manager)
 - Pupils who are **present**: after clicking either 'All Present' or the 'Yes' buttons, please make sure to select '**+ - Present – Remote Learning**' from the 'Optional presence reason' drop down box at the right-hand side. You will need to select this optional presence reason individually for all pupils who are present.
 - Pupils who are **late**: after clicking the 'Late' button, please also make sure to select 'L – Late (during registration)' from the 'Optional presence reason' drop down box at the right-hand side.
 - Pupils who are **absent**: please register these pupils as normal, by clicking 'No'. If you are aware of the reason for absence, you can select the reason from the drop-down box at the right-hand side. Otherwise, please leave this blank and the office will follow up on any Ns from AM/PM registers.
- iSAMS can take a few seconds to save the register so please ensure that you either click 'Force Save' at the top right or that you wait until all of the hourglass symbols have gone from next to pupils (once the save is complete the 'Force Save' box will be greyed out and you will not be able to click it) before closing the window.

Appendix 9- Safeguarding Policy Update Table

Date	Change	Reason	Staff Responsible
16/9/21	Change to Terminology of Domestic Abuse	In line with KCSIE 2021- (SG briefing- Best practice)	RN
20/9/21	Update to Staff Code of Conduct- Use of Social Media Sites	ISI Safeguarding Policy Update-	RN