



Frodsham Primary Academy
Child Protection Policy and Safeguarding Procedures

Ratified: September 2025

Next Review Date: September 2026

Policy Responsibilities and Review

Policy type:	School
Guidance:	<ul style="list-style-type: none">• Keeping Children Safe in Education (2025) KCSIE• Working Together to Safeguard Children (Dec 2023)• What to do if you're worried a child is being abused (advice for practitioners) (March 2015)• Information Sharing (advice for practitioners providing safeguarding services to children, young people, parents and carers) (July 2018)
Related policies:	<ul style="list-style-type: none">• Mental Health and Wellbeing Policy• Online Safety Policy• Attendance Policy• Safer Recruitment Policy• Allegations of Abuse Policy• Whistleblowing Policy• Behaviour Policy• RSHE Policy• Staff Code of Conduct• SEND/Inclusion Policy• Lockdown Policy
Review frequency:	Annually
Committee responsible:	Local Governing Committee
Chair signature:	
Changes in latest version:	Adapted to reflect the changes in KCSIE 2025

Who this document applies to:

This document applies to all children and young people under 18 at this setting.

Anyone coming into contact with our pupils or visiting our site must abide by this policy.

Everyone working at the setting as a member of staff or volunteer has a duty to safeguard and protect children and young people. They must read this policy as well as Keeping Children Safe in Education (2025), and sign to say they understand them and agree to work to them.

Visitors to the setting such as supply staff, contractors and visitors must read our safeguarding statement:

Keeping children & young people safe is our top priority.

If on your visit you have any worries at all, please raise them with a member of staff or ask to speak to the Designated Safeguarding Lead or Headteacher.

- **Speak to Gemma Callaghan the Designated Safeguarding Lead**
- **Speak to Debbie Sutton, Deputy DSL on extension 203**

If you are still worried or do not feel able to share your concern with us, you can:

- **Contact the Local Authority Children's Social Care on 01606275099**

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

Keeping Children Safe in Education 2025

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Aims

At Frodsham Primary Academy we are committed to safeguarding children and young people and we expect everyone who works in our schools to share this commitment.

Adults in our school take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them.

We will always act in the best interest of the child.

Legislation and statutory guidance

This policy is based on the Department for Education's (DfE) statutory guidance

[https://assets.publishing.service.gov.uk/media/68add931969253904d155860/Keeping_children_](https://assets.publishing.service.gov.uk/media/68add931969253904d155860/Keeping_children_safe_in_education_from_1_September_2025.pdf)

[afe_in_education_from_1_September_2025.pdf Working Together to Safeguard Children 2023](https://assets.publishing.service.gov.uk/media/68add931969253904d155860/Working_Together_to_Safeguard_Children_2023.pdf)

and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our local 3 safeguarding partners:

- The local authority (LA)
- Integrated care boards (previously known as clinical commission groups) for an area within the LA
- The chief officer of police for a police area in the LA

1. Key Personnel

Gemma Callaghan is the Designated Safeguarding Lead (DSL). This means they have lead responsibility for the wellbeing and protection of all children at the setting, ensuring staff are recruited and trained safely, and monitoring the progress of any child needing additional care or protection.

The following staff have received full DSL training and are able to support with concerns in the absence of the DSL- Debbie Sutton

The Designated Teacher for looked-after and previously looked-after children is Gemma Callaghan. Gemma Callaghan is the Headteacher and has overall responsibility for the setting, staff and pupils.

The Designated Safeguarding Lead (DSL) should have the appropriate status and authority within the school to carry out duties of the post. The role of the DSL carries a significant level of responsibility, and they should be given the additional time, funding, training, resources and support they need to carry out the role effectively. Their additional responsibilities include providing advice and support to other staff on child welfare, safeguarding and child protection matters, taking part in strategy discussions and inter-agency meetings, and/or supporting other staff to do so, and contributing to the assessment of children.

The DSL is expected to refer cases:

- of suspected abuse and neglect to the local authority children's social care as required and support staff who may also need to make referrals to local authority children's social care
- to the Channel programme where there is a radicalisation concern as required and support staff who may also be required to do referrals
- where a crime has been committed to the Police as required

The DSL is expected to:

- act as a source of support, advice and expertise for all staff

- act as a point of contact with the safeguarding partners
- liaise with the head teacher to inform them of issues – especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations
- as required, liaise with “case manager” and the local authority designated officer (LADO) for child protection concerns in cases which concern a staff member
- liaise with the senior mental health lead and, where available the mental health support team, where safeguarding concerns are linked to mental health
- promote a supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstance

The DSL will also:

- Keep the headteacher of any issues
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- Discuss the local response to sexual violence and sexual harassment with police and local authority children’s social care colleagues to prepare the school’s policies
- Be confident that they know what local specialist support is available to support all children involved (including victims and perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support

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

The Governing Board will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 and our school’s local multi-agency safeguarding arrangements
- Appoint a senior board level lead to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL
- Ensure all staff undergo safeguarding and child protection training, including online safety and that such training is regularly updated and is in line with advice from the safeguarding partners
- Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:
- Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
- Reviewing the DfE’s guidance and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards

- Make sure the DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
- The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
- That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- All governors will read *Keeping Children Safe in Education* in its entirety

The Headteacher is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction
- Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources and that there is always adequate cover if the DSL is absent
- Acting as the 'case manager in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this

2. When we review this policy

This policy is reviewed annually and updated if required. This is so we can keep up to date with safeguarding issues as they emerge and evolve, including lessons learnt and is available on our website. We have incorporated key changes in line with the latest government guidance, *Keeping Children Safe in Education*. A summary of the changes are available in [Keeping Children Safe in Education 2025](#)

3. Hire or rent of setting premises

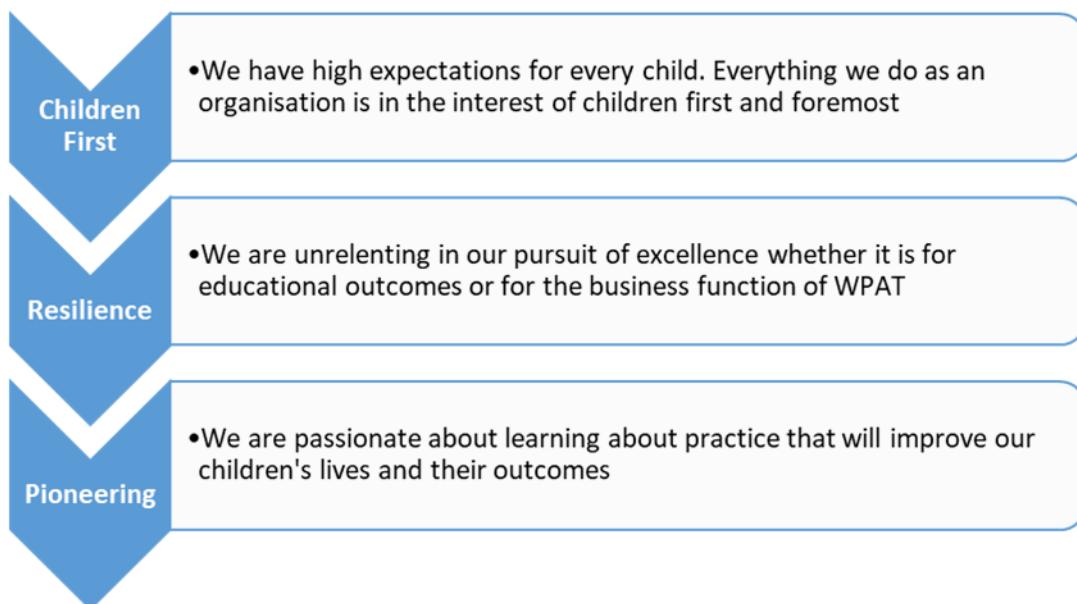
When we hire or rent the premises or facilities to other organisations, the governing body checks and ensures that appropriate safeguarding arrangements are in place and the organisation meets our requirements, relevant legal requirements and statutory guidance. This will be a requirement of any agreement between the setting and the other organisation.

4. Complaints

As well as talking to or emailing the staff above, children or parents can make a complaint about something they have seen at the setting. Please see our [complaints procedure](#) on our Trust website for more details.

5. Our values and guiding principles

1. We **always** act in the best interests of each pupil.
2. We **listen** to any communication from pupils, parents or carers and always take concerns seriously.
3. We acknowledge there are **risks** to the pupils in our care. Without proper care and vigilance abuse or neglect of pupils could happen at the setting. We talk about these risks with pupils, staff and parents/carers and together will plan carefully to keep them safe.
4. People **must** act if they are worried about a pupil and keep acting until they believe the pupil is safe.
5. We are **open** in our decisions and let parents and local authorities know about concerns.
6. We make it easy to raise a concern, and **anyone** raising concerns will be kept safe.
7. Through our wider curriculum and interventions we give children the tools to keep themselves **safe**.



6. UNICEF

Frodsham Primary School **working towards becoming a [UNICEF Rights Respecting School](#)**. Our vision and values support Articles 3, 28, 29, 31 of the United Nations Convention on the Rights of a Child.

- Article 3: The best interests of a child must be a top priority in all things that affect children
- Article 28: Every child has the right to an education
- Article 29: Education must develop every child's personality, talents and abilities to the full
- Article 31: Every child has the right to relax, play and take part in a wide range of cultural and artistic activities

7. Valuing diversity

We promote inclusive behaviours that empower children to make choices right for them. Discrimination can also be a safeguarding issue, and we will work with other agencies to consider how hurtful behaviour or comments affect children and act accordingly. If staff or volunteers behave in a way that discriminates against particular groups, we will take action to rectify things and consider whether this is a breach of our Code of Conduct.

8. Mental health

It is widely recognised that a child's emotional health and wellbeing influences their cognitive development and learning, as well as their physical and social health and their mental wellbeing in adulthood. It is part of the role of our staff to promote the welfare of pupils, mental as well as physical.

Our school will provide a safe environment which nurtures and encourages children's sense of self-worth and self-efficacy, reduces the threat of bullying and violence, and promotes positive behaviours.

All staff foster an ethos that promotes mutual respect, learning and successful relationships among children and staff. We strive to create a culture of inclusiveness and communication that ensures all children's concerns can be expressed and addressed.

Alice Pemberton (Senior Mental Health Lead) and Debbie Sutton (Pastoral lead) have completed training that reflects the needs of children, which includes Mental Health First Aid and Elsa.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the DSL or Senior Mental Health Lead.

The school will work in partnership with parents, carers and other family members to promote children's social and emotional wellbeing. All children have access to pastoral care and support so that emotional, social and behavioural problems can be dealt with as soon as they occur. When issues arise that need more support than the academy community can offer, parents and children are referred for additional help to [Mental Health Support Team in Schools \(MHST\)](#).

9. What to do if you are worried about a pupil/student at the setting

All staff, volunteers & visitors have a duty to act to protect children. The following procedure will guide you through what to do in the event you have a concern. If, after following the below procedure you still have a concern, please speak to Gemma Callaghan or follow our [Whistleblowing Policy](#).

Parents & Visitors

If the child is in **imminent danger**, take action to keep them safe. Tell our staff or if necessary, call the Police on 999 or Children's Services on **01606 275 099**

If you are concerned about **staff behaviour** contact the appropriate person as per **Appendix 1**

For other concerns speak to your class teacher

We will contact you by the next school day (sooner if required) to tell you that action has been taken

If you do not hear, or you remain concerned, please speak to the head teacher.

Staff & Volunteers

The DSL should be spoken to about any immediate concerns. Record on CPOMS and alert the DSL. Telephone to ensure this has been received

The DSL will assess the level of risk using the Warrington Threshold & Need Guidance document and may contact the Early Help Hub for advice. For Level 1 & 2 needs, talk to the parents, and provide support, including possible referral to other services.

For levels 3 & 4 needs, the DSL will contact parents (unless this would increase the risk) to talk about involving other agencies, as explained the threshold of needs guide. The DSL may contact Children's Services for advice and clarification on level of need.

If we have consent, the DSL will refer to children's social care on 01606- 275-099. If we do not have consent and we have a child protection concern, the DSL **must** still refer.

Monitor progress for the pupil/student.

Unless it will increase the risk to the child/young person contact the referrer, parent and any staff who need to know to let them know what is happening and what to do.

10. Legislation and the Law

Governing bodies have a strategic leadership responsibility for their school's safeguarding arrangements and must ensure that they comply with their duties under legislation. They must have regard to this guidance, ensuring policies, procedures and training in their schools are effective and comply with the law at all times. Headteachers should ensure that the policies and procedures, adopted by their governing bodies (particularly those concerning referrals of cases of suspected abuse and neglect), are understood, and followed by staff. We follow the below national guidance so we are clear what to expect and can explain this to children and their families.

- Working Together to Safeguard Children (a guide to inter-agency working to safeguard and promote the welfare of children) December 2023
- Keeping Children Safe in Education 2025
- What to do if you're worried a child is being abused (advice for practitioners) March 2015
- Information Sharing (advice for practitioners providing safeguarding services to children, young people, parents and carers) May 2024

Where there are specific risks we will access other specific guidance – please see a full list in [Appendix B](#) of KCSIE 2025.

'Safeguarding & Promoting Welfare' of children is defined as:

- providing help and support to meet the needs of the children as soon as problems emerge, whether that is within or outside the home, including online
- protecting children from maltreatment
- 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 in line with the outcomes set out in the Children's Social Care National Framework

Working Together to Safeguard Children Safe in Education 2024

'Child Protection' are the systems and processes all agencies follow if there is reasonable cause to suspect a child is suffering, or at risk of suffering, significant harm.

(s47, Children Act 1989)

- Child Protection is part of safeguarding and promoting the welfare of children and is defined for the purpose of the guidance as activity that is undertaken to protect specific children who are suspected to be suffering, or likely to suffer significant harm. This includes harm that occurs inside or outside the home, including online.
- Effective safeguarding means practitioners should understand and be sensitive to factors, including economic and social circumstances and ethnicity, which can impact children and their families' lives.

- promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children

11. Safeguarding in Cheshire West

We work within the [**Cheshire West and Chester Safeguarding Partnership**](#). This policy should be read in conjunction with Cheshire West and Chester Guidance on [Chester Safeguarding Children Online Procedures](#).

Where there is a welfare or child protection concern about a child in our setting, we will contact CWAC Council Children's Services by phone on 01606 275 099 this will be followed up by an electronic referral (MARF).

The Female Genital Mutilation (FGM) mandatory reporting duty (KCSIE 2025 pages 161-163) is a legal duty requiring teachers in England and Wales to make a report to the police where, in the course of their professional duties, they either:

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

It is recommended that teachers make a report orally by calling 101, the single non-emergency number. Where there is a risk to life or likelihood of serious immediate harm, professionals should report the case immediately to police, including dialling 999 if appropriate.

At Frodsham Academy we recognise that when a child has a social worker, it is an indicator that the child is more at risk than most pupils. This may mean that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health. We need to take these needs into account when making plans to support pupils who have a social worker.

12. Teaching about safeguarding

We work to facilitate a whole setting approach to safeguarding to listen to and empower pupils to keep themselves safe both on and offline. How we do this varies through the setting depending on the age and understanding of the pupil, worries and issues we come across and the views and values of the families and communities with whom we work.

The setting's curriculum statement is to create '**respectful citizens in a world of possibilities**' which embodies this vision. Citizenship is about belonging in a community, looking after one another, respecting one another's rights and understanding one's own rights. Pupils are taught formally about the United Nations Convention on the Rights of the Child – their right to an education that helps them fulfil their potential, to protection from violence, abuse or neglect and

to express their opinions and be listened to. This can occur in the classroom, or through modelling effective ways to resolve issues between children.

Children at Frodsham Academy are taught about how they can keep themselves and others safe, including online. To be effective, we present this information in an age-appropriate way. We are sensitive to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs or disabilities.

Children are taught what to do if they are worried about something for themselves or another child using the [Kidsafe](#) programme. They are encouraged to identify safe and important people in their immediate and surrounding family and friends, in the staff team here at the setting and about [Childline](#) and other organisations that are there to help children and young people in trouble. There are posters and other information about this in the setting.

13. Relationships education

The academy follows the statutory guidance in teaching about relationships. We talk about healthy relationships, choices, our rights over our bodies, keeping safe and what to do when you are worried – there is more information in our relationship policy which may affect an individual child (such as where there has been a significant life event) there will be discussions between the parent, the DSL and the relevant teacher to ensure the teaching is most supportive of the pupil.

14. Online safety

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate the whole school approach community in its safe and responsible use of technology, including mobile and smart technology
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism
- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them sexual, criminal, financial or other purposes

- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

15. Early Help

Providing early intervention is more effective in promoting the welfare of children and young people than reacting later. Early intervention means providing support as soon as a problem emerges, at any point in a child's life, from the foundation years through to the teenage years.

Any child may benefit from early intervention; however, staff should be particularly alert to a child who:

- Is disabled or has certain health conditions and has specific additional needs
- Has a mental health need
- has SEN (whether or not they have a statutory EHCP)
- Is a young carer
- Is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Is frequently missing/goes missing from education, home or care
- Is at risk of modern slavery, trafficking, sexual or criminal exploitation
- Is at risk of being radicalised or exploited
- Has a parent or carer in custody, or is affected by parental offending
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced marriage
- Is a privately fostered child

Staff should discuss their concerns with the Designated Safeguarding Lead who will consider the need for an Early Help Assessment and will work with the family to identify their needs and the services best placed to address those needs.

16. Identifying abuse, neglect and exploitation

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.

In our local area children and young people face risks of substance misuse, domestic violence, radicalisation and child criminal exploitation - county lines, gangs and serious violence, and violence against women and girls every day. Some may be at risk of female genital mutilation. We focus on these areas within staff training and where appropriate school life and our curriculum,

we take action where we have concerns, and we work so that children over time develop skills themselves in recognising risks and keeping themselves and others safe.

We also have a proactive safer recruitment policy, safeguarding training and where physical contact is necessary it is identified in the code of conduct, intimate care and physical restraint policy training for all staff. We also work with children to ensure they develop positive, enjoyable, and respectful relationships as they grow up, including relationships education, choices, and health.

Where there are serious concerns, we always involve others such as parents, carers, health staff, police or social workers.

There are four categories of abuse defined in Working Together to Safeguard Children in Education 2023 and accompanying indicators which, if observed should trigger you to carefully consider whether what you are seeing could be as a result of abuse. That something is or is not on the list does not mean that you can instantly rule in or rule out abuse as a possibility and if there is something that is causing you concern you should act on those concerns. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can 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.

Physical abuse	Sexual abuse	Emotional abuse	Neglect
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Staff must be familiar with each form of abuse and what to look for.

Children and young people are abused or neglected in a range of situations. There is specific guidance about the following situations, also in Appendix B:

- Child abduction and community safety incidents
- Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)
- County Lines
- Children and the court system
- Children who are absent from education
- Children with family members in prison
- Cybercrime
- Domestic Abuse
- Homelessness
- Mental health
- Modern Slavery and the National Referral Mechanism
- Preventing Radicalisation
- The Prevent Duty
- Channel

- Sexual violence and sexual harassment between children in schools and colleges
- Serious violence
- So-called 'honour-based' abuse (including FGM and Forced Marriage)
- FGM
- FGM mandatory reporting for teachers
- Forced Marriage
- Additional advice and support

17. If a child raises a concern

Staff should share any concerns with the DSL. However, it should be remembered that sometimes children will not feel ready or know how to tell someone that they are being abused, exploited, or neglected and/or they may not recognise their experiences as harmful. This should not prevent staff from having a professional curiosity and speaking the DSL about this. For example, children may feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers.

DO...

- Listen carefully to what they are saying
- Give them time to talk and tools to talk
- Let them know that they have done the right thing by telling you
- Tell them it's not their fault
- Say you'll take them seriously
- Don't confront the alleged abuser
- Explain what you will do next
- Report what the child has told you as soon as possible to the DSL both verbally and on CPOMS

DON'T...

- Promise confidentiality
- Investigate
- Use leading questions
- Ask the child to repeat the disclosure
- Judge or make assumptions

18. How to respond to a child's concern

Parents & children:

If you have a concern about your child or another child at the setting, please contact our DSL. We will listen to your concerns, take these seriously and ensure you receive a response. You can contact Gemma Callaghan on telephone number 01928 249840. If you are still not satisfied you

can contact Rachel Atherton, Chair of Governors on frodsham.cog@wpat.uk or, the Cheshire West and Chester Integrated Access and Referral Team (iART) on 0300 123 7047 or if necessary, Ofsted (0300 123 4666).

Setting staff & volunteers:

Every member of staff has a duty to act to keep children safe. Failure to act on a concern could lead to disciplinary action.

Concerns about and/or disclosures by children should be taken to the DSL who will ensure the concern is explored and must let you know what happens as far as is possible.

Concerns about the behaviour of staff must be taken directly to the Head Teacher. If the concern is about the Head Teacher, the Chair of Governors should be contacted on frodsham.cog@wpat.uk, or the Local Authority Designated Officer (LADO) on 0151 3374570

If you still have concerns you must escalate the matter to the Chair of Trustees on abrown@wpat.uk. If your concern still remains, please contact Children's Social Care on telephone number 03001237047

19. How do I tell if a young person is at risk of abuse or neglect?

It's difficult to be certain, but if you have a reason to worry then that's enough to talk more with the DSL about the risk or to involve other agencies. Use the definitions of abuse or neglect detailed in [Appendix A of KCSIE 2025](#).

Where there are concerns for the wellbeing of a child that do not meet the threshold for abuse or neglect, the setting will consider the completion of an Early Help Assessment to record such concerns.

Children with special educational needs and disabilities

There are additional safeguarding challenges for children with special educational needs (SEND) and/or disabilities, including:

- that behaviour, mood and injury may relate to possible abuse and not just a SEN or a disability
- higher risk of peer group isolation
- disproportionate impact of bullying
- difficulties with communication

Sometimes, children with SEND, or with certain medical, physical and mental health needs are seen first, and the potential for abuse second. If pupils are behaving in particular ways or they're looking distressed or their behaviour or demeanour is different from in the past, staff should think about that being a sign of the potential for abuse, and not simply see it as part of their disability or their special educational needs.

Pupils with a SEND need have a higher risk of being left out, of being isolated from their peers, and they are disproportionately affected by bullying. Staff are encouraged to make sure that children with SEND needs have a greater availability of mentoring and support.

Where a school places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and should be satisfied that the placement meets the pupil's needs.

Our setting's [Behaviour Policy](#) provides detail around the 'use of reasonable force' and how this is only used as a last resort for managing incidents of very challenging behaviour. This is in line with national guidelines and takes into account individual pupil needs and risk management/care plans and in particular with regard to SEND.

20. Information Sharing

"Fears about sharing information cannot be allowed to stand in the way of the need to safeguard and promote the welfare of children at risk of abuse or neglect"

(Information sharing advice for practitioners)

Sharing information internally:

Legally, we must share information within the setting on a 'need to know' basis, so that everyone who needs to know information to keep children safe and help them develop does know.

When we are worried about a child it is essential we record the concern and inform the Designated Safeguarding Lead promptly.

Some information within the setting will be further restricted, for example:

- Where there is an allegation about a member of staff the Head Teacher will decide who will lead on the concern and contact other agencies.
- Where the detail of information is particularly sensitive this can be restricted further, for example the details of sexual abuse or a young person sharing worries about their mental health or sexuality. Staff involved in their direct care may need to know in general terms the nature of the concern

Sharing information with other agencies:

Where a significant issue arises the Designated Safeguarding Lead will ensure the parent is contacted within 24 hours, or immediately if required (unless doing so will put a child or adult at risk of harm).

We follow the 7 Golden Rules from [Information sharing advice for practitioners](#):

1. The Data Protection Act 2018 and the UK General Data Protection Regulation and the Human Rights Act 1998 are not barriers to justified information sharing, but provide a

framework to ensure that personal information about living individuals is shared appropriately.

2. We will be open and honest with individuals (and/or family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. We will seek advice from other practitioners (e.g. I-ART), or our information governance lead, if in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. We share information with informed consent where appropriate and, if possible, respect the wishes of those who do not consent to share confidential information. We still share information without consent if, in our judgement, there is a lawful basis to do so, e.g. where safety may be at risk. We base judgements on the facts of the case. We are clear why we share or request personal information from someone. We remain mindful that individuals might not expect information to be shared, even with consent.
5. We consider safety and well-being and base our information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: We ensure information we share is necessary for the purpose for which we are sharing it, is shared only with individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.
7. We keep records of our decision to share (or not to share) and the reasons for it. We record what we have shared, with whom and for what purpose.

21. Local Authority Children's Social Care

We ask parents to let us know if their child has ever had a social worker and this information is also shared routinely with us by local authorities. This allows us to put in extra support to give them the best chances of success and to take earlier action if we are worried about a pupil's progress, behaviour or if they go missing.

22. Contacting the Police

We share information with the Police if we suspect abuse or neglect in-line with the Warrington's Safeguarding Partnerships' Child Protection procedures. We will consider contacting the Police if we suspect a crime has been committed in line with [the National Police Chiefs Council guidance](#).

23. The role of the Appropriate Adult

How the Police conduct themselves when a person is detained and/or questioned is covered by the [Police and Criminal Evidence Act 1984 \(PACE\) Code C](#). The role of the appropriate adult is to safeguard the interests, rights, entitlements and welfare of children and vulnerable people who are suspected of a criminal offence, by ensuring that they are treated in a fair and just manner and are able to participate effectively.

24. What to do if you're still worried

The setting has an internal escalation process which links with the [Cheshire West and Chester Safeguarding Partnerships Child Protection Procedures](#) professional conflict resolution policy. Every member of staff must follow this process. There will be no reprisals for honestly raising a concern. Where an immediate decision is needed, and a particular person is unavailable you may move to the next stage. The timescale for the process relates to the urgency of the decision, but in any event should not extend beyond one week.

We always listen to concerns raised by children, families, staff, visitors, or other organisations. The whistleblowing process should only be used if there are no clear safeguarding procedures, you are concerned your concern won't be dealt with properly or will be covered up, your concern has not been acted upon or you are worried about being treated unfairly.

The prescribed organisation for safeguarding children whistleblowing is the NSPCC: **0808 800 5000** or help@nspcc.org.uk

25. Safer Recruitment

We do our best to ensure we employ 'safe staff' by following the guidance given by Warrington Borough Council on Safer Recruitment and our individual procedures. Those involved in recruitment and employment of staff have received safer recruitment training in line with DfE guidance, Keeping Children Safe in Education.

Safer recruitment means that all applicants will:

- a) Understand their duties to safeguard children and young people from the outset through the advertisement and in their job description.
- b) Complete and sign an application form which includes a full education, qualification and employment history (with explanations for any gaps).
- c) Provide business contact details for two verified, formal referee statements following our own format, including at least one who can comment on the applicant's suitability to work with children and young people (the last childcare employer if they have one) and one who is a senior person with appropriate authority in their current employment.
- d) Provide evidence of identity and qualifications (including birth certificate, where available).
- e) Be checked in accordance with the Disclosure and Barring Service (DBS) regulations as appropriate to their role, including s128 checks.
- f) Have their mental and physical fitness to carry out their work responsibilities verified
- g) Provide evidence of their right to work in the UK.
- h) Be interviewed by a panel of at least two people testing skills and abilities with value-based questions against the job description. At least one member of the panel will have completed safer recruitment training.

We also ensure that recruitment documentation will state its commitment to safeguard children and young people. All new members of staff will undergo face to face induction training within

two weeks which includes familiarisation with our safeguarding policies and procedures and support to identify their child protection training needs.

All staff will sign to confirm that they have read and **understood** the safeguarding policies and procedures and will attend relevant training.

Agency

If ever used, we would obtain written confirmation from supply agencies that agency staff have been appropriately checked, and their suitability to work with children at the setting will be assessed based on the children needs.

We maintain records of recruitment checks undertaken and the appointing manager signs to evidence they have checked this documentation and the overall record is signed by the Designated Safeguarding Lead and Safeguarding Governor termly.

26. Supporting staff at the setting

Code of conduct

We have published a code of conduct which sets out expectations of staff around appropriate boundaries and staff keeping themselves safe – staff sign to say they have read and understood this document.

Emotional support

Having to deal with a situation where a child has experienced harm can be stressful and upsetting. We will support staff in a variety of ways, including debriefs with their line manager and/or the Designated Safeguarding Lead as appropriate.

Supervision

Welfare staff involved in working directly with children or young people, or supervising staff who do, will receive regular supervision. This supervision will be delivered in line with the MAT programme and will provide a space for the staff member to:

- Reflect on any safeguarding issues that the staff member has been involved in (directly or indirectly) and allow for agreement on any further action required
- Talk about issues which they are facing in the work environment, including thoughts that they have in terms of developing the service that is provided to the children and
- Discuss the emotional impact of the role as well as any other issues that they consider relevant

27. Concerns and allegations about staff

Staff should take care not to place themselves in a vulnerable position with a child. While staff are friendly with children, they do not become friends. No staff member will share their personal details with children, have on-going contact or relationships with children outside of the setting

(including social networking) and accept or give significant gifts. Staff must adhere to the risk assessment for lone working which is incorporated in our Health & Safety policy. Any member of staff who is unsure should seek advice from their line manager. All staff understand that a child may make an allegation against a member of staff. Any such concern will be reported directly to the head teacher, unless it is about the head teacher, in which case it will be reported directly to the chair of the local governing committee. Members of staff must advise the head teacher **immediately** if it is alleged current staff (including volunteers) may have:

- Behaved in a way that has harmed a child, or may have harmed a child
- Behave in a way that the child feels humiliated
- 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 would 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

If the allegation concerns the head teacher staff will immediately inform the Chair of Governors without notifying the head teacher first. The Chair of Governors (or a designate) will follow the Allegations of Abuse Policy and where appropriate discuss the content of the allegation with Cheshire West and Chester LADO (designated officer for the management and oversight of allegations) on telephone number 0151 3374570 and follow their procedures for managing allegations and safeguarding concerns about staff. We will [make a barring referral to the DBS](#) should an allegation made against a member of staff be upheld. Allegations about prior members of staff or historic allegations will be referred to the police.

Low level concerns

Staff, including volunteers and agency staff, will report to the head teacher any concern about other adults working with children, no matter how small they seem. The term low level concern does not mean it is insignificant, it means that the behaviour towards a child does not meet the allegations threshold of harm or is not serious enough to consider a referral to the LADO. It could amount to inappropriate behaviour such as being over friendly with children, having favourites, taking photographs of children on their mobile phone, engaging with a child on a one-to-one basis behind a closed door or secluded area or using sexualised, intimidating or offensive language. Staff are clear about what appropriate behaviour looks like and are trained to help to identify any weakness in the setting's safeguarding system. The head teacher will consider whether a low-level concern is in fact an allegation. If there is doubt the LADO should be advised **immediately**.

Whistleblowing

We promote good practice and professional conduct through the organisation. Staff must be committed to providing a high standard of service and understand that children cannot be expected to raise concerns in an environment where staff fail to do so. All staff are aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues. Staff will follow our [Whistleblowing Policy](#). As necessary, they should speak to the Designated Safeguarding Lead, Senior Leadership Team or the Warrington local authority designated officer.

If a member of staff notices anything that gives them cause for concern it is vital that this is raised. Acting upon staff concerns is fundamental in order to ensure good practice and support for staff. Resolving issues must be viewed by all staff as a positive action and not a breach of trust between colleagues or an attack on the organisation. We value an atmosphere of openness and honesty and welcome suggestions, complaints and criticisms. Whistleblowing includes raising and passing on concerns about any of the following:

- a) Poor standards of service
- b) Issues of bad practice
- c) The conduct of colleagues or managers
- d) Anything which is not in the best interest of the young person or the organisation
- e) Anything which is illegal or unacceptable behaviour

If you think that your concern won't be dealt with properly or will be covered up, your concern has not been acted upon or you are worried about being treated unfairly, then the prescribed organisation for safeguarding children whistleblowing is the NSPCC: **0800 800 5000** or help@nspcc.org.uk.

28. Staff Training

This strategy has been devised drawing on requirements in DfE guidance, Keeping Children Safe in Education 2025.

Principles

The Designated Safeguarding Lead will ensure all staff and volunteers have safeguarding children training relevant to their role. We see safeguarding training as an on-going process and the Safeguarding Team will ensure there are safeguarding and child protection updates and reminders at least once a term via staff meetings and inset days which continues to provide staff with the relevant skills and knowledge to safeguard children effectively.

Job roles at the setting

We have aligned all job roles at the setting depending on role and contact with our children. Each role has specific training requirements.

Requirements for staff undertaking supervision, interview panels and other particular roles are also taken into account.

New staff

As part of induction process the school Business Manager will send the appointment letter to new staff with links to Part I and Annex B of the current [Keeping Children Safe in Education](#) with a requirement this is read and understood before they start work. Before the first day of working with children, the **Designated Safeguarding Lead** will:

- Talk with them about Keeping Children Safe in Education with opportunity for questions

- Introduce them to the setting's Safeguarding and Child Protection Policy and pathways for raising concern and
- Ensure they know what to do if worried about a child or young person

Staff will be notified if they are required to take part in a probationary review where they will be explicitly asked about any concerns they have for children at the setting and any other safeguarding issues they have identified.

Agency staff

Agency staff working at the setting for a month or more will be required to meet the same standards as permanent staff. Agency staff working for less than one month must read Part I or Annex A (as appropriate) of the current [Keeping Children Safe in Education](#). Their agency must provide written assurance the member of staff has safeguarding children training to the appropriate level for the role in the relevant time period.

29. Allegations of abuse against other pupils

Staff and Governors have a vital role to play in the assessment of risk that a child may pose to themselves and others in the school setting. This guidance aims to ensure that all staff working with young people who display harmful sexual behaviour, have a common understanding of the issues and a consistent and common framework for assessing, reporting and managing the risks that these children pose. Harmful sexual behaviour can occur online or face-to-face and can occur simultaneously. The school will make clear that there is a **zero-tolerance** approach to sexual violence, sexual harassment and harmful sexual behaviours that it is never acceptable, and it will not be tolerated. It should **never** be passed off as "banter", just having a laugh, "a part of growing up" or "boys being boys". Failure to do so can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it. We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously. The DSL has undertaken training and is now able to use the ERASE Multi-Agency Sexualised Behaviour Assessment Tool to support referrals to Children's Social Care.

The school may wish to discuss the behaviours with other professionals as part of their initial assessment process. The following people could be contacted for advice:

*Safeguarding Children in Education Team T: **0300 123 7047***
Lucy Faithfull Foundation: T: 0808 1000 900 email: stopitnow.org.uk/helpline
NSPCC Advice Line: T: 0808 800 5000 email: help@nspcc.org.uk

Procedures taken to minimise the risk of child-on-child abuse

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils and appropriate behaviour and consent
- Ensure children are able to easily and confidently report abuse using our reporting system **Whisper®** - <https://swgfl.org.uk/whisper/ESP1>
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra-familial harms and necessary support for siblings following a report of sexual violence and/or harassment
- Ensure staff are trained to understand:
 - how to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
 - that even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”.
- That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
 - children can show signs or act in ways they hope adults will notice and react to
 - a friend may make a report
 - a member of staff may overhear a conversation
 - a child’s behaviour might indicate that something is wrong
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns

- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential between the victim, alleged perpetrator(s) and friends from either side

Procedures for assessing possible child-on-child abuse

When sexualised behaviour has been observed or, a child or parent has informed staff that such behaviour has taken place then staff should inform the Designated Safeguarding Lead who will clarify the exact behaviour which has taken place and make a considered assessment of its nature and decide appropriate next steps. All information will be recorded on CPOMS. It is important to understand that children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to it. In some cases, the victim may not make a direct report. The initial response by a school to a report from a child is incredibly important. It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of school should not be downplayed and should be treated equally seriously.

This assessment should determine whether the incident is:

- Age-appropriate sexual exploration
- Inappropriate sexual behaviour which is not considered to be abusive
- Inappropriate sexual behaviour which when put together with other information might be an indication that the child is experiencing sexual abuse
- Sexual behaviour which constitutes an offence

Outcomes of the assessment and initial responses

(please see concerns flowchart and Traffic Light Tool)

- Behaviour assessed as “normal” sexual exploration which is age appropriate - no further action
- Behaviour assessed as being inappropriate but not abusive (behaviour consensual, no marked power deferential, no indication of any coercion) – The DSL will discuss the behaviour with the parents and plan a management strategy to address the behaviour. Consideration might also be given to supporting parents/carer in making a referral to another agency (e.g. CAMHS, Educational Psychologist). When assessing child to child behaviour the needs of both young people must be taken into consideration as both may be ‘children in need’ and a referral to Social Care, with consent of parents for an assessment of need may be considered.
- Behaviour assessed as being inappropriate and as a possible indication that the child might be experiencing child sexual abuse – The DSL will discuss the incident with Social Services in order to determine next steps. This could result in the school making a Child Protection referral to Social Care (Section 47) using the Multi-Agency Request for Service (MARF).
- Behaviour constitutes an offence – The DSL will discuss with the parents/carers of the child alleging assault and support them if they wish to make a formal complaint to the police. Staff will need to decide if the incident is so serious that they need to inform the police and decide when to speak with the parents/carer of the young person who instigated the behaviour.

30. Sharing of nudes and semi-nudes (sexting)

Staff responsibilities when responding to an incident:

If staff are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos ('sexting' or 'youth produced sexual imagery') this should be reported immediately to the DSL and recorded on CPOMS.

You must not:

- View, copy, print, store or save the imagery yourself, or ask a pupil to share or download (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other parents/carers
- Say or do anything to blame or shame any pupil(s) involved

Staff should explain to the pupil(s) that they will need to report the incident, and reassure them that they will receive support and help from the DSL.

Initial review meeting

Following an incident, the DSL will hold an initial review meeting with appropriate school staff. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the pupil
- Whether the imagery has been shared widely and via what services and/or platforms
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents/carers of the pupils involved

The DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult
- There is reason to believe that a child has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent e.g. SEND
- What the DSL knows about the images or videos suggests the contents depicts sexual acts which are unusual for the child's developmental stage, or are violent
- The imagery involves sexual acts and any child in the images is under the age of 13
- If they have reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (e.g. if the pupil is presenting as suicidal or self-harming)

Further review by the DSL

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks. If at any point during the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or police immediately.

31. Extra-familial harms

The school assesses the risks and issues in the wider community when considering the well-being and safety of its pupils.

All staff, but especially the Designated Safeguarding Lead should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships, criminal exploitation, serious youth violence, county lines and radicalisation.

32. Child Sexual Exploitation (CSE)

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.

Indicators of child sexual exploitation may include:

- Acquisition of money, clothes, mobile phones etc. without plausible explanation;
- Gang-association and/or isolation from peers/social networks;
- Exclusion or unexplained absences from school;
- Leaving home/care without explanation and persistently going missing or returning late;
- Excessive receipt of text/phone calls;
- Returning home under the influence of drugs/alcohol;
- Inappropriate sexualised behaviour for age/sexually transmitted infections;
- Evidence of/suspicions of physical or sexual assault;
- Relationships with controlling or significantly older individuals or groups;
- Multiple callers (unknown adults or peers);
- Frequenting areas known for sex work;
- Concerning use of internet or other social media;
- Increasing secretiveness around behaviours; and
- Self-harm or significant changes in emotional well-being.

Potential vulnerabilities include:

Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues.

- Having a prior experience of neglect, physical and/or sexual abuse;

- Lack of a stable/safe home environment, now or in the past (domestic abuse of parental substance misuse, mental health issues or criminality, for example);
- Recent bereavement or loss;
- Social isolation or social difficulties;
- Absence of a safe environment to explore sexuality;
- Economic vulnerability;
- Homelessness or insecure accommodation status;
- Connections with other children and young people who are being sexually exploited;
- Family members or other connections involved in adult sex work;
- Having a physical or learning disability;
- Being in care (particularly those in residential care and those with interrupted care histories); and
- Sexual identity

33. Child Criminal Exploitation (CCE)

Both CCE and CSE are forms of abuse that occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal or sexual activity. It may involve an exchange for something the victim needs or wants, and/or the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CCE and CSE can affect children, both male and female and can include children who have been move (commonly referred to as trafficking) for the purpose of exploitation.

They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

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 or time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

34. County Lines

County Lines is 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 [within the UK], 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.

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

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

35. 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 who are over the age of 16, who are 'personally connected' to each other:

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

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

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

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and 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.

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

36. Operation Encompass

Operation Encompass operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to local authority children's social care if they are concerned about a child's welfare. At Frodsham Academy, our Key Adult who receives the information is Gemma Callaghan (DSL). The information received will be shared with the child's class teacher so that they are aware of a domestic incident occurring prior to them coming into school. The Operation Encompass alert will be recorded on CPOMS.

Operation Encompass provides an advice and helpline service for all staff members from education settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8am to 1pm, Monday to Friday on 0204 513 9990 (charged at local rate).

37. Female Genital Mutilation (FGM)

FGM refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK.

FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

Risk factors of FGM include:

- low level of integration into UK society;
- mother or a sister who has undergone FGM;
- girls who are withdrawn from PSHE;
- a visiting female elder from the country of origin
- being taken on a long holiday to the country of origin;
- talk about a 'special' procedure to become a woman.

Symptoms of FGM

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out of school to visit an 'at risk' country (especially before the summer holidays), or parents wish to withdraw their

children from learning about FGM. Staff should not assume that FGM only happens outside the UK.

Indications that FGM may have already taken place may include:

- difficulty walking, sitting or standing, and may even look uncomfortable;
- spending longer than normal in the bathroom or toilet due to difficulties urinating;
- spending long periods of time away from a classroom during the day with bladder or menstrual problems;
- frequent urinary, menstrual or stomach problems'
- prolonged or repeated absences from school, especially with noticeable behaviour changes (for example, withdrawal or depression) on the girl's return;
- reluctance to undergo normal medical examinations;
- confiding in a professional without being explicit about the problem due to embarrassment or fear, and;
- talking about pain or discomfort between her legs.

38. So-called 'Honour-based Abuse'

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

Since February 2023, the age of consent for marriage in England is 18. The Marriage and Civil Partnership (Minimum Age) Act 2022 means that 16 and 17 year olds may not marry or enter a civil partnership, even if they have parental consent. It is an offence, under the Marriage and Civil Partnership (Minimum Age) Act to cause a child under the age of 18 to enter a marriage in any circumstances, without the need to prove that a form of coercion was used. This includes non-legally binding 'traditional' ceremonies which would still be viewed as marriages by the parties and their families.

39. Children who are absent from education

Knowing where children are during school hours is an extremely important aspect of safeguarding. Missing school can be an indicator of abuse and neglect and may also raise concerns about other safeguarding issues, including the criminal exploitation of children. We monitor attendance carefully and address poor or irregular attendance without delay. Please click on this hyperlink to view our [Attendance Policy](#) for further information.

40. Filtering and Monitoring

Frodsham Academy uses the Smoothwall package to support our filtering and monitoring needs. Filtering refers to the technology preventing access to harmful or inappropriate content, whilst monitoring refers to the practical steps staff take to ensure harmful or inappropriate access is not made. Monitoring can include:

- physical monitoring
- live software monitoring
- monitoring user logs
- monitoring individual devices
- We make sure that any school devices used away from the school site are also subject to filtering and monitoring procedures.
- All our staff undertake training to understand the risks of poor filtering and monitoring, and know how to share their concerns.
- All our staff have taken part in annual cybersecurity training.

41. Preventing Radicalisation

As part of the Counter Terrorism and Security Act 2015, schools have a duty to 'prevent people being drawn into terrorism'. This is become known as the 'Prevent Duty'.

Where staff are concerned that children and young people are developing extremist views or show signs of becoming radicalised, they should discuss this with the DSL. The DSL has received training about the Prevent Duty and tackling extremism and is able to support staff with any concerns they may have.

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

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 judgment in identifying children who might be at risk of radicalisation and act proportionately which may include the DSL making a Prevent referral.

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

Recognising Extremism

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes;
- glorifying violence, especially to other faiths or cultures;
- making remarks or comments about being at extremist events or rallies outside school;
- out of character changes in dress, behaviour and poor relationships (but there are also very powerful narratives, programmes and networks that children and young people can come across online, so involvement with particular groups may not be apparent);
- secretive behaviour;
- online searches or sharing extremist messages or social profiles;
- intolerance of difference, including faith, culture, gender, race or sexuality;
- graffiti, art work or writing that displays extremist themes;

- attempts to impose extremist or practices on others;
- verbalising anti-Western or anti-British views, and;
- advocating violence towards others.

42. Children with SEND

Children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges. Governing bodies should ensure their child protection policy reflects the fact that additional barriers can exist when recognising abuse and neglect in this group of children.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
- these children being more prone to peer group isolation or bullying (including prejudice based bullying) than other children;
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in managing or reporting these challenges.

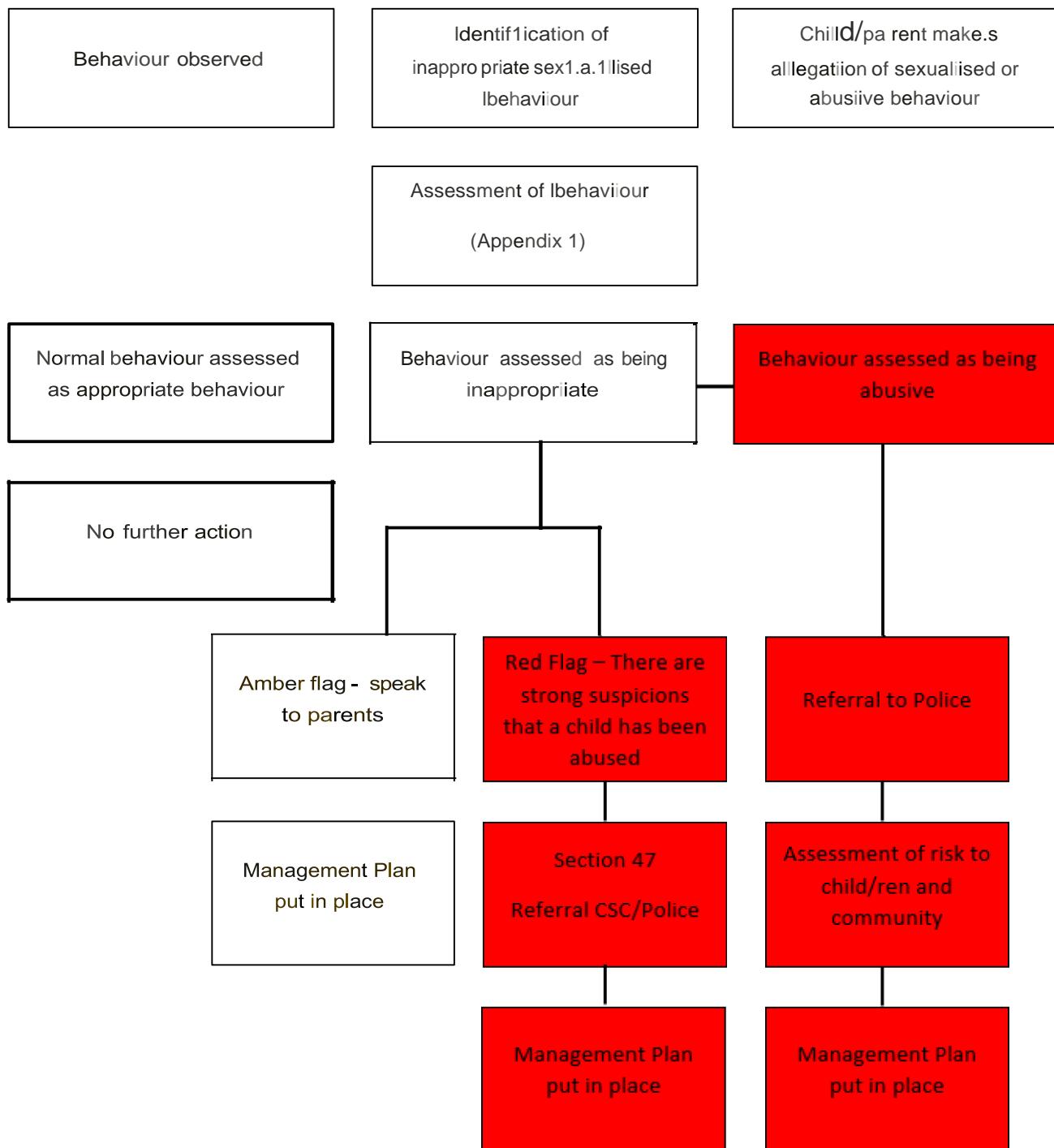
43. Private Fostering

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. A close family relative is defined as a grandparent, brother, sister, uncle or aunt and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence and carries a penalty of a maximum £5,000 fine.

A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Such arrangements may come to the attention of school and college staff through the normal course of their interaction, and promotion of learning activities, with children. Where the arrangements come to the attention of the school or college (and the school or college is not involved in the arrangements), they should then notify the local authority to allow the local authority to check the arrangement is suitable and safe for the child. Schools and colleges who are involved (whether or not directly) in arranging for a child to be fostered privately must notify local authorities of the arrangement as soon as possible after the arrangement has been made.

Flow chart for use by the OSIL when concerns have been raised



This 'Traffic Light Tool' forms part of a resource designed to help professionals who work with children and young people to identify, assess and respond appropriately to sexual behaviours.

By identifying sexual behaviours as **GREEN**, **AMBER** or **RED**, professionals across different agencies can work to the same criteria when making decisions and protect children and young people with a unified approach. The normative list aims to increase understanding of healthy sexual development and distinguish it from harmful behaviour.

This tool must be used within the context of the guidance provided at www.brook.org.uk/traffic-lights and should not be used in isolation.

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
- reflective of natural curiosity, experimentation, consensual activities and positive choices

Expressing sexuality through sexual behaviour is natural, healthy and a part of growing up.

Green behaviours provide an opportunity to positively reinforce appropriate behaviour, and to provide further information and support.

Green behaviours

Age 0 – 5

- 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

Age 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

Age 9 – 13

- solitary masturbation
- use of sexual language including swear and slang words
- having girl/boyfriends who are of the same or opposite 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 development. They may be:

- unusual for that particular child or young person
- of potential concern due to age or developmental differences
- of potential concern due to activity type, frequency, duration or the context in which they occur

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

Please refer to internal guidance or safeguarding frameworks to decide on the next steps to take or talk to a designated safeguarding lead.

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
- 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

What is a Red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be:

- excessive, secretive, compulsive, coercive, degrading, or threatening
- involving significant age, developmental, or power differences
- of concern due to the activity type, frequency, duration, or the context in which they occur

Red behaviours indicate a need for immediate intervention and action, though it is important to consider actions carefully.

Please refer to internal guidance or safeguarding frameworks to decide on the next steps to take or talk to a designated safeguarding lead.

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
- 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
- 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

Appendix 1 – Contacting the Appropriate Person

If you have concerns about a member of staff please contact the Headteacher:

Gemma Callaghan

Email: frodsham.head@wpat.uk

Telephone Number: 01928 249840

If your concern relates to the Headteacher, please contact the Chair of Governors:

Rachel Atherton

Email: frodsham.cog@wpat.uk

Telephone Number: 01928 249 840

If your concern relates to the Chair of Governors, please contact the Trust CEO:

Louise Smith

Email: ceo@wpat.uk

Telephone Number: 01925 202256

If your concern relates to the Trust CEO, please contact the Chair of Directors &

Trustees:

Alastair Brown

Email: abrown@wpat.uk

Telephone Number: 01925 202256

Protocol #1 – Child on Child Abuse

Child on Child Abuse

STEP 1

Any concern to be reported immediately to the Designated Safeguarding Lead (DSL).

STEP 2

Speak, listen and reassure the child. Inform the child that all information shared is being taken seriously, no matter when or where the incident reported happened. ***(Preferably two members of staff should be present during the conversation and no imagery should be viewed or shared).***

STEP 3

Listen carefully to the child, reflecting back using the child's language and ensure staff are asking open-non-leading questions. Never promise the child confidentiality. The DSL to share information internally with only those who are deemed necessary.

STEP 4

Staff should record their accounts on CPOMS immediately, which must be factual, using the child's language.

STEP 5

The DSL will then discuss on a case by case review whether a risk assessment is required to ensure the safety of all pupils and staff. The risk assessment should be reviewed and updated on a regular basis.

Female Genital Mutilation (FGM)

STEP 1

Member of staff discovers that an act of FGM appears to have been carried out.

STEP 2

Teaching staff have a mandatory duty to report their concerns personally to the Police and inform the Designated Safeguarding Lead (DSL).

- It is recommended that you make a report orally by calling 101
- When your call is connected, the system will determine your location and connect you to the police force covering that area.
- You will hear a recorded message announcing the police force you are being connected to. You will then be given a choice of which force to be connected to.
- Calls to 101 are answered by trained police officers and staff in the control room of the local police force. The call handler will log the call and refer it to the relevant team within the force, who will call you back to ask for additional information and discuss the case in more detail.
- You should be prepared to provide the call handler with the following information:
 - explain that you are making a report under the FGM mandatory reporting duty;
 - your details: name; contact details (work telephone number and e-mail address) and times when you will be available to be called back, role and place of work;
 - DSL's details: name; contact details; place of work
 - the girl's details: name; age/date of birth; address
 - if applicable, confirm that you have undertaken, or will undertake, safeguarding actions, as required by the Working Together to Safeguard Children.
 - you will be given a reference number for the call and should ensure that you document this in your records on CPOMS

N.B. Where there is a risk to life or likelihood of serious immediate harm, professionals should report the case immediately to police, dialling 999.

Non-teaching staff should report their concerns immediately to DSL. Staff should record their accounts on CPOMS immediately, which must be factual, using the child's language where appropriate.



Protocol #3 - Radicalisation

Preventing Radicalisation

STEP 1

Staff have concerns about child's welfare.

Report to Single Point of Contact (SPOC) Gemma Callaghan and record concern on CPOMS using the child's language.

STEP 2

SPOC will seek advice from 01606 362121 to consider if a Prevent Referral is required.

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STEP 3

If a referral is required, the Prevent Referral Form is completed which can be found here

<https://www.cheshire.police.uk/advice/advice-and-information/t/prevent/prevent/alpha/prevent-referral/>

or email

prevent@cheshire.police.pnn.uk

Protocol #4 – Child Sexual Exploitation

Child Sexual Exploitation (CSE)

STEP 1

Any concern to be reported immediately to the Designated Safeguarding Lead (DSL).

STEP 2

Speak, listen and reassure the child. Inform the child that all information shared is being taken seriously, no matter when or where the incident reported happened. ***(Preferably two members of staff should be present during the conversation and no imagery should be viewed or shared).***

STEP 3

Listen carefully to the child, reflecting back using the child's language and ensure staff are asking open, non-leading questions. Never promise the child confidentiality. The DSL will share information internally with only those who are deemed necessary.

STEP 4

Staff should record their accounts on CPOMS immediately which must be factual, using the child's language. The DSL will then inform the I-ART Team. If directed to by the I-ART Team, staff should complete the PAN Cheshire Contextual Safeguarding Screening Tool. Follow the I-ART advice in regards to informing parents/carers.

STEP 5

Continue to provide support for the child and work with external services.

Protocol #5 – Child Criminal Exploitation

Child Criminal Exploitation (CCE)

STEP 1

Any concern to be reported immediately to the Designated Safeguarding Lead (DSL).

STEP 2

Speak, listen and reassure the child. Inform the child that all information shared is being taken seriously, no matter when or where the incident reported happened.

STEP 3

Listen carefully to the child, reflecting back using the child's language and ensure staff are asking open, non-leading questions. Never promise the child confidentiality. The (DSL) will share information internally with only those who are deemed necessary.

STEP 4

Staff should record their accounts on CPOMS immediately which must be factual, using the child's language. The DSL will then inform the I-ART Team. If directed to by the I-ART Team, staff should complete the PAN Cheshire Contextual Safeguarding Screening Tool. Follow the I-ART advice in regards to informing parents/carers.

STEP 5

Continue to provide support for the child and work with external services.

Protocol #6 – County Lines

County Lines

STEP 1

Any concern to be reported to the Designated Safeguarding Lead (DSL) immediately.

STEP 2

Listen carefully to the child, reflecting back using their language and ensure staff are asking open, non-leading questions. Never promise the child confidentiality. The DSL will share information internally with only those who are deemed necessary.

STEP 3

Staff should record their accounts on CPOMS immediately which must be factual, using the child's language. The Safeguarding Team will then inform the I-ART Team. If directed to by the I-ART Team, staff should complete the PAN Cheshire Contextual Safeguarding Screening Tool. Follow the I-ART's advice in regards to informing parents/carers.

STEP 4

Continue to provide support for the child and work with external services.

Protocol #7 – Forced Marriage

Forced Marriage

STEP 1

Any concern to be reported immediately to the Designated Safeguarding Lead (DSL).

STEP 2

Speak, listen and reassure the child. Inform the child that all information shared is being taken seriously, no matter when or where the incident reported happened.

STEP 3

Listen carefully to the child, reflecting back using the child's language and ensure staff are asking open, non-leading questions. Never promise the child confidentiality. The DSL will share information internally with only those who are deemed necessary.

STEP 4

Staff should record their accounts on CPOMS immediately which must be factual, using the child's language. The DSL will then inform the I-ART Team and Police. Follow the I-ART's advice in regards to informing parents/carers.

STEP 5

Continue to provide support for the child and work with external services.

Protocol #8 – Honour Based Abuse

So-called 'honour'- based abuse

STEP 1

Any concern to be reported immediately to the Designated Safeguarding Lead (DSL).

STEP 2

Speak, listen and reassure the child. Inform the child that all information shared is being taken seriously, no matter when or where the incident reported happened.

STEP 3

Listen carefully to the child, reflecting back using the child's language and ensure staff are asking open, non-leading questions. Never promise the child confidentiality. The DSL will share information internally with only those who are deemed necessary.

STEP 4

Staff should record their accounts on CPOMS immediately which must be factual, using the child's language. The DSL will then inform the I-ART Team and Police. Follow the I-ART's advice in regards to informing parents/carers.

STEP 5

Continue to provide support for the child and work with external services.

Protocol #9 – Online Safety Incident

Online Safety Incident

STEP 1

Staff to report any online safety incidents to the Designated Safeguarding Lead (DSL) who will review the incident and decide upon the best course of action.

STEP 2

Staff to record incident on CPOMS.

STEP 3

DSL will create an online safety concern form and log and also advise of any further action that staff need to take.

Protocol #10 – Whistleblowing

Whistleblowing

STEP 1

Wherever possible, concerns should be raised in the first instance with your immediate line manager either verbally or written. If this is not appropriate for reason of the matter to be raised, you should approach the Head teacher. If the matter raised has to do with the Head teacher, the matter should be brought to the attention of the schools Chair of Governors, frodsham.cog@wpat.uk in line with the stages of our complaints procedure.

STEP 2

The concern should:

- Describe the context and history of the concern, giving names, dates and place where possible (the earlier a concern is raised, the easier it is to take action)
- Outline the reason why you are raising the concern
- Demonstrate as far as possible that there are sufficient grounds for raising the concern

STEP 3

Within ten working days, the responsible person will write to you to:

- Acknowledge that the concern has been received
- Indicate how WPAT proposes to deal with the matter
- Giving an estimate (if the matter is subject to an ongoing investigation) of how long it will take to provide a final response
- Informing you if any initial enquiries have been made
- Informing you whether further investigations will take place and, if not, why not

Protocol #11 – Educational Visits

Critical Incident on an Educational Visit

STEP 1

Alert all adults supporting the visit. If groups are in different locations, recall all groups to an agreed central meeting point. (Mobile telephone numbers MUST be exchanged before the start of the visit). A staff member qualified in first aid should accompany every off-site visit. (Refer to Educational Visits Policy).

STEP 2

The Visit Leader should delegate an adult to seek assistance from the venue.

STEP 3

The First Aider should triage any pupils / adults, administer any temporary first aid measures and report findings to the Visit Leader.

STEP 4

Should the incident warrant it, the Visit Leader should contact emergency services to request assistance. Where a pupil has been injured, it is essential to advise that paediatric care is needed.

STEP 5

If an injury has occurred, the child should be monitored at all times by the qualified First Aider. As this will adjust staffing ratios, the Visit Leader should reallocate pupil groups and ensure all supporting adults know who is now in their care.

STEP 6

The Visit Leader should initiate and maintain contact with the Head Teacher / SLT to advise of the current and on-going situation.

STEP 7

On arrival of emergency services, the Visit Leader and First Aider should ensure all known facts are given. If any pupils / adults from the school's party are to be taken to hospital they should be accompanied by a member of staff. The Visit Leader should record which hospital will be receiving the casualty and notify the school. Ideally the First Aider should remain with the school party.

STEP 8

The Head Teacher / SLT should contact parents / guardians then the Chair of Governors to advise of the situation as known. The Head Teacher / SLT should commence an incident log and accurately record all actions / relevant factual information. (Ensure dates and times of action are recorded).

STEP 9

The Head Teacher/SLT will decide if the visit should continue or if the party should return to school. If to return to school, the office staff should arrange transport.

STEP 10

No press briefing should be made unless directed by the Police with the input of the Local Authority Media Relations Office.

STEP 11

Under the direction of the Head Teacher/SLT, all staff should ensure parents/ guardians are supported.

STEP 12

Head Teacher, SLT & Visit Staff members to complete the school's critical incident paperwork. A case review should be conducted as a priority together with a meeting with parents / guardians. Head Teacher and Governing Board to review the critical incident paperwork and the school's safeguarding arrangements.

N.B. Critical incident – loss of child; significant injury; death of child or adult.

Source: SSSCPD 2021

Protocol #12 – Visitors to School

Visitors to School

STEP 1

Visitors to school should enter through the main entrance and report to the main office. All visitors must state the purpose of their visit and who has invited them or who they wish to see and be ready to produce formal identification. Visitors are subject to Disclosure and Barring Service Checks (Keeping Children Safe in Education 2023). The school office staff will inform the visitor as to whether or not they require a DBS check.

STEP 2

Visitors will be asked to sign into the Inventory electronic system and must read all notices and Visitor Information Leaflet. A visitor badge will be provided and this must be worn at all times along with their agency badge. Adults without a badge will be challenged. Visitors will be given one of 3 coloured lanyards:

Blue- Staff member

Green- Not staff, but DBS cleared

Red- No DBS completed- Should not be left unsupervised

STEP 3

Visitors will be escorted to their point of contact or their point of contact will be asked to come to reception to receive their visitor. The member of staff will be the main contact for the duration of the visit and will escort them to the area they are working in.

STEP 4

After the visit, the member of staff will escort the visitors to the main entrance and asked to sign out on the Inventory system.