HARDY MILL PRIMARY

SAFEGUARDING AND CHILD PROTECTION

POLICY AND PROCEDURES

HEADTEACHER:	Mrs J Briggs
DESIGNATED SAFEGUARDING LEAD (DSL):	Mrs J Briggs
DEPUTY DESIGNATED SAFEGUARDING LEAD (DDSL):	Miss L Perry and Mrs J Hamblet
DESIGNATED TEACHER FOR CLA:	Mrs J Briggs
PREVENT LEAD:	Miss L Perry
MENTAL HEALTH LEAD:	Mrs J Hamblet
CHAIR OF GOVERNORS:	Mrs C Stephenson
SAFEGUARDING GOVERNOR:	Mrs S Wardle

Author: Bolton Safeguarding in Education Team
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Updates and amendments made from the Safeguarding and Child Protection Policy 2025-26

Section	Summary of change
All	Keeping Children Safe in Education has been updated throughout to 2026. Working Together to Safeguard Children updated throughout to 2026.
All	Minor rewording
Scope	Improved wording Added Early Years Foundation stage Added Wellbeing and Schools Act
Key concepts and definitions	Added that nationally the term Early Help is used whilst locally Family help is used. For the purpose of this policy we will use Early/Family Help.
Equality and diversity	Statement strengthened. Children who are questioning their gender section added.
Our Role	Added bullet point- regarding a recognition that children may experience prejudice-based harm, including racism, faith-based prejudice, and other forms of discrimination and that Staff are alert to the signs and impact of prejudice-based harm and ensure that concerns are considered within safeguarding practice where appropriate.
Types of abuse	Updated definitions of abuse to be in line with KCSIE 2026. persistent criticism, belittling, or name-calling added to emotional abuse Added child to care giver abuse. Sexual abuse- Added penetration with an object and link to Child Centre for Sexual Abuse
Record Keeping	Added additional information relating to transition - The DSL will provide comprehensive context on high-level risks; such as serious violence, channel support, and AI-related harms prior to the child's arrival. Verbal DSL to DSL consultations will take place to ensure no safeguarding nuance is lost during the transition. Added reference to the information sharing duty 2026.
Relationships and sex education	Added reference that statutory guidance is followed. Link added.
Responding to a disclosure	Wording strengthened
Safeguarding and promoting welfare	Added stronger recognition that students who are repeatedly absent from education, repeatedly removed from lessons, experience multiple suspensions, are on a part-time timetable, are at risk of permanent exclusion, or attend alternative provision may have unmet needs and be more vulnerable to harm and may require additional safeguarding support and family help.
Early Help	Changed throughout to Early/**Family** Help Additional factors added to why Early/Family help may be needed- Exhibiting early signs of violent, abusive and/or harmful behaviours, pregnant or a parent themselves, Frequent removal from classroom and parttime timetable, Addition of community based Early help and Targeted Early Help due to SG reforms.
Child on child	Added to title- (including harassment and violence) Additions and changes to the types of child on child abuse Added additional bullet point in relation to discriminatory behaviour, including racism, faith-targeted abuse and other prejudice-based incidents. Additional information added to nude and semi nude to include consensual and non consensual sharing of Nudes and Semi Nudes including those generated by AI.

	Added bullet points relating to domestic abuse in teenage relationships, physical assault and harm, or the threat of harm with a weapon, causing someone to engage in sexual activity without consent, harmful sexual behaviour, sexual violence and sexual harassment – which may include misogyny/misandry. Added- Any concerns whether this is thought to have taken place on or off site will be reported to the DSL (or deputy). Added any concerns will be investigated, dealt with and recorded Added recognition that it is more likely that girls will be victims and boys' perpetrators, but that all child-on-child abuse is unacceptable and will be taken seriously. Also a recognition that even if there are no reports of child-on-child abuse, such abuse may still be taking place and is simply not being reported.
Sexually harmful behaviour and Harassment	Title updated to HARMFUL SEXUAL BEHAVIOUR, SEXUAL VIOLENCE AND SEXUAL HARASSMENT Added Misogyny Our culture – sentence regarding zero tolerance to banter strengthened to add - We recognise that this can lead to a culture of unacceptable behaviour, misogyny and an unsafe environment for our students. Section improved throughout.
Honor Based Abuse	Title amended to include faith based abuse
The voice of the child	Strengthened this section regarding treating concerns seriously listening and acting upon concerns.
Online safety	Added reference to the 4 C's. Added heading in relation to mobile devices. Added reference in relation to procedures for all mobile devices such as smart glasses and smart watches Added - We are a mobile phone free school and follow Mobile phones in schools - GOV.UK guidance.
Nude and semi nude	Changed heading from nude and semi-nude to Nude and Semi-nudes including where generated using AI (In line with KCSIE) Expanded information to include consensual and non consensual Added The term 'images' includes all visual content, such as photographs, videos and livestreams. Added that guidance in Searching Screening and Confiscation Advice for schools will be followed and that any incidents will be fully investigated. Where appropriate, consulting with and referring to relevant external agencies, added that incidents will be recorded, and ongoing education, guidance, and support will be offered to all students involved.
Consent	Strengthened and made clearer
Indicators of abuse	Added exploitation to the title. Additional bullet points added and section improved.
FGM	Added link to mandatory reporting duty
Channel	Contact details updated
Harm outside the Home	Added sentence- We understand that children cannot consent to be criminally or sexually exploited and as such will be treated as victims.
Serious violence	Section strengthened, sentence added - Staff will report any child expressing the intent to use or carry a weapon, to allow for earlier DSL intervention and de-escalation.

Initiation /hazing	Added that this includes initiation or hazing-related violence and rituals, which may involve harassment, abuse or humiliation as a way of initiating a person into a group and may also take place online.
Children with family members in prison	Statistics updated to 193,000 and support available updated to Prisoners' Families Helpline.
Homelessness	Section re written and included temporary accommodation notification
Attendance and children missing education	Added reference to Boltons guidance 'Removing barriers to school attendance' and that home visits may be carried out in certain circumstances when a child is absent
Special education needs	Added that children with SEND can have challenges both online and offline. Added Restrictive interventions including use of reasonable force guidance
Mental Health	Examples added to this sentence – All staff are aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, signs of an eating disorder, suicidal ideation or suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
EYFS	Section strengthened. Updated link to 2026 EYFS guidance.
Domestic abuse	Added stalking and the term "teenage relationship".
Looked After Children and Virtual School	Added – more recognition of previously looked after children
Behaviour and Safeguarding	Added reference to arranging alternative provision guidance and use of restrictive interventions including reasonable force.
Managing allegation against those that work with children and young people	Added – Trainee Teacher Added reference regarding those who are not employed by school
Appendix 1	Removed appendix 1 (shorten version of this policy). We recommend all staff read it in full.
All appendix numbers have changed	
Appendix 2 parents' version of the policy	Now appendix 1 . Added links to endeavour and fortalice Added more examples of child on child
Appendix 3	Now appendix 2 .Changed annex C to Annex B. Removed detail and instead provided the link directly to Annex B.
Appendix 4 Guidance for safeguarding records	Now appendix 3 . Added conversations with parents/carers
Appendix 11	Now Appendix 10 .Updated version of First Steps
Appendix 13	Now Appendix 12. Section strengthened in relation to previously looked after children
Appendix 14	Now Appendix 13. Added link to **Making a Good Referral** document

Principles for Child Protection and Safeguarding Children

PURPOSE AND PRINCIPLES

At **Hardy Mill Primary School** we strive to ensure that all students remain safe and free from harm, and we are committed to playing a full and active part in the multi-Agency response to Child Protection concerns. We recognise that we are an important part of the wider safeguarding system for children and young people. The purpose of this document is to ensure that all our staff are aware of the arrangements that we have in place for safeguarding and promoting the welfare and safety of our students. It provides guidance to help staff who may have concerns about the safety or welfare of a child or young person and sets out our position in relation to all aspects of the Safeguarding and Child Protection process.

SCOPE

This policy applies to all staff, volunteers, trainee teachers, governors/trustees, contractors, visitors and any other adults working on behalf of the school/college. It applies at all times when children and young people are the responsibility of the setting, including on-site, off-site activities, educational visits, alternative provision and online environments.

The purpose of this policy is to ensure that all children and young people are safeguarded from harm and that their welfare is promoted. It outlines our responsibilities and procedures for identifying, responding to and reporting safeguarding concerns.

We recognise our statutory responsibility to safeguard and promote the welfare of children and will fulfil our duties in accordance with relevant legislation and statutory guidance, including:

- The Education Act 2002
- The Children's Wellbeing and Schools Act
- Keeping Children Safe in Education 2026 (KCSIE),
- Working Together to Safeguard Children 2026
- The Early Years Foundation Stage Statutory Framework
- Other relevant safeguarding legislation and local safeguarding partnership arrangements.

This policy should be read alongside all other safeguarding-related policies and procedures, including behaviour, attendance, online safety, staff code of conduct, whistleblowing, SEND and anti-bullying policies.

This policy is publicly available on our website, will be reviewed at least annually and updated as required to reflect changes in legislation, statutory guidance, local safeguarding arrangements and school/college procedures. A condensed version is available for parents/carers (see appendix 1). All staff are asked to sign to say they have read and understood the policy (see appendix 17).

KEY DEFINITIONS AND CONCEPTS

The Children Act 1989 and 2004, states a child is anyone who has not reached their 18th birthday. The commitment to safeguarding and promote the welfare of children however will extend to all children and young people who visit **Hardy Mill** as well as our own students.

The Integrated Front Door (IFD) is the point of contact for enquiries and referrals relating to children made by professionals, families and the public. The IFD is a team of multi-agency professionals. These agencies work together to provide advice and guidance to jointly triage referrals and navigate them to the correct service.

EQUALITY AND DIVERSITY

Promoting equality, diversity and inclusion, and tackling discrimination, are fundamental to safeguarding and promoting the welfare of children. We recognise that some children may be more vulnerable to harm or face additional barriers to recognising abuse or seeking help. We are committed to providing a safe, inclusive environment in which all pupils are valued and respected. We have separate policies and procedures in place to address issues such as bullying, harassment and discrimination. In accordance with the Equality Act 2010:

- We will not unlawfully discriminate against pupils with protected characteristics.
- We will consider the needs of pupils with protected characteristics when assessing safeguarding concerns and providing support.
- We will take reasonable and proportionate steps to remove barriers and address any disadvantages that pupils with protected characteristics may experience.
- We will promote equality of opportunity and foster good relations between different groups within our school community.

Further information about the Equality Act 2010 can be accessed here:

CHILDREN WHO ARE QUESTIONIG THEIR GENDER

We will support children who are questioning their gender in a sensitive, respectful and child-centred way. We will listen to the child's views, wishes and feelings and seek to understand their experiences and circumstances.

We recognise that children who are questioning their gender may be vulnerable and may need additional support. This may include support for their emotional wellbeing, mental health, relationships with family and friends, or experiences of bullying, harassment or discrimination. Bullying is never acceptable. We are committed to preventing all forms of bullying and will respond quickly and appropriately to any concerns.

Requests for Social Transition

Any request relating to social transition will be considered carefully and on an individual basis. Decisions will take account of the child's welfare and best interests, the needs and rights of other pupils, and the school's legal responsibilities. We keep clear records of discussions, assessments and decisions. Staff will not make changes relating to social transition unless these have been considered and agreed through the school's decision-making processes.

Working with Parents and Carers

We recognise the important role that parents and carers play in supporting their children and will involve them in the vast majority of cases. If involving parents or carers may place a child at risk of harm, the Designated Safeguarding Lead (DSL) will decide what action is needed to keep the child safe before any contact is made with parents or carers.

REGULATIONS AND SAFEGUARDING REQUIREMENTS RELATING TO SCHOOL PREMISES

Toilets, showers and changing rooms

For pupils aged 8 years and over, access to toilets, changing rooms and shower facilities will be provided according to their biological sex. Pupils will not be permitted to use facilities designated for the opposite biological sex.

Where a gender questioning child is uncomfortable using facilities designated for their biological sex, we will consider whether suitable alternative arrangements can be made while protecting the privacy, dignity, safety and wellbeing of all pupils.

Pupils aged 11 years and over at the start of the school year will not be required or permitted to undress in front of pupils of the opposite biological sex.

When considering any request relating to social transition, the school will not permit a pupil to access changing facilities designated for the opposite biological sex.

SAFEGUARDING AND PROMOTING WELFARE

No single professional can have a full picture of a child or young person's needs and circumstances. If children, young people and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action. To fulfil this responsibility effectively, all staff will ensure that their approach is child-centred. This means that they will always consider what is in the best interests of the child.

We recognise that students who are repeatedly absent from education, repeatedly removed from lessons, experience multiple suspensions, are on a part-time timetable, are at risk of permanent exclusion, or attend alternative provision may have unmet needs and be more vulnerable to harm. Such pupils may require additional safeguarding support and family help.

The Department for Education (DfE) Keeping Children Safe in Education (2026), states safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

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

We have statutory policies in place that link to safeguarding and promoting the welfare of our students. The list can be found here Statutory policies for maintained schools Details of procedures are contained in our standalone policies and can be requested or accessed via our website. We also refer to a number of additional safeguarding guidance documents which the DfE issue Department for Education.

Child Protection

The welfare of our students is paramount. All children have the right to grow up in a safe environment, free from abuse, neglect and exploitation. Child Protection is part of safeguarding and promoting the welfare of children. It refers to the activity that is undertaken to protect specific children who are suffering or are at risk of suffering significant harm.

Significant Harm

The Children Act 1989 defines *harm* as ill-treatment or the impairment of a child's health or development. Whether harm is considered *significant* is determined by comparing a child's health and development with that which could reasonably be expected of a similar child.

There are no absolute criteria for determining whether harm is significant. Children's Social Care, the police, education, health professionals and other relevant agencies work together to assess concerns and risks. Decisions are made on a case-by-case basis using professional judgement and the available evidence, with the child's welfare being the paramount consideration.

OUR ROLE

- The Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Leads have specific responsibilities for safeguarding and child protection (see Appendix 2).
- All staff have a responsibility to provide a safe environment in which children and young people can learn.

- Safeguarding is everyone's responsibility. All staff play an important role in identifying concerns early, sharing information appropriately and providing support to prevent concerns from escalating.
- All staff are expected to be alert to issues affecting the safety and welfare of children and young people and must report any concerns, regardless of how minor they may appear. It is not the role of staff to investigate concerns.
- We work in partnership with parents and carers and recognise their right to be informed of concerns about their child's welfare or any action taken to safeguard and promote their welfare, unless doing so would place the child at increased risk of harm.
- Children are best protected when professionals work together effectively and share responsibility for safeguarding and promoting their welfare.
- Confidentiality cannot be guaranteed where there are concerns about a child's safety or welfare. Information will be shared appropriately and on a need-to-know basis in accordance with safeguarding procedures and data protection requirements.
- We have robust procedures in place to deter, identify and manage safeguarding concerns, including allegations against adults working with children. Any member of staff with a concern about a child's welfare must follow the procedures set out in this policy.
- We will work closely with Children's Social Care, the police, health services and other agencies to safeguard children and support families when concerns are identified.
- When children disclose abuse or neglect, they will be listened to, taken seriously and supported. Where appropriate, concerns will be referred to Children's Social Care and/or the police for investigation.
- All staff are expected to identify children who may benefit from Family Help and, where appropriate, contribute to assessments and support plans alongside other professionals.
- Teachers, including Headteachers, are expected to safeguard pupils' wellbeing and maintain public trust in the teaching profession in accordance with the Teachers' Standards. The Teachers' Standards 2011
- Support may be provided through the school's pastoral and safeguarding systems, and consideration will be given to whether parents or carers should be informed, provided this does not place the child at additional risk of harm.
- Staff maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the best interests of the child.
- Staff recognise that children may experience prejudice-based harm, including racism, faith-based prejudice, and other forms of discrimination. Staff are alert to the signs and impact of prejudice-based harm and ensure that concerns are considered within safeguarding practice where appropriate.

Record Keeping

Records are kept updated and stored securely. Records are only accessed by those who need to and when file content is shared, this is done in line with Information Sharing Guidance and the Information sharing Duty 2026. All concerns, discussions and decisions made, and the reasons for those decisions, are recorded using an electronic data base- CPOMS. If in doubt about recording requirements, staff should discuss with the Designated Safeguarding Lead (or deputy) and read guidance in appendix 3.

The Designated Safeguarding Lead has oversight of record keeping and is responsible for keeping clear chronologies and picking up any patterns and themes.

Transferring information

The Designated Safeguarding Lead is responsible for transferring Child Protection files to a students new school or college within five days of an in-year transfer or within the first five days of term. This is transferred separately from the main file and a receipt should be obtained. The DSL will provide comprehensive context on high-level risks; such as serious violence, channel support, and AI-related harms prior to the child's arrival. Verbal DSL to DSL consultations will take place to ensure no safeguarding nuance is lost during the transition.

The 'Transferring of Safeguarding Information form' (appendix 9) can be used as a check list and as receipt.

Child Protection records will be retained by the child's last setting until they reach their 25th birthday and 75 years if a child was ever Looked After.

What staff need to know:
All staff are aware of our systems that support safeguarding, and these are explained to them as part of staff induction and staff are provided with this policy along with the following:

- Part one of Keeping Children Safe in Education (2026).
- The staff Code of Conduct policy
- The identity of the Designated Safeguarding Lead and deputies and their role.
- The staff handbook

All our staff receive appropriate safeguarding and child protection training at induction along with online safety training and information including an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring. This is regularly updated. In addition, all staff receive safeguarding and child protection updates (for example, via email, newsletters, and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.
All our staff are aware of the early/family help process and understand their role in it. This includes identifying emerging concerns, liaising with the Designated Safeguarding Lead, sharing information with other professionals to support early identification and assessment and, in some cases acting as the lead professional.
All our staff are aware of the process for making referrals to children's social care (see flowchart- appendix 13).
All our staff know what to do if a child tells them he/she is being abused or neglected. Staff know how to manage the requirement to maintain an appropriate level of confidentiality whilst at the same time liaising with relevant professionals such as the Designated Safeguarding Lead and children's social care. Staff will not promise confidentiality about an allegation of abuse.

If a child or young person is in **immediate danger or is at risk of harm** either during working hours, outside of these hours or during an out of school/college activity a referral will be made to The Integrated Front Door or the out of hours team immediately. To avoid any delay, anybody can make a referral, however our DSL should always be notified. If the student's situation does not appear to be improving the staff member with concerns should press for re-consideration. Concerns should always lead to help for the student.

Responding to a disclosure
It is recognised that a pupil may choose to speak to a member of staff about abuse, neglect or exploitation, or they may disclose information spontaneously, either individually or in a group setting.
In these situations, staff and volunteers are expected to:

- Provide a safe, supportive environment where all pupils, including LGBTQ+ students, feel able to speak about any worries or concerns.
- Listen carefully and allow the student to give their account in their own words.
- Avoid leading questions or attempting to investigate the concern. Where necessary, ask only simple, open or clarifying questions to establish the facts.
- Reassure the pupil that they have done the right thing by speaking up.
- Never promise confidentiality or agree to keep a secret. Explain that the information may need to be shared with people who can help keep them safe.
- Explain that a record of the disclosure will be made and passed to the Designated Safeguarding Lead (DSL).
- Make an accurate, factual record as soon as possible, including the date, time, location, those present, the pupil's words wherever possible, their demeanour, and any actions taken.
- Record any questions asked and the responses given, together with the rationale for any decisions made.
- Recognise that this may not be the first incident of abuse and that the effects of trauma may mean a student is unable to recall events fully or provide details in a clear chronological order.

- Be aware that some students may face additional barriers to disclosing abuse, including those related to disability, communication needs, culture, ethnicity, sex, gender identity or sexual orientation.
- Reflect back using the child's own language where appropriate, to check understanding and avoid misinterpreting what has been said.
- Report the concern to the Designated Safeguarding Lead (or deputy DSL) without delay and follow the procedures set out in this policy. (see Appendix 3)

We recognise that pupils may not feel ready, or know how, to tell someone that they are being abused, neglected or exploited. They may also not recognise that what they are experiencing is harmful. Staff will maintain professional curiosity and speak to the Designated Safeguarding Lead (DSL) or deputy DSL if they have concerns about a child's welfare, even where no disclosure has been made. Staff will seek to build trusted relationships with pupils so that they feel safe, listened to and able to share concerns.

PREVENTION

We take seriously our duty of care, and we are proactive in seeking to prevent our students becoming the victims of abuse, neglect, or exploitation. We do this in several ways:

- Through the creation of an open culture which respects all individuals' rights and tackles bullying and discrimination of all kinds.
- By identifying members of staff who have overall responsibility for safeguarding and child protection matters.
- By promoting British values and offering Relationships Education, Relationships and Sex Education (RSE) and Health Education curriculum to address the issue of child protection in the wider context of safeguarding Relationships Education, Relationships and Sex Education and Health Education guidance.
- By ensuring our Designated Safeguarding Lead receives training and acts as a source of advice and support to other staff.
- By informing students of their rights to be free from harm and encouraging them to talk to staff if they have any concerns.

EARLY/FAMILY HELP

Early Help means providing support as soon as a problem emerges to improve outcomes for children and families and prevent concerns from escalating. We recognise that providing Early Help is more effective than reacting when difficulties become more serious.

In Bolton, we follow the Framework for action and work with families and partner agencies to:

- Identify children and families who may benefit from Early/family Help.
- Assess needs using a whole-family approach.
- Provide or coordinate appropriate support.
- Review progress and outcomes to ensure support remains effective.

Factors which may indicate a student may benefit from Early/Family Help (not exhaustive)		
Misusing drugs or alcohol	Young carers	Mental ill health
Family circumstances such as parental drug, alcohol, mental health and domestic abuse	Is viewing problematic and/or inappropriate online content or developing inappropriate relationships online.	Anti-social behaviour, criminality, gangs/Organised Crime Group (OCG), County lines, including knife crime
Exhibiting early signs of violent, abusive and/or harmful behaviours	Missing education, persistently absent or not in receipt of full-time education	Returned to family from care or stepped down from social care involvement

Is at risk of radicalisation and being drawn into terrorism	Frequent removal from classroom, on part-time timetable, suspensions and at risk of, or has been permanently exclusion	Is at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation
A family member in prison or parental offending	Medical conditions, disabled or special educational needs	Honour or faith based abuse such as FGM or forced marriage
Is going missing	Is pregnant or is a parent themself	Is being privately fostered

We are committed to identifying and responding to the unmet needs and emerging vulnerabilities of our students and their families at the earliest opportunity. We recognise that providing support early can improve outcomes for children and prevent needs from escalating. Our staff understand the Early/family Help process and their role in identifying concerns, sharing information appropriately and working with other agencies to support children and families.

We work to support the wellbeing of children, young people and families by identifying emerging needs early and providing the right support at the right time. We recognise that the needs of family members can affect one another and that some children and families may face additional barriers to accessing support. We will ensure that individual needs and circumstances are considered, including those relating to disability, special educational needs, language, culture, family composition, sex, sexual orientation and gender identity.

Support may be provided through:

- **Community-Based Early Help**, which offers advice, guidance and support to children and families through universal and community-based services where needs are emerging. Where appropriate, staff may initiate or contribute to community based Early Help assessments, plans and reviews, and some staff may act as Lead Practitioner to coordinate support.
- **Targeted Early Help**, which provides coordinated multi-agency support where children and families have additional or more complex needs requiring a planned intervention. Where Community-Based Early Help is not sufficient, or concerns increase, we will consult with the Family Help Service and other relevant agencies to determine whether additional support through Targeted Early Help or a referral to Children's Social Care is required. We recognise that safeguarding is a continuum and will always act promptly where concerns indicate that a child may be at risk of harm.

Bolton's Integrated Front Door aligns Children's Social Care and Early/Family Help. Contact details- 01204 331500 Option 1 Family Help Team, Option 2 Children's Social Care, Option 3 Professional Consultation Line.
The Family help Assessment and review form can be found here: Childrens Portal with guidance also available Quick Start Guide - Partner Early/family Help Assessment
To refer to the Targeted Early/Family Help service an online referral form can be found here

TYPES OF ABUSE AND NEGLECT

Abuse*: a form of maltreatment of a child. Anybody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse. Types of abuse may overlap.*

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.*

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 verbal abuse, such as persistent criticism, belittling, or name-calling, as well as not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing 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.*

Sexual abuse *involves forcing, causing or inciting a child 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, such as acts of penetration, whether that is with part of a person's body or an object (e.g. rape or assault by penetration), and non-penetrative acts such as masturbation, kissing, rubbing, and touching over clothing. Sexual abuse may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online as well as offline, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Children can be sexually abused within the family, an institution or a community setting, and are more likely to know their abuser than not. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it. There are specific offences for children under 13, who can never provide valid consent to sexual activity and there are specific offences which make clear that sexual activity with a child under 16 is an offence, regardless of whether they agreed to that activity.* We are aware of and access Resources for education settings | CSA Centre

Neglect: *the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.* We refer to Boltons Neglect Practice Guidance

INDICATORS OF ABUSE, NEGLECT AND EXPLOITATION

All staff should be alert to the signs of abuse, neglect and exploitation and take appropriate action if they have concerns about a child. Indicators may include, but are not limited to, a student:

- Having unexplained injuries, including bruises, burns, fractures or marks, particularly where there is no satisfactory explanation.
- Giving explanations for injuries that are inconsistent, implausible or change over time.
- Making a disclosure of abuse, neglect or exploitation, either directly or indirectly through conversation, behaviour, play, artwork or written work.
- Displaying sudden or significant changes in behaviour, mood or presentation, including becoming withdrawn, anxious, fearful, aggressive or unusually compliant.
- Experiencing a decline in attendance, engagement, behaviour or educational progress.
- Demonstrating age-inappropriate sexual knowledge, language or behaviour.
- Displaying harmful sexual behaviour or engaging in sexualised behaviour that is not appropriate for their age and stage of development.
- Appearing fearful of, or reluctant to be around, a particular person.

- Having difficulty forming or maintaining friendships, becoming socially isolated, or being prevented from socialising with peers.
- Showing signs of emotional distress, poor mental health, self-harm or suicidal thoughts.
- Presenting with unmet medical needs or frequently missing medical appointments.
- Experiencing unexplained weight loss, poor nutrition, persistent hunger or tiredness.
- Appearing consistently unkempt, inadequately clothed, poorly supervised or lacking appropriate care.
- Being absent from education, regularly missing school or displaying patterns of unexplained absence.
- Showing signs of online harm, child criminal exploitation, child sexual exploitation, county lines involvement, radicalisation or other forms of abuse.

This list is not exhaustive and the presence of one or more indicators does not necessarily mean that abuse, neglect or exploitation is taking place. Staff should consider the child's circumstances as a whole, exercise professional curiosity and remain vigilant to any concerns.

It is not the responsibility of staff to determine whether a child is being abused or neglected. Any concerns about a child's welfare must be reported without delay to the Designated Safeguarding Lead (DSL) or a deputy DSL and managed in accordance with this policy.

GUIDANCE FOR SPECIFIC SAFEGUARDING CIRCUMSTANCES

All staff have an awareness of specific safeguarding areas. Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example, NSPCC offers information for schools and colleges at www.nspcc.org.uk. We access broad government guidance on a range of safeguarding issues via the GOV.UK website, Bolton Safeguarding Partnership website and Greater Manchester Procedures.

DOMESTIC ABUSE

Domestic violence and abuse is: Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are or have intimate partners or family members regardless of gender or sexuality. The abuse can include, but is not limited to:

*Psychological *Physical *Sexual *Financial *Emotional *stalking

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children and young people through seeing, hearing, or experiencing the effects of it within in their home life and/or in their own intimate relationships (teenage relationship abuse).

The Domestic Abuse Act came into force in 2021 and support can be found here. Bolton's Domestic Abuse Handbook will be referred to and can be accessed here.

If we are concerned about domestic abuse, we will take action. This could be contacting local domestic abuse support services such as Endeavour, Fortalice or the Police or the Integrated Front Door. An Early/family Help assessment will be considered in cases with no social care involvement.

OPERATION ENCOMPASS

Encompass is a partnership between the Police and Education. Working together to safeguard children, the Police will inform us after a domestic abuse incident where there are children related to either of the adult parties involved. This enables us to take appropriate steps to safeguard and support students during what could be a difficult day. In its simplest form, they are given some leeway, comfort, support and interventions where appropriate. If Social Care are not working with the family, Early/family Help will be considered to offer a holistic package of support to students and their family.

Operation Encompass Key Adult training has been accessed by the DSL/DDSL. We can also gain free advice and support from the OE Teachers' National Helpline on 0204 513 9990. Resources are available through the Operation Encompass website. See flow chart appendix 14.

CONSENT

Under the Sexual Offences Act 2003, a child under the age of 13 cannot legally consent to any form of sexual activity. Sexual activity involving a child under 13 is a serious safeguarding concern and will require a referral to Children's Social Care through the Integrated Front Door and, where appropriate, the police. The age of consent in England is 16. The Sexual Offences Act 2003 recognises that mutually agreed, non-exploitative sexual activity may take place between young people of a similar age. However, children and young people under the age of 16 may still be vulnerable to abuse, exploitation, coercion or other safeguarding risks. Where concerns arise regarding sexual activity involving young people aged 13 to 15, the Designated Safeguarding Lead (DSL) will consider the individual circumstances of the case. This will include consideration of:

- The age, maturity and understanding of those involved.
- Any difference in age, power, maturity, functioning or experience.
- Whether the relationship is consensual or involves pressure, coercion, exploitation or abuse.
- Any additional vulnerabilities or safeguarding concerns.
- The young person's ability to understand the nature and consequences of their decisions, including consideration of Gillick competence and the Fraser Guidelines where appropriate.

The DSL may seek advice from the Safeguarding in Education Team, the Integrated Front Door, health professionals or other relevant agencies when determining the most appropriate course of action.

RELATIONSHIP AND SEX EDUCATION

It is compulsory to teach relationships education in primary schools, and relationships and sex education in secondary schools. This area of work will support our students with a variety of issues that will reduce them being at risk of harm and promote them having better life chances. Our teachers are on hand and prepared to handle any safeguarding issues that may arise during these lessons and will report any concerns that are identified to the Designated Safeguarding Lead without delay. We follow statutory DFE guidance RSE guidance 2026.

CHILD ON CHILD ABUSE (including harassment and violence)

Children can abuse other children. This is generally referred to as child-on-child abuse and can take many forms. This can include (but is not limited to):

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- discriminatory behaviour, including racism, faith-targeted abuse and other prejudice-based incidents
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- physical assault and harm, or the threat of harm with a weapon
- causing someone to engage in sexual activity without consent
- harmful sexual behaviour, sexual violence and sexual harassment – which may include misogyny/misandry.
- up skirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or harm
- consensual and non-consensual sharing of Nudes and Semi Nudes including those generated by AI
- abuse in intimate personal relationships between children (also known as teenage relationship abuse)
- initiation/hazing type violence and rituals

We recognise it is more likely girls will be the victims of sexual harassment and sexual violence and more likely it will be perpetrated by boys but that all child-on-child abuse is unacceptable and will be taken seriously. We also recognise that even if there are no reports of child-on-child abuse, such abuse may still be taking place and is simply not being reported.

Child on Child abuse will never be accepted or dismissed as 'children being children'. Any concerns whether this is thought to have taken place on or off site will be reported to the DSL (or deputy) this will be investigated, dealt with and recorded. This may include a referral to the Integrated Front Door and the police to make sure that the children

and young people affected get the help and protection they need. Should Social Care intervention not be required Early/family Help will be offered.

Staff are aware of the harm caused by bullying and will follow our anti-bullying procedures where needed. However, there will be occasions when a student's behaviour warrants a response under child protection rather than anti-bullying procedures.

Our PSHE curriculum aims to prevent child on child abuse and opportunities are provided for students to report any concerns. However, should we identify child on child abuse and identify risk of significant harm, we will refer to the Integrated Front Door and the police to make sure that the children and young people affected get the help and protection they need. Should the case not require Social Care intervention, Early Help may be offered.

HARMFUL SEXUAL BEHAVIOUR, SEXUAL VIOLENCE AND SEXUAL HARASSMENT

*Sexual violence and harassment can occur between two children of **any** age and sex both on and offline. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children and young people who are victims of sexual violence and harassment will likely find the experience stressful and distressing. This will, likely, adversely affect their educational attainment.*

Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and both in and out of school. Some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBTQ+ children are at greater risk.

What is Sexual violence and sexual harassment?

Sexual violence

When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

Rape: *A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus, or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.*
Assault by Penetration: *A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.*
Sexual Assault: *A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.*

Sexual harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. 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.

Sexual harmful behaviour, sexual violence and sexual harassment can include:

- Unwanted sexual comments, remarks and messages, including online and through social media, such as sexualised comments, sexual jokes, sexual remarks about a person's appearance or clothing, and the use of sexualised language.
- Sexual jokes, taunting, banter, misogynistic comments and other forms of behaviour that create a hostile or intimidating environment.
- Physical behaviour, such as deliberately brushing against another person, touching without consent, interfering with someone's clothing, or displaying images, photographs or drawings of a sexual nature.
- Online sexual harassment, including unwanted sexual messages, requests for sexual content, sexualised comments and online abuse.
- Non-consensual sharing, creating or distribution of nude or semi-nude images and videos.
- Sexualised bullying, including behaviour that humiliates, intimidates or targets another person in a sexual way.
- Abuse within intimate personal relationships between peers.

- Sexual exploitation, coercion, manipulation, threats or intimidation.
- Upskirting, down-blousing or other forms of image-based abuse.
- Sexual violence, including sexual assault, rape and assault by penetration.

(Also see Consent section)

Sexual harassment, sexual violence and harmful sexual behaviour can occur in person, online or through a combination of both. Such behaviour is never acceptable and will be taken seriously, with all concerns managed in accordance with this policy and relevant statutory guidance.

OUR CULTURE

We are committed to creating and maintaining a culture where sexual harassment, sexual violence and online sexual abuse are not tolerated. We recognise the importance of identifying concerns early and taking appropriate action to protect our students.

- We make it clear that sexual violence, sexual harassment and harmful sexual behaviour are never acceptable and will not be tolerated.
- We do not dismiss or tolerate sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys". We recognise that such attitudes can create a culture of unacceptable behaviour, misogyny and an unsafe environment for children.
- We challenge inappropriate behaviour, including behaviour that may be harmful or potentially criminal, such as unwanted sexual touching, grabbing bottoms, breasts or genitalia, flicking bras, sexist language, sexualised name-calling, and upskirting.
- We do not rely solely on children making disclosures. Staff remain vigilant to signs that a child may have experienced abuse or harassment, including changes in behaviour, attendance, presentation or emotional wellbeing, and will act on any concerns.
- We ensure that pupils understand how to report concerns and know which trusted adults they can speak to if they are worried about themselves or someone else. Regular reminders are given in assemblies about ways to report and who trusted adults are.
- We are committed to preventing, identifying and responding to harmful sexual behaviour at the earliest opportunity.
- Through our PSHE and RSE curriculum, pupils learn about healthy and respectful relationships, consent, appropriate boundaries, sexual harassment, sexual violence, online safety and how to seek help and support. We provide opportunities for discussion of issues that pupils may find difficult, including consent and the sharing of nude and semi-nude images.
- We follow the guidance set out in Keeping Children Safe in Education (2026), relevant Greater Manchester safeguarding procedures, and any associated local safeguarding guidance.
- We promote the NSPCC's dedicated helpline for victims of abuse in education settings and encourage pupils to access appropriate sources of support.
- We recognise that sexual harassment, sexual violence and abuse can have a significant impact on a child's wellbeing, safety and educational experience, and may interfere with their rights and freedoms.

We ensure that all staff receive appropriate training so that they are able to:

- Understand the definitions of harmful sexual behaviour, sexual harassment and sexual violence, including online sexual abuse.
- Recognise the signs and indicators of child-on-child sexual abuse.
- Respond appropriately and consistently to incidents of harmful sexual behaviour, sexual harassment, sexual violence and online sexual abuse.
- Engage pupils in sensitive conversations and respond to disclosures in a supportive and professional manner.

- Understand the school's procedures for reporting, recording and responding to concerns relating to child-on-child abuse.
- Contribute to a culture where sexual harassment and sexual violence are not tolerated and where students feel safe to report concerns.

Our behaviour policy will be followed including sanctions when appropriate, to reinforce a culture where sexual abuse, violence, harassment and online sexual abuse are not tolerated. Also see our Online Safety and Anti Bullying policies.

How we respond to sexual violence or sexual harassment:

- Sexual violence, sexual harassment and harmful sexual behaviour are never acceptable and will not be tolerated.
- All reports of sexual violence, sexual harassment or harmful sexual behaviour will be taken seriously and responded to promptly, proportionately and in line with safeguarding procedures.
- Advice, support and guidance may be sought from the Safeguarding in Education Team, Children's Social Care, the Police and other specialist services, where appropriate.
- Where a child is suspected to have suffered, or is at risk of suffering, significant harm, an immediate referral will be made to Children's Social Care and, where appropriate, the Police.
- We will take all reasonable steps to protect and support the victim, ensuring they feel safe, listened to and supported throughout the process.
- We will carefully consider the wishes of the victim while balancing these against our safeguarding responsibilities towards the victim and other children. Where action is taken that differs from a victim's wishes, this will be explained sensitively and appropriate support will be provided.
- We will complete and regularly review safety plans, where required, to protect all pupils involved.
- We will put appropriate measures in place without delay to safeguard children. This may include adjustments to timetables, supervision arrangements, seating plans, movement around the school site, transport arrangements, break times, educational provision and before- and after-school activities.
- Staff will listen carefully to reports, avoid leading questions and will not investigate allegations themselves. Concerns will be passed to the Designated Safeguarding Lead (DSL) without delay.
- We will ensure that victims are not made to feel responsible for the abuse, harassment or violence they have experienced and will never suggest that they are creating a problem by making a report.
- Appropriate support will be offered to the student accused, recognising that they may also have unmet needs, vulnerabilities or safeguarding concerns that require assessment and intervention.
- We will consider the impact on any witnesses and other pupils who may have been affected and ensure that appropriate support is available.
- Where statutory services are not involved, support may be provided through Family Help, pastoral support, targeted interventions or other appropriate services.
- We will work closely with parents and carers, where appropriate, while ensuring that doing so does not place any child at increased risk of harm.
- Our Behaviour Policy will be applied consistently, and appropriate sanctions and interventions will be implemented where necessary to reinforce a culture in which sexual violence, sexual harassment and harmful sexual behaviour are not tolerated.
- We will signpost pupils and families to specialist services and support agencies where appropriate.
- All concerns, disclosures, decisions, actions and outcomes will be recorded accurately and reviewed by the DSL to identify patterns, inform interventions and ensure that children receive the support they need.
- We will regularly review our safeguarding practice, curriculum and culture to ensure that sexual violence, sexual harassment and harmful sexual behaviour are identified, challenged and addressed effectively.

*See flow chart Appendix 15.

Where a report involves rape or assault by penetration, the alleged perpetrator will normally be removed from any shared classes with the victim whilst enquiries are ongoing. We will consider what arrangements are needed to keep the victim and student accused appropriately separated during the school day, at school activities and, where appropriate, on transport. These arrangements are made to safeguard all children involved and do not imply guilt. For all other reports of sexual violence or sexual harassment, the need for separation and any additional safeguarding measures will be considered on a case-by-case basis. Where bail conditions, court orders or other legal restrictions are in place, we will take reasonable steps to ensure they are followed.

ONLINE SAFETY

Online safety is an integral part of safeguarding. Our Online Safety Policy sets out how we keep pupils safe when using technology and accessing the internet. We recognise that children may be exposed to a range of online risks, including cyberbullying, online abuse, exploitation, harmful content, misinformation, disinformation and AI-generated content. Cyberbullying will be treated as seriously as any other form of bullying and managed in accordance with our Behaviour and Anti-Bullying Policies.

We have appropriate filtering and monitoring systems in place to help protect pupils from harmful and inappropriate content. These systems are reviewed regularly, and staff are trained to identify and respond to online safety concerns.

Through our curriculum, including PSHE, RSE and Computing, pupils are taught how to stay safe online. This includes understanding the risks associated with online content, contact, conduct and commerce.

We work in partnership with parents and carers to promote online safety and will always consider online risks when responding to safeguarding concerns.

Should we have any concerns we will:

- Refer to the Department of Education guidance on Teaching on line safety in schools (2023), Greater Manchester Procedures and UK Council for child internet safety (UKCCIS).
- Report to CEOP a law enforcement agency that keeps children and young people safe from sexual exploitation and abuse- Reporting link or Tel 0800 1111
- We access resources from UK safer Internet and Safeguarding in Schools | SWGfL to keep students safe online. We will also encourage our students/parents/carers to anonymously report online child sexual abuse imagery and videos to the safer internet Hotline.
- Report any harmful content to - www.reportharmfulcontent.com

We recognise the increasing use of generative artificial intelligence (AI) and the potential safeguarding risks associated with its misuse. In line with Department for Education guidance, we ensure that our filtering and monitoring systems consider risks relating to AI-generated content and that staff remain alert to emerging online safety concerns.

See our online safety policy and AI Policy.

Mobile devices

We are a mobile phone free school and follow Mobile phones in schools - GOV.UK guidance.

See our Mobile Phone and Smart Technology Policy.

NUDE AND SEMI NUDE INCLUDING WHERE GENERATED BY AI

Sharing of consensual and non-consensual nude and semi-nude images and/or videos refers specifically to the creation, sending or posting of nude images and/or videos including those generated using AI by young people under the age of 18. The term 'images' includes all visual content, such as photographs, videos and livestreams. When responding to an incident we will follow guidance in Searching Screening and Confiscation Advice for schools

and Sharing nude and semi nudes: advice for education settings 2024. Any incident will be fully investigated. Where appropriate, we will consult with and refer to relevant external agencies, including the Police and the Integrated Front Door. The incident will be appropriately recorded, and ongoing education, guidance, and support will be offered to all students involved.

We also utilise resources through the SWGFL So You Got Naked Online and promote the Report Remove tool whereby children, young people and adults can report intimate images of them that are circulating social media and ensure they are taken down.

See our online safety Policy, AI policy and mobile and smart technology policy.

HARM OUTSIDE THE HOME

Child Criminal Exploitation /County Lines

Child Criminal Exploitation (CCE) is a form of abuse where children and young people are manipulated, coerced or deceived into criminal activity for the benefit of others. This may include involvement in county lines, gangs, organised crime groups and drug networks. County lines is a form of criminal exploitation in which organised criminal groups use dedicated mobile phone lines to move and supply drugs, often from urban areas to suburban, rural and coastal locations. Children may be groomed, threatened or exploited to transport drugs, money or weapons and may be trafficked away from their local area. Children involved in county lines activity may be required to stay in temporary accommodation, including hotels, short-term rental properties or the homes of vulnerable adults. Criminal groups may take over the home of a vulnerable person to facilitate criminal activity, a practice known as 'cuckooing'.

Indicators of Child Criminal Exploitation may include going missing from home or school, unexplained absences, a decline in educational engagement, unexplained money or gifts, multiple mobile phones, increased secrecy, changes in behaviour, or association with older individuals or groups involved in criminal activity.

Staff will remain vigilant to the signs of Child Criminal Exploitation and will report any concerns to the Designated Safeguarding Lead (DSL) without delay.

If we have any concerns regarding exploitation we will refer to guidance provided by the Home Office and Greater Manchester procedures along with Multi agency practice principles for responding to exploitation and extra familial harm. We will record the concerns and if we believe the threshold is met for statutory intervention refer to The Integrated Front Door. Should Social Care intervention not be required Early/family Help will be offered.

The Designated Safeguarding Lead (and any deputies) is aware of the National Referral Mechanism and will consider if a notification is required through the Integrated Front Door. Like other forms of abuse and exploitation, Child Criminal Exploitation (CCE):

- Can affect any child or young person (male or female) under the age of 18.
- Can affect vulnerable adults aged 18 and over.
- Can involve force, coercion, manipulation, control, intimidation and/or enticement, and is often associated with violence or threats of violence.
- Can be perpetrated by individuals or groups, males or females, and by both children and adults.
- Is characterised by an imbalance of power between the victim and the perpetrator(s), which may arise from factors such as age, gender, cognitive ability, physical strength, status, access to resources or other vulnerabilities.
- May involve the exploitation of children through county lines activity, gangs, organised crime groups or local criminal networks.
- Can have a significant impact on a child's physical health, emotional wellbeing, safety, education and future outcomes.

Staff will be alert to the signs of Child Criminal Exploitation and will report any concerns to the Designated Safeguarding Lead (DSL) or a deputy DSL without delay.

Child Sexual Exploitation (CSE):
The definition of Child Sexual Exploitation is as follows:
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.

Technology is widely used by perpetrators as a method of grooming and coercing victims, often through social networking sites. More information about Child Sexual Exploitation is available on the Bolton Safeguarding Children Partnership website, Greater Manchester Procedures , Preventing Child Sexual Exploitation | The Children's Society and staff are also aware of the Department for Education's Child sexual exploitation: guide for practitioners.

If we have any concerns regarding exploitation we will refer to guidance provided by the Home Office and Greater Manchester procedures along with Multi agency practice principles for responding to exploitation and extra familial harm. We will record the concerns and if we believe the threshold is met for statutory intervention refer to The Integrated Front Door. Should Social Care intervention not be required Early/family Help will be offered.

We will also complete the Police Partner Agency form (gained from the schools extranet) to share any information we have in relation to child exploitation (criminal or sexual).

We will work in partnership with the Complex Safeguarding Team, If the student becomes allocated to a Complex Safeguarding Support Worker or Social worker within the team.

We will share appropriate information as requested by the CEAM (Child Exploitation and Missing) panel via the Local Authority Safeguarding Education Team.

Serious Violent Crime
All staff should be aware of the indicators that may suggest a child is at risk of, or involved in, serious violence. These may include increased absence from school, changes in friendships or associations with older individuals or groups, a significant decline in wellbeing, signs of assault or unexplained injuries, involvement in drugs or alcohol, unexplained money, gifts or possessions, and indicators of criminal exploitation or gang involvement.

Any indication that a child is carrying, has access to, or intends to use a weapon will be treated as a serious safeguarding concern and reported to the DSL immediately.

We will ensure that we carry out **'justified, proportionate and reasonable'** searches in our school where appropriate following the guidance on Searching, Screening and Confiscation available from the DFE. Guidance on gangs and youth violence can be found here.

More information can be found in our behaviour policy.

We will work in partnership with the Police, Children's Social Care, Family Help Services and other relevant agencies to identify timely intervention for our students at risk of exploitation and violent crime. We utilise Education Resources from Greater Manchester Violence Reduction Unit and will consult the NPCC- When to call the police. Intelligence will be shared with the police using the intel form above (see exploitation section).

Hazing/Initiation

Hazing or initiation practices are activities expected of someone joining or participating in a group that may involve harassment, humiliation, abuse, degradation or danger, regardless of a person's willingness to take part.

Such practices can occur in a range of settings, including sports teams, friendship groups, gangs and other organised groups. They may involve physical, emotional, psychological or sexual harm and, in some cases, may constitute criminal behaviour. This includes initiation or hazing-related violence and rituals, which may involve harassment, abuse or humiliation as a way of initiating a person into a group and may also take place online.

Staff will remain alert to signs of hazing or initiation practices and will respond in line with this policy and the school's Behaviour Policy. Where appropriate, concerns will be referred to Children's Social Care, the Police and/or Family Help Services.

Modern Day Slavery & Trafficking

Modern Slavery is a term used to describe anyone, including children who are exploited for criminal gain. The impact can be devastating for the victims. Modern Slavery comprises slavery, servitude, forced and compulsory labour and human trafficking. More information and the guidance we follow can be found here.

COMMUNITY SAFETY AND LIAISING WITH THE POLICE

In emergencies we will ring 999. NPCC- When to call the police supports us to understand when we should consider calling the police and what to expect when we contact the police.

Community safety incidents in the vicinity, such as people loitering and unknown adults talking to students, will be reported to the police and a school safe incident report (gained from the extranet) completed and uploaded to the Extranet to share with other education settings.

HONOUR OR FAITH BASED ABUSE (Including Female Genital Mutilation and Forced Marriage)

So-called 'honour-based' abuse (HBA) includes 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. Abuse committed in the context of preserving 'honour' often involves a wider network of family and community pressure and can include multiple perpetrators. It is important that we are aware of this dynamic and additional risk factor when deciding what action to take. All forms of so-called Honour based abuse (regardless of the motivation) will be handled and escalated as appropriate.

If our staff have concerns about HBA they will speak to the Designated Safeguarding Lead (DSL) who will refer to The Integrated Front Door. Should Social Care intervention not be required Early/family Help will be offered.

Information on Breast Ironing and Forced Marriage is available here:
Forced Marriage and Breast Ironing

FEMALE GENITAL MUTILATION (FGM)

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

Indicators of risk:

- Victims are likely to come from a community that is known to practice FGM.
- Any girl born to a woman who has been subjected to FGM.
- Any girl who has a sister who has undergone FGM.
- Girls taken abroad at start of school holidays.
- Parents state that they or a relative will take the child out of the country for a prolonged period.
- A professional hears reference to FGM in conversation e.g., a child may tell other children about it.

Indicators of FGM:

- Girl may have difficulty walking, sitting or standing.
- May spend longer in the bathroom or toilet owing to difficulties in urinating.

- Recurrent urinary tract infections or complaints of abdominal pain.
- Spending longer periods away from the classroom.
- Refusing to participate in P.E. regularly without a medical note.
- Prolonged absence from school with noticeable behaviour changes on return.

FGM Mandatory Reporting Duty
Section 5B of the Female Genital Mutilation Act 2003 (as inserted by Section 74 of the Serious Crime Act 2015) places a statutory duty on teachers to report to the Police where, in the course of their professional duties, they either:

- are informed by a girl under the age of 18 that an act of FGM has been carried out on her; or
- observe physical signs which appear to show that FGM has been carried out on a girl under the age of 18 and have no reason to believe that the procedure was necessary for her physical or mental health or for purposes connected with labour or birth.

In such cases, the teacher must make a report to the Police and inform the Designated Safeguarding Lead (DSL). All concerns relating to FGM will be managed in accordance with safeguarding procedures and statutory guidance.

See flow chart in Appendix 16

- Mandatory reporting duties can be found here
- Statutory guidance on FGM 2020 can be found **here**
- Online E- Learning training on FGM is available here

RADICALISATION AND EXTREMISM

Radicalisation refers to the process by which a person comes to support terrorism or extremist ideologies. There is no single profile of a person who may be vulnerable to radicalisation. Vulnerability can arise from a combination of factors, including personal circumstances, family influences, peer relationships and online activity. The internet and social media can play a significant role in exposing children and young people to extremist content and influences.

Staff are alert to changes in behaviour, presentation and circumstances that may indicate a child is vulnerable to radicalisation or extremism and will act on any concerns in accordance with this policy.

Prevent
Schools and colleges are subject to a duty under Section 26 of the Counter-Terrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism. This is known as the ***Prevent Duty****.*

We understand the risks affecting children and young people and are committed to identifying and supporting those who may be vulnerable to radicalisation. This includes vulnerability to Islamist extremism, Extreme Right-Wing extremism and online extremism.

As part of our Prevent Duty, the Designated Safeguarding Lead (DSL) will:

- Undertake Prevent and Channel awareness training and understand how to make a referral here.
- Provide advice and support to staff on protecting children from the risk of radicalisation.
- Ensure appropriate filtering and monitoring systems are in place to safeguard children from extremist and terrorist material online.
- Ensure the Prevent Duty is met through a risk-assessed approach.
- Ensure staff receive appropriate safeguarding training and understand the definitions of radicalisation, extremism and terrorism.
- Prevent Guidance (2023) summarises the requirements for education.

We refer to managing risk of radicalisation and utilise the 'Educate Against Hate' website which provides us with information, tools and resources to recognise and address extremism and radicalisation.

Support and guidance will be gained from Bolton Councils Safeguarding Against Harmful Radicalisation handbook and community.safety.services@bolton.gov.uk.

Channel

Channel is a multi-agency programme that provides early intervention and support to individuals who may be vulnerable to being drawn into terrorism. It provides a mechanism for schools to refer concerns where a child may be at risk of radicalisation.

Channel awareness guidance will be accessed from the home office here along with The Home Office Prevent and Channel Fact Sheet

Any concerns regarding radicalisation will be discussed with the DSL without delay. Where appropriate further advice will be sought and if required a Channel referral made in accordance with local and national procedures.

Schools can seek advice and support from: community.safety.services@bolton.gov.uk . Bolton Channel Panel referrals should be sent to: Channel.project@gmp.police.uk

CHILDREN WITH FAMILY MEMBERS IN PRISON

Approximately 193,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation, and poor mental health.

Children with family members in prison may be vulnerable to poor educational, emotional and social outcomes; therefore, the school will provide sensitive, trauma-informed support and consider the need for Early/Family Help and other appropriate interventions. Families can also be signposted to support from the Prisoners' Families Helpline that offers free, confidential support and advice for families Prisoners' Families Helpline.

HOMELESSNESS

We recognise that homelessness, housing instability and living in temporary accommodation can have a significant impact on a child's safety, welfare, wellbeing, attendance and educational outcomes. Being homeless or at risk of homelessness may increase a child's vulnerability and present safeguarding concerns.

The Designated Safeguarding Lead (DSL) and deputies will be aware of local referral pathways and will work with the Local Housing Authority and other relevant agencies to ensure children, young people and families receive appropriate support at the earliest opportunity. Indicators that a family may be at risk of homelessness can include household debt, rent arrears, domestic abuse, anti-social behaviour, family breakdown or being asked to leave accommodation.

Where we are notified that a child has been placed in temporary accommodation, this information will be used to help safeguard and promote the child's welfare and educational outcomes. Such notifications do not replace existing safeguarding responsibilities and, where there are concerns that a child has been harmed or is at risk of harm, a referral to Children's Social Care will be made in accordance with local safeguarding procedures. Where social care are not involved Early/family help will be offered.

MENTAL HEALTH

All staff are aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, signs of an eating disorder, suicidal ideation or suicide. They could also 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 mental health diagnosis. Our staff, however, are well placed to observe children and young people day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health difficulty or may be at risk of developing one.

Where children and young people have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences (known as ACE's), this can have a lasting impact throughout childhood, adolescence and into adulthood. It is important that our staff are aware how experiences, can impact on behaviour and education.

We promote positive emotional wellbeing in a number of ways, these include building resilience, promoting healthy lifestyles and recognising what a healthy relationship is.

Children and young people requiring mental health support.
We recognise that we have an important role to play in supporting the mental health and wellbeing of our students.

We have specific staff who are trained to identify possible mental health difficulties and are aware of support services available. We signpost to: Bolton' s The *Be Kind to My Mind* Website and refer to Bolton's Suicide and Self harm pathway located in the professionals area of the website.

Where a student requires support with their mental health/ emotional wellbeing we will:

- Phone 999 in an emergency and follow the pathway above.
- Contact the student's parent/carer and advise if medical attention is needed.
- Consider if a referral is required to The Integrated Front Door and/or CAMHS.
- Complete an Early/family Help assessment and support the student/family by using the Early/family Help process.
- Consider if a safety plan is required to help protect the student and others.
- Access a range of advice and support from specialist mental health services to help us to identify what extra support can be provided.

More information is available at mental health and behaviour in school's guidance. Resources are also available here.

Please see Mental Health and Wellbeing Policy and Wellbeing at Hardy Mill section of the school website for further information.

Behaviour and safeguarding
We are aware that a student's behaviour may be communicating that they could have suffered from abuse, neglect and exploitation. The behaviour that is being displayed could be 'distressed behaviour'.

If we have serious concerns about a student's behaviour, we will follow our behaviour policy and will also consider whether a multi-agency assessment such as an Early/family help assessment or statutory assessment is required.

Where a student is placed in an alternative provision, we follow Arranging Alternative Provision - guide for LAs and schools. We understand that we continue to be responsible for the safeguarding of that student. We know where the student is based during school hours and will take steps to gain written information to ensure the provision is a safe environment. We regularly review the provision to ensure this is meeting the child's welfare and educational needs.

We follow Boltons Inclusive Practice Handbook (found on the Extranet) and refer to the DfE Behaviour Guidance (2024) Behaviour in schools and Restrictive interventions guidance.

For more information see our behaviour policy

ATTENDANCE AND CHILDREN WHO ARE MISSING EDUCATION
We recognise that regular attendance is essential to safeguarding and promoting the welfare of children. Children who are absent from education, particularly on repeated occasions or for prolonged periods, may be at increased risk of abuse, neglect, exploitation, mental health difficulties, radicalisation, family harm or other safeguarding concerns.

We will monitor attendance closely and respond promptly to all unexplained absence. Particular attention will be given to children who are persistently absent or severely absent, and staff will work with children, families and partner agencies to identify and address any barriers to attendance using Boltons' Removing barriers to school attendance' document located on the schools extranet. We also follow the Department for Education's statutory guidance Working together to improve school attendance - GOV.UK and will take a whole-school approach to promoting good attendance**.**

We maintain admission and attendance registers in accordance with statutory requirements. Where a pupil is removed from roll, we will do so only in accordance with the **School Attendance (Pupil Registration) (England) Regulations 2024** and local authority procedures. Appropriate notifications will be made to the local authority where required. Guidance for schools on removing a pupil from the school roll

We complete the web-based form as soon as one of the grounds for deletion has been met and not later than the date on which the pupils' name is deleted from the register - http://www.bolton.gov.uk/schoolsadminremove

We will ensure that reasonable enquiries are made to establish the whereabouts of any child who is absent from education and whose location is unknown. Children will not be removed from roll unless a lawful ground for deletion has been established. The school will work closely with the local authority's Children Missing Education (CME) service and other relevant agencies to locate and safeguard children who are missing education.

If child is believed to have left Bolton with no forwarding address of travel evidence a CME 1A form will be completed and sent to onrollgonemissing@bolton.gov.uk .The child remains on role until reasonable checks have been carried out to ascertain the where abouts under 9(1)(i) School Attendance(Pupil Registration)(England) Regulations 2024 (one of the 15 grounds must apply). Any other related CME enquires are emailed to: childrenmissingeducation@bolton.gov.uk

If a student is absent, a home visit may be undertaken to establish contact and ensure the child's safety and wellbeing. For any student who is absent and has a child protection plan in place or is looked after but placed at home, we will submit the online form to the Early Intervention Service on the first day of absence before 10:30am. School User Guides – Bolton Council The Early Intervention Service duty team will then conduct a home visit the same day.

Where persistent or severe absence continues despite support and intervention, the school will consider whether the circumstances may indicate neglect or another safeguarding concern and will make appropriate referrals in line with local safeguarding procedures.

Further information can be found in our Attendance Policy.

CHILDREN GOING MISSING FROM SCHOOL SITE

If a child leaves the school site without permission or the child cannot be located the Headteacher or member of the Senior Leadership Team will be informed. All efforts will be made to locate the child and parents will be informed. The risks will be assessed, such as age and vulnerability of the child and any associated risks i.e. self-harm or exploitation and if appropriate the police will be contacted. We will follow the procedures outlined in Boltons Missing Protocol (accessed from the extranet).

LATE COLLECTION OR NON-COLLECTION OF A CHILD AT THE END OF THE SCHOOL DAY

If a parent/carer does not arrive to collect a child, efforts to contact the parent/carer and all other emergency contacts will be made. If a child has a social worker, social care will be contacted. If all efforts have been exhausted, where possible we will make a home visit, if this is unsuccessful then the police will be contacted. Depending on the reason for the late/non collection we will monitor the situation and if this re-occurs Early/family Help or a referral to the Integrated Front Door will be considered.

LOOKED AFTER CHILDREN AND PREVIOUSLY LOOKED AFTER

A looked after child is a child who is in the care of a local authority or who is provided with accommodation by a local authority for a continuous period of more than 24 hours, in accordance with Sections 20 and 21 of the Children Act 1989, is subject to a care order under Part IV of the Children Act 1989, or is subject to a placement order.

We will ensure that appropriate staff have the information they need in relation to a child's looked after status, care arrangements and contact arrangements with parents or others who have parental responsibility. We will also ensure that staff understand the levels of authority delegated to carers by the local authority and will work closely with relevant agencies to safeguard and promote the child's welfare and educational achievement.

We recognises the particular vulnerabilities and educational needs of looked after and previously looked after children and will work to ensure they receive appropriate support to achieve positive outcomes.

The Designated Teacher

Our Designated Teacher is Mrs Jo Briggs and she is responsible for promoting the educational achievement of looked after and previously looked after children. The Designated Teacher will work with the local authority and other relevant agencies to promote the educational achievement, attendance and wellbeing of looked after children. In accordance with the Children and Social Work Act 2017, the Designated Teacher also has responsibility for promoting the educational achievement of previously looked after children, including those who have left care through adoption, a special guardianship order or a child arrangements order.

The Designated Teacher chairs and leads on Personal Education Plans (PEP) to make sure the child's progress towards education targets is monitored. For further information on the role of the Designated Teacher please see Appendix 12 and the following link.

Virtual School

The Virtual School in Bolton is led by the Virtual School Head Lindsay Nelson. The Virtual School exists to support and challenge all those involved in the education of Looked After Children. The Virtual School team will work in partnership with the child or young person's educational setting to ensure that they are supported to fulfil their potential at all stages of their education.
The team will ensure that they are receiving a suitable education, wherever they are living, and monitor their attendance, attainment and progress.

The Designated Teacher works with the Virtual School to ensure that the Looked After Children in their education setting have an accurate and reflective Personal Education Plan (PEP) which gives an overview of their learning and monitors their attainment and progress. Pupil Premium Plus is closely monitored to ensure that it is being utilised to support the needs identified in the PEP.

The Virtual School also have a statutory duty to promote the education of Previously Looked After Children. The service will provide information advice and guidance to education establishments and their families.

In addition to this the Virtual School also has a non-statutory responsibility to promote the educational outcomes including attendance, attainment and progress of children with a social worker and those living under kinship care arrangements. More information on the Virtual School can be found here.

PRIVATE FOSTERING

By law the Local Authority must be notified when parents make arrangements for their child to be cared for by friends, neighbours or extended family for more than 28 days. When parents make plans for their child to be cared for like this it is called a Private Fostering Arrangement.

If a member of staff believes a child may be privately fostered, they must inform the Designated Safeguarding Lead, who will contact the Integrated Front Door. More information can be found here.

SPECIAL EDUCTIONAL NEEDS AND DISABILITIES

Children with Special Educational Needs and Disabilities (SEND) can face additional safeguarding challenges both online and offline. We recognises that children with SEND may be more vulnerable to abuse, neglect, exploitation and bullying and may experience barriers to reporting concerns.

The school will ensure that:

- Staff are aware that children with SEND may be at heightened risk of abuse and neglect.
- Assumptions are not made that indicators of possible abuse, such as behaviour, mood changes, injuries, attendance concerns or communication differences, are solely related to a child's SEND without further exploration.
- Staff remain alert to the fact that children with SEND may be disproportionately impacted by bullying, abuse, neglect, exploitation, online harms and child-on-child abuse, without outwardly displaying signs.
- Communication barriers do not prevent children from expressing their views, wishes and feelings, and staff will use appropriate strategies and support to facilitate effective communication.
- The Designated Safeguarding Lead (DSL) and Special Educational Needs Co-ordinator (SENCO) work closely together whenever there are safeguarding concerns to ensure that appropriate support and intervention are provided.

We recognise that a child's SEND must never be used as a reason to minimise, dismiss or overlook safeguarding concerns. We refer to guidance on Restrictive interventions including use of reasonable force guidance and Reducing the need for Restraint to supporting students. We also signpost families to Bolton's SEND local Offer and refer to SEND Code of Practice 0-25yrs, and Supporting Pupils with Medical Conditions.

See our SEND policy.

THE CHILD'S VOICE AND DAILY LIVED EXPERIENCE

We are proactive and take positive steps to inform students of their rights to safety and protection and the options available to express their fears or concerns. We have systems in place to ascertain our students wishes and feelings and understand their daily lived experiences. Where there is a safeguarding concern, we seek the views of the student. All our systems operate with the students' best interests at heart. Tools and resources we may use are available here. Children and young people can report a worry or concern in a number of ways: telling a trusted adult, placing a note in the KS2 concerns box, joining the Mindful Monday meetings. We regularly remind students of the methods they can use to report concerns and will listen carefully, treat all concerns seriously, and take appropriate action in response to any concerns identified.

EARLY YEARS FOUNDATION STAGE (EYFS)

We ensure that the relevant safeguarding and welfare requirements of the EYFS statutory framework for group and school-based providers are met.

We recognise that young children may be particularly vulnerable and will ensure that appropriate safeguarding arrangements are in place that take account of the specific needs of EYFS children, including:

- Suitable staffing levels and supervision arrangements.
- Staff holding the appropriate qualifications and training, including paediatric first aid where required.
- Effective procedures for managing children's health, safety and welfare.
- Safe and secure learning environments supported by appropriate risk assessments.

This list is not exhaustive and the school will comply with all relevant safeguarding and welfare requirements set out in the EYFS Statutory Framework.

Whole-school safeguarding policies apply to EYFS provision. Where necessary, additional EYFS-specific procedures will be implemented to ensure compliance with the EYFS Statutory Framework and to meet the needs of younger children.

Please see our EYFS policy.

WHISTLEBLOWING

Staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in our safeguarding regime. Appropriate whistleblowing procedures, which are suitably reflected in staff training and staff behaviour policies, are in place for such concerns to be raised with our Senior Leadership Team. The Designated Safeguarding lead in the first instance.

Our Whistleblowing policy enables staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place. All concerns of poor practice or concerns about a child's welfare brought about by the behaviour of colleagues should be reported to the Headteacher. Complaints about the Headteacher should be reported to the chair of governors.

Staff can also refer to the NSPCC Whistleblowing Advice Line if:

- They feel we don't have clear safeguarding procedures to follow.
- Their concern won't be dealt with properly or may be covered up.
- They have raised a concern, but it hasn't been acted upon.
- They are worried about being treated unfairly.

Staff can call about an incident that happened in the past, is happening now or they believe may happen in the future. Whistleblowing Advice Line Call 0800 028 0285 Email help@nspcc.org.uk.

RESOLVING DIFFERENCES AND ESCALATION PROCESS

We recognise that effective partnership working is a vital element in ensuring that children are safeguarded, and positive outcomes are achieved. However if we do need to escalate and challenge practice, we will follow Bolton's Resolving differences and Escalation processes.

MANAGING ALLEGATIONS AGAINST THOSE WHO WORK WITH CHILDREN

Bolton's First Steps flow chart is displayed around our building and will be followed in the event that there is a concern about a member of staff, supply teacher, trainee teacher, volunteer or contractor (see appendix 10). Allegations against staff will be reported to the Headteacher. Allegations against the Headteacher will be reported to the Chair of Governors.

We will not wait to act if a student is at risk of significant harm, we will immediately contact the Police or Integrated Front Door. We will also contact the Local Authority Designated Officer (LADO) using the LADO portal Bolton Safeguarding Children LADO webpage and use guidance from The Safer Recruitment Consortium Guidance for Safer Working Practice .A tracking form will be used to record all allegations and actions taken (appendix 11) and this information will be stored securely in Staff Safe.

Staff who are the subject of an allegation

Any concern or allegation about an adult working in, or on behalf of, the school, including agency staff, contractors, volunteers, visitors and other individuals not directly employed by the school, will be reported and managed in accordance with Part Four of Keeping Children Safe in Education and local procedures for managing allegations against adults who work with children.

Transferable risk

Safeguarding concerns may arise from an individual's behaviour outside of the school environment. Such behaviour may indicate that an adult is unsuitable to work with children and may present a risk to students; this is known as transferable risk**.** Where concerns are identified, we will undertake an assessment of any potential risk to children and take appropriate action. Where there is uncertainty, advice will be sought from the **Local Authority** Designated Officer (LADO)**.**

Low Level concerns

A low-level concern is any concern, no matter how small, that an adult working in or on behalf of the school may have acted in a way that is inconsistent with the staff code of conduct, including behaviour outside of work. Such concerns may arise from a sense of unease or a 'nagging doubt' about an adult's behaviour towards a child and do not meet the harm threshold or otherwise require referral to the Local Authority Designated Officer (LADO).

Low-level concerns should be reported to the Head teacher who will record the concern, review any previous concerns, and determine any necessary action. The Headteacher will make the final decision regarding the response to the concern. Where there is uncertainty as to whether the harm threshold has been met, or where a pattern of concerns is identified, advice will be sought from the LADO.

Records of low-level concerns will be retained. Repeated concerns or allegations that have been determined to be false, unfounded, unsubstantiated or malicious will not be included in employment references. Substantiated safeguarding allegations that meet the harm threshold will be included in references where appropriate.

See Part Four, section two of KCSiE.
More information on managing allegations can be found here.
Also see our Staff Code of Conduct Policy and Grievance Policy.

SAFER RECRUITMENT

We are committed to ensuring that people who pose a risk of harm to children are prevented from working with them. We will fulfil our statutory responsibilities by operating robust safer recruitment procedures and carrying out all required pre-employment checks, including those undertaken through the Disclosure and Barring Service (DBS). We have comprehensive recruitment and selection procedures designed to deter, identify and reject unsuitable applicants. These procedures are underpinned by safeguarding principles and are applied consistently to all appointments, including employees, volunteers, contractors and agency staff where appropriate

We utilise information from The Safer Recruitment Consortium in particular Guidance for Safer Working Practice for those working in Education settings. At least one person who conducts the recruitment process and interview has completed safer recruitment training.

Also see our Safer Recruitment policy/ Safeguarding, disclosure, and barring policy

ARRANGEMENTS FOR INDIVIDUALS AND ORGANISATIONS COMING USING OUR PREMISES

When services or activities are provided, under the direct supervision or management of our staff, our arrangements for child protection will apply to those services /activity providers. An assessment of the education value, the age appropriateness of what is going to be delivered and whether relevant checks will be required.
However, where services or activities are provided separately by another body, we seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with us on these matters where appropriate.

We ensure that safeguarding requirements are included in any transfer of control, lease, hire or use agreement relating to the school premises. Compliance with these safeguarding requirements will be a condition of use and occupation of the premises, and any failure to comply may result in termination of the agreement.

See Lettings Policy

USEFUL LOCAL AUTHORITY CONTACT DETAILS

Integrated Front door:	01204 331500
Emergency Duty Team – Out of Hours:	01204 337777
Children's Child Protection Unit:	area.cpc@bolton.gov.uk
Local Authority Designated Officer (LADO):	LADO@bolton.gov.uk

Safeguarding in Education Team:	SET@bolton.gov.uk
Virtual School	Virtual.school@bolton.gov.uk
Child Missing Education	childrenmissingeducation@bolton.gov.uk

APPENDIX 1

HARDY MILL PRIMARY– Child Protection and Safeguarding Policy for Parents and Carers

Introduction

We strive to ensure that all our students remain safe and free from harm, and we are committed to playing a full and active part in the multi-agency approach to child protection concerns. Additionally, we have a legal duty to safeguard and promote the welfare of children and young people, and to have a child protection policy and procedures in place, which should be shared with you, to address concerns about the safety and protection of children and young people. We follow both local [insert link to FFFA] and national guidance [insert link to KCSIE] [insert link to WTSC]

Through our day-to-day contact with students, and direct work with families, our staff have a crucial role to play in noticing indicators of possible abuse, neglect, and exploitation. Parents/carers should be aware therefore, that where it appears to a member of staff that a child or young person may have been abused, exploited or neglected, we are required, as part of the local child protection procedures to report this concern to Children's Social Care (known as the Integrated Front Door) immediately. Therefore, to avoid any misunderstandings, parents/carers of students who sustain accidental injuries such as cuts/bruises/fractures should inform us **without delay** and explain the cause.

Principles ● Children and young people have a right to be safe. ● Parents/carers have a right to be informed of any concerns unless this would compromise safety. ● Children and young people are best protected when we work together with parents/carers.	**Partnership** ● Parents and carers are encouraged to speak to us if they have any concerns. ● We will inform parents/carers of any concerns we have and will offer help and support as necessary. ● We will involve parents/carers and actively encourage them to participate in any meetings regarding their child. ● We will consult with other agencies when we have concerns that a child or young person may have been abused, neglected, or exploited. ● When it is practical and safe to do so, we will attempt to speak to you regarding sharing information, providing this does not put anyone at risk.
Prevention ● We aim to offer help and support at the earliest opportunity as needs emerge (Early/family Help). ● We have a comprehensive PSHE curriculum that teaches our students about keeping safe. ● We will take positive action to prevent children and young people from abuse, neglect, and exploitation through the development of an open culture that informs children and young people of their rights and encourages them to speak about any concerns. ● We will provide parents/carers with information to help you to keep your child safe out of school.	**Responding to Concerns** ● We listen to children's concerns and take these seriously. We may work with the child to gather their views and daily lived experience. ● We will listen to parents/carers who raise concerns about their child and offer support. ● We will refer all allegations or concerns that a student has been, or is likely to be, abused, neglected, or exploited to The Integrated Front Door. ● We will put support in place if we are aware of any concerns this may include completing an Early/family Help Assessment.

Child on Child Abuse

- Abuse of children by other children will not be tolerated and will be treated seriously. Child on Child abuse can include but not limited to:

- Bullying, including cyberbullying, prejudice-based and discriminatory bullying
- Abuse in intimate personal relationships (teenage relationship abuse)
- Physical abuse, including assaults
- Serious violence and threats involving weapons
- Sexual violence
- Sexual harassment
- Sharing nude or semi-nude images without consent
- Upskirting
- Initiation or hazing-type violence and rituals

Parents/carers will be kept informed of actions taken. Concerns that meet the significant harm threshold will be referred immediately to Children's Social Care (The Integrated Front Door).
Parents/carers or students can report abuse by contacting social care on 01204 335100 or report through the NSPCC Helpline.
We will ensure students are listened to, their views are taken seriously, and support is put in place. This may include a safety plan. Sanctions will be put in place for students accused where required and support offered to all children involved.

Emotional health and wellbeing

- We aim to support any students who experience any difficulties with their emotional health and wellbeing. Please speak to a member of staff for more details and support can be accessed at Be Kind to My Mind here

Domestic Abuse

- As part of Operation Encompass, we receive notifications from the police relating to domestic incidents where there are children related to either of the adult parties involved. The aim is for us to offer advice and support.
- Parents and carers are encouraged to speak to us about domestic abuse**.**
- Services can be accessed at Fortalice Fortalice - Domestic Abuse Charity Bolton - 01204 365677 and Endeavour Project 01204 394842.

Online Safety

- Children can be harmed and abused online and therefore we have measures in place to protect them. We also teach students how to keep safe online. We have systems in place to monitor online activity in school and ensure harmful content is blocked. **See Online Safety Policy.**
- It is important that Parents/carers have adequate safety measures in place at home, that children receive consistent messages of how to keep safe online and that they are appropriately supervised. Parents and Carers - UK Safer Internet Centre

Child Protection Strategy Meetings and Conferences

- If circumstances require, a member of our staff will attend strategy meetings and child protection conferences and will share information. This information for CP conferences will be shared with parents/carers beforehand where possible. We will keep confidential child protection records separately from a student's academic records. And these will be transferred to their future school/college.

Confidentiality

- Information from any source, including parents, about possible child abuse cannot be kept confidential however this will only be shared with relevant appropriate professionals.
- Information and records about children who have a Child Protection Plan will be given only to those people who need it and will be kept strictly confidential by them.

If parents have any concerns, they should contact:

HEADTEACHER:	**Mrs J Briggs**
DESIGNATED SAFEGUARDING LEAD (DSL):	**Mrs J Briggs**

DEPUTY DESIGNATED SAFEGUARDING LEADS (DDSL):	**Miss L Perry and Mrs J Hamblet**
DESIGNATED TEACHER FOR CLA:	**Mrs J Briggs**
PREVENT LEAD:	**Miss L Perry**
MENTAL HEALTH LEAD:	**Mrs J Hamblet**
CHAIR OF GOVERNORS:	**Mrs C Stephenson**
SAFEGUARDING GOVERNOR:	**Mrs S Wardle**

Signed: ……

Headteacher…… Date: …….

APPENDIX 2

Role of the Designated Safeguarding Lead can be found in Annex B in Keeping Children Safe in Education 2026. Keeping Children Safe in Education 2026

APPENDIX 3

GUIDANCE FOR SAFEGUARDING RECORDS

What is a "welfare concern"?

Concerns may arise in one or more of the following areas:

- The student's behaviour
- The student has a physical injury.
- The student makes a disclosure or allegation.
- The student's physical presentation
- Information from or observation of behaviour from a parent/carer or any other person

What to record

- Date and your details – avoid using initials.
- The incident / event / observation of concern described clearly and concisely.
- Written using straightforward language and fact and opinion are differentiated.
- If recording a disclosure, the student's own words are recorded and any questions asked are included.
- Physical marks and injuries are recorded on a body map
- All actions taken.
- Rationale for decision making.
- Using the electronic data – CPOMS, scan in handwritten notes taken when a student makes a disclosure and body maps when there is a physical mark or injury and make reference to this in the chronology.

How to record actions taken in response to staff concerns

When a welfare concern is logged on CPOMS, it is important that this is checked to ensure sufficient detail has been recorded and has been correctly date stamped. If a body map has been completed or there are any other documents referred to in the log, ensure these are attached and where appropriate are also dated and signed. A DSL or DDSL should be alerted to the log.

It is important that a record of the action taken in response to every welfare concern is documented. The level of detail of this record will clearly depend on the nature and seriousness of the concern but may include:

- Requests to staff for monitoring specific aspects of the student's presentation, behaviour, attendance etc.
- Discussions and telephone calls (with colleagues, parents, student, Social Care and other agencies or services), including rationale, actions and outcomes.
- Professional consultations
- Conversations with parents/carers
- Letters sent and received
- Direct work e.g. Day in the life, 3 houses and any check-ins.
- Early/family Help Assessments and reviews
- Any referrals (both for external and education-based services)

APPENDIX 4

HOME ACCIDENT OR INJURY FORM

This form should be completed when a parent/carer informs us that a student has sustained an injury or had an accident outside of school

Date Accident/Injury Reported:	

Name of student:	
Class/Year Group:	

Person Reporting Incident:	
Relationship to student:	

Date Accident Occurred:	
Place of Accident:	

Description of injury (complete body map if needed):

Brief detail of how the accident occurred:

Witnessed by:	

First Aid Treatment given:	**Yes** ☐	**No** ☐

Was Medical advice sought?	**Yes** ☐	**No** ☐
If yes, when and where?		

Signed by parent/carer:	

Member of staff accident reported to:	

APPENDIX 5

TRANSFER OF SAFEGUARDING RECORDS

This form should be completed when a student moves to another setting and there are safeguarding concerns and records to transfer and the information has not been transferred electronically via CPOMS.

Student's name:

DOB:

Previous surnames or aliases:

Name of people with parental responsibilities:

Name of social worker/lead professional:

Information and files transferred (to include chronologies and assessments)
NB: Parental consent is needed to transfer Early/family Help Assessments

Name of sending school

Name of receiving school/college

Passed to (name)

Date of first entry in file

Date of last entry in file

Status: (please tick)

Single Agency Support (Prevention threshold)

Early/family Help

Targeted Early/family Help

Child in Need

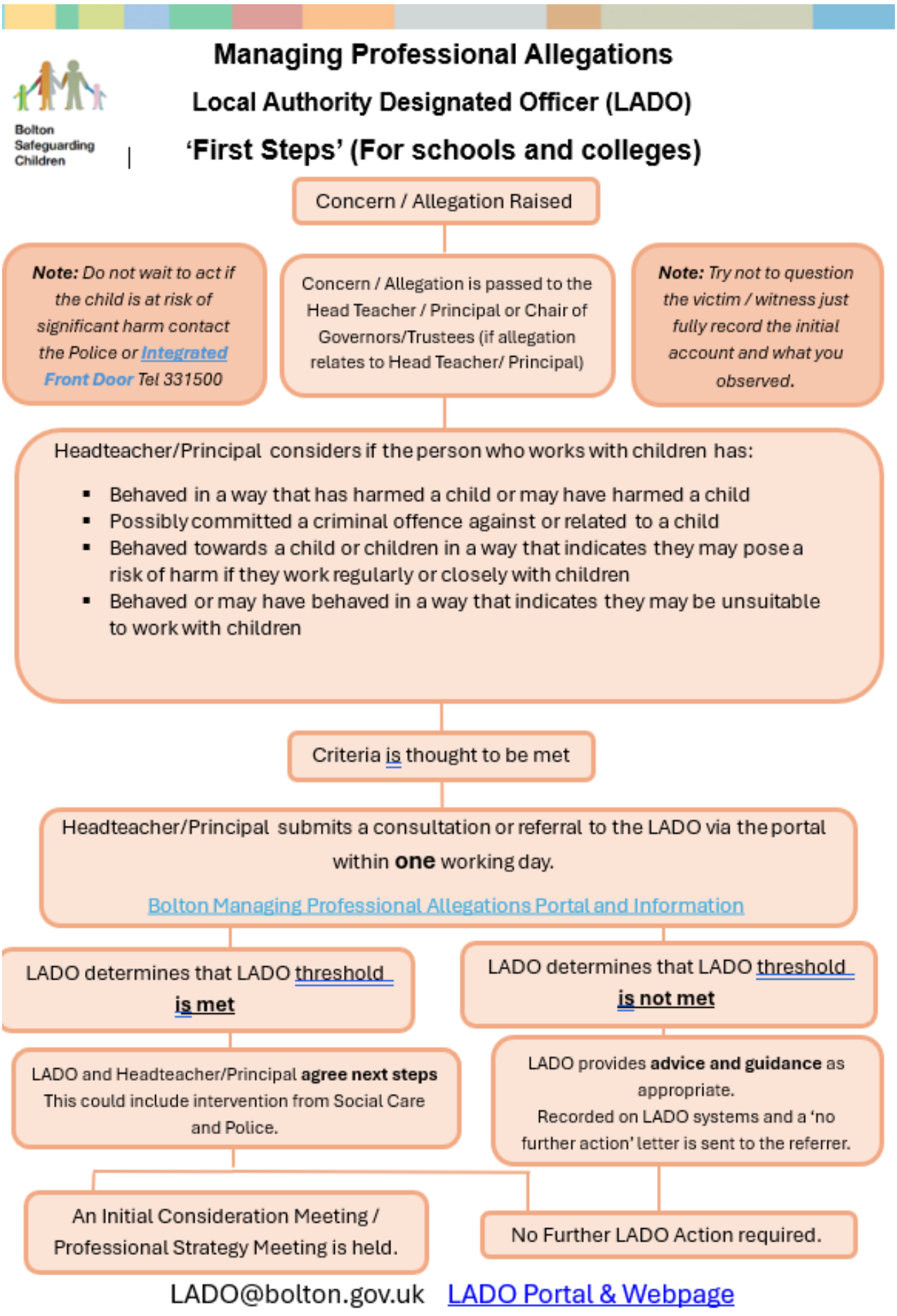
Child Protection

Looked After Child

Privately Fostered Child

Transferred by:	**Received by:**
Name:	Name:
Position:	Position:
Signed:	Signed:
Date:	Date:

APPENDIX 6


Bolton Safeguarding Children
Managing Professional Allegations
Local Authority Designated Officer (LADO)
'First Steps' (For schools and colleges)
Concern / Allegation Raised
Note: Do not wait to act if the child is at risk of significant harm contact the Police or Integrated Front Door Tel 331500
Concern / Allegation is passed to the Head Teacher / Principal or Chair of Governors/Trustees (if allegation relates to Head Teacher/ Principal)
Note: Try not to question the victim / witness just fully record the initial account and what you observed.
Headteacher/Principal considers if the person who works with children has:
Behaved in a way that has harmed a child or may have harmed a child
Possibly committed a criminal offence against or related to a child
Behaved towards a child or children in a way that indicates they may pose a risk of harm if they work regularly or closely with children
Behaved or may have behaved in a way that indicates they may be unsuitable to work with children
Criteria is thought to be met
Headteacher/Principal submits a consultation or referral to the LADO via the portal within one working day.
Bolton Managing Professional Allegations Portal and Information
LADO determines that LADO threshold is met
LADO determines that LADO threshold is not met
LADO and Headteacher/Principal agree next steps This could include intervention from Social Care and Police.
LADO provides advice and guidance as appropriate.
Recorded on LADO systems and a 'no further action' letter is sent to the referrer.
An Initial Consideration Meeting / Professional Strategy Meeting is held.
No Further LADO Action required.
LADO@bolton.gov.uk
LADO Portal & Webpage

APPENDIX 7

Tracking Form
Allegation/concern raised against Staff

To be completed by the headteacher

Date:		Time	
Allegation/Concern raised by- Name: Role if staff/ year group if student:			
Allegation/concern alerted to: Name: Role:			
Who the allegation/concern is made against Name: Role:			
If there is a victim Name: Role if staff/ year group if student:			
NB: The subject of the allegation should not be informed without first seeking advice			
Brief details of the allegation/concern:			
Date and time of alleged concern /incident:			
Does this allegation involve restraint?	YES / NO / NK		

Case manager appointed and to complete further tracking form	

Allegations which appear to meet the criteria should be referred to LADO within 24 hours (see Note 1)

Chronology (record here a chronology of all conversations, email, telephone calls)	
Does this appear to meet the criteria for a LADO referral?	YES / NO
If no, are you recording the incident as a Low-Level Concern?	YES / NO If you answer Yes- Record rationale for decision making here:
Referred to LADO via portal:	YES / NO Date:
Advice provided by LADO:	
Date advice provided:	
Action to be taken:	

Suspension should never be automatic but should be considered and rationale given for decisions made.	Decision to suspend YES / NO / NA

Information gathered about the allegation.

Staff or parent/carer witnesses	Account taken	Copy forwarded to LADO
1.		
2.		
3.		
Student witnesses		
1.		
2.		
3.		
4		
Plan of setting/classroom etc		
CCTV		
Chronology of events		
1st Aid log		

Full details gathered.

If there is a Victim - name:	
Date of Birth	
Address:	
Is the student known to Social Care?	YES / NO
Does the student have Special Educational Needs?	YES / NO If yes - details.
Has the student raised previous concerns?	YES / NO If yes - details

Staff accused full name:	
Date of Birth:	
Address:	
Has this person had concerns raised against them before?	

Informing others

Have parents of the student been informed?	
Details of response	

Staff members should be informed of the allegation ASAP - on advice from LADO

Has the staff member been informed?	YES / NO
Name of Key person nominated to feedback to them:	

Outcome

Does this meet LADO criteria:	YES / NO
Further action required:	
Professional Strategy Meeting to be held:	YES / NO /NA
Professional Strategy Meeting date:	
Attended by Case Manager:	YES / NO / NA
Minutes received:	YES / NO /NA

Outcome: – *please circle* **Substantiated**: there is sufficient evidence to prove the allegation **Malicious**: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person subject of the allegation False: there is sufficient evidence to disprove the allegation **Unsubstantiated**: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made	Unfounded Unsubstantiated False Substantiated Malicious
The information will be referred to in any future reference	YES/NO
Disciplinary investigation to be held:	YES / NO / NA
Staff member informed of outcome:	YES / NO
Parents informed of outcome (no info about the staff member should be shared):	YES / NO
Chair of governors/Trustees informed:	YES / NO /NA
Details added to internal overview table (to spot patterns /themes):	YES / NO
Outcome:	
If substantiated has a referral to the TRA and Disclosure and Barring Service (DBS) been made if the person has been dismissed or would have been had they not resigned.	YES/NO/NA

Lessons learned:

Note 1 - Criteria for managing allegations.

An allegation may relate to a person who works with children who has:

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

APPENDIX 8

The Role of the Designated Teacher for Looked After and Previously Looked After Children

The Designated Teachers role is to promote the educational achievement of looked after and previously looked after children. The Designated Teacher will have appropriate training and experience to carry out this role and will work with the local authority, Virtual School, carers, parents and other relevant professionals to support positive educational outcomes.

The Designated Teacher will:

- Promote a culture of high expectations and aspirations for looked after and previously looked after children.
- Promote the educational achievement of looked after and previously looked after children throughout the school.
- Ensure that staff understand the barriers to learning that looked after and previously looked after children may face and the importance of promoting their educational achievement.
- Ensure that looked after and previously looked after children are supported sensitively and that their confidentiality is protected.
- Be a source of advice and information for staff regarding the educational needs of looked after and previously looked after children.
- Work closely with the Virtual School and other relevant professionals to improve educational outcomes.
- Promote the involvement of looked after children in setting their own educational targets and support plans, taking account of their wishes and feelings.
- Take lead responsibility for ensuring that a high-quality Personal Education Plan (PEP) is developed, implemented and reviewed for each looked after child.
- Monitor the educational progress, attainment and attendance of looked after children and ensure that appropriate interventions are in place where necessary.
- Work with carers, parents and professionals to strengthen home-school relationships and support educational achievement.
- Ensure that the needs of looked after and previously looked after children are considered when developing and reviewing school policies and procedures.
- Undertake appropriate training and keep their knowledge and skills up to date.

All staff should have high expectations of looked after and previously looked after children and seek to promote their educational achievement and welfare through effective support and partnership working.

APPENDIX 9

QUICK GUIDE TO MAKING A REFERRAL TO THE INTERGRATED FRONT DOOR

You have a concern

You need to consider whether urgent action is needed – i.e. the child is at immediate risk of death or has significant injuries; if this is the case immediate medical treatment and police involvement should be sought and then follow this process.
In most cases there will be sufficient time to follow this process; when considering if you have concerns that warrant referral to The Integrated Front Door.

Speak to your Designated Safeguarding Lead (DSL)

Make sure all relevant information has been shared with the DSL immediately, this should include basic details about the student, what your concerns are and why you have them at this time and a summary of your involvement with the child/family .When having this discussion, it may be useful to use Bolton Safeguarding Children tool Is this significant harm?

You should ensure that you record a summary of the discussion and the outcome of it and provide this to the DSL– the DSL will include a rationale for decisions about whether or not they have referred to The Integrated Front Door.

Tell the parents/carers/ child about the referral

Parents and carers should be contacted if safe to do so. The concerns and actions to be taken should be discussed. The Designated Safeguarding Lead will consider whether in telling parents/carers/child, the child or any other children are placed at further risk. If in any doubt, the referral will be made and advice sought from The Integrated Front Door. All discussion and decision making must be recorded.

Information can be shared if this is for safeguarding purposes.

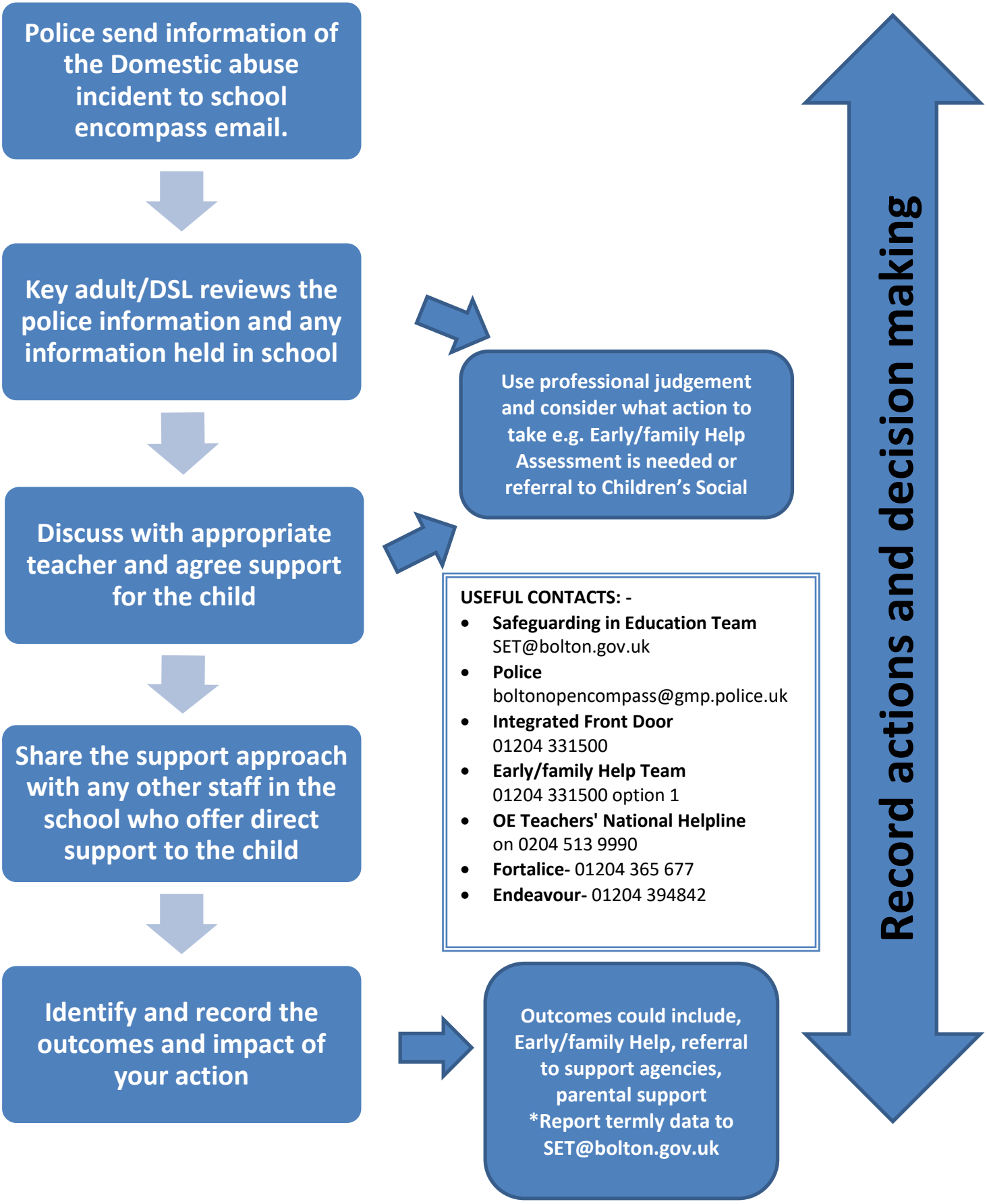
DSL refers to The Integrated Front Door

DSL to refer to Making a Good Referral
If at immediate risk telephone 01204 331500 option 2.
Clearly state you are making a referral, this will avoid confusion
Ask and record who you are talking to, provide a clear account of your concerns, the history and why you are contacting The Integrated Front Door now. Follow up with the Referral Form within 1 working day.
If the child is not at immediate risk complete the online Referral Form

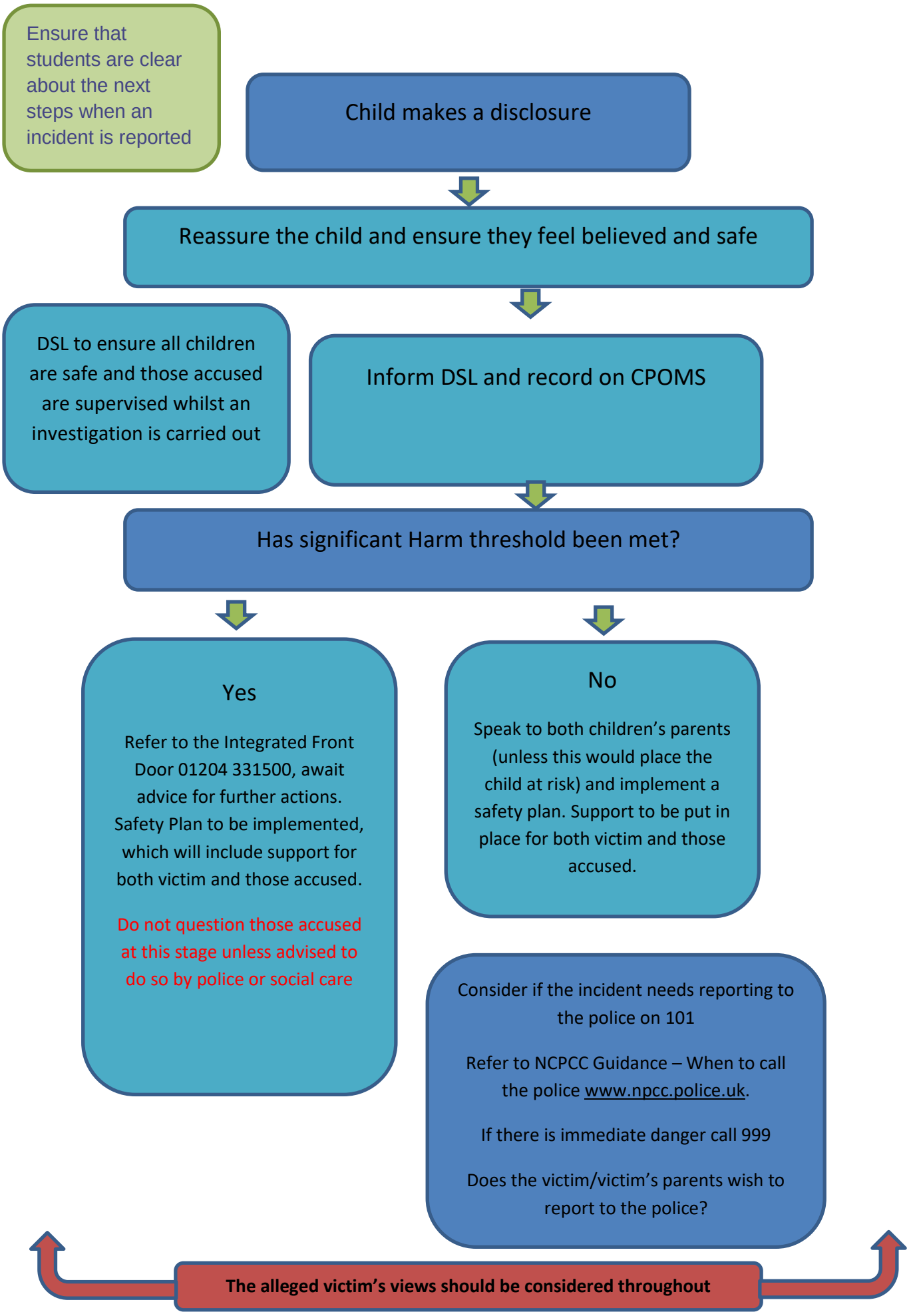
You will receive a response to a referral within 24hrs. If you do not receive a response, you must contact the Integrated Front Door again. Record all action taken.

At the end of the call you should know what is going to happen next, the timescales for action and what your role in this will be. When making a referral refer to 'Making a good referral' found here -Worried about a child? – Bolton Safeguarding Children
If the Integrated Front Door does not agree that social work involvement is needed you should listen to their reasoning for this and their advice about alternative action – including recommendations to use early/family help processes; if at the end of this you still do not agree then you should refer to Bolton's Resolving differences and Escalation Procedures.
You should ensure that the child and their family continue to be supported and kept safe while awaiting resolution.
If you know there is an Early/family Help Assessment and Plan open but you are not the Lead Professional, you should tell the Lead Professional about the action you have taken and why as soon as possible; if you are not sure if there is an Early/family Help Assessment you can check with the Early/family Help team (01204 331500 option 1) who will let you know and share details of the Lead Professional where one is identified – it would be good practice to share this information with the Lead Professional. If you are the current Lead Professional making the referral and there is an Early/family Help Assessment and Plan in place, this should be updated to include the referral information - this helps to avoid duplication and gives the social worker the best possible information from which to start their assessment.

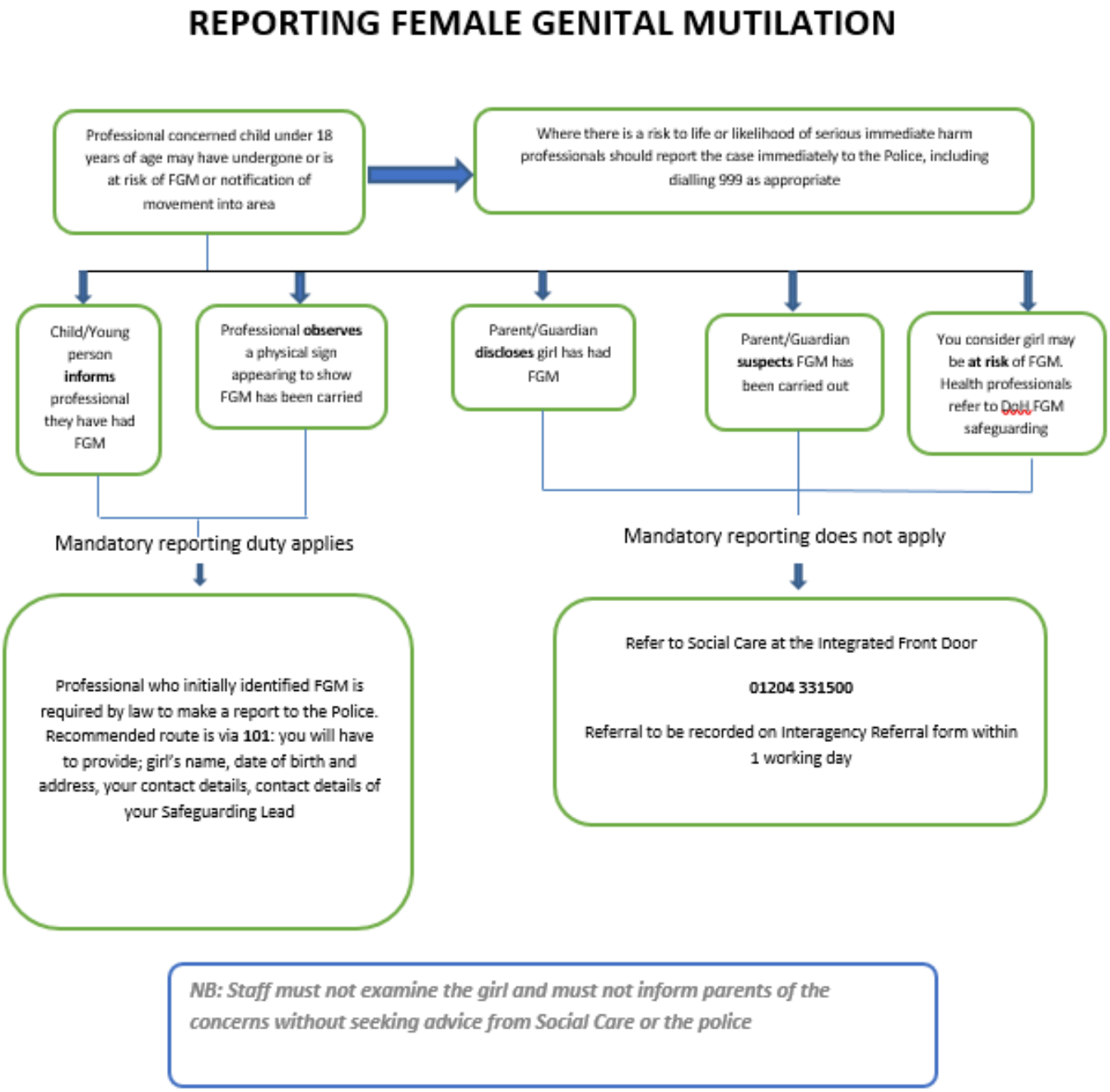
APPENDIX 10 Operation Encompass Flow Chart



APPENDIX 11 Child on child Abuse, Sexual Violence and Harassment Flowchart



APPENDIX 12 FGM Flow Chart



APPENDIX 13

Statement of Staff Commitment to the Hardy Mill Primary School Safeguarding & Child Protection Policy

To be completed annually BY ALL STAFF

Staff Member…… Post…….....

Line Manager……

I have read and understood the standards and guidelines outlined in the Safeguarding & Child Protection Policy.

I agree with the principles contained therein and accept the importance of implementing the policies and practices whilst working at Hardy Mill Primary.

I confirm that I have:

- Read Keeping Children Safe in Education Part 1
- Received a copy of the Safeguarding & Child Protection Policy
- Had the opportunity to read and discuss the policy and procedures with my Line Manager
- Discussed and recorded training requirements for ongoing action.

Signed (Staff)……

Signed (Line Manager) ……

Date …….