Safeguarding and Child Protection Policy

Original Author: Safeguarding Advisor for Education, Oldham Safeguarding Children's Partnership, Oldham Council.

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Review Date: August 2027 or when new legislation requires changes.

Royton Hall School's Safeguarding & Child Protection Policy is in line with the quality and standards expected from Oldham Council and will be monitored by The Governing Body. This policy will also be reviewed annually or when new legislation requires changes, whichever is the soonest.

Date approved: 01/09/2026
Headteacher: Sarah Charlton
Date approved: 05/10/2026
Chair of Governors: Michael Booth
Date approved: 05/10/2026
Safeguarding Link Governor: Wendy Sefton

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1. Safeguarding Policy Statement

A whole-school, child-centred approach is fundamental to all aspects of everyday life at our school. At Royton Hall Primary we strive to create a culture which enables children to express their wishes and feelings and talk about anything that is of importance to them. We believe that every child deserves to receive an education within an environment where they feel safe to learn and develop. We want our pupils, staff, parents and carers to have confidence and trust in our goals and know that collaborative working is fundamental to create and maintain a child-centred approach to safeguarding.

In practice this means we endorse the key principle that the welfare of a child is paramount, keeping them at the centre of all decision making in our partnership working with them, their families, and those supporting them.

In line with our duties set out in the Children Act (1989, 2004) and Working Together to Safeguard Children (2026) we are committed to providing support and help as soon as possible, underpinned by our values that children are best looked after within their families, with their parents playing a full part in their lives where possible. We are also committed to ensuring that we work with agencies, including the Local Authority, to access support and targeted interventions for families when we consider that a child is, or may be, at risk of harm.

We hope that parents and carers will support us to undertake our statutory duties to offer Family Help support and to liaise with agencies to protect children who have suffered or otherwise likely to suffer significant harm without doing so. The core objective of Family Help support is to prevent any child from being harmed or placed at risk of harm and therefore halt any escalation where possible.

This policy outlines the commitment to our legal duties to safeguard children, the responsibilities for all our staff and the specific roles and responsibilities for our key Designated Safeguarding Leads and Governance.

2. Important Safeguarding Contacts

School's In-House Contacts

Organisation / Role	Name	Contact details
Designated Safeguarding Lead (DSL)	**Sarah Charlton**	0161 770 7640 head@roytonhall-pri.oldham.sch.uk
Deputy Designated Safeguarding Lead (DDSL)	**Jen Glynn**	0161 770 7640 jenny.glynn@roytonhall-pri.oldham.sch.uk
Deputy Designated Safeguarding Lead (DDSL)	**Amereen Rafiq**	0161 770 7640 amereen.rafiq@roytonhall-pri.oldham.sch.uk
Deputy Designated Safeguarding Lead (DDSL)	**Dan Charnock**	0161 770 7640 Dan.charnock@roytonhall-pri.oldham.sch.uk
Designated Teacher for Children in Care (DT for Children in Care)	**Amereen Rafiq**	0161 770 7640 amereen.rafiq@roytonhall-pri.oldham.sch.uk
Special Educational Needs Coordinator (SENCO)	**Amereen Rafiq**	0161 770 7640 amereen.rafiq@roytonhall-pri.oldham.sch.uk
Mental Health Lead	**Amereen Rafiq**	0161 770 7640 amereen.rafiq@roytonhall-pri.oldham.sch.uk
DSL Prevent Lead	**Sarah Charlton**	0161 770 7640 head@roytonhall-pri.oldham.sch.uk
Chair of Governors	**Michael Booth**	boothsgardencentre@gmail.com
Vice Chair of Governors	**Wendy Sefton**	wendysefton@aol.com
Link Safeguarding Governor	**Wendy Sefton**	wendysefton@aol.com

Non School Contacts

Organisation / Role	Name	Contact details
Local Authority Designated Officer (LADO)	Colette Morris Wendy Nicholls	Tel: 0161 770 8870 or 07583101863 Email: colette.morris@oldham.gov.uk Tel: 0161 770 0008 or 07974619094 Email: wendy.nicholls@oldham.gov.uk
Oldham Children's Social Care	Duty and Advice	Tel: 0161 770 7777 Email: child.mash@oldham.gov.uk ****only referrals made via telephone will be accepted** **Out-of-hours:** Tel: 0161 770 6936 or the Police on 101 (999 in emergencies).
Safeguarding Advisor for Education	Stacey Brackenridge	Tel: 0161 770 8868 or 07753715566 Email: Stacey.brackenridge@oldham.gov.uk
Oldham Safeguarding Children's Partnership (OSCP)	Jayne Haigh (OSCP Business Manager)	Jayne.haigh@oldham.gov.uk OSCP.group@oldham.gov.uk
Prevent Co-ordinator	Nicole Lamont	Nicole.lamont@oldham.gov.uk Referrals do not come through the Prevent Co-ordinator, information about referral is on page 35.
Family Help Partnership Officers (delete the districts you do not need)	North district: Farhat Nazir (07980755733), Louise Holt (07811720838) and Emily Johnson (07974898054). Central district: Aziza Khatun (07791611907), Shabina Khatun (07791611907) and Andrea Johnson (07866989396). West district: Farhat Nazir (07980755733), Louise Holt (07811720838) and Emily Johnson (07974898054). East district: Casey Stewart (07811720949) and Kymberli Spratt (07974898062) South district: Lauren Shaw (07483937439)	
NSPCC Helpline	N/A	Call: 0808 800 5000 Email help@NSPCC.org.uk.
Police	N/A	Emergency 999. Non-emergency 101

3. Legislation and Guidance

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

Keeping Children Safe in Education which sets out the legal duties that all schools and colleges in England must follow to safeguard and promote the welfare of children under the age of 18.

Section 157 and 175 of the Education Act 2002,places a duty on schools and Local Authorities to safeguard and promote the welfare of pupils.

The School Staffing (England) Regulations 2009, which sets out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to be trained in safer recruitment techniques.

Maintained schools governance guide - 7. Compliance - Guidance - GOV.UK (www.gov.uk) (2024) provides guidance for governing bodies on how to meet their legal and regulatory responsibilities with regards to compliance. It covers various aspects of compliance, including education, funding and finances, health and safety, inspections, political impartiality, protecting and sharing information, safeguarding and pupil welfare, pupil behaviour, school admissions, school attendance, schools causing concern, school complaints, length of school day and year, opening, closing or making organisation changes to a school, managing school premises, control and community use of school premises, school uniform, staffing and performance management, and whistleblowing.

This guidance is a reference document for those involved in local-authority-maintained school governance. It brings together essential information from a range of sources on the governing body's roles and legal responsibilities.

This policy also meets requirements relating to safeguarding and welfare in the Statutory framework for the early years foundation stage for group and school providers (publishing.service.gov.uk). This should be read alongside Keeping Children Safe in Education.

The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children.

Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children

Working Together to Safeguard Children statutory guidance outlines what organisations and agencies must and should do to help, protect and promote the welfare of all children and young people under the age of 18 in England

The Lead Safeguarding Partners for Oldham Safeguarding Children Partnership Oldham Council, Greater Manchester Police, Oldham Integrated Care Board, working in close collaboration with Education. They have a joint and equal duty to ensure multi-agency safeguarding arrangements are in place at a local level, and organisations and agencies are clear about how they will work together to safeguard children and promote the welfare of children.

Serious Crime Act 2015, Female Genital Mutilation Act 2003 which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18

Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM

The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children

Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children

Prevent duty guidance: England and Wales (2023) - GOV.UK (www.gov.uk). All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 to have "due regard to the need to prevent people from being drawn into terrorism"

The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)

The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils regarding these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it is proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there is evidence that they are being disproportionately subjected to sexual violence or harassment

The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination

Working collaboratively as professionals is a key part of providing services to children and families. When professional disputes happen that cannot be resolved in a timely manner the OSCP Resolution and Escalation Protocol should be followed.

DfE Information Sharing Advice For Practitioners 2024 produced by the DfE, outlines the importance of sharing information about children, young people, and their families in order to safeguard children. It provides clarity on when and how information can be shared legally and professionally to achieve improved outcomes. It also includes the “Seven Golden Rules for Sharing Information,” which provide a framework to support information sharing where practitioners have reason to believe failure to share information may result in the child being at risk of harm. It is non-statutory and has been produced to support practitioners in the decisions they take to share information, which reduces the risk of harm to children and young people and promotes their well-being.

Children’s Wellbeing and Schools Act 2026 strengthens the safeguarding framework for children by placing greater emphasis on early intervention, multi-agency working and ensuring that no child is "invisible" to services. Key measures include strengthening information sharing between safeguarding partners, introducing a statutory register for children not in school, reinforcing schools' role within multi-agency child protection arrangements, and improving oversight of children's welfare and attendance. The Act also introduces wider reforms relating to school standards, attendance and child wellbeing

Crime and Policing Act 2026 introduces a range of measures to strengthen public protection, tackle serious violence, child sexual abuse, exploitation and anti-social behaviour, and improve the effectiveness of policing. The Act includes new provisions relating to child sexual abuse, including mandatory reporting duties in certain circumstances, stronger action against those who conceal abuse, and enhanced powers to protect victims and prevent offending.

School Premises (England) Regulations 2012 and the Education (Independent School Standards) Regulations 2014

The School Premises (England) Regulations 2012 (for maintained schools) and the Education (Independent School Standards) Regulations 2014 (for academies and independent schools) set out the minimum standards for school premises to ensure that they are safe, suitable and support the health, welfare and safeguarding of pupils. These regulations require schools to provide appropriate toilet, washing, changing and showering facilities that are suitable for the age, sex and needs of pupils, including those with disabilities or special educational needs, and which provide appropriate privacy.

In relation to safeguarding, schools must ensure that toilet, changing and shower facilities:

- provide appropriate privacy and dignity for pupils whilst enabling effective supervision and safeguarding;
- are clean, safe, well maintained and fit for purpose;
- are designed and managed to reduce opportunities for bullying, harassment, abuse, sexual violence, sexual harassment, voyeurism or other inappropriate behaviour;
- include appropriate risk assessments where supervision arrangements are required;
- meet the needs of all pupils, including those with disabilities or medical needs, through reasonable adjustments where necessary;

- are subject to clear arrangements regarding staff access and supervision, ensuring that staff only enter changing areas or toilet facilities when necessary, announce their presence where appropriate, and always act in accordance with the school's Staff Code of Conduct;
- are supported by appropriate policies relating to intimate care, personal care, health and safety, equality, privacy and safeguarding.

The school recognises that toilets, changing rooms and shower facilities can present increased safeguarding risks due to their private nature. The school will therefore ensure that these areas are appropriately designed, maintained and supervised, taking account of pupils' age, developmental needs and any additional vulnerabilities, while respecting pupils' privacy and dignity. Any safeguarding concerns arising within these areas will be managed in accordance with this Safeguarding and Child Protection Policy and the school's behaviour, anti-bullying and staff conduct procedures.

4. Definitions: Safeguarding and Child Protection

All our staff at Royton Hall Primary are expected to be familiar with the wide range of policies and procedures we have to keep our children safe and promote their wellbeing at all times.

Safeguarding as defined in Keeping Children Safe in Education, means:

- *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 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.*

Working Together to Safeguard Children (2023) further extends this definition to include:

- *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*
- *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.*

Child/ren: The legal definition of a child in the UK includes everyone under the age of 18.

'Family Help' means taking action to support a child, young person or their family early in the life of a problem, as soon as it emerges. It can be required at any stage in a child's life and applies to any problem or need that the family cannot deal with or meet on their own.

Child in Need: Under the Children Act 1989, local authorities are under a general duty to provide services for children in need for the purposes of safeguarding and promoting their welfare. A child in need is defined under section 17 of the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired without the provision of services, or a child who is disabled. To fulfil this duty, practitioners undertake assessments of the needs of individual children, giving due regard to a child's age and understanding when determining what, if any, services to provide.

Child Protection: Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child who lives or is found in their area is suffering or is likely to suffer significant harm, it has a duty to make such enquiries as it considers necessary to decide whether to take any action to safeguard or promote the child's welfare. Such enquiries, supported by other organisations and agencies, as appropriate, should be initiated where there are concerns about all forms of abuse, neglect, and exploitation whether this is taking place in person or online, inside or outside of the child's home. There may be a need for immediate protection whilst an assessment or enquiries are carried out. Schools are required to cooperate with children's social care when carrying their inquiries and therefore we have a duty to share information when requested to do so.

Significant Harm is the threshold for a child protection response to support and or protect children. Harm is defined in the Children Act 1989 as the ill-treatment of a child or the impairment of their health or development. This can include harm caused by seeing someone else being mistreated, for example by witnessing domestic abuse. The phrase 'significant harm' was introduced by the Children Act 1989. The Act does not define 'significant.' The question of whether or not harm is 'significant' relates to its impact on a child's health or development.

Children, Young People and Families Referral provides a single point of contact for professionals and members of the public who want to seek support or raise concerns about a child. Oldham have created these advice referral toolkits as part of our commitment to work with a resident focus. They are for everyone to use – residents, elected members, staff, and partners.

Multi Agency Safeguarding Hub (MASH) is a fully integrated multi-agency team which involves key safeguarding agencies including professionals from social care, police, health and education. These agencies work together to identify the need of children and their families and signpost to the appropriate agency or resources where threshold is met.

The main aim of a MASH is to improve the quality of information sharing when making decisions between agencies at the earliest opportunity.

Children in Care: A child is 'looked after' (in care) if they are in the care of the Local Authority for more than 24 hours. Children can be in care by agreement with parents or by order of a court. The placement providing the care can be a connected person to the child or a Local Authority approved foster carer.

Kinship Care refers to a type of care where a child who cannot be looked after by their birth parents is cared for by relatives or friends. The government in England has launched a Kinship

Care Strategy to improve kinship carers' financial stability, education, training, and partnership with local authorities and other agencies. Oldham have also set out their Kinship offer.

These arrangements can be known as either family and friends care or private fostering.

- **Family and Friends Carers**: If you are a grandparent, aunt, uncle, brother, sister, or family friend looking after a child who cannot be cared for by their birth parents, you are known as a family and friends carer. Sometimes these carers will be given Parental Responsibility for the children through a Child Arrangements or Special Guardianship Order.

- **Private Fostering**: You are a private foster carer if you are not a close relative and you are looking after a child who is under 16 (or under 18 if they are disabled) for more than 28 days in a row.

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children and their parents and carers) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what is appropriate and which terms to use on a case-by-case basis.

5. Equality Statement, Children with Protected Characteristics

Some children are at greater risk of harm, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. At Royton Hall Primary we are committed to anti-discriminatory practice and ensuring that all children are provided with the same protection regardless of any additional needs, barriers or protected characteristics they may have. As stated in the Equality Act 2010, we recognise the protected characteristics that may be applicable to our pupils:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation.

Whilst all children should be protected, it is important that governing bodies and proprietors recognise (and reflect in their policies and procedures) that some groups of children are potentially at greater risk of harm than others (both online and offline). The list below is not exhaustive but highlights some of those groups.

Children with Special Educational Needs and Disabilities (SEND)

We know who our pupils are with special educational needs, disabilities, or additional health needs and recognise that they may face additional barriers, which can include:

- assumptions that indicators of possible abuse, such as behaviour, mood and injury, relate to the child's impairment without further exploration
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- assumptions that children with SEND can be disproportionally impacted by things like bullying - without outwardly showing any signs
- communication barriers and difficulties in managing or reporting these challenges
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.
- reluctance to challenge carers (professionals may over-empathise with carers because of the perceived stress of caring for a disabled child)
- disabled children often rely on a wide network of carers to meet their basic needs and therefore the potential risk of exposure to abusive behaviour can be increased
- a disabled child's understanding of abuse
- lack of choice/participation.

Children Looked After (CLA)

The most common reason for a child to become looked after is because of abuse and/or neglect. We therefore ensure that the appropriate arrangements are in place to support these children and keep them safe from further harm. This includes:

- appointment of a Designated Teacher (DT) for Children in Care
- appropriate staff made aware of a child's looked after status
- ensure that necessary staff have the skills, knowledge and understanding of the child's needs
- ensure the child's record contains a clear understanding of their legal status and care arrangements, including the levels of authority delegated to their carer and contact arrangements with birth parents or those with parental responsibility
- keep contact details of the child's social worker, carer(s) and name and contact details of the virtual school head for DT to liaise with.

Children with a Social Worker

Virtual School Heads have a responsibility for the strategic oversight of the educational attendance, attainment, and progress of:

- **children in care**,
- **children previously in care**; and
- **children with a social worker** – defined as any child who has been assessed as being in need under section 17 of the Children Act 1989 and currently has a social worker; it also includes those who have been assessed as needing, or previously needing, a social worker within the past 6 years due to safeguarding or welfare reasons.

The statutory guidance on Promoting the education of looked after and previously looked after children contains further information on the roles and responsibilities of Virtual School Headteachers.

In line with Promoting the education of children with a social worker and children in kinship care arrangements: virtual school head role extension - GOV.UK (www.gov.uk) this has been extended to include:

- **children who have previously had a social worker** – the cohort of children with a social worker and those who have previously had a social worker who are aged from 0 to 18; and
- **children in kinship care arrangements** - this means any friend or family member, who is not a child's parent but raising them for a significant amount of the time, either as a temporary or permanent arrangement.

Royton Hall Primary ensures that our Designated Teacher has the appropriate training, so they are able to take the leadership of this crucial area of our safeguarding arrangements in collaboration with our Designated Safeguarding Lead which includes:

- working closely with virtual school heads to ensure that funding is best used to support the child's educational achievement and development needs that are identified in their personal education plans
- collaborating with the virtual school heads to also promote the educational achievement of children previously in care.

Children who are absent from education

Children who are absent from education, particularly those who are persistently or severely absent, or who go missing from education, can be at increased risk of a range of safeguarding concerns, including neglect, child sexual exploitation (CSE), child criminal exploitation (CCE), domestic abuse, mental health concerns, forced marriage, female genital mutilation (FGM), radicalisation and involvement in county lines. A child's unexplained or prolonged absence from school may be an indicator that they are at risk of harm or in need of additional support.

At Royton Hall Primary, we recognise that improving attendance is a safeguarding priority and that identifying the underlying causes of absence requires a child-centred, multi-agency approach. Our procedures for managing attendance, persistent absence, severe absence and Children Missing Education (CME) are detailed within the school's Attendance Policy.

The Attendance Policy reflects the statutory guidance Working Together to Improve School Attendance and sets out how the school works in partnership with parents, the Local Authority and other agencies to identify barriers to attendance, provide early support and fulfil our safeguarding responsibilities where absence indicates a child may be at risk of harm.

The school also follows the statutory guidance Children Missing Education, ensuring that all reasonable enquiries are made to establish the whereabouts of children who leave the school roll or fail to attend, and that timely referrals are made to the Local Authority where a child is identified as missing education.

Elective Home Education (EHE)

We recognise that many children who are electively home educated receive a suitable education and have positive learning experiences. We respect the right of parents to choose elective home education where this is in the best interests of their child and enables them to fulfil their duty to provide an efficient, full-time education suitable to the child's age, ability, aptitude and any special educational needs.

However, we also recognise that elective home education may, in some circumstances, reduce a child's visibility to the services that help to safeguard and promote their welfare. For some children, it may result in them not receiving a suitable education or increase the risk that safeguarding concerns go unidentified.

Therefore, where a parent expresses an intention to remove their child from roll in order to educate them at home, Royton Hall Primary will work collaboratively with parents, the Local Authority and other relevant professionals to ensure that the decision is made in the child's best interests and that any safeguarding concerns are appropriately considered. The school will follow local authority procedures and statutory guidance relating to Elective Home Education, including making appropriate referrals and sharing relevant information where there are safeguarding concerns or where this is necessary to support the child's welfare.

Where a child is subject to a Child Protection Plan, is a Child in Need, has an Education, Health and Care (EHC) Plan, or there are existing safeguarding concerns, the school will ensure that relevant agencies are informed promptly and that appropriate multi-agency discussions take place before the child is removed from roll, in accordance with statutory guidance.

Children requiring mental health support

At Royton Hall Primary, we recognise that promoting positive mental health and emotional wellbeing is fundamental to safeguarding and enables children to achieve, thrive and reach their full potential. We are committed to fostering a whole-school approach that promotes resilience, positive relationships and emotional wellbeing for all pupils.

We recognise that, whilst mental health problems are not in themselves safeguarding concerns, they can, in some cases, become safeguarding concerns or be an indicator that a child has experienced, or is at risk of experiencing, abuse, neglect, exploitation or other adverse childhood experiences. This may include concerns relating to self-harm, eating disorders, suicidal ideation or suicide.

All staff have a responsibility to promote positive mental wellbeing, identify pupils who may be experiencing emotional or mental health difficulties, and respond appropriately to concerns. Staff are expected to:

- promote positive mental health and emotional wellbeing through the curriculum and wider school ethos;
- remain vigilant to changes in a pupil's presentation, behaviour, attendance or engagement that may indicate emerging mental health concerns;
- provide appropriate early support and identify pupils who may benefit from targeted intervention;
- share concerns promptly with the Designated Safeguarding Lead (DSL) or Deputy DSL in accordance with the school's safeguarding procedures; and
- work collaboratively with parents, carers and partner agencies to ensure pupils receive the support they need.

Staff should not attempt to diagnose mental health conditions. Where concerns arise, they should record and report these in line with the school's safeguarding procedures so that appropriate assessment and support can be arranged. The Designated Safeguarding Lead (or Deputy DSL) will consider, where appropriate, whether parents or carers should be informed of concerns relating to their child's mental health and wellbeing, unless doing so would place the child at increased risk of harm.

The school has a Senior Mental Health Lead who supports the development of a whole-school approach to mental health and emotional wellbeing. The Senior Mental Health Lead works alongside the safeguarding team to coordinate early intervention, develop staff awareness and ensure pupils are able to access appropriate support.

Where additional support is required, the school will work in partnership with parents, the Mental Health Support Team (MHST), health professionals, Children's Services and other specialist agencies to ensure children receive timely and appropriate intervention. The school also signposts families to local and national mental health services where appropriate.

Mental health and wellbeing are promoted through the curriculum, including Personal, Social, Health and Economic (PSHE) education, Relationships, Sex and Health Education (RSHE), pastoral support and wider wellbeing initiatives. The school is committed to creating a safe, inclusive and nurturing environment where pupils feel able to seek help, talk about their worries and access support at the earliest opportunity.

Safeguarding children with medical conditions

At Royton Hall Primary, we recognise that children with medical conditions, including allergies, may be more vulnerable and require additional support to ensure their health, safety and wellbeing. We are committed to ensuring that all pupils with medical needs are fully supported to access education safely and are not placed at unnecessary risk.

The school complies with the statutory guidance Supporting Pupils at School with Medical Conditions and Allergy Safety in Schools, ensuring that appropriate arrangements are in place to meet pupils' medical needs. Individual Healthcare Plans (IHPs) are developed where appropriate in partnership with parents, healthcare professionals and, where suitable, the child. The school also has a separate Allergy Policy, which sets out the procedures for preventing, managing and responding to allergic reactions, including the administration of adrenaline auto-injectors and the requirements of Benedict's Law. All relevant staff receive appropriate training to enable them to support pupils with medical conditions safely, including the administration of prescribed medication and the use of emergency medication where required. The school ensures that emergency procedures are understood and practised where appropriate.

Whilst an incident relating to the management of a child's medical condition, including an allergy, would not automatically constitute a safeguarding concern, staff should remain professionally curious where incidents indicate that a child may be at increased risk of harm. This may include situations where:

- essential medical information has not been shared with the school;
- a child is repeatedly sent to school without essential medication or medical equipment;
- parents or carers repeatedly fail to engage with medical advice or agreed healthcare plans;
- there are concerns that a child's medical needs are not being consistently met; or
- a child's medical condition may be placing them at increased risk of neglect, abuse or exploitation.

Where concerns arise that a child's medical needs are not being appropriately met, staff must report these immediately to the Designated Safeguarding Lead (DSL) in accordance with the school's safeguarding procedures. The DSL will consider whether the concerns indicate that the child may be suffering, or is at risk of suffering, significant harm and whether a referral to Children's Social Care or other agencies is required.

The school promotes a whole-school approach to supporting children with medical conditions, recognising that effective communication, partnership working with families and health professionals, and timely information sharing are essential to safeguarding children's health, wellbeing and educational outcomes. Further information is provided in the statutory guidance Pupils at School with Medical Conditions and Allergy safety in schools.

Children who are lesbian, gay or bisexual

At Royton Hall Primary, we recognise that a child or young person being lesbian, gay or bisexual is not, in itself, a safeguarding concern or risk factor for harm. However, we also recognise that children who are lesbian, gay or bisexual, or who are perceived by others to be lesbian, gay or bisexual, may be more vulnerable to discriminatory language, prejudice, bullying, harassment and social isolation.

The school is committed to creating a safe, inclusive and respectful environment where all pupils are treated with dignity and respect. Discriminatory behaviour, including homophobic or biphobic language, bullying or harassment, will not be tolerated and will be addressed promptly in accordance with the school's Behaviour Policy and Anti-Bullying Policy. All staff are expected to remain vigilant to any indicators that a child may be experiencing bullying or discrimination because of their actual or perceived sexual orientation. Concerns should be recorded and reported in line with the school's safeguarding procedures so that appropriate support can be provided.

The school promotes equality, inclusion and respect through its curriculum, policies and wider school culture. Where appropriate, pastoral support will be provided, and the school will work in partnership with parents, carers and external agencies to ensure children receive the support they need to feel safe, valued and able to achieve. Where bullying, harassment or discrimination is persistent, places a child at risk of harm or is linked to other safeguarding concerns, the Designated Safeguarding Lead (DSL) will consider whether safeguarding procedures should be implemented and whether additional support or referrals to external agencies are required.

Children who are questioning their gender

At Royton Hall Primary, we recognise that some children and young people may question their gender at different stages of their development. We are committed to providing a safe, respectful and inclusive environment where all children are treated with dignity, feel valued and are protected from bullying, discrimination and harm.

We recognise that children who are questioning their gender may have a range of experiences and, in some cases, may be vulnerable to bullying, social isolation, mental health difficulties or other safeguarding concerns. Staff should approach these situations with sensitivity, professional curiosity and a child-centred approach, ensuring that the child's welfare remains paramount.

The school will not initiate discussions or actions relating to social transition. Where a child or parent/carer requests support relating to social transition, the school will respond in accordance with Keeping Children Safe in Education (KCSIE), taking a careful, evidence-informed approach that considers the child's welfare, the rights and wellbeing of other pupils, and the school's statutory responsibilities under safeguarding, equality and human rights legislation.

The Designated Safeguarding Lead (DSL) will be informed of any request relating to social transition or where a child is questioning their gender and there are safeguarding concerns. The DSL will ensure that any decisions are appropriately documented and that relevant advice is sought where necessary.

Parents and carers will normally be involved in discussions at the earliest opportunity, recognising their primary role in their child's upbringing and wellbeing. The only exception would be where involving parents or carers is considered likely to place the child at risk of significant harm. In such circumstances, the DSL will determine the most appropriate course of action in line with safeguarding procedures.

When considering any request for support, the school will:

- place the best interests, welfare and safety of the child at the centre of decision-making;
- consider any wider safeguarding, health, mental health, SEND or neurodiversity needs;
- work collaboratively with parents, carers and, where appropriate, relevant professionals;
- ensure that decisions are proportionate, carefully considered and fully documented; and
- review decisions where circumstances change or new information becomes available.

The school is committed to preventing and responding to all forms of bullying, harassment and discrimination. Any incidents of bullying related to gender questioning or gender identity will be addressed promptly in accordance with the school's Behaviour Policy, Anti-Bullying Policy and safeguarding procedures.

The school will comply with its statutory responsibilities under safeguarding legislation, the Equality Act 2010, the Human Rights Act 1998, and all relevant Department for Education guidance when responding to requests relating to children questioning their gender outlined in Keeping Children Safe in Education.

The School complies with the requirements of the School Premises (England) Regulations 2012 and, where applicable, the Education (Independent School Standards) Regulations 2014 (see Section 3) in relation to the provision and management of toilet, changing and shower facilities. Where individual arrangements are required to meet a pupil's needs, the School will ensure that these are clearly recorded, communicated on a need-to-know basis to relevant staff, and reviewed regularly to ensure they continue to support the safety, privacy, dignity and wellbeing of all pupils

The school will also ensure that arrangements for participation in physical education and sport are lawful, safe and fair. Where sports or activities are organised on a single-sex basis because of safety considerations or because the physical strength, stamina or physique of the average child of one biological sex would place them at a disadvantage in competition with the average child of the other biological sex, participation will be based on biological sex in accordance with the Equality Act 2010. Where there are no safety concerns and a child requests support relating to participation in PE or sport, the school will consider the request on a case-by-case basis, taking into account the child's best interests, the impact on other children, and the need to provide a safe, fair and inclusive environment. Decisions will be made in line with the school's approach to considering requests for social transition and in consultation with parents or carers where appropriate.

6. Roles and Responsibilities of Staff including Leadership and Management

Role and Responsibilities of the Whole School

Safeguarding is **everyone's** responsibility at Royton Hall Primary. This policy applies to all of our staff including permanent, temporary and supply, volunteers, governors and contractors. It also applies to our safeguarding arrangements for extended school and off-site activities.

Royton Hall Primary plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by our:

- behaviour policy
- pastoral support system
- planned programme of relationships, sex and health education (RSHE) in an age appropriate way, which is inclusive and delivered regularly, tackling issues such as:
    - healthy and respectful relationships
    - boundaries and consent
    - stereotyping, prejudice, and equality
    - body confidence and self-esteem
    - how to recognise an abusive relationship (including coercive and controlling behaviour)
    - the concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, faith-based or honour-based violence such as forced marriage and FGM and how to access support
    - what constitutes sexual harassment and sexual violence and why they are always unacceptable.

Role and Responsibility of all staff (permanent, temporary and supply), volunteers and contractors

All staff will be required to:

- read Part One of Keeping Children Safe in Education, and the reviewed version of this guidance at least annually.

  Translated versions of Part One Keeping Children Safe in Education can be found at Keeping Children Safe in Education Part 1 Translations | LGFL for staff, volunteers, parents and carers whose first language may not be English, should they wish to use this
- sign an annual declaration to state that they have read the expected sections according to their role, have understood the content and their roles and responsibilities in our whole school approach to safeguarding

- understand the **mandatory reporting** duty for Female Genital Mutilation (FGM). Teachers have a statutory duty to report to the Police where, in the course of their professional duties, they either discover that an act of FGM appears to have been carried out on a girl under the age of 18 or a girl under 18 discloses that she has been subjected to FGM. This duty is mandatory and should be carried out in accordance with statutory guidance, while also informing the Designated Safeguarding Lead;
- understand the **statutory mandatory** reporting duty for child sexual abuse under the Crime and Policing Act 2026. Where staff who undertake regulated activity with children are made aware by a child that they have been sexually abused, or they witness a child being sexually abused, they must comply with the statutory reporting duty without delay. Staff must immediately inform the Designated Safeguarding Lead, who will ensure that appropriate referrals are made to Children's Social Care and/or the Police in line with statutory guidance. This duty sits alongside, and does not replace, existing safeguarding responsibilities;
- promote and raise awareness about the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they will be interacting with online)
- contribute to creating a culture for pupils who are lesbian, gay, bisexual, or gender questioning to speak out and share their concerns
- contribute to creating a culture for any child defined as having a protected characteristic to speak out and share their concerns (see Section 5).

All staff will be aware of:

- our school's safeguarding arrangements and systems which is explained to staff as part of their induction and annual update training for Keeping Children safe in Education. As part of staff induction new staff/ volunteers are provided with the following key guidance and information provided by our school senior leadership team:
    - safeguarding and child protection policy
    - staff behaviour policy/code of conduct
    - the role and identity of the Designated Safeguarding Lead (DSL) and deputies
    - the behaviour policy
    - online safety policy
    - Mobile Phone and Smart Device Policy;
    - Allergy and Medical Needs Policy;
    - Whistleblowing Policy;
- our expected safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods
- signs of vulnerabilities to look out for in children who may benefit from Family Help support, we explain to staff the Family Help process for children and their families and what their role is in this to support DSLs in ensuring children and their families receive support as soon as problems emerge

- what to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- the process for recording and sharing information internally to DSLs and on children's safeguarding records
- the process of making referrals to the Local Authority Children's Social Care and/or Police where required and the statutory processes that may follow
- the signs of specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- how to support and speak to children when they may share their worries or make disclosures of abuse, neglect or exploitation and contribute to creating a culture where children feel able to speak with the relevant safeguarding leads
- the importance of reassuring children that they are being taken seriously and that they will be supported and kept safe
- the importance of supporting families and providing a culture of support to encourage parents/carers to seek support and engage with our school and professionals when issues emerge or become a concern
- children can be at risk of harm inside the home (familial harm) and outside of their home (extra familial harms) and that any form of harm can happen directly or online
- the fact that children who are (or who are perceived to be) lesbian, gay, bisexual (LGBTQ+) can be targeted by other children
- what to look for to identify children who need help or protection in accordance with statutory procures under the children act section 17 (child in need) and section 47 (significant harm).

Role and Responsibilities of the Designated Safeguarding Lead (DSL)

Our DSL team includes a member/s of our senior leadership team. We also have Deputy DSLs (DDSL) within our staffing group. Whilst one of the DSLs is referred to the 'lead' and will coordinate the DSL team, they are all trained at the same level to ensure that at all times one or more of them are available to carry out all of their designated functions in safeguarding.

- The DSL takes lead responsibility for our school's child protection and wider safeguarding arrangements. This includes online safety and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.
- Whilst all of our staff are part of our safeguarding culture, it is the role of our DSL to receive information, review and make decisions about any necessary further considerations or actions needed to respond to any safeguarding matters that arise.
- The DSL will act as the main contact in our school when a child and their family are receiving support from the school, external agencies and statutory services.

- The DSL will liaise with other staff within school who are responsible for attendance so that they are aware of the associated risks with children being absent from education for prolonged periods and/or on repeat occasions, as this can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. The school will identify those pupils who are persistently absent or those who are missing from education and work with Children's Social Care where the school absence indicates safeguarding concerns. Where there are no safeguarding concerns they, will follow the protocol for educational neglect.
- During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. DSLs can work outside of these hours when matters of support or a child protection matter arises.
- In the event that non-urgent matters arise out of school hours, our DSL can be contacted, if necessary at head@roytonhall-pri.oldham.sch.uk

- When the DSL is absent, the Deputy DSL(s) will be available via their contact details as stated at the start of this policy.
- During school holiday periods the Headteacher/DSL team will check in periodically to ensure that any safeguarding requests or queries are responded to as soon as possible i.e section.17, section 47, MARAC/Court requests.

The DSL will be given the time, funding, training, resources and support to:

- provide advice and support to other staff on child welfare and child protection matters
- take part in and/or lead Family Help support
- take part in strategy discussions organised by the Local Authority's Children's Social Care and inter-agency meetings and/or support other staff to do so when required
- contribute to the assessment of children (when a child may have suffered harm or is at risk of harm)
- refer suspected cases, as appropriate, to the relevant body (Local Authority Children's Social Care, Channel Programme, Disclosure and Barring Service, and/or Police), and support staff who make such referrals directly
- have a good understanding of behaviours that may impact on a child's engagement and learning that may require consideration through safety/support planning, this includes the impact on themselves but also to other children
- have a good understanding of harmful behaviours that may require risk management, safety planning and/or support in school, this includes those presented by children within the setting, their parents/carer or associated adults where necessary
- have a good understanding of the filtering and monitoring systems and processes in place at our school
- assist the Headteacher to review and respond to low-level concerns that may arise regarding staff

- share information and/or take part in statutory processes that involve reviewing and analysing of safeguarding practice and policies. This can include meetings held by Oldham Safeguarding Children's Partnership in response to significant safeguarding incidences, child death and/or where a Safeguarding Practice Review is required to determine learning and practice analysis.
- Share information and/or take part in non-statutory safeguarding processes that involve reviewing and analysing of safeguarding practice and policies. This can include Brief Learning Review, Thematic Reviews and Single Agency Reviews.

The DSL will also:

- keep the Headteacher informed of any issues, the conversations with children and their families, universal services and referrals to external agencies and statutory services
- liaise with universal, targeted and statutory agencies, Local Authority workers (Children's Services and other key practitioners) when there are safeguarding concerns as appropriate (includes Family Help and child protection)
- share information about incidences of sexual violence and sexual harassment with statutory colleagues such as Police and Children's Social Care colleagues in order to prepare and implement the school's policies.
- maintain an awareness of local specialist services and ensure appropriate referrals and support are available for children affected by sexual violence or sexual harassment, including victims and alleged perpetrators.
- ensure child protection records and other relevant safeguarding information are transferred securely and without delay when a pupil moves school, liaising directly with the receiving Designated Safeguarding Lead where there are safeguarding concerns or identified risks. Ensure the receiving school is informed of any known risks posed to or by a pupil, enabling appropriate risk assessments and safety plans to be implemented from the outset.
- be aware that children are entitled to have an 'Appropriate Adult' to support and help them in Police investigations or if there is threshold met for them to be searched.

Keeping Children Safe in Education does provide a full overview of the role of the designated safeguarding lead in Annex B

Role and Responsibilities of the Governance

Our Governing Body have a strategic role within our leadership and management team and must ensure that all staff comply with legislation and local guidance at all times.

The Governing Body 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 for the setting

- evaluate and approve this safeguarding and child protection policy along with other policies related to safeguarding at each review, ensuring they comply with the law, and hold the Headteacher to account for their implementation
- evaluate and approve recommendations/action plans identified through quality assurance activity that the Headteacher/DSL undertakes to review safeguarding practice through audits and annual/termly governing reports to ensure that they have regular oversight and hold the Headteacher/Principal accountable for the practice improvement
- carry out an annual review of the school's policies and procedures to provide information to the Local Authority about how the duties set out in the Education Act (2002) have been discharged (Section 157/175)
- appoint a senior body level/ link governor to monitor the effectiveness of the school's safeguarding arrangements including policies and their implementation, in conjunction with the full governing body. This is always a different person from the DSL
- be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- ensure all staff undergo safeguarding and child protection training, including online safety according to their roles, and that such training is regularly updated and in line with statutory guidance.
- ensure that all governors/trustees:
    - read Keeping Children safe in Education in its entirety, and review compliance of this task at least annually
    - sign a declaration at the beginning of each academic year to say that they have reviewed the above guidance.
- 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 filtering and monitoring standards and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards.

The Governing Body will 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

- the school has effective procedures to manage any safeguarding concerns (no matter how small) that arise. This includes those related to child welfare concerns, low level concerns and allegations made against staff
- that this policy reflects those children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- where another body is providing services or activities on the school site (regardless of whether or not the children who attend these services/activities are children on the school roll):
    - seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place and inspect them if needed
    - make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate.
- make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply.
- the Chair of Governors will act as the 'case manager' in the event that an allegation is made against the Headteacher. where appropriate (see Section 11 Managing Concerns and Allegations)
- all governors receive appropriate safeguarding training, including at induction. This training should equip governors with the knowledge and skills to understand their safeguarding responsibilities and contribute to a safe school environment as outlined in Keeping Children Safe in Education. Organisations like the National Governance Association and The Key for School Governors offer resources and training to support governors in this area

Role and Responsibilities of the Headteacher

The Headteacher will:

- implement this policy and ensure that all staff:
    - are informed of our school's systems which support safeguarding, including reading and understanding this policy, as part of their induction
    - follow the procedures included in this policy, what they should know and do in relation to information sharing and referrals of cases of suspected abuse and neglect
- make this policy available to parents/carers, professionals and the community to ensure there is transparency and clear expectations about the school's duty to safeguarding and promote the welfare of children and the arrangements for responding to children presenting with needs that may require Family Help or support to protect them. This policy will be available on the school website and a copy can be made available via the school office.
- ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent

- act as the ‘case manager’ representing the school in the event of an allegation of abuse made against another member of staff or volunteer
- managing cases where there are low-level concerns regarding the conduct of staff, or oversee delegation to the DSL
- be responsible for the safeguarding of pupils attending an alternative provision and should be satisfied that the placement meets the pupil’s needs and know where the pupil attending is based during school hours. This includes having records of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend.
- obtain written information from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at their establishment (i.e. those checks that schools would otherwise perform on their own staff). This includes written confirmation that the alternative provider will inform them of any arrangements that may put the child at risk (i.e. staff changes), so that they can ensure that appropriate safeguarding checks have been carried out on new staff.
- ensuring the relevant staffing ratios are met, where applicable
- making sure each child in the Early Years Foundation Stage is assigned a key person
- overseeing the safe use of technology, mobile phones and cameras in Early Years setting.

Role and Responsibilities of the Designated Teacher

Our Designated Teacher takes leadership of promoting the educational attainment of Children With a Social Worker which includes:

- working closely with Virtual School Heads to ensure that funding is best used to support the child’s educational achievement and development needs that are identified in their personal education plans
- to carry out their duties in line with Designated teacher for looked-after and previously looked-after children - GOV.UK and extended duties as outlined Promoting the education of children with a social worker and children in kinship care arrangements: virtual school head role extension - GOV.UK working closely with our DSL for those children who are supported by a Child in Need or Child Protection Plan to ensure support for the education attainment of these children is appropriately entwinned with safeguarding processes.

7. Working with Families

Alongside Keeping Children Safe in Education, Royton Hall Primary adopts the fundamental principal of ***working in a child-centred approach within a whole family focus*** as promoted in Working Together to Safeguard Children 2023.

This principle is underpinned by the findings and recommendations within the Government's 2023 publication Stable Homes, Built on Love in response to the recommendations of the Independent Review of Children's Social Care. The strategy sets out how children's social care is to be committed to supporting every child to grow up in a safe, stable and loving home. For most children this means growing up within their family. The strategy also emphasises the importance of having stronger expectations of support through Family Help and family networks.

At Royton Hall Primary our principles align to the above. We endeavour to work in partnership and collaboration with children and their families so that they are supported from an early stage by being a part of and leading the conversations about change and aims for their children. We are keen to support families in a strength and solution-based approach, encouraging motivation and confidence to improve their own agency to make safe and positive decisions for themselves and their children.

Our principles include, but are not limited to:

Promoting effective partnership working with parents and carers e.g. build strong, positive, trusting, and co-operative relationships by:

- approaching families and their wider family networks and communities with empathy, respect, compassion, and creativity
- avoiding reinforcing family shame, suffering, and blame
- making efforts to understand the impact of the parental trauma influencing the dynamics and experiences of the family
- using strength-based approaches, working with parents and carers to identify what is working well and how their strengths could support them to effect positive change
- ensuring we work sensitively with parents, carers, and children, to identify and understand the impact of adversity and trauma in their lives; seeking to understand how adversity and trauma might manifest and affect children and parent's engagement and use their expertise to adapt their response with care and compassion
- adapting our responses to meet the diverse needs of parents and carers, including fathers and male carers, and the specific challenges being faced, including parents and carers of disabled children, and where harm is outside the home
- understanding a family's circumstances and the needs of parents of children with additional needs and/or disabilities and consider this when establishing their ability to care for the child
- ensuring we understand the family's background, ethnicity, religion, financial situation, ability, education, sex, ages and sexual orientation, and potential barriers these create in seeking and accessing help and support
- being alert and recognising where parents or carers may not be acting in the best interest of the child or where children may be experiencing abuse, neglect, and exploitation as a

result of actions by parents, carers, or other individuals in their lives. Practitioners use their skills and expertise to adapt their response to secure engagement

- being mindful of negative stereotypes when making decisions which might lead to false assumptions.
- Being aware and recognising when parents have mental health problems and work with them to assess parents' awareness of their child's needs

Communicating effectively verbally and non-verbally by:

- communicating with respect, being clear, curious and inclusive; adapting to parent's and carer's needs
- providing materials to children, parents, carers, and families which are jargon free, developmentally appropriate and in a format that is easily understood
- ensuring any materials, such as minutes or reports, capture the school's contribution but also those from the children, parents and carers which must include their views and wishes
- supporting families to access support to translate information where English is not their first language. Our school will access interpreters where needed including British Sign Language.

Empowering our parents and carers to participate in decision-making to help, support and protect children by:

- creating a safe culture which is an open and accepting forum free from discriminatory or prejudicial judgements
- ensuring the open culture is one which still provides reflection and challenge where the information has the potential to be a risk or influencing factor which may impact on a child's safety and wellbeing
- asking families for their perspective on a situation or issue that arises, ensuring we consider their point of view and factor this in when thinking about support
- promote families' rights to support through use of advocates, family members or a supporter
- ensuring parents and carers are fully aware of who will attend meetings and discussions, if the child will be invited to participate, and the format of the meeting or discussion
- giving parents and carers adequate preparation at every stage, relevant information, a safe and appropriate environment for participation, and suitable access arrangements
- signposting parents and carers to sources of help and support available locally or through the Local Authority
- provide opportunities for feedback and review to ensure acknowledgement of positive progress but also reviewing and discussion of any new or increasing issues to adapt a family's plans
- being transparent about our concerns and why we may need to request support from an outside agency; and the potential actions should our concerns increase for the children
- helping parents and carers to understand what the issues are and how these impact on the child, what decisions could be made, what changes need to be made, why and how, timescales and possible outcomes

- providing information about different types of support, what it involves and expects from parents and carers so they can make an informed choice and decision about which support pathways will be more helpful and effective for them.

All staff and volunteers understand the importance of recognising that a child may benefit from Family Help intervention, and it is integral to our whole school approach to look and listen out particularly for children:

- who have a special educational need and/or disabilities (SEND) or health conditions
- who are a young carer
- who could experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- have English as an additional language
- are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- are at risk of FGM, sexual exploitation, faith-based as well as honour-based abuse, forced marriage, or radicalisation
- are asylum seekers
- are at risk due to either their own or a family member's mental health needs
- are in care or were previously in care (see Section 11)
- who have ongoing unexplainable and/or persistent absences from education
- whose parent/carer has expressed an intention to remove them from school to be provided with elective home education (EHE).

In Oldham, if professionals are requesting Targeted Early Help support on behalf of a family, the Family Help Tool will need completing with the family. This asks about both strengths and needs, and identifies what support the family want and could benefit from. It includes a consent form, and a simple Family Action Plan to record what the family and professionals have agreed to do to make things better for the child and family. A completed Family Help Tool can be added as an attachment when making an online referral for targeted Family Help.

All staff should be aware of the process for community-based Family Help assessments including the criteria, including the level of need, for when a case should be referred to Family Help support and services provided at:

• Targeted early help level (under sections 10 and 11 of the Children Act 2004), and

• Statutory services delivered under section 17 of the Children Act 1989 (children in need, including how this applies for disabled children)

School staff may be asked to contribute to Family Help assessments by sharing relevant information, attending meetings and working with other agencies to support children and their families. In some circumstances, a member of staff may act as the lead practitioner where appropriate. The Designated Safeguarding Lead (DSL) will ensure that children receiving Family Help are monitored regularly. If a child's needs increase, concerns escalate, or progress is not

being made, the DSL will consider whether a referral to Children's Social Care for a statutory assessment is required.

8. Confidentiality and Sharing Information

At Royton Hall Primary trusted relationships are at the heart of working with children and their families. We strive to uphold good practice and work in partnership with children and families, communicating effectively and listening well so that we have sufficient information to understand and be able to meet their needs.

An open culture is imperative when deciding whether to share information and it is important to get the lawful basis right. The legal framework can appear complex, and a lack of clarity can lead practitioners to assume, incorrectly, that no information can be shared because consent has not been provided. Our school understands the lawful basis in which our DSLs can share information with other people, agencies and organisations about the children and families we are supporting.

In line with our principles of working with families outlined above, we strive to be transparent, open and clear when we need to discuss any information or concerns that worry us about a child's wellbeing. If we feel that we need to share information, we will explain how information will be shared or used so that families can make an informed choice about whether to consent.

If we feel that we need to share information with services due to concerns about a child's safety or welfare to provide the family with specific support, we will be upfront, transparent and honest about our concerns and the ways in which such services could help the family. We will endeavour to support and encourage the family to consent and engage with such support. We believe that this collaborative approach will support children to have the confidence to speak up and share their views as well as encouraging parents and carers of children at our school to have a willingness to engage with services that provide support.

If we have a concern about a child's safety and have decided to share information to protect them from a risk of harm, we will endeavour to gain cooperation and understanding from parents and carers. We will strive where possible to always gain consent from parents/guardians when we believe our concerns have increased and warrant the sharing of information to statutory services such as Police and Children's Social Care, we will have made efforts to discuss, explore and provide support to address these with families in a collaborative way beforehand; concerns should not be a surprise to families unless in situations where a one off or unprecedented incident occurs.

However, for a small number of children, seeking parental consent is not always possible and may place a child or others at risk of harm, for example:

- the child would be placed at increased risk of significant harm through the action of gaining this consent
- there would be an impact on a criminal investigation
- a delay in making the referral would impact on the immediate safety of the child.

In situations where our professional or legal duty is exercised to share certain information in the absence of consent, we will inform them as soon as possible if it is safe and appropriate to do so. We will be clear about what we have shared, with whom, the reasons why and how the information will be used.

In any situation where a child or their parent/carer object to consent or particular information sharing and we decide that it is proportionate to do so, a clear rationale, outlining our decisions and the reasons why, will be recorded on the child's file.

In situations where there are allegations of child-on-child abuse, we will notify the parents or carers of all the children involved. If a child or group of children have suffered significant harm or are considered at risk of harm either directly or online, we will have a duty to consider making a referral to Children's Social Care and the Police if a crime has been committed. The process for this can be found in Section 9 and our principles for information sharing and consent will apply unless we have a legal obligation to report the incident.

In addition to sharing information, our DSLs will endeavour to arrange a meeting with the parents and carers of all children to share information about the incident, plan safety strategies and/or risk management plans. Our DSLs will endeavour to keep families up to date and provide reassurance on any measures being taken, whilst respecting the privacy of each individual child involved.

The Data Protection Act (DPA) 2018 does not prevent or limit the sharing of information for the purposes of keeping children safe. Royton Hall Primary recognises that timely information sharing is essential for effective safeguarding. Whilst we promote collaboration and partnership with our families, fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children when required.

The following principles apply to Royton Hall Primary confidentiality agreement:

- timely information sharing is essential to effective safeguarding.
- the Data Protection Act (DPA) 2018 does not prevent, or limit, the sharing of information for the purposes of keeping children safe
- if staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk
- staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- if a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
    - even if a victim does not consent to sharing information, staff may still lawfully share it if there is another legal basis under the Data Protection Act that applies
    - the DSL will have to balance the victim's wishes against their duty to protect the victim and other children

- the DSL should consider the following points:

➢ parents or carers should normally be informed (unless this would put the child at greater risk)

➢ the basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to Children's Social Care where the child resides

➢ where a report of rape, assault by penetration or sexual assault is made, this should be referred to the Police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the Police remains.

- regarding anonymity, all staff will:
  - be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
  - do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
  - consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
  - have regard for the Government's publication Information sharing advice for safeguarding practitioners - GOV.UK includes 7 'golden rules' for sharing information and will support staff who have to make decisions about sharing information with all relevant parties.

When deciding what information to share, schools and colleges should consider:

- the relevancy of the information, including to the current safeguarding risk,
- what is necessary for the receiving setting to know, and

whether it is clearly presented and appropriately contextualised.

At Royton Hall Primary we use professional judgement to share information that is focused, relevant and proportionate. Information may be summarised or omitted where it is not needed for safeguarding purposes, but care must be taken not to leave out anything relevant to understanding or managing safeguarding risk. The new information sharing duty is intended to give staff greater confidence to share information appropriately and promptly to safeguard children. *We will update our policies and procedures in line with the Information Sharing Duty once it is released following consultation*. In the meantime, staff who are unsure about sharing information should seek advice from the Headteacher, DSL, a senior leader or the Data Protection Officer.

9. Recognise and Respond to Abuse, Neglect and Exploitation (what all staff must know and do if they have concerns)

Abuse, neglect and exploitation

All our staff are aware of what abuse, neglect and exploitation is and have an understanding of the different types of indicators which could suggest a child is suffering or likely to suffer harm.

We encourage our staff to be professionally curious about what to look out for as this is vital for the early identification of abuse, neglect and exploitation so that we are able to identify children who may be in need of help or protection at the earliest opportunity.

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

Our staff are aware that children may be abused by an adult or adults or by another child or children.

Physical Abuse

Physical abuse is a form of abuse which may involve:

- hitting
- shaking
- throwing
- poisoning
- burning or scalding
- drowning
- suffocating or otherwise causing physical harm to a child.

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child (Fabricated Induced Illness).

Emotional Abuse

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve:

- conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate

- age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction
- a child seeing or hearing the ill-treatment of another
- serious bullying (including cyberbullying)
- causing a child to feel frightened or in danger
- exploitation or corruption of children.

Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. It can be difficult to recognise emotional abuse and children may not always realise they are experiencing it. However, there may be indicators in the way a child behaves and reacts to certain situations.

Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve:

- **Physical contact:** including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing
- **Non-contact activities:** such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse
- **Online abuse:** sexual abuse can take place online, and technology can be used to facilitate offline abuse.

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

The CSA Centre Child Sexual Abuse Response Pathway is designed to support professionals in identifying and responding to child sexual abuse and to empower them to understand the role they, and their colleagues, play in protecting and supporting children. The Response Pathway sets out how to respond to concerns of child sexual abuse at key points, from first concerns and Family Help safeguarding through to child protection and criminal justice responses. Throughout, it focuses on meeting the needs of children and their families.

Mandatory Reporting of Child Sexual Abuse

Under the Crime and Policing Act 2026, a statutory duty requires certain individuals undertaking regulated activity with children, including school staff, to make a report where they are made aware by a child that they have been sexually abused, or where they witness a child being sexually abused. Failure to fulfil this duty without a reasonable excuse may constitute a criminal offence.

In accordance with this duty, all staff must immediately report any disclosure or witnessed incident of child sexual abuse to the Designated Safeguarding Lead (DSL). The DSL will ensure that an

immediate referral is made to Children's Social Care and/or the Police, as appropriate, and that all concerns are recorded accurately in line with statutory guidance and local safeguarding procedures. Staff must not promise confidentiality to a child making a disclosure and should always act in the child's best interests to ensure they receive appropriate protection and support.

The mandatory reporting duty sits alongside, and does not replace, existing safeguarding responsibilities. All concerns relating to child sexual abuse or suspected child sex offences must be reported immediately to the Designated Safeguarding Lead (DSL), who will ensure that appropriate referrals are made to Children's Social Care and/or the Police in accordance with statutory guidance and local safeguarding procedures.

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.
Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing, and shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate caregivers)
- ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Safeguarding Issues and Specific Forms of Abuse

All our staff understand that children can be at risk of abuse or exploitation in situations outside their families. They are aware that extra familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse - - including physical, sexual, emotional abuse and stalking), drug taking and/or alcohol misuse, criminal exploitation, child sexual exploitation, serious youth violence, county lines, radicalisation, consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as youth produced sexual imagery) and can put children in danger.

Staff are aware that Extra Familial Harms can present online, in a child's environment/neighbourhood, school and any place/space that children occupy or access such as:

- Child abduction
- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation (CCE)
- County Lines
- Children and the Court system
- Children 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
- Serious Violence
- FGM and the mandatory reporting duty for teachers
- Forced marriage.

Child-on-Child Abuse

At Royton Hall Primary, we know that children can cause harm to other children. As a school we have a zero acceptance of child-on-child abuse and create a culture of keeping an open mind and attitude that "it could happen here." Our staff are aware that even if no reports are being made in our school, it does not mean it is not happening.

Our staff understand that it is important to challenge inappropriate behaviours between children that are abusive in nature, and we have clear expectations that incidents are not downplayed or should never be passed off as "banter", "just having a laugh", "a part of growing up" or "boys being boys", as this can lead to a culture of unacceptable behaviours and unsafe environments for children and young people.

Child-on-child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- physical assault and harm, or the threat of harm with a weapon
- harmful sexual behaviour, sexual violence, sexual harassment which may include misogyny/misandry. More about this is in Part five of Keeping Children Safe in Education
- consensual and non-consensual sharing of nude and semi-nude images and/or videos, including those generated using AI
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- upskirting which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm

- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Residential Visits and Overnight Accommodation

As part of our arrangements to prevent child-on-child abuse and protect the safety, privacy and dignity of all pupils, the school will ensure that overnight accommodation on residential visits and other overnight activities is allocated appropriately. Children will not share overnight accommodation with a child of the opposite biological sex. Where a child is unwilling to share accommodation with another child of the same biological sex, the school will consider appropriate alternative arrangements where reasonably practicable, provided these do not compromise the safety, privacy, dignity or wellbeing of any child. Decisions will be made on a case-by-case basis, taking account of the school's safeguarding responsibilities and relevant legal duties.

Child-on-Child Abuse (Including Harmful Sexual Behaviour, Sexual Harassment and Sexual Violence)

At Royton Hall Primary, we recognise that child-on-child abuse can occur between children of any age and gender, both inside and outside of school, including online. It may include bullying (including cyberbullying and prejudice-based bullying), physical abuse, abuse within intimate personal relationships, initiation or hazing-type violence, harmful sexual behaviour (HSB), sexual harassment, sexual violence, upskirting, the consensual and non-consensual sharing of nude and semi-nude images and/or videos, and causing someone to engage in sexual activity without consent.

Harmful sexual behaviour exists on a continuum and may range from inappropriate or problematic behaviour to sexual harassment and sexual violence. Such behaviours are never acceptable. The school maintains a zero-tolerance approach to all forms of child-on-child abuse and will never dismiss sexual harassment or sexual violence as "banter", "part of growing up", "just having a laugh" or "boys being boys". We recognise that failing to challenge inappropriate behaviour can create an unsafe environment, reinforce harmful attitudes and normalise abuse.

The school is committed to creating a culture where all children feel safe, respected and able to report concerns. We recognise that the absence of reported incidents does not necessarily mean abuse is not occurring. Staff receive safeguarding training to recognise, respond to and report concerns at the earliest opportunity, including identifying misogynistic attitudes and behaviours. They are expected to challenge inappropriate conduct and respond promptly to behaviours such as sexualised comments, unwanted touching, grabbing, lifting clothing or any other behaviour that may constitute harmful sexual behaviour, sexual harassment or sexual violence.

The sharing of nude or semi-nude images or videos by children will always be treated as a safeguarding concern. All incidents will be assessed on a case-by-case basis, taking account of the age, developmental stage and circumstances of the children involved, together with any indicators of coercion, exploitation, abuse or vulnerability. The welfare of all children involved, including victims, alleged perpetrators and other affected pupils, will remain central to decision-making.

The Designated Safeguarding Lead (DSL) and deputies will ensure that staff are aware of the school's procedures for responding to child-on-child abuse and that concerns are recognised, reported and managed promptly and effectively. The DSL will maintain up-to-date knowledge of local specialist support services and referral pathways to ensure appropriate support is available for victims, alleged perpetrators and any other children affected by an incident. Where

appropriate, the DSL will work with the Police, Children's Social Care and other safeguarding partners to ensure a coordinated response, effective risk management and ongoing support.

Harmful Sexual Behaviour (HSB)

We recognise that Harmful Sexual Behaviour (HSB) is a safeguarding and child protection issue that can occur both online and offline. Children's sexual behaviour exists on a continuum from developmentally appropriate and expected behaviours through to inappropriate, problematic, abusive or violent behaviours. In Oldham, we use the Hackett Continuum to support the assessment and understanding of sexualised behaviours displayed by children and young people. The continuum helps professionals distinguish between behaviours that are developmentally typical and those that may be harmful, ensuring that concerns are responded to proportionately and that appropriate safeguarding measures and support are put in place.

We recognise that HSB may involve children of the same age or different ages and that power imbalances, vulnerability, disability, social status or physical size may influence the nature and impact of the behaviour. Early identification and intervention are essential, as inappropriate behaviours such as sexist language, misogyny or unwanted sexualised behaviour can escalate into more serious forms of abuse, including sexual harassment and sexual violence if left unchallenged.

The Designated Safeguarding Lead (DSL) and deputy DSLs maintain an appropriate understanding of harmful sexual behaviour (HSB) and use Oldham's Harmful Sexual Behaviour Protocol to ensure that concerns are identified, assessed and responded to effectively. We adopt a whole-school approach to prevention, education and safeguarding and recognise that children who display harmful sexual behaviour may have experienced abuse, trauma or other adverse childhood experiences. As such, our response focuses on safeguarding, support and appropriate intervention for all children involved, whilst ensuring that victims are protected, supported and listened to. We work with relevant agencies where appropriate to assess risk, reduce harm and promote positive outcomes for children and young people.

Sexual harassment

We also recognise that sexual harassment is a form of child-on-child abuse and will not be tolerated. Sexual harassment refers to unwanted conduct of a sexual nature and can occur both online and offline, inside and outside of school. Such behaviour can violate a child's dignity, make them feel intimidated, degraded or humiliated, and create a hostile, offensive or sexualised environment.

Sexual harassment may include, but is not limited to:

- Sexual comments, remarks, jokes, gestures or taunting.
- Making comments about someone's appearance, body, clothing or sexual activity.
- Using sexualised language or inappropriate sexualised names.
- Deliberate physical contact of a sexual nature, including brushing against another person or interfering with their clothing.
- Displaying, sharing or circulating sexual images, photographs or drawings.

- Upskirting, which is a criminal offence.
- Online sexual harassment, including unwanted sexual comments or messages, sexualised online bullying, sharing unwanted explicit content, sexual coercion, exploitation or threats.
- The consensual or non-consensual creation or sharing of nude or semi-nude images and videos.
- Pressuring, coercing or manipulating others into sharing images of themselves or engaging in online activity that makes them feel uncomfortable.

We recognise that sexual harassment can occur as a standalone incident or as part of a wider pattern of harmful sexual behaviour, and that if left unchallenged it can normalise inappropriate conduct and contribute to a culture in which sexual violence and abuse are more likely to occur. All allegations and concerns relating to sexual harassment will be taken seriously, addressed promptly and managed in line with the school's safeguarding and child protection procedures. The wishes, feelings and lived experience of the child affected will be central to all decision-making, and appropriate support will be provided to both victims and, where appropriate, those displaying the behaviour.

Sexual violence

We recognises that sexual violence is also a form of child-on-child abuse and that it can occur both inside and outside of school, including online. Sexual violence is never acceptable and all reports, disclosures or concerns will be taken seriously and responded to promptly, fairly and in accordance with statutory safeguarding guidance.

Sexual violence includes a range of sexual offences under the Sexual Offences Act 2003, including:

- Rape: intentional penetration of the vagina, anus or mouth of another person with a penis without their consent.
- Assault by Penetration: intentional sexual penetration of the vagina or anus with a part of the body or an object without consent.
- Sexual Assault: intentional sexual touching of another person without their consent. This can include behaviours such as unwanted kissing or intentionally touching another person's breasts, buttocks or genitalia.
- Causing Someone to Engage in Sexual Activity Without Consent: intentionally causing or forcing another person to participate in a sexual activity without their consent. This may include forcing someone to remove clothing, touch themselves sexually or engage in sexual activity with another person.

We recognise that consent is about having the freedom, choice and capacity to agree to a specific sexual activity. Consent may be withdrawn at any time and agreeing to one type of activity does not imply consent to another. A child under the age of 13 can never legally consent to any sexual activity, and the legal age of consent is 16.

We are committed to maintaining a culture where sexual violence is not tolerated, where victims are believed, supported and protected, and where children feel safe to report concerns. All incidents will be managed using a child-centred and trauma-informed approach, with the welfare of the victim as the primary consideration. Appropriate action will be taken to assess and manage risk, support all children involved, and work with parents, carers and external agencies where necessary. Staff will never dismiss sexual violence as banter, part of growing up, or normal behaviour, and will challenge attitudes and behaviours that may contribute to a culture of abuse.

More information about Harmful sexual behaviour (HSB), sexual harassment and sexual violence can be found in Part five of Keeping Children Safe in Education

Child Exploitation

Exploitation in relation to children refers to the use of children for someone else's advantage, gratification, or profit often resulting in unjust, cruel, and harmful treatment of the child. These activities are to the detriment of the child's physical or mental health, education, moral or social-emotional development. It covers situations of manipulation, misuse, abuse, victimization, oppression or ill-treatment.

Our staff are aware that there are several types of child exploitation, including, but not limited to:

Child Sexual Exploitation (CSE):

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge, for example through others sharing videos or images of them on social media.

CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. This can be committed by an individual or an organised network and most sexual abuse is committed by those previously known to the victim. Some children do not realise they are being exploited and may believe they are in a genuine romantic relationship. As with CCE, victims are not always recognised and can be criminalised for actions they take whilst under coercion. This remains a significant concern, as professionals continue to encounter cases where children are manipulated, groomed, and exploited without fully understanding the abuse they are experiencing.

Child Criminal Exploitation (CCE):

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. Children who are criminally exploited should have their vulnerabilities recognised by adults and professionals (particularly older children) and should be treated as victims. It is not possible for a child to consent to be exploited, abused or trafficked, and they may not recognise that it is happening to them.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Both CCE and CSE are forms of abuse that occur where an individual or group takes advantage of an imbalance in 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 for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. This can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. CCE and CSE can affect children, both male and female, and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. This may constitute modern slavery, and further information is available in the Modern Slavery statutory guidance. In accordance with this guidance, a relevant child protection and modern slavery referral should be completed where a potential victim of CCE or CSE is identified.

Modern Slavery:

Modern slavery encompasses a range of offences, including human trafficking, slavery, servitude, and forced or compulsory labour. It involves the exploitation of children and adults for a variety of purposes, including sexual exploitation, criminal exploitation (including financial exploitation), forced labour, domestic servitude, forced criminality and the removal of organs. Children may be recruited, transported, transferred, harboured or received for the purpose of exploitation. Exploitation may be committed or facilitated by an individual, an organised criminal network or a gang. Child trafficking and exploitation can occur within the UK as well as across international borders and do not always involve a child being moved over long distances.

The National Referral Mechanism (NRM) is the UK framework for identifying and supporting potential victims of modern slavery and human trafficking. All staff should be aware of the indicators that a child may be a victim of exploitation or modern slavery, the support available to victims, and the process for making a referral to the NRM where appropriate. Further information is available in the statutory guidance Modern slavery: how to identify and support victims.

Domestic Abuse

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduced the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. They may also experience it within their own intimate relationships.

Our staff understand that these experiences can have a detrimental and long-term impact on their health, well-being, development, and ability to learn. The statutory definition of domestic abuse,

based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members.

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

Oldham are committed to supporting families with domestic abuse and have listed where support can be found on their website.

Operation Encompass

The school participates in Operation Encompass, the national information-sharing scheme between the police and education settings. Under the statutory duty introduced in November 2025, the police will notify the school when they have reasonable grounds to believe that a child has been affected by a domestic abuse incident. This enables the school to provide timely and appropriate support, taking account of the child's individual needs.

The Designated Safeguarding Lead (DSL), or nominated Key Adult, will receive and manage Operation Encompass notifications, ensuring information is handled confidentially, recorded securely and used to inform appropriate safeguarding support. Operation Encompass does not replace existing safeguarding procedures, and where there are concerns about a child's welfare, referrals to Children's Social Care will be made in accordance with local safeguarding procedures.

Female Genital Mutilation (FGM)

Keeping Children Safe in Education explains that FGM includes *'all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs.'*

FGM is illegal in the UK and is considered as a form of child abuse that has significantly harmful and long-lasting consequences. It can also be referred to as 'female genital cutting,' 'circumcision' or 'initiation.'

Our teachers are aware of their **mandatory reporting duty** and the requirement to immediately contact the Police if they are

- informed by a girl under 18 that an act of FGM has been carried out on her
- observes 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).

The duty for teachers above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. In these circumstances, teachers know they must report to the DSL who will follow local safeguarding procedures.

Our members of staff who are not teachers, are aware that if they suspect a child is at risk or that FGM has been carried out, they should report this to the DSL immediately.

Serious Violence

Serious violence is a significant safeguarding concern that can have a profound impact on a child's safety, wellbeing and future outcomes. It may involve physical assault, carrying, threatening with or using weapons, and can occur in the context of peer conflict, bullying, criminal exploitation or organised violence. Children involved in serious violence may be victims, perpetrators or both.

All staff should be alert to the indicators and risk factors associated with serious violence and understand that some children may be at increased risk, including those with disrupted education, repeated suspensions or permanent exclusion, attendance at alternative provision, involvement in offending behaviour or experiences of exploitation. Staff should also be aware that children may be at greater risk at particular times of the school day, for example, when travelling to and from school. We will use the advice provided by the Home Office: Preventing youth violence and gang involvement to inform our approach to serious violence at our school.

Any concerns that a child is carrying or using a weapon, or has expressed an intention to do so, must be reported immediately to the Designated Safeguarding Lead (DSL) or Deputy DSL. The DSL will assess the level of risk to the child and others, taking account of any wider safeguarding information, and will take appropriate action. This may include developing a safety and support plan, implementing measures to reduce conflict, making referrals to Children's Social Care or other agencies, and involving the Police where necessary.

The School recognises the importance of early identification and intervention. Where concerns are identified, the School will work with the child, their family and partner agencies to provide timely, evidence-informed support, including access to trusted adults, social and emotional support, mentoring or other targeted interventions, to reduce the risk of harm and improve outcomes for children.

We will share information when a child moves schools, especially where the pupil is a risk to others and/or the individual pupil, for example where a pupil has previously carried, threatened with, or used a knife or weapon, it is incumbent on the receiving school to assess risk, and accordingly, put in place a safety and support plan for when the child arrives. More information on the child protection file is in Annex B. It would be good practice for a conversation to take place between the designated safeguarding leads at both settings, where there are issues or concerns.

Prevent and concerns about extremism

Royton Hall Primary is aware of our duty under section 26 of the Counter-Terrorism and Security Act 2015, in the exercise of our functions, to have "*due regard to the need to prevent people from becoming terrorists or supporting terrorism*" (known as the Prevent duty).

The Prevent duty is one of our wider safeguarding obligations. Our DSLs and senior leaders are aware of the revised Prevent duty guidance: England and Wales (2023) for England and Wales, especially paragraphs 141-210, which focus on education and childcare. The guidance covers 3 general themes: leadership and partnership, capabilities, and reducing permissive environments.

Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, which aims to:

- negate or destroy the fundamental rights and freedoms of others; or
- undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
- intentionally create a permissive environment for others to achieve the results in (1) or (2)

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the Government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to Children's Services or Channel, the Government's programme for identifying and supporting individuals at risk of being drawn into terrorism.

The DfE also has a dedicated telephone helpline, 020 7340 7264, which all staff and governors can call to raise concerns about extremism for a pupil. In non-emergency situations DSLs can also email counter.extremism@education.gov.uk. In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321.

If you are a practitioner and want to make a safeguarding referral because you have concerns that someone you work with or know is being drawn into terrorism or extremism, you can have an initial discussion with the Duty and Advice Team on 0161 770 7777. Alternatively, you need to complete and submit the online form to make a Prevent referral in Oldham.

Oldham Safeguarding Children's Partnership have developed a Prevent handbook for educational settings to access so that they can use this as a reference tool to help safeguard children and young people at risk of being drawn into terrorism, or extremism leading to terrorism.

Concerns about mental health

Mental health difficulties can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Poor or deteriorating mental health can also be a safeguarding concern in its own right. Our staff know to be alert to behavioural signs that suggest a child may be experiencing mental health or be at risk of developing one.

If a staff member has a concern about a child's mental health, no matter the level of the child's emotional difficulties, they must speak to the school's DSL who will evaluate if the child is at risk of immediate harm, and if so, will escalate to the appropriate level of support which includes speaking to the school lead for Mental Health.

If a child is experiencing low moods, low self-esteem and general anxiety, our school mental health lead will be able to provide some advice about some self-accessed support through relevant approved wellbeing websites and apps. If however, the child is presenting with a concerning level of low mood and anxiety for a period of time then our mental health lead in partnership with the DSL will discuss with the child and their parents/carer to explore options of support.

If someone is experiencing suicidal thoughts but they do not need physical input from A&E then consideration will be given to accessing support from the SPA/Crisis team. If a referral for targeted mental health support is required then a referral through SPA will be made.

If, however, a child/young person is at immediate risk the school will recommend they need to be sent to A&E or dial 999.

In Oldham, mental health and well-being is considered of high importance and there is a dedicated webpage where professionals can find out how to signpost to agencies and what support is available for educational settings for Mental Health in Education.

Further information about specific safeguarding issues can be found in Annex A of this policy. Annex A contains important guidance on a range of forms of abuse and safeguarding concerns. School leaders and all staff who work directly with children are expected to read and be familiar with the contents of Annex A.

What all staff need to do to respond if abuse, neglect and exploitation is suspected or been disclosed.

At Royton Hall Primary, we adopt a whole school approach and safeguarding is everyone's responsibility. Staff and volunteers, and governors must comply with our safeguarding procedures as set out below:

Concerns about child-on-child abuse

In most circumstances, incidences of pupils hurting other pupils will be dealt with under our school's behaviour policy https://www.roytonhall-pri.oldham.sch.uk/

Our safeguarding and child protection policy will apply to all incidents that raise safeguarding concerns where the alleged behaviour:

- is serious, and potentially a criminal offence
- could put pupils in the school at risk
- is violent
- involves pupils being forced to use drugs or alcohol
- involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including consensual and non-consensual sharing of nude and semi-nude images and/or videos, including those generated using AI).

If a pupil makes an allegation of abuse against another pupil:

- staff must record the allegation on CPOMS and report to the DSL, staff should not investigate the matter
- the DSL will assess and consider the relevant next steps which may include, speaking with the child and parents, accessing relevant consultation lines provided to schools by the Local Authority, making a request for support to Children's Services as well as the

Police if the allegation involves a potential criminal offence or the Child and Adolescent Mental Health Service (CAMHS), if appropriate

- the DSL will consider whether a risk assessment or a safety and support plan would be beneficial for any children involved, including the victim(s), the child(ren) against whom the allegation has been made and any others affected, with a named person they can talk to if needed. This should include consideration of all aspects and areas of the school environment and beyond, for example off-site activities and school transport
- the DSL will speak to the child and their parent/s or carers to share the concerns, gain their views and consent to liaise with other agencies if there are any identified risks and unmet needs
- if the incident is a criminal offence school have a duty to report this and thereafter work closely with the Police (and other agencies as required) while protecting children and/or taking any measures to manage risk. For incidences which involve significant harm and/or a potential criminal offence, the DSL will endeavour to gain consent but may override this should not gaining consent increase the risk to a child
- our DSLs are committed to ensuring that where concerns are raised about child-on-child abuse, incidences are taken seriously and dealt with fairly. DSLs will consider all information available to them and ensure that any action or decision is proportionate for all children involved, and that such decisions do not disproportionately impact on their access to education, although at times some restrictions or adaptations may be required to manage identified risk.
- If the disclosure relates to a suspected child sex offence, including sexual abuse or, where applicable, sexual exploitation that constitutes a child sex offence, the statutory mandatory reporting duty under the Crime and Policing Act 2026 applies. Individuals undertaking regulated activity with children, including school staff, have a statutory duty to make a report where, in the course of their work, they become aware of a suspected child sex offence involving a child. Failure to comply with this duty, without a reasonable excuse, may constitute a criminal offence.

  This duty applies irrespective of whether the alleged perpetrator is an adult or another child. However, it does not apply to consensual sexual activity between children of a similar age where there is no evidence of abuse, coercion, exploitation or any other criminal offence.

  The mandatory reporting duty sits alongside, and does not replace, existing safeguarding responsibilities. All concerns relating to child sexual abuse or suspected child sex offences must be reported immediately to the Designated Safeguarding Lead (DSL), who will ensure that appropriate referrals are made to Children's Social Care and/or the Police in accordance with statutory guidance and local safeguarding procedures.

Creating a culture where children feel safe in school and minimising the risk of all forms of abuse.

We recognise the importance of taking proactive action to minimise the risk of any form of abuse, neglect and exploitation irrespective of from whom and where this comes from, including child-on-child abuse. Creating a supportive environment where children can feel confident in reporting incidents is key to our safeguarding culture in Royton Hall Primary.

We expect all staff to:

- 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 about appropriate behaviour and consent
- ensure pupils are able to easily and confidently report abuse using our reporting systems
- 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 in the school or elsewhere that could be addressed by us updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with our 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, and alleged perpetrator(s) and any witnesses are not bullied or harassed
- consider intra-familial harms (adults close to the child and family) and any necessary support for siblings following a report of sexual violence and/or harassment.

Our staff are trained to understand:

- how to recognise the signs of child-on-child abuse, and know how to identify it and respond to reports
- 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 open mind and attitude of “it could happen here”
- if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told; and always speak to the DSL should they be unclear
- children may not always make a direct disclosure and therefore they must be aware that:
    - children can show signs or act in ways they hope adults will notice and react to; it may be that their difficulties emerge from behaviour when they do not have the language to express themselves
    - a friend of the child may share information to a staff member or make comments; professionally curiosity is key, do not fear exploring the information and asking open ended questions
    - staff overhear a conversation between children
    - a child’s behaviour may change suddenly with no clear reason or precipitating event that might offer some explanation
    - some children can face additional barriers to telling someone, for example they have a disability, special educational need, age gender, ethnicity and/or sexual orientation etc.

- one child's concerning/abusive behaviour towards another could be an indicator of that child having been harmed themselves.

If a child makes a disclosure to a member of staff or volunteer

All staff are aware they should always be prepared as children can disclose spontaneously to anyone anywhere.

We understand the importance that all children should feel heard and understood. Therefore, designated safeguarding leads (and deputies) ensure the school:

- encourages a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school or college may put in place to protect them, and

- understands the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

Royton Hall Primary is situated within Oldham which has a rich and diverse population. We cannot, and do not, assume that all children and their families have the ability, understanding, language and resilience to convey any difficulties they may experience. It is key to our school ethos to recognise the needs of children and their families and to recognise and provide support where English may not be their first language and/or the children or family members have special educational needs; and without doing so may impede their ability to represent their voice, wishes and feelings.

We also understand the 'voice of the child' is a phrase that is used to describe the real involvement of children and young people. It does not only refer to what children say directly but it refers to many other aspects of their presentation. It means seeing their experiences from their point of view and taking into account the child's daily lived experience. Staff will use the acronym '**VOICE'** when working with a child or young person:

- **V**alue the views and opinions of children by listening to them

- **O**pen, friendly and non-judgemental in our engagement, developing trusting relationships

- **I**nvolve children in the planning, design and delivery of services

- **C**ommunication through a wide range of methods in a manner that is understood

- **E**nsure that views are captured through different mediums so that children and young people know that we take the approach 'nothing about me, without me'.

All staff know that we place the voice of children at the centre of everything we do and endeavour to place their best interests at heart. We ensure we know who our children are, staff are encouraged to be curious by speaking and listening to children whilst respecting any protected

characteristics. We hope our children have confidence and trust in our staff, believing they will be taken seriously and be supported with their issues or concerns sensitively.

Staff also know that children may not always feel ready or know how to tell someone that they are being abused, neglected or exploited and do not always recognise their experiences as harmful. At Royton Hall Primary, if staff have a concern about a child, they follow the school's procedures for reporting concerns. These procedures are reflected in the flowchart in Appendix B.

Staff recognise that a child or young person may seek a trusted adult out to share information about abuse or neglect or talk spontaneously individually or in a group when a member of staff is present. In these situations, staff know that they need to:

Listen to children by:

- showing patience regardless of a child's age as we know they can find it hard to find the words to express themselves
- encouraging children to tell their account in their own words
- avoiding the use of leading questions or suggesting what may have happened, instead we maintain genuine curiosity, and only ask open-ended questions/prompts
- giving the child the necessary time needed to give them a voice and ensure they are listened to without being judged

Reassure children by:

- making sure a child does not feel they are in trouble and that they have done the right thing in speaking to staff
- we let a child know it is not their fault as children are often made to feel blame by those harming them
- never promising confidentiality and being transparent about our obligations to share information if we are concerned that they are at risk of harm
- helping children to understand how we plan to support them and their family and let them know what action we will need to take next to support them.

It is important that staff are sensitive to giving children with additional needs a 'voice'. Therefore, staff need to be aware of subtle indicators of abuse and neglect, especially where children have complex needs or multiple disabilities. Research and national guidance make it clear that for some children it is not yet possible to proscribe techniques for communicating about possible harm that they have experienced, that are reliable and evidentially safe. We should be mindful of the following when seeking to give children with additional needs and disabilities a 'voice'.

- if possible, involve someone that knows the young person well and who has a good overview of their level of understanding so that they can communicate with them
- think about the environment where the disclosure is taking place or where the child is based if you are carrying out direct work to ascertain what has happened. Unfamiliar, noisy or busy places create added distractions and/or anxiety

- more time may be needed for any prompts, questions or information to be processed
- language and symbols need to be clear and specific as possible. Questions or prompts shouldn't be rephrased for any questions that you need to ask to find out the child's lived experience to understand the harm or risk they have been exposed to
- if you are able to, use visual supports to help reinforce what you are saying or to help when asking questions. This could be symbols or a communication systems (Widgets or Picture Exchange Communication System), pictures, writing or other tools that a child uses to communicate with others

Professional curiosity

Staff recognise their responsibility to remain vigilant and to monitor children who may be at risk or who are experiencing neglect closely and holistically. For example, at lunchtime, before and after school as well as in the classroom. Professional curiosity is about enquiring more deeply, using proactive questioning and challenge. Staff will use their skills to understand what is happening within a family rather than making assumptions or accepting things at face value. We acknowledge that curious professionals engage with individuals and families through visits, conversations, observations and asking relevant questions to gather historical and current information. This does mean potentially asking difficult and challenging questions with parents and other professionals involved with the family.

Professional curiosity is key to safeguarding children and young people and staff at Royton Hall Primary receive training to triangulate information that they receive, seek independent confirmation of individual accounts and evaluate the details provided from a range of sources. Staff also know that the child is the key focus and is the centre of every decision made and action taken. They focus on the need, voice and lived experience of the child and family.

Recording concerns

Staff know that reporting concerns is a procedural requirement when safeguarding and promoting the welfare of children. Staff are clear that they must:

- record all conversations relating to any level of concerns on our recording systems; ensuring that the record is as detailed as possible, is factual, does not contain assumptions or personal judgement and captures the child's account in their own words
- inform the DSL about their concern as soon as possible; where the concern involves a disclosure or concern that the child is at risk of harm they must inform the DSL immediately. Staff to specify any marks

The school uses the online recording system CPOMS to record incident.

The body map in CPOMS is used to highlight where an injury has occurred, these may not be visible, but a child or young person may have detailed where they are. Staff know not to check injuries or take photographs but when they are recording the incident they will note the location on the body map or describe its location. Staff know that they must only report factual points regarding the injury so they will report its size, colour and shape. They know that they must not make assumptions about the age of the injury or how it was caused. More information about the use of body maps is in Appendix C.

Visitors and volunteers who do not have access to the School's CPOMS can fill out a cause for concern form in Appendix D (delete Appendix D if this is not relevant) outlining the safeguarding incident they have witnessed. This will be passed onto the DSL so that it can be analysed and recorded on CPOMS.

Our staff are aware that such information is confidential and should be shared with the DSL only who may hold additional information about the child and their family and therefore can form a view on its significance and whether any action is required. Staff will not share information amongst themselves and will not share the information outside of the formal reporting process unless asked to by the DSL. This ensures that information is shared without delay enabling the DSL to carry out any necessary functions of their role whilst upholding confidentiality for the child and their family.

What school and college staff should do if they have concerns about a child

Royton Hall Primary is committed to ensuring that all children feel safe and comfortable to share and report any concerns and/or allegations about their personal experiences at home, in the community, online or regarding a member of staff or other children in the school. As outlined above, all our staff are clear on the importance of listening to and supporting children when making disclosures, and the need to reassure them.

Our staff are aware that children can share information with anyone in our school but there are clear reporting processes when such information sharing raises concern about their welfare. Children may talk about worries and anxieties around friendships and school life which they need to support with but on other occasions they may share information about their family life which indicates that the children and their family may be in need of help and/or fear or experiences which cause staff to be concerned about whether they have been harmed or are at risk of being harmed. Where such situation arises, our staff are clear on the reporting processes.

Any member of staff, including supply teachers, contract workers, volunteers, governors/trustees and visitors at Royton Hall Primary who has any concerns about a child's welfare should:

- maintain an attitude of 'it could happen here' where safeguarding is concerned and always act in the best interests of the child. Never promise a child confidentiality
- reassure the child they have done nothing wrong and if appropriate explain to them how they will be supported and who you will need to share information with
- record what the child or others have disclosed using their language - or describe what you have seen or suspect and your rational for this. Also ensure you make a note of any injuries observed or described by the child (*if it is the latter two*)
- consider if the child needs medical attention and if so, prioritise ensuring they receive this
- you must never delay reporting your concerns about the welfare of a child and always act immediately by reporting/speaking to the school's DSL/deputies
- record what the child or other has disclosed in their language or describe what you have seen or suspect and your rational for this (*if it is the latter two*)

The DSL or deputy will:

- assess the concerns raised and consider the impact on the child's welfare, at the same time their safety. They will also review the child's record in order to establish if there has been any previous concerns (records help to establish relevant history and risk factors for example even if a concern appears low level on the surface, a series of incidents can highlight patterns of ongoing abuse and neglect.) The DSL will use the Continuum of Need to support their analysis and rationale for any decision

- DSL or deputy will speak to the child to verify their wishes and feelings, contact the child's parents or carers to either inform them of the concerns and also to gauge their view (it will be at the discretion of the DSL team to carefully consider if this action may place a child at further risk, e.g. if the child has disclosed abuse and neglect caused in the family home)

- if it is immediately apparent that a child has suffered significant harm or is at risk of harm e.g. suffered abuse, neglect and/or exploitation, the school's DSL will make a referral to Children's Social Care to request support at the earliest opportunity; consent will be gained where appropriate. If there has been a crime committed within the circumstances of the abuse, they will also report this to the Police.

What will the Local Authority Children's Social Care do?

Within one working day of a referral being made, a social worker should acknowledge its receipt to the school's DSL and make a decision about the next steps and the type of response that is required. This will include determining whether:

- the child requires immediate protection and urgent action is required

- any services are required by the child and family and what type of services

- the child is in need and should be assessed under section 17 of the Children Act 1989. Working Together to Safeguard Children provides details of the assessment process

- there is reasonable cause to suspect the child is suffering, or likely to suffer, significant harm, and whether enquiries must be made, and the child assessed under section 47 of the Children Act 1989. Working Together to Safeguard Children provides details of the assessment process

- Further information may be required by the Local Authority to determine the level of intervention required in deciding what further action is needed. As part of this, Children's Social Care may request that the school provides additional information or evidence, which may include photographs of visible injuries to assist with the assessment. Before taking or sharing any photographs, staff must seek parental consent unless doing so would place the child at increased risk of significant harm or compromise a child protection or police investigation. Staff must always consult with the Designated Safeguarding Lead (DSL) and follow local safeguarding procedures. Any photographs must be taken and stored securely using school-approved devices and systems, in accordance with the

school's Code of Conduct, Acceptable Use of IT Policy, Data Protection requirements and local authority guidance. Under no circumstances should personal mobile phones or personal devices be used to take, store or transmit images of a child.

- The DSL or deputies should follow up if this information is not forthcoming.

Anyone working/volunteering with children can make a referral, if in an emergency staff are unable to locate or do not have time to inform DSL of a serious concern, the following process must be followed without delay.

Making a referral to Children's Services and/or requesting support

What children and young People need to know and do to report safeguarding concerns (abuse neglect and exploitation)

At Royton Hall Primary we cultivate a culture of openness and transparency and want to make it clear to all our pupils/students that we are available at any time to listen to you and will always take your concerns seriously, however small you may consider them to be.

Our pledge is:

- we will ensure we provide you with the space away from public areas for you to talk
- we will listen without judgement and endeavour to respect your wishes and feelings
- we want you to feel safe and we will be honest about our duty to prioritise your wellbeing and longer term safety, this means, depending on the circumstances, we cannot offer you total confidentiality. We understand that this may create uncertainty, but we are confident that often when matters are dealt with as they emerge the longer-term prospects can be much improved for you and your family
- we will respect your place but if we consider that you have suffered significant harm or are at risk of harm, we will need to share this information so that you and your family can be offered the right support. We will be clear on what information needs to be shared, with whom and how it might be used
- when the concerns suggest you may benefit from Family Help support this may include considering support to your parents and carers with matters that will improve your situation
- we will provide a named mentor for you so that you can have the confidence and trust to know that you have someone to go to at school if you are feeling vulnerable and experiencing difficulties
- your education and welfare is important to us and we want to reassure you that your experience at school remains positive and you feel safe.

What you can do to report concerns:

- you can speak to any member of staff of your choice. Those staff will listen and support you but we have a team of DSLs in our school who have a specific role to support children and therefore it is likely that the staff members will talk to them or arrange for you to.

If you are being abused, neglected or exploited you can call Children's Services (the details are on page 6). Only referrals made via a telephone call will be accepted.

If you are in immediate danger and/or think a crime has/is being committed, you can call the Police on **999.**

You can contact the NSPCC Helpline by calling 0808 800 5000 or email: help@nspcc.org.uk

Our PSHE curriculum and Assembly times will promote children feeling safe in school and will provide reassurance that they will be heard and listened to if they have any concerns. Information regarding the NSPCC will also be shared via Assemblies.

Risk management and safety planning

The DSL, with support from deputy DSL, will take the lead role in managing any proposed risk by the alleged perpetrator(s) and will provide support at the same time, it is not our intention to villainise children, but it is everyone's responsibility to uphold the Behaviour Policy and standards within the school to maintain a safe environment. Such assessments or plans will be robust but sensitive to the individual needs of the children to ensure any identified risk is managed as effectively as possible whilst also supporting them to continue accessing a satisfactory level of education.

Risk management strategies can be put in place while other investigations are going on, e.g. by the Police. Although another agency such as the Police or Children's Services is or has investigated an incident, it is our duty here at Royton Hall Primary to ensure we identify and implement our own assessment and management of the concerns, informed by the needs of our school and the children we care for and the advice and outcomes of those agency's actions. This is to ensure that all children and staff are supported and always protected. We will consider these matters on a case-by-case basis, considering whether:

- taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the Police and/or Children's Services to determine this
- there are circumstances that make it unreasonable or inappropriate for us to reach our own view about what happened while an independent investigation is ongoing.

10. Online Safety and Filtering

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 (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors
- protect and educate the whole school community to be safe and responsibly use 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.

Our approach to online safety is based on addressing the following 4 categories of risk as identified in Keeping Children Safe in Education:

Content – being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.

Contact – being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example: child-on-child pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

Conduct – online behaviour that increases the likelihood of, or causes harm, for example: making, sending and receiving explicit images, including those generated using AI and online bullying

Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams. These can be reported to the Anti-Phishing Working Group

To meet our aims and address the risks above, we will educate pupils about online safety as part of our curriculum. For example:

- the safe use of social media, the internet and technology
- keeping personal information private
- how to recognise unacceptable behaviour online
- ensuring children know not to meet up with a person they have met online without a safe adult
- how to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim.

We will also:

- train staff, as part of their induction, on how to keep themselves safe online as well as children, in line with the school's online safety policy This needs to include issues for example: cyber-bullying, the risks of online radicalisation, and the roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required at least once each academic year

- educate parents/carers about online safety through letters and emails sent directly to them. We will also share clear procedures with them so they know how to raise concerns about online safety
- make sure staff are aware of any restrictions placed on them with regards to the use of their personal mobile phone and cameras, for example that:
    - staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
    - staff will not take pictures or recordings of pupils on their personal phones or cameras.
- make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- make sure all staff, pupils and parents/carers are aware that appropriate staff designated by the Headteacher, have the power to search pupil's phones, as set out in the DfE's guidance on searching, screening and confiscation if there is a concern regarding a child's safety or a crime in which case the Police will be contacted
- put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.
- take appropriate action to meet the cybersecurity standards and guidance on generative AI for users in education settings
- carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community
- provide regular safeguarding and child protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly.

Mobile Phones

At Royton Hall Primary we operate a mobile phone-free environment to support pupil safety, wellbeing and learning. We follow the Department for Education's statutory guidance on Mobile phones in schools and have implemented a policy which prohibits the use of mobile phones throughout the school day, including during lessons, transition periods, breaktimes and lunchtimes. Our approach is consistent with the behaviour in schools guidance, which supports schools in creating calm, safe and supportive environments that are conducive to learning. It also reflects our commitment to safeguarding and promoting the welfare of all pupils by reducing the risks associated with mobile phone use, including online harms, cyberbullying, inappropriate content and distractions from learning.

Filtering and Monitoring

As part of our responsibility to safeguard and promote the welfare of children and provide a safe learning environment, has appropriate filtering and monitoring systems in place across all school-owned devices and networks. Our filtering and monitoring arrangements are informed by the Department for Education's filtering and monitoring standards and are further supported by risk assessments undertaken as part of our wider safeguarding responsibilities, including those required under the Prevent Duty.

The effectiveness of our filtering and monitoring systems is reviewed regularly and at least annually. Records of these reviews are maintained securely and are used to inform senior leaders and relevant staff of the safeguards in place. This ensures that filtering and monitoring arrangements remain effective, proportionate and responsive to emerging risks. Any concerns, incidents or weaknesses identified through monitoring activities are reported and escalated appropriately in accordance with the school's safeguarding procedures.

Cyber Security and Data Protection

We recognise that cyber security forms an important part of our wider safeguarding responsibilities. To protect children, staff and sensitive information, has appropriate cyber security measures in place to reduce the risk of unauthorised access, data breaches, system disruption and safeguarding incidents.

Our approach is informed by the Department for Education's cyber security standards for schools and colleges and we take reasonable steps to strengthen our resilience against cyber threats. This includes implementing appropriate technical controls, regularly reviewing cyber security arrangements, promoting staff awareness, and ensuring that personal information is handled securely and in accordance with data protection requirements.

Through these measures, we aim to maintain a secure digital environment that supports teaching and learning while safeguarding the welfare and personal information of all members of the school community.

11. Safer Recruitment

At Royton Hall Primary, we comply with the statutory requirements of Keeping Children Safe in Education (KCSIE) and local multi-agency safeguarding arrangements. We operate robust safer recruitment procedures to help deter, identify and reject applicants who may pose a risk of harm to children and to ensure that those appointed are suitable to work with children.

All recruitment information will make clear the school's commitment to safeguarding and promoting the welfare of children. Applicants will be informed that safeguarding checks form part

of the recruitment process and that the successful applicant will be required to undergo all appropriate pre-employment checks before commencing employment.

The School will carry out all required pre-appointment checks and verify, where applicable:

- identity;
- right to work in the UK;
- professional qualifications;
- employment history;
- references;
- criminal record information;
- prohibition from teaching checks;
- Section 128 checks for management positions, where applicable;
- overseas checks, where appropriate;
- health and physical capacity for the role; and
- overall suitability to work with children.

In accordance with Keeping Children Safe in Education, shortlisted candidates will be asked to complete a self-declaration of their criminal record and other information relevant to safeguarding. The School will also undertake an online search of shortlisted candidates to identify incidents or issues that are publicly available online which may be explored with the applicant at interview. Information obtained through online searches will only be considered where it is relevant to the individual's suitability to work with children.

- At least one member of every recruitment panel will have successfully completed appropriate safer recruitment training.
- The School obtains written confirmation from supply agencies or third-party organisations that agency staff and other individuals supplied to work at the School have undergone all appropriate pre-employment checks.
- The School will satisfy itself that the individual presenting for work is the same person on whom the checks have been completed.
- Trainee teachers will be checked either by the School or by the initial teacher training provider. Written confirmation will be obtained where the provider is responsible for undertaking the checks.
- Where a trainee teacher is fee-funded, the training provider will be responsible for carrying out the required checks. The School will obtain written confirmation that the checks have been completed and that the trainee has been judged suitable to work with children.
- The School maintains a Single Central Record of all recruitment and vetting checks required by Keeping Children Safe in Education.
- The School will not knowingly permit a barred person to engage in regulated activity with children.

The Headteacher will ensure that relevant staff are aware of the requirements relating to disqualification under the Childcare Act 2006 and the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) Regulations 2018, where these apply to their role, including their obligation to disclose relevant information.

Volunteers

All volunteer roles will be assessed before the individual begins work. The School will determine whether the role amounts to regulated activity and what checks are required.

From 1 September 2026, a volunteer who teaches, trains, instructs or supervises children frequently (on more than three days in any 30-day period) or overnight will be regarded as engaging in regulated activity, even where they are supervised. In these circumstances, the

School will obtain an enhanced DBS check with children's barred list information before the volunteer begins the role. A volunteer will not undertake regulated activity until their children's barred list status has been confirmed.

The school will review the roles of existing volunteers to identify any individual who becomes engaged in regulated activity because of the changes introduced from 1 September 2026. Where this applies, the School will obtain the appropriate enhanced DBS check with children's barred list information and update the Single Central Record accordingly.

Where a volunteer meets the frequency requirement through volunteering across more than one school or setting, the School will work with the other settings to determine which organisation will obtain the enhanced DBS check with children's barred list information. Where a volunteer is not engaged in regulated activity, the School will undertake and record a written risk assessment to determine what checks, if any, are appropriate.

The assessment will take account of:

- the nature of the work with children;
- the level and frequency of contact with children;
- what is known about the volunteer, including information provided by staff, parents, referees or other volunteers;
- whether the individual undertakes other paid or voluntary work where a referee can comment on their suitability; and
- whether an enhanced DBS check without children's barred list information, or another level of check, is appropriate.

Under no circumstances will a volunteer for whom no checks have been obtained be left unsupervised or permitted to undertake regulated activity.

Where the statutory criteria are met, the School will make a referral to the Disclosure and Barring Service (DBS) in relation to a volunteer who is removed from regulated activity, or who ceases volunteering before they can be removed.

Work Experience

The school recognises its responsibility to safeguard pupils undertaking work experience placements. Before a placement is agreed, the school will seek assurance that the placement provider has appropriate safeguarding, child protection, health and safety, and supervision arrangements in place to protect pupils from harm.

Where a person supervising a pupil on work experience will be providing teaching, training, instruction, care or supervision frequently, for more than three days in any 30-day period, or overnight, this may constitute regulated activity. The school will ensure that no individual barred from working with children undertakes regulated activity.

The school acknowledges that other employees within the workplace who are not directly responsible for teaching, training, instructing, caring for or supervising pupils are not engaged in regulated activity. For pupils aged 16–17 undertaking work experience, the school cannot require the placement provider to obtain an Enhanced DBS check with Children's Barred List information for staff supervising the placement.

Where work experience takes place within our school and the placement provides opportunities

for contact with children, the placement provider should consider whether an Enhanced DBS check is appropriate for the young person undertaking the placement. DBS checks cannot be obtained for children under the age of 16.

The Designated Safeguarding Lead (DSL) will provide advice where safeguarding concerns arise in relation to work experience placements and will ensure that any concerns are managed in accordance with the school's child protection procedures.

Third-Party Staff (Contractors)

The School will ensure that contractors and other third-party staff working on the premises have undergone the appropriate checks for the work they will undertake. The level of DBS check required will be determined through a written risk assessment, taking account of whether the individual will be engaging in regulated activity, the frequency of contact with children and the level of supervision.

Where a contractor will engage in regulated activity, an enhanced DBS check with children's barred list information will be required. Where a contractor will not engage in regulated activity but may have regular opportunity for contact with children, an enhanced DBS check without children's barred list information may be required.

Where a contractor has not undergone the appropriate checks, they will not be permitted to work unsupervised or undertake regulated activity while children are present.

The School will:

- obtain written confirmation from the contractor's employer that the appropriate checks have been completed;
- verify the identity of contractors and third-party staff when they arrive at the School; and
- ensure that the individual presenting for work is the same person on whom the checks were completed.

Where a self-employed contractor is engaged, the School will obtain the appropriate checks directly or verify that the individual holds a suitable and current DBS certificate where this is permissible and appropriate.

Where the School directs a pupil to attend alternative provision, it will obtain written assurance that adults working with pupils have undergone the appropriate safer recruitment checks. This assurance does not remove the School's responsibility to undertake its own safeguarding oversight and keep the placement under regular review. Further information is provided in Section 6.

Site Security and Visitors

Visitors to the School, including contractors, will be required to sign in and will be issued with an identification badge confirming that they have permission to be on the premises.
Parents and carers who are only delivering or collecting children will not normally be required to sign in.

All visitors are expected to comply with the School's safeguarding arrangements, visitor procedures, staff instructions and health and safety requirements. Visitors will be provided with safeguarding information appropriate to the purpose of their visit, including what to do if they have concerns about a child or the behaviour of an adult working with children.

For visitors attending in a professional capacity, the School will verify their identity and obtain assurance that the appropriate safeguarding checks have been completed by their employer, where relevant. The School will not normally ask to see the DBS certificate itself where satisfactory written assurance has been provided.

The School will not request DBS or children's barred list checks for visitors such as relatives attending sports days, performances or similar events where such checks are neither legally permitted nor necessary.

The Headteacher will exercise professional judgement when deciding whether a visitor should be escorted or supervised whilst on the premises, taking account of the purpose of the visit, the visitor's level of contact with children and any checks that have been completed.

The Single Central Record

The School maintains a Single Central Record (SCR) in accordance with Keeping Children Safe in Education. The SCR contains the information required by KCSIE for all relevant staff, including salaried teacher trainees, agency workers, third-party supply staff, volunteers for whom an enhanced DBS certificate has been obtained, and Governors.

The SCR is maintained accurately, kept up to date and is recorded in such a way that information relating to each individual school can be produced separately, and without delay, for those entitled to inspect it, including inspectors.

12. Managing Safeguarding Concerns or Allegations made about staff, including supply teachers, trainee teachers, volunteers and contractors

Section 11 of the 2004 Children's Act places an expectation on our school to have a clear policy in line with the OSCP Child Protection & Safeguarding procedures for dealing with allegations against staff who work with children. All staff based within our school will be considered to be in either a position of trust or working with children.

A 'position of trust' is one in which a teacher or other member of staff/volunteer is in a position of power or influence over a child, by virtue of the work or nature of activity being undertaken. The Sexual Offences Act 2003 (ss.16-24) and/or Crown Prosecution Service Website sets out detailed definitions and a range of criminal offences associated with abuse of such a position.

A person aged 18 or over is said to be in a position of trust in relation to students at the school/college if they:

- look after children at the school/college. "Looking after" is defined as regularly involved in caring for, training, supervising or being in sole charge of such persons
- a professional who has power and authority in a child's life and may have a key influence on their future is regarded as being in a 'position of trust'
- such a person will have regular contact with the child and may be acting in loco parentis.

The Police, Crime, Sentences and Court Act (August 2022) extended the roles which fall into the definition of 'Position of Trust' within the Sexual Offences Act (2003). The new legislation makes it an offence for anyone who coaches, teaches, trains, supervises or instructs a child under 18, on a regular basis, in a sport or a religion to engage in inappropriate relationships with those children/young people. In line with *Keeping Children Safe in Education 2026*, this section has been extended to include trainee teachers, who are also subject to the same expectations and restrictions while undertaking their training.

On receipt of any information which raises a concern about any of our staff, the Headteacher, or Chair of Governor, will consider whether the information suggests it is the following:

Allegation is a claim or assertion that someone has done something illegal or wrong, typically one made without proof. The threshold for an allegation that is considered by the LADO is wider than those in which there is reasonable cause to suspect a child is suffering, or likely to suffer, harm. The LADO threshold is, in respect of all people working or volunteering with children in a position of trust, where they have:

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

Any information or concern which meets the above threshold should be referred to the LADO service prior to the school taking any action.

Concern about the Quality of Care/Practice is an accusation, not of a child protection nature, that the care/practice provided to a child does not meet the standards expected and is about the level of value provided by any care/practice resource, as determined by some measurement. As with quality in other fields, it is an assessment of whether something is good enough and whether it is suitable for its purpose.

These types of concerns should be addressed internally using performance management processes.

Complaint is a statement that something is unsatisfactory or unacceptable. A concern may be defined as 'an expression of worry or doubt over an issue considered to be important for which reassurances are sought.' A complaint therefore can be defined as 'an expression of dissatisfaction however made, about actions taken or a lack of action.'

These issues must be addressed through internal complaints policy and procedures.

When concerns/allegations meet the harm threshold Royton Hall Primary are required to comply with both Part Four of KCSiE and also the LADO referral form on Oldham Safeguarding Children Partnership.

All staff and volunteers at Royton Hall Primary are required to immediately report any level of concerns about behaviour and/or conduct of adult working/volunteering with children towards a

child to leadership and management. This includes reporting adults who are providing out of school activities/leasing the school's facilities.

What happens next

Headteacher/Chair of Governors may undertake initial inquiries to gather key information. They will assess whether the allegation meets the LADO threshold, if it does they will make a referral to LADO giving consideration to our staff code of conduct, managing allegations policy and OSCP Allegations Against Staff or Volunteers procedures. If necessary, they will compete a LADO referral within one working day.

If the allegation does not meet the harm threshold for LADO, our Headteacher/Chair of Governors will follow the school's Low Level Concerns policy.

Role of LADO

- **Case management** - oversee the process and ensure it is working, not to investigate.
- **Consultation** - provide advice and guidance to employers and voluntary organisations.
- **Monitoring** - the progress of cases to ensure that they are dealt with as quickly as possible consistent with a thorough and fair process.
- **Liaison** -with the Police, Children's Services and other partner agencies (managers of the subject of allegation).

Role of school's Case Manager, includes:

- clarify facts of the concerns/allegation (not investigate) before contacting the LADO
- take part in Strategy Meetings to liaise with other partner agencies
- undertake internal planned inquiries/fact finding
- take part to review the progress of the case in which there is a Police officer investigation
- operate a thorough disciplinary process when appropriate
- ensure a properly managed conclusion and outcome to process.

LADO Principles and Response

Timeliness - any allegation of abuse must be dealt with fairly, quickly and consistently in accordance with the safeguarding and child protection procedures, this is best practice to provide immediate safety for child/ren and make safe arrangements for the person who is the subject of the allegation. It is crucial that employers **make a referral to LADO within one working day**.

Objectivity - it is not permissible for a member of staff to conduct (though their involvement may still be required) an enquiry about suspicion or allegation of abuse with respect to a:

- relative
- friend
- colleague, supervisor/supervisee or someone who has worked with her/him previously in any of these capacities.

If, following the conclusion of child protection processes, further enquiries are pursued for the purpose of disciplinary, regulatory or complaint investigation, they should be arranged in a way that avoids the repeated interviewing of children or other vulnerable witnesses.

Confidentiality - information about an allegation must be restricted to those who have a need to know in order to:

- protect children
- facilitate enquiries
- avoid victimisation
- safeguard the rights of the person about whom the allegation has been made and others who might be affected
- manage disciplinary/complaints aspects.
- A media strategy should be developed with no improper or inadvertent releases of information to the media, in accordance with the Association of Chief Police Officers (ACPO) guidance (now known as The National Police Chiefs' Council (NPCC)

Concerns that DO NOT meet the harm threshold - Low-Level Concerns (LLC)

Schools must have a policy in place which outlines the relevant processes and procedures for dealing with concerns raised to them that do not meet the LADO threshold, these concerns are referred to as low-level concerns. The term low-level does not seek to minimise the seriousness of any concerns, the term low-level indicates that it a concern that is lower than the LADO threshold, but they are still practice concerns that need to be considered with a safeguarding lens and require suitable action through internal procedures of the school. It is important these are managed robustly as a repeated low-level concern or a pattern of concerns which may not meet the LADO threshold individually may together indicate a concern about the person's suitability and potential risk to children in the capacity of their role.

At Royton Hall Primary leadership manage LLC using our school's internal due process, if we consider a member of staff has breached our school's code of conduct, depending on the seriousness and impact on a child, we will also liaise with our human resource service:

- ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others

- empowering staff to share any low-level safeguarding concerns

- addressing unprofessional behaviour and supporting the individual to correct it at an early stage

- providing a responsive, sensitive and proportionate handling of such concerns when they are raised

- helping identify any weakness in the school's or college's safeguarding system.

Our low-level concerns policy is a reflection and extension of Royton Hall Primary wider relevant staff behaviour guidance and code of conduct.

Concerns may arise from a range of scenarios, e.g. suspicion; complaint or disclosure made by a child, parent or other adult within or outside of the organisation or as a result of vetting checks undertaken.

All staff should know that in line with our school's culture we encourage staff to have the confidence and trust to confine in leadership if they have concerns about adults working or volunteering with children.

We share information responsibly and understand this is on a need-to-know basis

We apply our protocols for recording and storing information confidentially.

We encourage an open and transparent culture, to identify concerning, problematic or inappropriate behaviour early so that we are able to minimise the risk of abuse; and ensure that adults working in or on behalf of the school or college are clear about professional boundaries and in accordance with the ethos and values of the institution.

The role of our school's case manager and the principles for manging LLC is the same as set out above reporting process parallel to what is set out within the section where concerns meet harm threshold, for example the principles and practice.

If we are uncertain of threshold criteria for either LADO referral or LLC we consult with school's HR and the LADO. At Royton Hall Primary we have clear codes of conduct and processes in place to deal with any concerns or allegations which do not meet the LADO threshold. Such concerns may arise from suspicion, complaint, safeguarding concerns, or allegation from another member of staff, disclosure made by a child, parent or another outside of the school or pre-employment vetting checks.

Outcome of Allegations and Concerns

Following the conclusion of an allegation or concern that meets the harms threshold, the school will record the outcome using the following definitions:

- Substantiated – there is sufficient evidence to prove the allegation.
- Malicious – there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the individual concerned.
- False – there is sufficient evidence to disprove the allegation.
- Unsubstantiated – there is insufficient evidence to either prove or disprove the allegation. This does not imply guilt or innocence.
- Unfounded – there is no evidence or proper basis to support the allegation.

Where an allegation is substantiated and the individual is dismissed, resigns, ceases to provide their services, or the school ceases to use their services because they have harmed, or pose a risk of harm to, a child, the Headteacher (or Chair of Governors where appropriate) will ensure that the appropriate referrals are made to the Disclosure and Barring Service (DBS) where there is a legal duty to do so. Where the individual is a qualified teacher, the school will also consider whether a referral should be made to the Teaching Regulation Agency (TRA) to determine whether the individual should be prohibited from teaching.

The school will maintain confidential records of all allegations and concerns in accordance with statutory guidance, employment law and data protection requirements.

The Use of Reasonable Force in Schools

There may be exceptional circumstances where it is necessary for staff to use reasonable force to safeguard a child or others from harm. Reasonable force refers to the range of actions involving a degree of physical contact used to control or restrain a pupil and can include guiding a child to safety, preventing a pupil from causing injury to themselves or others, stopping a fight, or preventing serious disruption.

Any use of reasonable force will always be lawful, proportionate and reasonable in the circumstances, meaning that no more force than is necessary will be used and only for the shortest time required. The decision to use reasonable force is a matter of professional judgement and will depend on the individual circumstances and the level of risk presented at the time. The School does not operate a 'no contact' policy, recognising that appropriate physical contact may, at times, be necessary to safeguard and support pupils.

Staff are expected to act in accordance with relevant legislation and guidance, including the Department for Education's guidance Restrictive interventions, including use of reasonable force, in schools, together with the School's Behaviour Policy and any policy relating to the use of reasonable force or restrictive intervention. Any incident involving the use of reasonable force will be recorded, reported and reviewed in accordance with the School's procedures.

The use of reasonable force can, on occasion, result in concerns, complaints or allegations being made against members of staff. Where this occurs, the School will manage the matter fairly, proportionately and in accordance with this policy, the staff Code of Conduct and the procedures for managing allegations and low-level concerns. Appropriate consideration will be given to the circumstances leading to the use of reasonable force, the actions taken by staff, any available

witness accounts, CCTV or other evidence, and whether the force used was reasonable, proportionate and necessary in the circumstances.

After-school clubs, community activities and tuition: safeguarding guidance for providers

Royton Hall Primary have a legal duty of care to ensure we maintain a safe environment for children. If we receive an allegation or concern relating to an incident that has happened when an outside individual or organisation are using our school premises, we will ensure that we follow our school's safeguarding and child protection procedures, which includes reporting allegations to the LADO, Children's Social Care and Police if a crime has been committed.

It is the role of Royton Hall Primary's *G*overning Body to ensure any organisation that hires the school premises is compliant with the guidance set out in Out-of-school settings: safeguarding guidance for providers - GOV.UK In particular we have embedded within our lease agreement with external organisations the standards and expectations for them to provide evidence and assurance of their safeguarding and child protection procedures.

Other complaints

If any of our stakeholders are not satisfied with any aspects of how we implement and comply with safeguarding policies and procedures, our school Complaints Procedures can be found on our school website.

Dealing with allegations involving supply teachers, trainee teachers and all contracted staff

Safeguarding allegations or concerns relating to supply teachers, trainee teachers, contractors or other staff provided by an employment agency or third-party organisation will be managed in accordance with Keeping Children Safe in Education and local safeguarding procedures. Although these individuals may not be directly employed by the School, the School remains responsible for ensuring that all safeguarding concerns and allegations are managed appropriately, that the facts are established, and that referrals are made to the Local Authority Designated Officer (LADO) where the allegation meets the relevant threshold. The School will work closely with the employment agency, training provider or contractor throughout the process. The agency or provider will normally be responsible for any employment or disciplinary action, while the School will lead on the safeguarding investigation and information gathering.

The School will not cease to use a supply teacher or other agency worker solely because safeguarding concerns have been raised without first establishing the facts and consulting the LADO where appropriate. Where necessary, discussions will take place with the agency regarding appropriate interim safeguarding measures, including whether the individual should be suspended, redeployed or otherwise prevented from working with children while enquiries are undertaken.

Employment agencies, contractors and initial teacher training providers are expected to cooperate fully with any enquiries undertaken by the School, the LADO, Children's Social Care and the Police. Relevant information will be shared, where lawful and appropriate, to support a thorough safeguarding investigation and to ensure that any previous concerns known to the agency or provider are taken into account.

The School will ensure that employment agencies and other providers are aware of its procedures for managing allegations and will expect them to fulfil their own statutory responsibilities, including making referrals to the Disclosure and Barring Service (DBS), Teaching Regulation Agency (TRA) or other relevant bodies where required.

Whistleblowing

At Royton Hall Primary we strive to create a culture of openness, trust and transparency to encourage all staff to confidentially share any concerns they have about poor or unsafe practice, concerns or allegations against staff or the school's safeguarding practice and arrangements so they can be addressed appropriately.

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's or college's safeguarding procedures and arrangements.

Examples where Whistleblowing may apply:

- pupil's or staff member's health and safety are being put in danger
- failure to comply with a legal obligation or statutory requirement
- attempts to cover up the above, or any other wrongdoing that is in the public/school interest

At Royton Hall Primary *staff* concerns will be taken seriously and investigated, and your confidentiality respected

Staff are encouraged to report their concern to the Headteacher/other member of staff on the SLT, and if the concerns are about the Headteacher, report to the Chair of the Governing Board/Board of Trustees

If, for any reason, there are difficulties with following the above procedure, you can whistle blow directly to Children's Services and/or the Police on 999, or to the NSPCC Whistleblowing Helpline 0800 028 0285 help@nspcc.org.uk

13. Record Keeping

Royton Hall Primary will hold records confidentially, safely, securely and in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

- a clear and comprehensive summary of the concern

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

Concerns and referrals will be kept in a separate child protection file for each child (either paper recorded or electronically).

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to know/access them.

Safeguarding records relating to an individual child will be retained for the student until they reach their 25th birthday or 31st birthday if there is an EHCP in place (Information Records Management Society 2022).

Safeguarding records which contain information about allegations of sexual abuse were being retained for the Independent Inquiry into Child Sexual Abuse (IICSA). This has now concluded and the Home Office sent a letter to schools advising that files no longer needed to be kept indefinitely. However, the recommendations from the inquiry have stated:

Recommendation 17: Access to records The UK government should direct the Information Commissioner's Office to introduce a code of practice on keeping and accessing records which relate to child sexual abuse. The code should require records about child sexual abuse and allegations of child sexual abuse to be kept for 75 years, with appropriate review periods.

Royton Hall Primary will follow the Recommendation 17.

Receiving in and transferring pupil records to other education provision

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their safeguarding information file is forwarded as soon as possible, securely, and separately from the main pupil file.

To allow the new school/college to have support in place when the child arrives, this should be within:

- **5 days** for an in-year transfer, or
- **the first 5 days** of the start of a new term.

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the wellbeing and safety of the child.

Retention, archiving and destruction of records

For records that are not transferred to another school, for example the child leaves the country or is going to be home educated, we have:

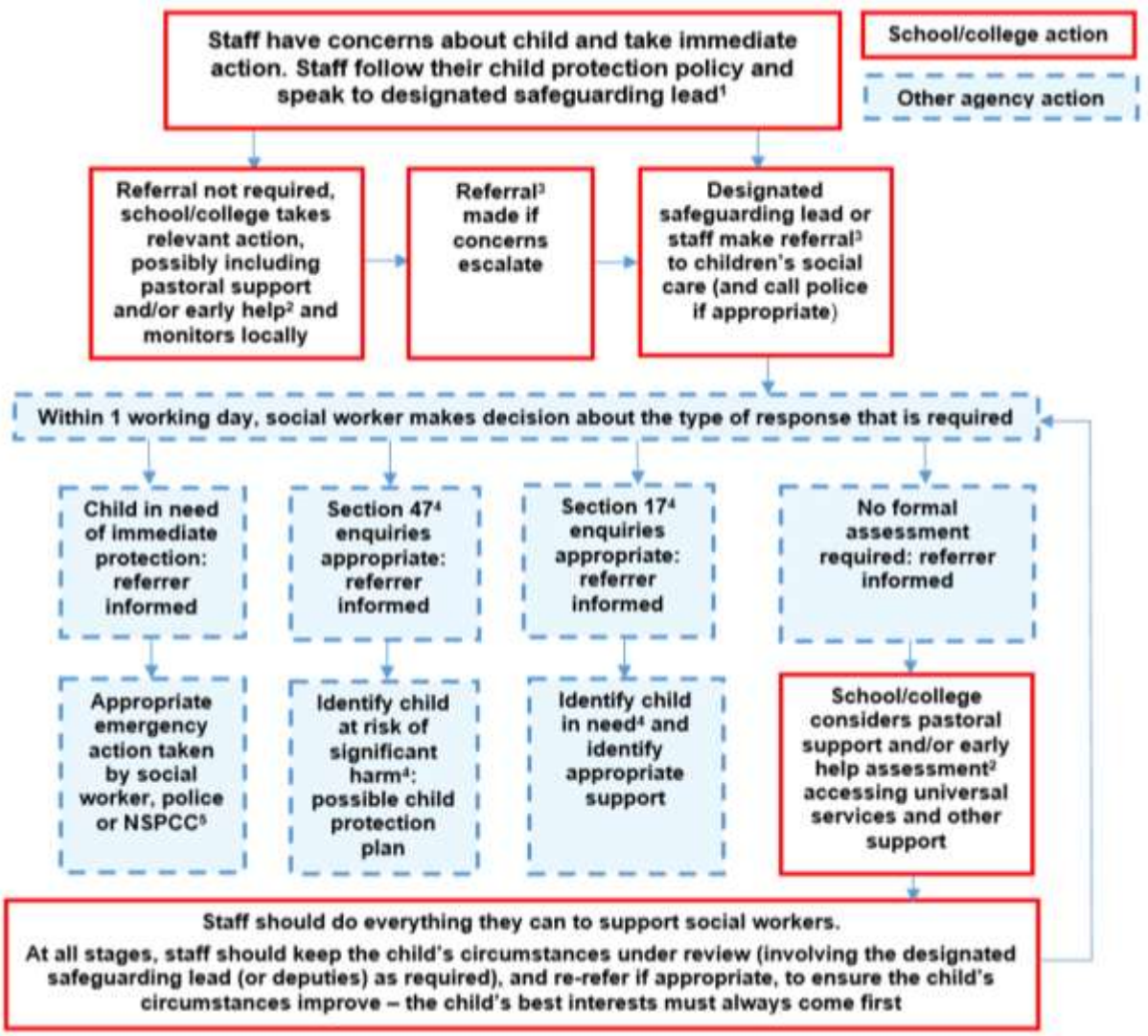
- a clear retention policy
- secure and appropriate system to archive with restricted access

- we have a written assurance from our providers of our electronic recording systems that all records are maintained securely which includes any archived records.

Storage, retention, and destruction of our child protection files is also made clear in our data management policy.

Appendix A: A flowchart setting out the actions taken where there are concerns about a child

Keeping Children Safe in Education (2026) has the following flowchart (Figure 1; Page 24) for staff and Designated Safeguarding Leads to use:



1. In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of this guidance.
2. Family Help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated Family Help, an Family Help inter-agency assessment should be arranged. Working Together to Safeguard Children provides detailed guidance on the Family Help process.
3. Referrals should follow the process set out in the local threshold document and local protocol for assessment. See Working Together to Safeguard Children.
4. Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Working Together to Safeguard Children.
5. This could include applying for an Emergency Protection Order (EPO).

Appendix B Flow chart for raising safeguarding concerns about a child

Designated Safeguarding Lead and Deputies:

Sarah Charlton- Headteacher/DSL

head@roytonhall-pri.oldham.sch.uk

Deputies

Jen Glynn
Jenny.glynn@roytonhall-pri.oldham.sch.uk

Amereen Rafiq

amereen.rafiq@roytonhall-pri.oldham.sch.uk

Dan Charnock

dan.charnock@roytonhall-pri.oldham.sch.uk

Staff member/volunteer has a safeguarding concern about a child

Concern is reported to the Designated Safeguarding Lead and reported on CPOMS.

Designated Safeguarding Lead reviews concern form and decides the next steps

The Local Authority Designated Officers for concerns about adults are:

Tel: 0161 770 8870 or 07583101863
Email: colette.morris@oldham.gov.uk

Tel: 0161 770 0008 or 07974619094
Email: wendy.nicholls@oldham.gov.uk

Staff must report concerns to the Headteacher or, in the event of concerns about the Headteacher, report concerns to the Chair of Governors.

The Headteacher must contact LADO.

Decision made to monitor the concern.

Monitor

Class teacher asked to monitor child and feedback to the Designated Safeguarding Lead within an agreed timescale

Decision made to discuss the concern informally with the parents/carers

Review

Once discussed with parents Designated Safeguarding Lead decides to discuss further with parents, monitor or refer to social care

Decision made to refer the concern to social care

Refer

DSL discusses decision with the headteacher and/or deputy DSL and agrees to refer to social care

In exceptional circumstances, anyone may report concerns directly to children's socia

Record

Designated Safeguarding Lead adds the associated actions to the record on CPOMS

Anybody can make a referral.

Contact the Multi-Agency Safeguarding Hub (MASH) and ask to speak to the Duty Officer:

Phone: on 0161 770 7777

For urgent concerns outside office hours, you can call the Emergency Duty Team:

Phone: 0161 770 6936
or the Police on 101 (999 in emergencies).

NSPCC Whistleblowing Helpline 0800 028 0285

Appendix C: Body Map Guidance

Body Maps should be used to document and illustrate visible signs of harm and physical injuries.

Always use a black pen (never a pencil) and do not use correction fluid or any other eraser.

Do not remove clothing for the purpose of the examination.

At no time should an individual teacher/member of staff or school take photographic evidence of any injuries or marks to a child's person, the body map on the following pages should be used.

Any concerns should be reported and recorded without delay to the Designated Safeguarding Leads.

When you notice an injury to a child, try to record the following information in respect of each mark identified e.g. red areas, swelling, bruising, cuts, lacerations and wounds, scalds and burns:

- Exact site of injury on the body, e.g. upper outer arm/left cheek
- Size of injury - in appropriate centimetres or inches
- Approximate shape of injury, e.g. round/square or straight line
- Has First Aid been provided?
- Colour of injury - if more than one colour, say so
- Is the skin broken?
- Is there any swelling at the site of the injury, or elsewhere?
- Is there a scab/any blistering/any bleeding?
- Is the injury clean or is there grit/fluff etc.?
- Is mobility restricted as a result of the injury?
- Does the site of the injury feel hot?
- Does the child feel hot?
- Does the child feel pain?
- Has the child's body shape changed/are they holding themselves differently?

The date and time of the recording must be stated as well as the name and designation of the person making the record.

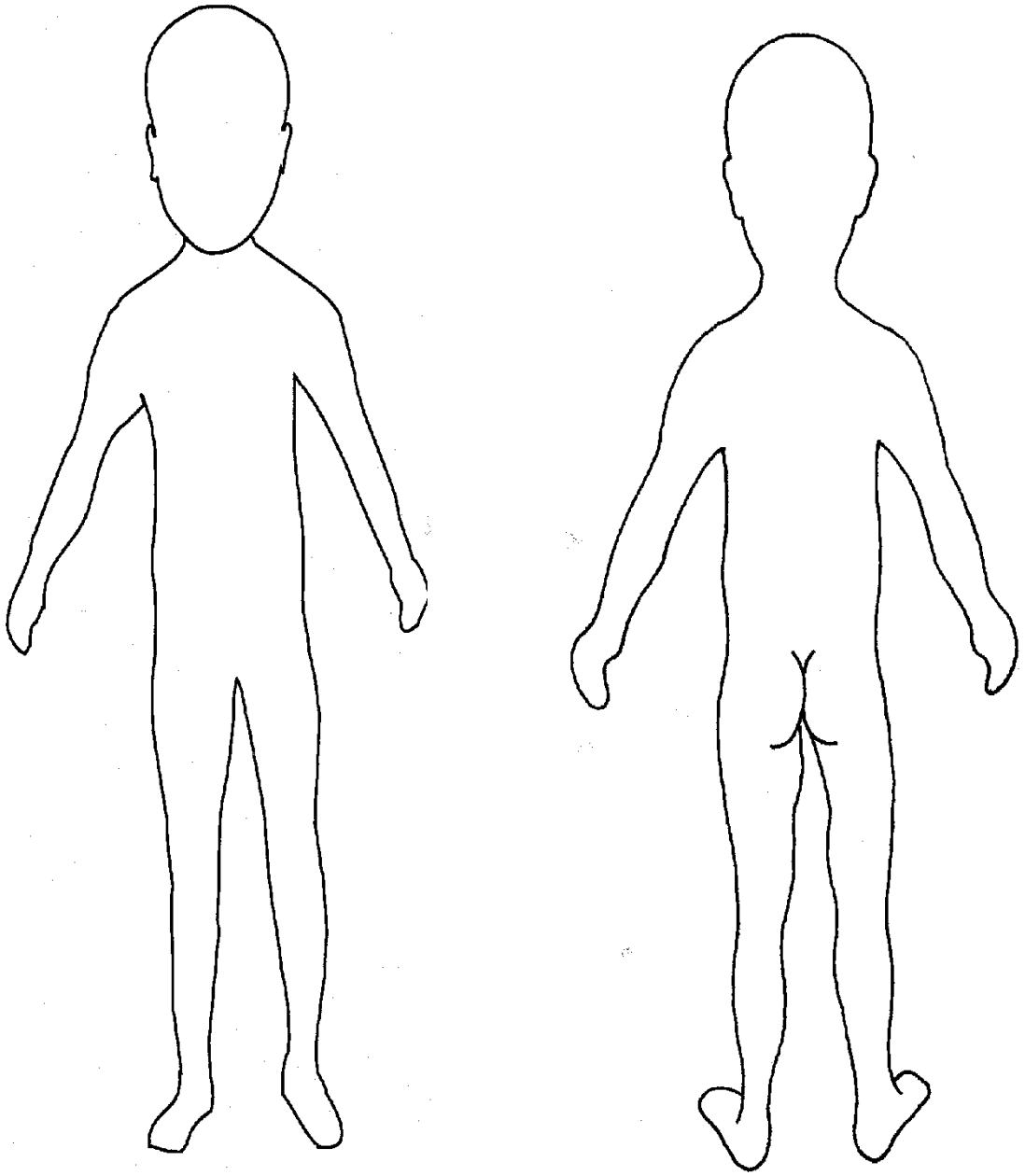
Add any further comments as required.

(This must be completed at time of observation)

Name of Pupil: ..... Date of Birth: .....

Name of Staff: ..... Job title: .....

Date and time of observation: .....



Appendix D: Record of Concern

Pupil's Name:
Year:
Date and Time of incident:
Date and time concern recorded:
Incident: Record the following factually: • Who: • What – if recording a verbal disclosure by a child, use their word: • Where: • When: (day and time) • Were there any witnesses?
What is the pupil's account and/or perspective?
Any other relevant information (distinguish between fact and opinion): *E.g., previous concerns
Who have you reported this to?
Your name: Signature:

~ Check to make sure your report is clear to someone else reading it ~

Please pass this form to your Designated Safeguarding Lead.

Part 2 – for use by DSL (optional)

Time and date information received and from whom:	
Any advice sought (if required):	Date, time, name, role, organisation & advice given:
Action Taken **(including rationale for decision making)**	Referral to children's social care/monitoring, advice given to appropriate staff or EHA with reasons: Note time, date, names, who the information was shared with etc.
Parents/carers informed.	Yes/No Reasons:
Outcome	Record names of individuals and agencies who have given information regarding outcome of any referral (if made):
Additional Information	Where can additional information regarding the child/incident be found (e.g. student file, serious incident book etc.)
Has the concern been put on the school's recording system?	Yes/No Why – state reasons:
Signed	
Print Name	

Date	

Appendix E: Additional Advice and Support

There is a wealth of guidance and resources available to support schools in safeguarding and promoting the welfare of children. Annex A of Keeping Children Safe in Education contains important information, together with links to additional advice and support, on a range of specific forms of abuse and safeguarding issues. School leaders and all staff who work directly with children are expected to read, understand and be familiar with the contents of Annex A.

Throughout this policy, links to relevant national guidance and local policies and procedures have been included to support Designated Safeguarding Leads (DSLs), senior leaders and governors in implementing effective safeguarding practice and ensuring compliance with statutory guidance. Schools should ensure they are familiar with, and follow, their local safeguarding partnership procedures and any other guidance relevant to their role.

Local Policies and Procedures:

Harmful Sexual Behaviour Protocol

Oldham's Continuum of Need

Educational Neglect Guidance

Prevent:

Prevent Handbook for Education – Oldham Safeguarding Children's Partnership

Other local policies and procedures can be found on Oldham Safeguarding Children's Partnership

Resources for professionals can be found in the Education section of Oldham Safeguarding Children's Partnership