





## Child Protection & Safeguarding Policy & Procedures 2021-22

Policy Type:	Statutory <a href="https://www.gov.uk/government/publications/statutory-policies-for-schools">https://www.gov.uk/government/publications/statutory-policies-for-schools</a>
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Last Reviewed/Approved:	December 2021. The Safeguarding Policy is reviewed as required and ratified annually by the governing board, or as events or legislation requires. Any deficiencies or weaknesses identified will be remedied immediately.
Designated Safeguarding Lead	Angela Williams (Deputy Headteacher – Pastoral)
Safeguarding Governor	Margaret Moore (Chair of Governors)
Date of Next Scheduled Review:	Autumn 2022
Notes:	This was a new policy in December 2021 to replace all previous versions

### Policy Approval:

Chair of Governors:		Date:	08.12.2021
Headteacher:		Date:	08.12.2021

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## 1. Introduction

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Cardinal Langley RC High School is committed to a strong culture of safeguarding, ensuring that all staff embrace the concept of “it could happen here.” We are fully committed to creating a culture of vigilance. We expect everyone who works in and visits our school to share this commitment. We encourage staff, pupils and visitors to report anything that concerns them and we will always act in the best interest of the child. Our pupils are taught how to stay safe, including when online, and to recognise when they may be at risk. We ensure our pupils know how to get help when they need it. In line with Working Together to Safeguard Children (2018), we place importance on contextual safeguarding and consider risks in our local community when assessing the safety of our pupils.

Cardinal Langley RC High School will fulfil local and national responsibilities as laid out in the following documents: -

- [Keeping children safe in education - GOV.UK \(www.gov.uk\)](#)
- [Working Together to Safeguard Children September 2018](#)
- [Statutory Guidance on Children Who Run Away or Go Missing from Home or Care January 2014](#)
- [Guidance for safer working practice for those working with children and young people in education settings \(Safer Recruitment Consortium September 2019\)](#)
- [Guidance for Safe Working Practice for those Working with Children in Education and Early Years Settings \(Code of Conduct\) Revised April 2020 \(local document\)](#)
- [Guidance for Safe Working Practice – School Appendix](#)
- [The Children's Act 1989 \(as amended 2004 Section 52\)](#)
- [The Education Act 2002](#)
- [The Teachers' Standards \(updated June 2013\)](#)
- [The Counter-Terrorism and Security Act 2015 \(section 26 The Prevent Duty\)](#)
- [Female Genital Mutilation Act 2003](#)
- [Serious Crime Act 2015](#)
- [Children Missing Education - Statutory guidance for local authorities](#)
- <http://greatermanchesterscb.proceduresonline.com/>
- [County Lines Guidance](#)

Staff are also referred to the following training:

<https://www.winstonswish.org/bereavement-training-courses-schools/>

<https://www.operationencompass.org/operation-encompass-on-line-key-adult-briefing>

This Policy conforms to locally agreed inter-agency procedures in line with the Rochdale Safeguarding Children's Partnership (RBSCP). It is available to all interested parties on our website and on request from the main school office. It should be read in conjunction with other relevant policies and procedures.

## 2. Definitions

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In line with Keeping Children Safe in Education 2021, we define safeguarding as:

- protecting children from maltreatment
- preventing impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes

Children includes everyone under the age of 18.

### 3. Key Contacts

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Name	Role	Contact details
Angela Williams	Designated Safeguarding Lead (DSL)	<a href="mailto:awilliams@clrchs.co.uk">awilliams@clrchs.co.uk</a>
Claire Flitcroft	Deputy DSL	<a href="mailto:cflitcroft@clrchs.co.uk">cflitcroft@clrchs.co.uk</a>
Andrew Eadie	Deputy DSL	<a href="mailto:aeadie@clrchs.co.uk">aeadie@clrchs.co.uk</a>
Kate Foster	Deputy DSL	<a href="mailto:kfoster@clrchs.co.uk">kfoster@clrchs.co.uk</a>
Jim Sweeney	Deputy DSL	<a href="mailto:jsweeney@clrchs.co.uk">jsweeney@clrchs.co.uk</a>
Bev Ashton	Deputy DSL	<a href="mailto:bashton@clrchs.co.uk">bashton@clrchs.co.uk</a>
Helen Farrell	Deputy DSL	<a href="mailto:hfarrell@clrchs.co.uk">hfarrell@clrchs.co.uk</a>
Margaret Moore	Safeguarding Governor	<a href="mailto:admin@clrchs.co.uk">admin@clrchs.co.uk</a>
Early Help and Safeguarding Hub (EHASH)	Children's Social Care	<a href="mailto:ehash@rochdale.gov.uk">ehash@rochdale.gov.uk</a>
Louise Hurst	LADO	<a href="mailto:LADO@rochdale.gov.uk">LADO@rochdale.gov.uk</a>
Chris Tyler	Virtual School	<a href="mailto:Christopher.Tyler@Rochdale.Gov.UK">Christopher.Tyler@Rochdale.Gov.UK</a>

### 4. Responding to concerns

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When staff or visitors to the school have a safeguarding concern, they should promptly contact the DSL or one of the six Deputy DSLs in person.

If a member of staff is concerned by verbal conversations or disclosures, these should promptly be recorded in writing and emailed to the DSL at [safeguarding@clrchs.co.uk](mailto:safeguarding@clrchs.co.uk)

The DSL will then decide what action must be taken, which can include:

- Further pastoral support in school
- Referral for an Early Help assessment
- Referral to children's social care

If the DSL and deputies are not available, staff should speak to another member of SLT, or contact the local children's social care for advice: 0300 303 0440 or 0300 303 8875 out of office hours.

### 5. Roles and Responsibilities

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#### 5.1 Designated Safeguarding Lead:

- Raise awareness of safeguarding across the school and contribute to our culture of vigilance
- Manage any internal safeguarding referrals and disclosures
- Work together and share information with the three safeguarding partners and other relevant professionals
- Update training every two years and ensure any Deputy DSLs also renew this training
- Update own knowledge and skills at least annually
- Work with other services to promote the welfare of children
- Ensure CP files are transferred to new schools, ensuring safe transit and confirmation of receipt
- Ensure children are taught about safeguarding, including online safety
- Operate with the best interest of the child at heart
- Support the mental health and wellbeing of pupils

- Adopt a sensible reasonable force policy
- Refer staff to DBS where necessary
- Raise awareness of safeguarding across the school
- Know which students have a social worker
- Help promote educational outcomes by sharing information with the relevant school staff

## 5.2 Governing body

- Approve this policy at each review and hold the headteacher to account over its implementation
- Appoint a safeguarding governor to oversee safeguarding compliance and the effectiveness of this policy
- Read and understand part 1 and Annex A of Keeping Children in Education, and review this guidance at least annually
- Engage with safeguarding training

## 5.3 All staff

- Read and understand part 1, part 5 and Annex B of Keeping Children in Education, and review this guidance at least annually
- Attend and engage with induction training, including reading and understanding our:
  - child protection policy
  - behaviour policy
  - the staff code of conduct
  - safeguarding response to children who go missing from education
- Engage with regular safeguarding and child protection updates as required, and at least annually, to provide the relevant skills and knowledge to safeguard children effectively
- Be aware of our safeguarding procedures, including:
  - The role of the safeguarding team
  - How the early help process works
  - How to make a referral to children's social care
  - How to respond to a safeguarding concern and refer this to the safeguarding team
  - The signs of different types of abuse and safeguarding concerns (see Appendix 1)
  - The need to refer any concerns regarding peer on peer abuse to the safeguarding team, no matter how small

## 6. Online safety

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We recognise that the use of technology has become a significant component of many safeguarding issues, including peer on peer abuse. We recognise that children need to be safeguarded from potentially harmful and inappropriate online material and the school's role within this. To address this, our school strives to:

- Have clear procedures in place to ensure the online safety of all staff and students
- Educate the school community in the safe and responsible use of online technology
- Set clear expectations for the use of online technology, including mobile phones which must be switched off and kept in a school bag during the school day unless a teacher has given permission for it to be used.

Our approach to online safety is framed by four main areas of risk:

- content: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism

- contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes'
- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying
- commerce - risks such as online gambling, inappropriate advertising, phishing and or financial scams.

To address the risks above, as a school we:

- Train staff in online safety, including at induction, throughout the academic year and in response to any emerging concerns local or national.
- Use the Impero filtering and monitoring system to protect children when they use the school's network to access the internet, including the desktop Confide button which can be used for a child to access support at any time.

## **7. Whistleblowing**

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At Cardinal Langley RC High School, we recognise that adults working in a school may cause harm, including agency staff, visitors and governors. Any concerns about a member of staff posing a risk of harm to children should immediately be referred to the headteacher. These concerns could include where anyone working in the school 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 he or she may pose a risk of harm to children
- behaved or may have behaved in a way that indicates they may not be suitable to work with children

Where there are concerns about the headteacher, these should be referred to our Chair of Governors, Margaret Moore, [admin@clrchs.co.uk](mailto:admin@clrchs.co.uk)

Any member of staff or volunteer with concerns about poor or unsafe practice and potential failures in our school's safeguarding regime should contact: LADO: 01706 925345 or email [lado@rochdale.gov.uk](mailto:lado@rochdale.gov.uk)

The NSPCC whistleblowing helpline can also be contacted via telephone 0800 028 0285 or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

## **8. Children potentially at greater risk of harm**

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At Cardinal Langley RC High School, we recognise that children with social workers may potentially be at greater risk of harm and need further support. Children may need this support due to abuse, neglect or complex family circumstances. Our staff are aware that these students may face additional barriers to their attendance, learning or behaviour. We take these needs into account and liaise regularly with the relevant social worker to put appropriate support in place.

We also recognise that low or erratic attendance and Children Missing Education (CME) may be an indicator of abuse or neglect. Our pastoral teams track attendance thoroughly, addressing concerns without delay and liaising with our Education Welfare Officer (EWO) where needed. We ensure that pupils who are expected to attend the school, but fail to take up the place, are referred to the local authority. We also strongly encourage parents to supply us with two emergency contacts for their child, updating their contact details without delay if they are changed. When a pupil leaves the school, we will record the name of the pupil's new school and their expected start date.

Children with special educational needs (SEN), disabilities or certain health conditions can face additional safeguarding challenges, for reasons including:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- being more prone to peer group isolation than other children
- the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- communication barriers and difficulties in overcoming these barriers.

At Cardinal Langley RC High School, we identify students who may be more at risk of harm and take action to ensure their safety, including:

Issuing a Key Worker

Incorporating a bespoke curriculum in The Hub if and when needed

Holding regular review meetings to review provision and progress

## **9. Records and information sharing**

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We recognise the importance of information sharing between practitioners and local agencies. We are proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to the local authority children's social care.

Our safeguarding records include:

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

We have due regard to the relevant data protection principles, understanding that the Data Protection Act 2018 and the GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. At Cardinal Langley RC High School, we understand that the Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe.

In line with our mandatory duty, School will notify our local authority if we become aware of any private fostering, to allow the local authority to check the arrangement is suitable and safe for the child. Private fostering occurs when a child under the age of 16 (under 18, if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home.

## **10. Site safety**

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All staff members have a responsibility to ensure the buildings and school site are secure and to report any concerns that may occur – every visitor will be given a school safeguarding handbook.

The identity of all visitors and volunteers coming into school is checked. Visitors are expected to sign in and out and to display a visitor's badge while on the school site. Any individual who is not known or identifiable will be challenged for clarification and reassurance by our staff.

The school will not accept the behaviour of any individual, parent or anyone else, that threatens the school security or leads others, child or adult, to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse the person access to the school site.

## **11. Peer on peer abuse**

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In line with our strong commitment to safeguarding, at Cardinal Langley RC High School we believe that all children have a right to learn in a safe environment. Our staff recognise that children of any

age or gender can be capable of abusing other children, which can happen both inside and outside of school and online. This behaviour will be dealt with in line with our Behaviour Policy. This peer on peer abuse can include, but is not limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- physical abuse
- sexual violence and harassment
- causing someone to engage in sexual activity without consent
- consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery)
- upskirting
- initiation-type violence and rituals

All of the above are examples of abuse and should never be tolerated or passed off as “banter,” “just having a laugh” or “part of growing up.” We recognise that the gendered nature of peer on peer abuse makes it more likely that girls will be victims and boys perpetrators.

We minimise the risk of peer-on-peer abuse through our extensive Life Skills curriculum and pastoral programmes, including assemblies and other key messages. All staff understand the importance of challenging inappropriate behaviours between peers and their role in preventing and responding to peer on peer abuse. Our staff understand that even if there are no reports of peer on peer abuse in our school, it does not mean peer on peer abuse is not happening-it may be the case that it is just not being reported. Children can report any peer on peer abuse by speaking to any trusted member of staff or by using the Impero ‘Confide’ button on each PC desktop.

Any cases of peer on peer abuse will be thoroughly investigated, with the victim always being taken seriously and given appropriate support. Support will take the child’s wishes into account and can include increased pastoral support, a mentor, access to counselling and a referral to external services. We will liaise with the police and children’s social care as necessary. Where there has been a report of sexual violence, an immediate risk assessment will be made, considering the needs of the victim, the alleged perpetrator and our other pupils. All allegations of peer-on-peer abuse will be recorded in our safeguarding files.

In cases where nudes or semi-nudes have been shared, we follow guidance given to schools and colleges by the UK Council for Internet Safety (UKCIS): Sharing nudes and semi-nudes (December 2020).

KCSIE splits abuse into four main categories:

**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 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.

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

**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 care-givers); or ensure access to appropriate medical care or treatment. It

There are a number of other safeguarding concerns that ALL staff need to be aware of. These are detailed further in Annex A of KCSIE:

**Child Criminal Exploitation (CCE):** where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE can also occur through the use of technology.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions
- children who associate with other young people involved in exploitation
- children who suffer from changes in emotional well-being
- children who misuse drugs and alcohol
- children who go missing for periods of time or regularly come home late



**County lines:** a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas, using dedicated mobile phone lines or other form of "deal line". Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move (and store) drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

**Serious violence:** where children are involved with serious violent crime. Indicators may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. There is a range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

**Child Sexual Exploitation (CSE):** occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child 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. Indicators can be similar to the indicators of CCE, as well as:

- children who have older boyfriends or girlfriends; and
- children who suffer from sexually transmitted infections or become pregnant

**Modern Slavery and the National Referral Mechanism:** Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

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

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

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

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

- a) physical or sexual abuse;
- b) violent or threatening behaviour;
- c) controlling or coercive behaviour;

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

Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

**Homelessness:** being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. It should also be recognised in some cases that 16- and 17-year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support.

**'Honour-based' abuse (HBA):** encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including 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 or community pressure and can include multiple perpetrators. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

**Forced marriage:** forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

**Female Genital Mutilation (FGM):** covers 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.

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a **statutory duty** upon teachers to report to the police where they discover that FGM appears to have been carried out on a girl under 18. It will be rare for teachers to see visual evidence, and they should not be examining pupils or students. If a victim discloses that FGM has been carried out on them, teachers must personally report to the police.

The duty does not apply in relation to at risk or suspected cases-these should be discussed with the DSL, in line with our referral process.

Potential risk factors may include:

- a female child is born to a woman who has undergone FGM
- a female child has an older sibling or cousin who has undergone FGM
- a woman/family believe FGM is integral to cultural or religious identity
- a parent or family member expresses concern that FGM may be carried out on the girl
- a girl talks about FGM in conversation, for example, a girl may tell other children about it
- being taken on a long holiday to country where FGM is prevalent

**Radicalisation:** We recognise that children are vulnerable to extremist ideology and radicalisation. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection.

Our school adheres to the Prevent duty and we have "due regard to the need to prevent people from being drawn into terrorism". We build pupils' resilience to radicalisation by providing a safe environment for debating controversial issues, promoting fundamental British values.

Staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral.

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying or advocating violence, especially to other faiths or cultures
- intolerance of difference, including faith, culture, gender, race or sexuality

**Mental health:** All staff at Cardinal Langley RC High School are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Where staff have a mental health concern about a child that is also a safeguarding concern, they should contact the DSL or a deputy DSL.

Our single central record (SCR) records information on the checks carried out on staff and volunteers. Copies of these checks, where appropriate, will be located in individuals' personnel files. We follow the guidance from Keeping Children Safe in Education and best practice, as outlined below.

**New staff**

When appointing new staff, we will:

- verify a candidate's identity, including checking the name on a birth certificate where this is available
- obtain (via the applicant) an enhanced DBS certificate (including barred list information, for those who will be engaging in regulated activity)
- obtain a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available
- verify the candidate's mental and physical fitness to carry out their work responsibilities
- verify the person's right to work in the UK
- if the person has lived or worked outside the UK, make any further checks the school or college consider appropriate
- verify professional qualifications, as appropriate
- ensure a candidate to be employed to carry out teaching work is not subject to a prohibition order issued by the Secretary of State
- check that a person taking up a management position is not subject to a section 128 direction made by the Secretary of State
- Seek two references, including from the current employer, before interview and ask specific questions about the suitability of the candidate to work with children

**Agency and third-party staff**

For agency and third-party staff, we will include written confirmation that the employment business supplying the member of supply staff has carried out the relevant checks and obtained the appropriate certificates, the date the confirmation was received and whether an enhanced DBS certificate check has been provided.

**Trainee/student teachers**

Where applicants for initial teacher training are salaried by the school, we will carry out all necessary checks. Where trainee teachers are fee-funded, we will ensure that the training provider has carried out the necessary checks and obtain written confirmation that these checks have been carried out.

**Existing staff**

If we have any concerns about an existing member of staff's suitability to work with children, we will carry out the relevant checks as if the member of staff were a new member of staff. If a member of staff moves from a post that is not in regulated activity to a post in regulated activity, we will ensure the relevant checks for that regulated activity have been carried out.

We will follow our legal duty to refer to the DBS if a member of staff has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- the harm test is satisfied in respect of that individual
- the individual has received a caution or conviction for a relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence
- the individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left

## **Volunteers**

We will never leave an unchecked volunteer to be left unsupervised or to work in regulated activity. We will obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity. We will undertake a risk assessment when deciding whether to undertake an enhanced DBS certificate for any volunteer not engaging in regulated activity, and retain a record of this risk assessment.

## **Governors**

All Governors will have an enhanced DBS check without barred list information. A barred list check will be completed if a governor is in regulated activity. All governors will also have a Section 128 check.

## **Contractors**

We will ensure that any contractor whose work provides them with the opportunity for contact with children will have the appropriate checks. Those contractors engaging in regulated activity will have an enhanced DBS check including barred list information.

For all other contractors who are not engaging in regulated activity, but whose work provides them with an opportunity for regular contact with children, an enhanced DBS check (not including barred list information) will be required.

This appendix applies to all cases where it is alleged that a staff member, supply teacher or volunteer 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 he or she may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children

We will deal with any allegation of abuse against a member of staff or volunteer quickly, in a fair and consistent way that provides effective protection for the child and supports the person who is the subject of the allegation. We recognise our duty of care to our employees and will provide effective support for anyone facing an allegation, including a named contact if the person is suspended. We will advise staff to contact their trade union representative.

The following definitions will be used when determining the outcome of any investigation:

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation. 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

#### Initial consideration when dealing with an allegation

The headteacher or (where the headteacher is the subject of an allegation) the chair of governors, should discuss the allegation immediately with the local authority designated officer. This discussion will consider the nature, content and context of the allegation and agree a course of action. There may be situations when the case manager will want to involve the police immediately, for example if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. Where there is no such evidence, the case manager will discuss the allegations with the designated officer in order to help determine whether police involvement is necessary. The case manager will inform the accused person about the allegation as soon as possible after consulting the designated officer. Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies.

If the initial sharing of information leads to a decision that no further action is to be taken in regard to the individual facing the allegation or concern, this decision and a justification for it will be recorded by both the case manager and the designated officer, and agreement reached on what information should be put in writing to the individual concerned and by whom. The case manager will then consider with the designated officer what action should follow both in respect of the individual and those who made the initial allegation. If the allegation is about physical contact, the strategy discussion or initial evaluation will take into account that school staff are entitled to use reasonable force to control or restrain children in certain circumstances.

Where it is clear that an investigation by the police or children's social care services is unnecessary, or the strategy discussion or initial evaluation decides that is the case, the designated officer will discuss the next steps with the case manager. In those circumstances, the options open to the school or college depend on the nature and circumstances of the allegation and the evidence and information available. This will range from taking no further action to dismissal or a decision not to use the person's services in future. Suspension will not be the default position: an individual should be suspended only if there is no reasonable alternative.

In some cases, further enquiries will be needed to enable a decision about how to proceed. If so, the case manager will discuss with the designated officer how and by whom the investigation will be undertaken. In straightforward cases, the investigation should normally be undertaken by a senior member of our staff. In other circumstances, the allegation will require an independent investigator.

Parents or carers of the child or children involved will be told about the allegation as soon as possible if they do not already know of it. However, where a strategy discussion is required, or police or children's social care services need to be involved, the case manager will not do so until those agencies have been consulted and have agreed what information can be disclosed to the parents or carers. Parent or carers will be kept informed about the progress of the case. Parents will be reminded of the requirement to maintain confidentiality about any allegations made against teachers whilst investigations are ongoing. If parents or carers wish to apply to the court to have reporting restrictions removed, they should be told to seek legal advice.

If the accused person resigns, or ceases to provide their services, this will not prevent an allegation being followed up. We will ensure that a referral to the DBS is made, if the four criteria at the start of this appendix are met. We will also consider whether a referral to the Secretary of State is appropriate.

Following a criminal investigation or prosecution, the police should inform the school and designated officer immediately when a criminal investigation and any subsequent trial is complete, or if it is decided to close an investigation without charge, or not to continue to prosecute the case after the person has been charged. In those circumstances, the case manager will discuss with the designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed.

If the allegation is substantiated and the person is dismissed or the person's services are no longer used, or the person resigns or otherwise ceases to provide his or her services, the designated officer will discuss with the case manager and their personnel adviser whether the school or college will decide to make a referral to the DBS for consideration of whether inclusion on the barred lists is required. In the case of a member of teaching staff, the case manager and personnel officer will discuss with the designated officer whether to refer the matter to the TRA to consider prohibiting the individual from teaching.

Where it is decided on the conclusion of a case that a person who has been suspended can return to work, the case manager will consider how best to facilitate this and consider how the person's contact with the child or children making the allegation can best be managed.

Allegations against a teacher who is no longer teaching will be referred to the police. Historical allegations of abuse will also be referred to the police.

### **Confidentiality**

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the designated officer, police and children's social care services to agree the following:

- who needs to know and, importantly, exactly what information can be shared
- how to manage speculation, leaks and gossip
- what, if any, information can be reasonably given to the wider community to reduce speculation
- how to manage press interest if, and when, it should arise.

### **Record keeping and references**

Details of allegations that are found to have been malicious will be removed from personnel records. For all other allegations, a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, is kept

on the confidential personnel file of the accused, and a copy provided to the person concerned. Records will be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.

Cases in which an allegation was proven to be false, unsubstantiated or malicious will not be included in employer references. A history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious will also not be included in any reference.

### **Timescales**

Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week.

If the nature of an allegation does not require formal disciplinary action, we will institute appropriate action within 3 working days.

If a disciplinary hearing is required and can be held without further investigation, we will hold this within 15 working days.

### **Suspension**

Suspension will not be an automatic response when an allegation is reported: all options to avoid suspension will be considered prior to taking that step. Suspension will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that it might be grounds for dismissal.

Based on assessment of risk, the following alternatives will be considered by the case manager before suspending a member of staff:

- redeployment within the school so that the individual does not have direct contact with the child or children concerned
- providing an assistant to be present when the individual has contact with children
- redeploying to alternative work in the school so the individual does not have unsupervised access to children
- moving the child or children to classes where they will not come into contact with the member of staff, making it clear that this is not a punishment and parents have been consulted; or
- temporarily redeploying the member of staff to another role in a different location, for example to an alternative school or work for the local authority

If immediate suspension is considered necessary, the rationale and justification for such a course of action will be agreed and recorded by both the case manager and the designated officer.

### **Supply staff**

We will ensure any allegations against an individual not employed by Cardinal Langley RC High School, such as supply teachers, will be dealt with properly. We will not decide to stop using a supply teacher due to safeguarding concerns without finding out the facts and liaising with our local authority designated officer to determine a suitable outcome. We will discuss with the agency whether it is appropriate to suspend the supply teacher. We will inform the agency of our process for managing allegations and invite the agency's human resource manager or equivalent to meetings as appropriate.

### **Learning lessons**

At the conclusion of a case in which an allegation is substantiated, we will review the circumstances of the case with the designated officer to determine whether there are any improvements to be made to the school's procedures or practice to help prevent similar events in the future.



## **Non-recent allegations**

Abuse can be reported no matter how long ago it happened. Where an adult makes an allegation to our school that they were abused as a child, the individual will be advised to report the allegation to the police. We will report any non-recent allegations made by a child to the LADO.

## **Low-level concerns**

In line with Section Two of Part Four of Keeping Children Safe in Education, we recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns with the right person so that they can be addressed appropriately. The purpose of our approach to low-level concerns is to ensure that our values are constantly lived, monitored and reinforced by staff.

### **Definition of low-level concerns**

The term 'low-level' concern does not mean that the concern is insignificant, it means that the threshold set out at the start of this appendix has not been met. A low-level concern covers any concern no matter how small, even if it is no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and;
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

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

Such behaviour can exist on a spectrum.

### **Sharing low-level concerns**

Low-level concerns about a member of staff, supply staff, volunteer or contractor should be reported to the headteacher. Any concerns about the headteacher should be reported to the Chair of Governors.

### **Recording low-level concerns**

All low-level concerns will be recorded in writing. Each record will include details of the concern, the context in which the concern arose, and action taken. Records will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation. Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or by referring to the LADO, where a pattern of behaviour moves from a concern to meeting the harms threshold.

### **Low-level concerns and references**

Low-level concerns will not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. Where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it will be referred to in a reference.

KEY AREA	CONTENT
Maintaining links with safeguarding partners	<ul style="list-style-type: none"> <li>The school will check briefings from the DfE, Rochdale MBC, RBSCP and CSC.</li> </ul>
Referrals to CSC and LADO	<ul style="list-style-type: none"> <li>Any concerns about harm to children are subject to consultation with the LADO as in normal operating (email <a href="mailto:LADO@Rochdale.gov.uk">LADO@Rochdale.gov.uk</a>).</li> <li>CSC can be contacted on 0300 303 0440 (0300 303 8875 out of office hours) and <a href="mailto:ehash@rochdale.gov.uk">ehash@rochdale.gov.uk</a></li> <li>The Early Help Advice Line and EHASH professionals are still available and will be used for advice about threshold and wider safeguarding concerns.</li> </ul>
Designated Safeguarding Lead	<ul style="list-style-type: none"> <li>If the DSL (Angela Williams) is not available on site, staff with a concern should:                             <ul style="list-style-type: none"> <li>➢ email <a href="mailto:awilliams@clrchs.co.uk">awilliams@clrchs.co.uk</a> and cc <a href="mailto:safeguarding@clrchs.co.uk">safeguarding@clrchs.co.uk</a></li> <li>➢ or speak to the member of SLT leading that day who will coordinate safeguarding arrangements with a member of the safeguarding team (Claire Flitcroft, Jim Sweeney, Kate Foster, Andy Eadie, Bev Ashton).</li> </ul> </li> <li>Children in our setting – we will ensure that if children from another school are being cared for on our site or vice versa then links will be in place between the respective DSL functions to share information.</li> <li>All staff from other settings will be provided with a CLRCHS Safeguarding handbook to ensure arrangements to ensure that all staff who are not familiar with the setting know who to speak to if they have concerns about a child.</li> <li>We will have arrangements to ensure that all adults on school site understand the schools commitment to acting immediately in response to any safeguarding concerns</li> </ul>
Supporting Vulnerable Children (allocated to a social worker)	<ul style="list-style-type: none"> <li>The safeguarding team will continue to liaise with CSC regarding TAF meetings and core group/ICPCC meetings. The Safeguarding Team update DSL regarding twice weekly contact with families/social workers.</li> <li>Any new social worker contacts will be sourced through the Early Help Advice Line and EHASH professionals</li> <li>Carers/social workers of all looked after children and those becoming looked after will receive twice weekly contact from the designated teacher for CLA who also has contact arrangements for the VHTs.</li> </ul>
Supporting potentially Vulnerable Children (not allocated to a social worker)	<ul style="list-style-type: none"> <li>The safeguarding team, through consultation with families, teachers, NHS and police, hold a database of families needing support despite the child not meeting the DfE criteria of ‘vulnerable’. This database is updated weekly through constant contact with families and all professionals.</li> <li>The Safeguarding team and PALs maintain contact / support and identify any concerns in such families through bespoke telephone and email updates with parents and professionals (daily, twice weekly, weekly contact depending on need).</li> <li>The Safeguarding team are in constant contact with professionals from partner agencies (Early Break, School Nurse, Closing the Gap, ACE) to support and identify any concerns in families.</li> </ul>

KEY AREA	CONTENT
Peer on peer abuse	<ul style="list-style-type: none"> <li>• Children and parents are advised and urged to email the Safeguarding team for a response to any concerns related to peer on peer abuse between children who do not ordinarily attend our school or are being looked after by adults who do not know them well</li> </ul>
Online Safeguarding	<ul style="list-style-type: none"> <li>• All video conferencing sessions (lessons, form group meetings) will be performed in a group format (no one-to-one sessions) and will be recorded for safeguarding purposes</li> <li>• All parents receive regular reminders of how to report/support children who are not physically attending school regarding online activity</li> <li>• Impero Alerts continues to monitor the use of school-based systems</li> <li>• Parents are advised to help keep their children safe online at this time through regular updated guidance from school with contacts from external agencies where appropriate. As well as reporting routes back to the school, we also regularly signpost children to age appropriate practical support from the likes of: <ul style="list-style-type: none"> <li>➤ <a href="#">Childline</a> - for support</li> <li>➤ <a href="#">UK Safer Internet Centre</a> - to report and remove harmful online content</li> <li>➤ <a href="#">CEOP</a> - for advice on making a report about online abuse</li> </ul> </li> </ul>
Children with specific health needs	<ul style="list-style-type: none"> <li>• Children with an EHCP receive twice weekly contact from the Additional Need Coordinator. PALS' use of their databases of lower level vulnerable children (including those with a medical condition) includes bespoke contact regarding management of conditions.</li> </ul>
Safer Recruitment & use of Volunteers	<ul style="list-style-type: none"> <li>• A member of SLT (trained in Safer recruitment) must be present to safely recruit and oversee volunteers with reference to para 183-188 of KCSIE</li> <li>• New staff, staff relocated to the school, and volunteers are provided with a CLRCHS handbook to understand the staff code of conduct</li> <li>• Any volunteers are individually risk-assessed by a member of SLT (trained in Safer recruitment).</li> </ul>
Operation Encompass	<ul style="list-style-type: none"> <li>• Any Operation Encompass notifications will be discussed by the Safeguarding team to consider what further actions are required as they would in normal working, including speaking to parents and seeking advice from EHASH.</li> </ul>

## Peer on Peer Abuse/Sexual Harassment and Violence - Addendum A

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### Introduction

At Cardinal Langley, we recognise that children are vulnerable to and capable of abusing their peers. We take such abuse as seriously as abuse perpetrated by an adult. This includes verbal as well as physical abuse. Peer on peer abuse will not be tolerated or passed off as trivial. We are committed to a whole school approach to ensure the prevention, early identification and appropriate management of peer on peer abuse within our school and beyond.

In cases where peer on peer abuse is identified, we will follow our child protection procedures taking a contextual approach to support all children and young people who have been affected by the situation.

We recognise that peer on peer abuse can manifest itself in many ways such as:

- Child Sexual Exploitation
- Sexting or youth produced digital imagery
- Up-skirting
- Bullying
- Radicalisation
- Abuse in intimate relationships
- Children who display sexually harmful behaviour
- Gang association and serious violence (County Lines)
- Technology can be used for bullying and other abusive behaviour

Some of these behaviours will need to be handled with reference to other policies in school such as the behaviour policy, anti-bullying policy, child protection policy and E-Safety safety policy. This Appendix concentrates on peer on peer abuse in the context of sexual harassment and sexual violence. It is compliant with the statutory guidance on peer-on-peer abuse as set out in Keeping Children Safe in Education (September 2020) and should be read in conjunction with the Rochdale Borough Safeguarding Children Partnership's Safeguarding procedures and any relevant Practice Guidance issued by it.

### Aims

This Appendix will: -

- Set out our strategies for preventing, identifying and managing peer on peer abuse
- Take a contextual approach to safeguarding all children and young people involved.
- Acknowledge that children who have allegedly abused their peers or displayed harmful sexual behaviour are themselves vulnerable and may have been abused by peer, parents or adults in the community.

We understand peer on peer abuse sexual violence and sexual harassment can occur between two children of any age and sex or a group of children sexually assaulting or sexually harassing a single child or group of children. The impact of this behaviour on children can be very distressing and have an impact on academic achievement and emotional health and wellbeing. Sexual harassment and sexual violence may also occur online and offline.

## **The Context**

All behaviour takes place on a spectrum. Understanding where a child's behaviour falls on a spectrum is essential to being able to respond appropriately to it. In this Appendix we recognise the importance of distinguishing between problematic and abusive sexual behaviour (Harmful Sexual Behaviour HSB). We are adopting the NSPCC definition of HSB as: - "Sexual behaviours expressed by children...that are developmentally inappropriate, may be harmful towards self or others, or be abusive towards another child...or adult." We will also use Simon Hackett's continuum model to demonstrate the range of sexual behaviours (Appendix 1) and the Brook Traffic Lights (appendix 2).

## **Vulnerable groups**

We recognise that all children can be at risk, however, we acknowledge that some groups are more vulnerable. This can include:

- experience of abuse within their family;
- living with domestic violence;
- young people in care;
- children who go missing; children with additional needs (SEN and/or disabilities);
- children who identify or are perceived as LGBT and/or have other protected characteristics under the Equalities Act 2010.

Whilst research tells us girls are more frequently identified as being abused by their peers and girls are more likely to experience unwanted sexual touching in schools, this is not confined to girls. Boys are less likely to report intimate relationship abuse and may display other behaviour such as antisocial behaviour. Boys report high levels of victimisation in areas where they are affected by gangs. We recognise that both boys and girls experience peer on peer abuse, but they do so in gendered ways.

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include:

- increased absence from school
- a change in friendships or relationships with older individuals or groups
- a significant decline in performance
- signs of self-harm or a significant change in wellbeing
- signs of assault or unexplained injuries
- unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

## **Responding to Alleged Incidents**

Responding to reports of sexual violence and sexual harassment

All reports of peer on peer abuse will be made on a case by case basis with the designated safeguarding lead or their deputy taking a leading role using their professional judgement and supported by other agencies such as social care or the police as required.

The immediate response to a report

- We will take all reports seriously and will reassure the victim that they will be supported and kept safe
- All staff will be trained to manage a report

- Staff will not promise confidentiality as the concern will need to be shared further (for example, with the designated safeguarding lead or social care) staff will however only share the report with those people who are necessary to progress it
- A written report will be made as soon after the interview as possible recording the facts as presented by the child. These may be used as part of a statutory assessment if the case is escalated later
- Where the report includes an online element, we will follow advice on searching, screening and confiscation. The staff will not view or forward images unless unavoidable and only if another member of staff (preferably the DSL) is present. The DSL will be informed as soon as possible.

### **Risk Assessment**

When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

- The victim, especially their protection and support
- The alleged perpetrator
- All the other children (and, if appropriate, adult students and staff) in school, especially any actions that are appropriate to protect them.

Risk assessments will be recorded (written or electronic say where these are filed) and be kept under review. The designated safeguarding lead (or a deputy) will ensure they are engaging with EHASH.

### **Action following a report of sexual violence and/or sexual harassment**

Following an incident, we will consider:

- The wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment;
- The nature of the alleged incident(s), including: whether a crime may have been committed and consideration of harmful sexual behaviour;
- The ages of the children involved;
- The developmental stages of the children involved;
- Any power imbalance between the children. For example, is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?
- If the alleged incident is a one-off or a sustained pattern of abuse;
- Are there ongoing risks to the victim, other children, adult students or school or college staff; and other related issues and wider context?

### **Follow up Actions**

Children sharing a classroom: whilst the school or college establishes the facts of the case and starts the process of liaising with children's social care and the police:

- The perpetrator will be removed from any classes they share with the victim.
- We will consider how best to keep the victim and alleged perpetrator a reasonable distance apart on school or college premises and on transport to and from the school or college.

These actions are in the best interests of both children and should not be perceived to be a judgment on the guilt of the alleged perpetrator.

### **Options to manage the report**

#### Manage internally

1. In some cases of sexual harassment, for example, one-off incidents, we may decide that the children concerned are not in need of early help or statutory intervention and that it would be appropriate to handle the incident internally, perhaps through utilising the behaviour and bullying policies and by providing pastoral support. This decision will be made based on the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated. All decisions, and discussions around making these decisions will be recorded and stored on CPOMS.

2. In line with 1 above, we may decide that the children involved do not require statutory interventions but may benefit from early help. Early help means providing support as soon as a problem emerges, at any point in a child's life. Providing early help is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address non-violent harmful sexual behaviour and may prevent escalation of sexual violence.

3. Where a child has been harmed, is at risk of harm, or is in immediate danger, we will make a referral to EHASH following locally agreed protocols. Where statutory assessments are appropriate, the designated safeguarding lead or a deputy will be working alongside, and cooperating with, the relevant lead social worker. Collaborative working will help ensure the best possible package of coordinated support is implemented for the victim and, where appropriate, the alleged perpetrator and any other children that require support.

### **Reporting to the Police**

Any report to the police will generally be made by school or through EHASH as above. The designated safeguarding lead will follow local processes for referrals. Where a report of rape, assault by penetration or sexual assault is made, the starting point is this will be passed on to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of reporting to the police remains. The police will take a welfare, rather than a criminal justice, approach. Where a report has been made to the police, the school or college will consult the police and agree what information can be disclosed to staff and others, the alleged perpetrator and their parents or carers. They will also discuss the best way to protect the victim and their anonymity. Where there is a criminal investigation, we will work closely with the relevant agencies to support all children involved (especially potential witnesses). Where required, advice from the police will be sought in order to help us.

Whilst protecting children and/or taking any disciplinary measures against the alleged perpetrator, we will work closely with the police (and other agencies as required), to ensure any actions the school or college take do not jeopardise the police investigation. The end of the criminal process If a child is convicted or receives a caution for a sexual offence, we will update our risk assessment, ensuring relevant protections are in place for all children. We will consider any suitable action following our behaviour policy. If the perpetrator remains in school, we will be very clear as to our expectations regarding the perpetrator now they have been convicted or cautioned. This could include expectations regarding their behaviour and any restrictions we think are reasonable and proportionate about the perpetrator's timetable.

Any conviction (even with legal anonymity reporting restrictions) is potentially going to generate interest among other students in school. We will ensure all children involved are protected, especially from any bullying or harassment (including online). Where cases are classified as "no further action" (NFA'd) by the police or Crown Prosecution Service, or where there is a not guilty verdict, we will

continue to offer support to the victim and the alleged perpetrator for as long as is necessary. A not guilty verdict or a decision not to progress with their case will likely be traumatic for the victim. The fact that an allegation cannot be substantiated does not necessarily mean that it was unfounded. We will continue to support all parties in this instance.

### **Support for Children Affected by Sexual-Assault**

Support for victims of sexual assault is available from a variety of agencies. We will support the victim of sexual assault to remain in school but if they are unable to do so we will enable them to continue their education elsewhere. This decision will be made only at the request of the child and their family. If they are moved, we will ensure the new school is aware of the ongoing support they may need. The DSL will support this move. Where there is a criminal investigation the alleged perpetrator will be removed from any shared classes with the victim and we will also consider how best to keep them a reasonable distance apart on the school premises or on school transport. This is in the best interest of the children concerned and should not be perceived to be a judgement of guilt before any legal proceedings. We will work closely with the police. Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, we may take suitable action, if we have not already done so.

In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and lead to the view that allowing the perpetrator to remain in the same school would seriously harm the education or welfare of the victim (and potentially other students). Where a criminal investigation into sexual assault leads to a conviction or caution, we may, if we have not already done so, consider any suitable sanctions using our behaviour policy, including consideration of permanent exclusion. Where the perpetrator is going to remain at school, the principle would be to continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on school premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.

Reports of sexual assault and sexual harassment will, in some cases, not lead to a report to the police (for a variety of reasons). In some cases, rape, assault by penetration, sexual assault or sexual harassment are reported to the police and the case is not progressed or are reported to the police and ultimately result in a not guilty verdict. None of this means the offence did not happen or that the victim lied. The process will have affected both victim and alleged perpetrator. Appropriate support will be provided to both as required and consideration given to sharing classes and potential contact as required on a case-by-case basis. All the above will be considered with the needs and wishes of the victim at the heart of the process (supported by parents and carers as required). Any arrangements will be kept under review.

### **Physical Abuse**

While a clear focus of peer on peer abuse is around sexual abuse and harassment, physical assaults and initiation violence and rituals from students to students can also be abusive. These are equally not tolerated and if it is believed that a crime has been committed, will be reported to the police. The principles from the anti-bullying policy will be applied in these cases, with recognition that any police investigation will need to take priority. When dealing with other alleged behaviour which involves reports of, for example, emotional and/or physical abuse, staff can draw on aspects of Hackett's continuum (Appendix 1) to assess where the alleged behaviour falls on a spectrum and to decide how to respond. This could include, for example, whether it:

- is socially acceptable
- involves a single incident or has occurred over a period of time
- is socially acceptable within the peer group



- is problematic and concerning
- involves any overt elements of victimisation or discrimination e.g. related to race, gender, sexual orientation, physical, emotional, or intellectual vulnerability
- involves an element of coercion or pre-planning
- involves a power imbalance between the child/children allegedly responsible for the behaviour
- involves a misuse of power

### **Online Behaviour**

Many forms of peer on peer abuse have an element of online behaviour including behaviours such as cyberbullying and sexting. Policies and procedures concerning this type of behaviour can be found in our Anti- Bullying policy, E-Safety policy, and Child Protection policy.

### **Prevention**

Our school actively seeks to raise awareness of and prevent all forms of peer-on-peer abuse by:

- Educating all Governors, Senior Leadership Team, staff and volunteers, students, and parents about this issue. This will include training all Governors, Senior Leadership Team, staff and volunteers on the nature, prevalence and effect of peer-on-peer abuse, and how to prevent, identify and respond to it.

This includes:

- a) Contextual Safeguarding
  - b) The identification and classification of specific behaviours
  - c) The importance of taking seriously all forms of peer-on-peer abuse (no matter how low level they may appear) and ensuring that no form of peer-on-peer abuse is ever dismissed as horseplay or teasing.
- Educating children about the nature and prevalence of peer-on-peer abuse via PSHE and the wider curriculum.
  - Students are frequently told what to do if they witness or experience such abuse, the effect that it can have on those who experience it and the possible reasons for it, including vulnerability of those who inflict such abuse.
  - They are regularly informed about school's approach to such issues, including its zero-tolerance policy towards all forms of peer-on-peer abuse.
  - Engaging parents on this issue by:
    - a) Talking about it with parents, both in groups and one to one
    - b) Asking parents what they perceive to be the risks facing their child and how they would like to see the School address those risks
    - c) Involving parents in the review of School policies and lesson plans
    - d) Encouraging parents to hold the School to account on this issue.
  - Ensuring that all peer-on-peer abuse issues are fed back to our safeguarding team so that we can spot and address any concerning trends and identify students who may be in need of additional support
  - Challenging the attitudes that underlie such abuse (both inside and outside the classroom)

- Working with Governors, Senior Leadership Team, all staff and volunteers, students and parents to address equality issues, to promote positive values, and to encourage a culture of tolerance and respect amongst all members of the school community
- Creating conditions in which students can aspire to and realise safe and healthy relationships;
- Creating a culture in which our students feel able to share their concerns openly, in a non-judgmental environment, and have them listened to
- Responding to cases of peer-on-peer abuse promptly and appropriately.

### **Multi-agency working**

The School actively engages with its local partners in relation to peer-on-peer abuse, and works closely with Rochdale Borough Safeguarding Children Partnership (RBSCP), Rochdale's Safeguarding Hub (EHASH), children's social care, other relevant agencies and other schools. The relationships we have built with these partners are essential to ensuring that we are able to prevent, identify early and appropriately handle cases of peer-on-peer abuse. They help the School

- a) To develop a good awareness and understanding of the different referral pathways that operate in its local area, as well as the preventative and support services which exist
- b) To ensure that our students can access the range of services and support they need quickly
- c) To support and help inform our local community's response to peer-on-peer abuse
- d) (d) To increase our awareness and understanding of any concerning trends and emerging risks in our local area to enable us to take preventative action to minimise the risk of these being experienced by our students.

The School actively refers concerns/allegations of peer-on-peer abuse where necessary to relevant agencies. Children resident out of county but attending a Rochdale school will be reported to their home MASH or equivalent Social Care. In cases involving children who are subject to risk, harm and abuse and who have LAC status, the children's social worker must be informed and a coordinated approach to address any incidents or concerns will be required.

### **Peer on Peer Abuse - Addendum B**

Simon Hackett (2010) has proposed a continuum model to demonstrate the range of sexual behaviours presented by children and young people, from those that are normal, to those that are highly deviant:

<https://www.nspcc.org.uk/globalassets/documents/publications/harmful-sexual-behaviour>

## Brook sexual behaviours traffic light tool

### Behaviours: age 0 to 5

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

#### What is a green behaviour?

Green behaviours reflect safe and healthy sexual development. They are displayed between children or young people of similar age or developmental ability. They are reflective of natural curiosity, experimentation, consensual activities and positive choices

#### What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

#### Green behaviours

- holding or playing with own genitals
- attempting to touch or curiosity about other children's genitals
- attempting to touch or curiosity about breasts, bottoms or genitals of adults
- games e.g. mummies and daddies,
- doctors and nurses
- enjoying nakedness
- interest in body parts and what they do
- curiosity about the differences between boys and girls

#### What is an amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be of potential concern due to age, or developmental differences. A potential concern due to activity type, frequency, duration or context in which they occur.

#### What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

#### Amber behaviours

- preoccupation with adult sexual

- behaviour
- pulling other children's pants down/skirts up/trousers down against their will
- talking about sex using adult slang
- 
- preoccupation with touching the genitals of other people
- following others into toilets or changing rooms to look at them or touch them
- talking about sexual activities seen on TV/online

#### What is a red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be excessive, secretive, compulsive, coercive, degrading or threatening and involving significant age, developmental, or power differences. They may pose a concern due to the activity type, frequency, duration or the context in which they occur

#### What can you do?

Red behaviours indicate a need for immediate intervention and action.

#### Red behaviours

- persistently touching the genitals of other children
- persistent attempts to touch the genitals of adults
- simulation of sexual activity in play
- sexual behaviour between young children involving penetration with objects
- forcing other children to engage in sexual play

## Behaviours: age 5 to 9 and 9 to 13

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

### What is a green behaviour?

Green behaviours reflect safe and healthy sexual development. They are displayed between children or young people of similar age or developmental ability and reflective of natural curiosity, experimentation, consensual activities and positive choices

### What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

#### Green behaviours 5-9

- feeling and touching own genitals
- curiosity about other children's genitals
- curiosity about sex and relationships, e.g. differences between boys and girls, how sex happens, where babies come from, same-sex relationships
- sense of privacy about bodies
- telling stories or asking questions using swear and slang words for parts of the body

#### Green behaviours 9-13

- solitary masturbation
- use of sexual language including swear and slang words
- having girl/boyfriends who are of the same, opposite or any gender
- interest in popular culture, e.g. fashion, music, media, online games, chatting online
- need for privacy
- consensual kissing, hugging, holding hands with peers

### What is an amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be of potential concern due to age, or developmental differences. A potential concern due to activity type, frequency, duration or context in which they occur.

### What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

#### Amber behaviours 5-9

- questions about sexual activity which persist or are repeated frequently, despite an answer having been given
- sexual bullying face to face or through texts or online messaging
- engaging in mutual masturbation
- persistent sexual images and ideas in talk, play and art
- use of adult slang language to discuss sex

#### Amber behaviours 9-13

- uncharacteristic and risk-related behaviour, e.g. sudden and/or provocative changes in dress, withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing
- verbal, physical or cyber/virtual sexual bullying involving sexual aggression
- LGBT (lesbian, gay, bisexual, transgender) targeted bullying
- exhibitionism, e.g. flashing or mooning
- giving out contact details online
- viewing pornographic material
- worrying about being pregnant or having STIs

### What is a red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be excessive, secretive, compulsive, coercive, degrading or threatening and involving significant age, developmental or power differences. They may pose a concern due to the activity type, frequency, duration or the context in which they occur

### What can you do?

Red behaviours indicate a need for immediate intervention and action.

#### Red behaviours 5-9

- frequent masturbation in front of others
- sexual behaviour engaging significantly younger or less able children

- forcing other children to take part in
- sexual activities
- simulation of oral or penetrative sex
- sourcing pornographic material online

#### Red behaviours 9-13

- exposing genitals or masturbating in public
- distributing naked or sexually provocative images of self or others
- sexually explicit talk with younger children
- sexual harassment
- arranging to meet with an online acquaintance in secret
- genital injury to self or others
- forcing other children of same age, younger or less able to take part in sexual activities
- sexual activity e.g. oral sex or intercourse
- presence of sexually transmitted infection (STI)
- evidence of pregnancy

## Behaviours: age 13 to 17

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

### What is a green behaviour?

Green behaviours reflect safe and healthy sexual development. They are displayed between children or young people of similar age or developmental ability and reflective of natural curiosity, experimentation, consensual activities and positive choices

### What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

#### Green behaviours

- solitary masturbation
- sexually explicit conversations with peers
- obscenities and jokes within the current cultural norm
- interest in erotica/pornography
- use of internet/e-media to chat online
- having sexual or non-sexual relationships
- sexual activity including hugging, kissing, holding hands
- consenting oral and/or penetrative sex with others of the same or opposite gender who are of similar age and developmental ability
- choosing not to be sexually active

### What is an amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be of potential concern due to age, or developmental differences. A potential concern due to activity type, frequency, duration or context in which they occur.

### What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

#### Amber behaviours

- accessing exploitative or violent pornography
- uncharacteristic and risk-related behaviour, e.g. sudden and/or provocative changes in dress,

- withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing
- concern about body image
- taking and sending naked or sexually provocative images of self or others
- single occurrence of peeping, exposing, mooning or obscene gestures
- giving out contact details online
- joining adult- only social networking sites and giving false personal information
- arranging a face to face meeting with an online contact alone
- involvement in sexual exploitation and/or trafficking
- sexual contact with animals
- receipt of gifts or money in exchange for sex

### What is a red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be excessive, secretive, compulsive, coercive, degrading or threatening and involving significant age, developmental or power differences. They may pose a concern due to the activity type, frequency, duration or the context in which they occur

### What can you do?

Red behaviours indicate a need for immediate intervention and action.

#### Red behaviours

- exposing genitals or masturbating in public
- preoccupation with sex, which interferes with daily function
- sexual degradation/humiliation of self or others
- attempting/forcing others to expose genitals
- sexually aggressive/exploitative behaviour
- sexually explicit talk with younger children
- sexual harassment
- non-consensual sexual activity
- use of/acceptance of power and control in sexual relationships
- genital injury to self or others
- sexual contact with others where there
- is a big difference in age or ability
- sexual activity with someone in authority and in a position of trust
- sexual activity with family members