



The Manchester
Grammar School
Founded 1515

Child Protection and Safeguarding Policy

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1. INTRODUCTION

- 1.1 This policy applies to The Manchester Grammar School. This policy is reviewed and updated annually and is available on the School website.
- 1.2 The safety and wellbeing of our pupils is our highest priority. Our aim is to know every pupil as an individual and to provide a secure and caring environment so that pupils can learn in safety. We are committed to safeguarding children and young people and we expect everyone who works in our School to share this commitment.
- 1.3 The School recognises that safeguarding and promoting the welfare of children is the responsibility of all individuals working in or for the School including all teaching and non-teaching staff, residential and part-time staff, supply staff, governors, volunteers and contractors. All references to 'staff' in this policy should be interpreted as applying to the aforementioned unless otherwise stated.
- 1.4 Safeguarding and child protection concerns can arise at any time and in any location. Staff are required to adopt an 'it could happen here' approach and always be vigilant for the signs of abuse, neglect and exploitation. Everyone who comes into contact with children has a role to play in identifying safeguarding concerns, sharing information and taking prompt action when necessary.
- 1.5 The School is an environment where welfare concerns about children and young people are taken seriously and our pupils are encouraged to talk to us about anything that worries them.
- 1.6 We always aim to act in the best interests of the child.
- 1.7 The School recognises that its duty is to safeguard and promote the welfare of all its pupils in a manner which respects the dignity, privacy and beliefs of all and without discrimination on the basis of gender, race, ethnicity, religion, sexual orientation or disability.
- 1.8 The School recognises the particular vulnerabilities and needs of pupils with special educational needs and disabilities (SEND), looked-after and previously looked-after children, and children who have or have had social workers.
- 1.9 This policy has regard to the following guidance and advice:
 - *Keeping Children Safe in Education* (September 2025) ('KCSIE')
 - *KCSIE incorporates the additional statutory guidance Disqualification under the Childcare Act 2006 (September 2018)*
 - *KCSIE also provides links to various toolkits and additional advice and support*
 - *Working Together to Safeguard Children* (December 2023) ('WT')
 - *WT refers to the non-statutory advice: Information sharing (July 2018)*

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- *Prevent duty guidance: Guidance for specified authorities in England and Wales (December 2023) ('Prevent'). Prevent is supplemented by non-statutory advice and a briefing note:*
 - *The Prevent duty: Departmental advice for schools and childcare providers (June 2015)*
 - *The use of social media for on-line radicalisation (July 2015)*
- *Relationships education, relationships and sex education (RSE) and health education (September 2021).*
- *Children's Social Care National Framework (December 2023)*
- *Behaviour in schools (September 2022)*
- *Working together to improve school attendance: statutory guidance for maintained schools, academies, independent schools and local authorities (February 2024)*
- *Keeping children safe in out of school settings (April 2022)*
- *After school clubs, community activities, and tuition (safeguarding guidance for providers) (September 2023)*
- *Digital and technology standards in schools and colleges (March 2023)*
- *The Charity Commission guidance Safeguarding and protecting people for charities and trustees (June 2022)*

1.10 This policy also takes into account the Greater Manchester Safeguarding Children Procedures (GMSCP), which are adopted by the Manchester Safeguarding Partnership (MSP). These can be found [here](#).

1.11 This policy should be read together with the following school policies, which can be found on the School website:

- Anti-bullying
- Behaviour, Rewards and Sanctions
- Online Safety
- Relationships and Sex Education
- Safer Recruitment
- School Rules
- SEND Policy, including support for pupils with Educational Healthcare Plans
- Acceptable Computer Use

1.12 Staff must also comply with the following, which can be found on the School SharePoint site:

- Code of Conduct for Staff
- Data Protection Policy
- Whistleblowing Policy
- MGS Prevent Strategy
- Visitors Procedures

1.13 All staff are under a general duty:

- To follow the School's safeguarding and child protection procedures as outlined in this policy;

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- To be able to identify pupils for whom there are safeguarding concerns;
- To be able to identify pupils who need additional support;
- To report any matters of concern to the Designated Safeguarding Lead (DSL), and to keep appropriate records under his direction.

1.14 The Designated Safeguarding Lead takes overall responsibility for the safeguarding of children in the school, and acts as the primary source of guidance for staff on matters pertaining to pupil wellbeing and safety. All safeguarding concerns should be reported to him, in accordance with procedures set out in this policy.

2. KEY SCHOOL CONTACT DETAILS

High Master	Dr Martin Boulton TEL: 0161 224 7201 ext. 201 EMAIL: highmaster@mgs.org
Governors	Chair of Governors Mrs Clare Bolton Contact via the Bursar - Clerk to the Governors (see below)
	Nominated Safeguarding Governor Kunal Hinduja Contact via the Bursar - Clerk to the Governors (see below)
School Bursar - Clerk to the Governors	Mrs Gillian Batchelor TEL: 0161 2247201 ext. 210 EMAIL: g.m.batchelor@mgs.org
Designated Safeguarding Lead (DSL) and Deputy Head (Safeguarding)	Mr Dan Farr TEL: 0161 224 7201 ext. 539 Work mobile: 07796 546250 EMAIL: d.farr@mgs.org
Deputy Designated Safeguarding Lead (DDSL) and Deputy Head (Pastoral)	Dr Sam Crawshaw TEL: 0161 224 7201 ext. 540 EMAIL: s.g.crawshaw@mgs.org
Designated Teacher for Looked After Children	Mrs Jo Dobbs TEL: 0161 224 7201 EMAIL: j.dobbs@mgs.org

3. KEY EXTERNAL CONTACT DETAILS

Local Authority Designated Officer	Jackie Shaw TEL: 0161 234 1214 EMAIL: quality.assurance@manchester.gcsx.gov.uk
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**Local Authority Children's
Social Services – Manchester
Advice and Guidance (multi-
agency safeguarding) Hub**

TEL: 0161 234 5001 (This is also the out-of-hours
emergency duty team number)
EMAIL: [mscreply@manchester.gov.uk](mailto:mscopy@manchester.gov.uk)

**Manchester Safeguarding
Partnership**

TEL: 0161 234 3330
EMAIL: MSP@manchester.gov.uk
<https://www.manchestersafeguardingpartnership.co.uk/>

**Greater Manchester
Children Procedures
Manchester**

[Welcome \(proceduresonline.com\)](http://proceduresonline.com)

**Support and Advice about
Extremism**

Police

Channel Team GMP CTU
TEL: 0161 856 6362
Emergency number: 999
Non-emergency number: 101
EMAIL: channel.project@gmp.police.uk

Local Authority

Dobir Mohammed Miah - Prevent Education Officer
TEL: 0161 234 1489
Direct Line: 0161 245 7214 Mobile: 07970 378988
EMAIL: mohammed.miah@manchester.gov.uk
Secure E-mail: M.Miah@manchester.gcsx.gov.uk

Department for Education

Non-emergency number: 020 7340 7264
EMAIL: counter.extremism@education.gsi.gov.uk

**NSPCC Whistleblowing
Advice Line**

ADDRESS: Weston House
42 Curtain Road
London
EC2A 3NH
TEL: 0800 028 0285
EMAIL: help@nspcc.org.uk

**NSPCC Report Abuse in
Education Advice Line**

TEL: 0800 136 663
EMAIL: help@nspcc.org.uk

**Disclosure and Barring
Service**

ADDRESS: DBS customer services
PO Box 3961
Royal Wootton Bassett
SN4 4HF
TEL: 03000 200 190
EMAIL: customerservices@dbb.gov.uk

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Teaching Regulation Agency	ADDRESS: Teacher Misconduct Ground Floor South Cheylesmore House 5 Quinton Road Coventry CV1 2WT TEL: 0207 593 5393 EMAIL: misconduct.teacher@education.gov.uk																				
OFSTED Safeguarding Children	TEL: 0300 123 4666 (Monday to Friday from 8am to 5pm) EMAIL: CIE@ofsted.gov.uk																				
Independent Schools Inspectorate	TEL: 0207 6000 100 EMAIL: concerns@isi.net																				
Other Children's Social Care Contact Numbers	<table><tr><td>Manchester</td><td>0161 234 5001</td></tr><tr><td>Bolton</td><td>01204 337 400</td></tr><tr><td>Bury</td><td>0161 253 5454</td></tr><tr><td>Oldham</td><td>0161 770 3790</td></tr><tr><td>Rochdale</td><td>0845 226 5570</td></tr><tr><td>Salford</td><td>0161 603 4500</td></tr><tr><td>Stockport</td><td>0161 217 6028</td></tr><tr><td>Tameside</td><td>0161 342 4150</td></tr><tr><td>Trafford</td><td>0161 912 5125</td></tr><tr><td>Wigan</td><td>01942 828300</td></tr></table> <p>To identify the correct Children's Social Care telephone number for a child, enter the child's postcode here: https://www.gov.uk/report-child-abuse-to-local-council</p>	Manchester	0161 234 5001	Bolton	01204 337 400	Bury	0161 253 5454	Oldham	0161 770 3790	Rochdale	0845 226 5570	Salford	0161 603 4500	Stockport	0161 217 6028	Tameside	0161 342 4150	Trafford	0161 912 5125	Wigan	01942 828300
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Rochdale	0845 226 5570																				
Salford	0161 603 4500																				
Stockport	0161 217 6028																				
Tameside	0161 342 4150																				
Trafford	0161 912 5125																				
Wigan	01942 828300																				
Police	Non-emergency 101 Emergency 999																				
Manchester Early Help	Early Help Practitioners Zone Help & Support Manchester																				
Other Organisations	Manchester Family Information Service 0800 083 7921 Childline 0800 1111 NSPCC 24/7 Helpline 0808 800 5000 Barnardo's 0800 942 8787 NSPCC FGM Helpline 0800 028 3550 National Bullying Helpline 0845 225 5787 Samaritans 116 123 Internet Matters www.internetmatters.org																				

4. INFORMATION SHARING

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- 4.1 The guidance, *Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers* supports staff who have to make decisions about sharing information. The governing body recognises the importance of information sharing between practitioners and local agencies, including ensuring arrangements for sharing information within the School and with local authority children's social care, the safeguarding partners and other organisations, agencies, and practitioners as required.
- 4.2 Fears regarding sharing information under the Data Protection Act 2018 (DPA 2018) and the UK General Data Protection Regulation (UK GDPR) should not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children, and neither the DPA 2018 or the UK GDPR prevent the sharing of information for the purposes of keeping children safe. If in doubt about what information can and should be shared, staff should speak to the Designated Safeguarding Lead (DSL).
- 4.3 The governing body/Bursar will ensure that staff understand the relevant data protection principles which allow them to share (and withhold) personal information, including:
- being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal and should be treated as 'special category personal data';
 - understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows the sharing of special category personal data, including without consent where there is good reason to do so. For example, information may be shared without consent where: it is not possible to gain consent; it cannot be reasonably expected to gain consent; and, gaining consent would place a child at risk;
 - not providing pupils' personal data where the serious harm test is met.

5. CONCERNS ABOUT A CHILD

- 5.1 The School has a duty to consider at all times the best interests of the pupil and take action to enable all pupils to achieve the best outcomes. Safeguarding and promoting the welfare of children is everyone's responsibility. The School adopts a 'whole school' approach to safeguarding, ensuring safeguarding and child protection are at the forefront of and underpin all relevant aspects of process and policy development.
- 5.2 Parents are encouraged to raise any concerns about the safety and/or welfare of children directly with the School. Parents may contact the ISI directly if they wish.
- 5.3 The school has a culture of listening to children, and has provided a range of means by which children can share concerns. These include:
- through the development of positive relationships between pupils and their personal tutors. Each personal tutor cares for approximately 12 pupils,

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typically for 2 or 3 years, allowing depth of knowledge and quality of oversight of pupil needs;

- through relationships between pupils and members of the pastoral team, which is substantial and well-trained to receive concerns from pupils;
- through an active School Council, the feedback from which is reflected and acted upon systematically by the pastoral team and senior leadership as appropriate;
- through pupil wellbeing surveys;
- through the PSHE programme, which is active in all school years;
- for children who are exploring LGBTQ+ issues, through conversations with the Assistant Head (Diversity, Inclusion and PSHE), who also acts as the School's LGBTQ+ representative;
- through an 'Ask For Help' Microsoft Form which pupils can access via the Welfare Hub on SharePoint, or via their regular wellbeing newsletters; and
- through the school's counselling service.

5.4 Safeguarding and promoting the welfare of children is defined as providing help and support to meet the needs of children as soon as problems emerge; protecting children from maltreatment, whether that is within or outside the home, including online; preventing 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; and taking action to enable all children to have the best outcomes.

5.5 Child protection is part of safeguarding and promoting the welfare of children and is defined as activity that is undertaken to protect children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

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

- physical abuse;
- emotional abuse;
- sexual abuse; and/or
- neglect.

5.7 Staff are referred to Appendix 1 of this policy for further detail on the types of abuse and possible signs of abuse, as well as further information regarding specific safeguarding issues and extra-familial harms including child criminal and/or sexual exploitation.

5.8 A child is anyone under the age of 18.

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6. PROCEDURES FOR DEALING WITH CONCERNS ABOUT A CHILD

6.1 Overview

- 6.1.1 If staff suspect or hear any allegation or complaint of abuse, exploitation, or neglect from a child or any third party, they must act immediately and follow the relevant procedures contained in this policy. Staff should maintain an attitude of 'it could happen here'. Staff should not assume that somebody else will take action and must always share information that might be critical in keeping children safe.
- 6.1.2 If staff have any concerns about a child, they should, where possible, speak with the School's DSL to agree a course of action, although staff can make a direct referral to children's social care. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made.
- 6.1.3 Staff should be aware of the important distinction between promoting the welfare of pupils who need additional support and taking immediate action to safeguard pupils who have suffered, or are likely to suffer, significant harm.
- 6.1.4 **If a child is in immediate danger or at risk of harm, a referral to Children's Social Care and/or the police must be made immediately.** (See the [NPCC guidance](#) 'When to call the police: guidance for schools and colleges'.) Referrals should follow the local referral process. The matter must be reported immediately and in person to the DSL or DDSL. If the DSL or DDSL are unavailable, anyone can make a referral. The DSL must be informed as soon as possible thereafter.
- 6.1.5 All other safeguarding concerns must be reported as soon as possible to the DSL via a Note of Concern or, in the case of members of the pastoral team, via the School's safeguarding record-keeping system, CPOMS.
- 6.1.6 Staff must not investigate reports of abuse themselves, including those that arise through disclosures from pupils. Doing so may undermine the work of other agencies whose responsibility it is to handle such investigations.
- 6.1.7 All concerns, discussions, and decisions (including the rationale for those decisions) made under these procedures should be recorded in writing. This includes instances where referrals were or were not made to another agency, such as children's social care or the Prevent programme. This will help if/when responding to any complaint about the way a case has been handled. The record should include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and a note of any action taken, the decision reached and the outcome.
- 6.1.8 The information should be kept confidential and stored securely in CPOMS.
- 6.1.9 Child protection files should be kept and shared in accordance with the provisions of Annex C of Keeping Children Safe in Education 2023.

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- 6.1.10 Where there is a safeguarding concern, the School should ensure the pupil's wishes and feelings are taken into account when determining what action to take and what services to provide. This is particularly important in the context of harmful behaviours, such as sexual harassment and sexual violence. The School manages this by ensuring that there are systems in place, that are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback. The School's processes always prioritise the best interests of the pupils.
- 6.1.11 If a child's situation does not appear to be improving, staff should bring the ongoing concern back to the attention of the DSL. Staff should always act on behalf of the child, challenging where they consider action to be inadequate or ineffective, in communication with the DSL and children's social care as appropriate.
- 6.1.12 The DSL should continue to liaise with external agencies over ongoing safeguarding concerns and, in particular, employ professional challenge and escalation processes where he feels this is necessary to safeguard the child. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.
- 6.1.13 Where there are safeguarding concerns in relation to a child, staff should follow procedures pertaining to the local authority in which that pupil resides.
- 6.1.14 The School's Local Safeguarding Children Executive is the Manchester Safeguarding Partnership. A full copy of their local procedures can be found [here](#). This online manual covers procedures for the following local authorities: Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Stockport, Trafford, Tameside and Wigan.
- 6.1.15 In determining the most appropriate level of response in relation to a concern about a child, staff should consult the 'Thresholds of Need' for the local authority in which the child resides. The Thresholds of Need for the Greater Manchester local authorities listed above can be found [here](#).
- 6.1.16 The DSL will lead the school's inter-agency work in relation to the safeguarding and welfare of children. Under his direction, staff will play a full and active role in statutory meetings and interventions in relation to the child.
- 6.1.17 A flowchart outlining the School's response to safeguarding and child protection concerns is contained in Appendix 2.

6.2 What staff should do if a child makes a disclosure of harm

- 6.2.1 Where a child wishes to make a disclosure with a safeguarding dimension, time should be made to listen immediately. The child should not be asked to come back later or make an appointment.

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- 6.2.2 Staff should recognise that sometimes children do not feel ready or able to talk about abuse or neglect that they have experienced. This may be because the harm has been perpetrated by someone they love, because they feel embarrassed or humiliated, or because they fear the consequences of making the disclosure. Adopting a patient, sympathetic and understanding approach is vital. Should a child decide not to make the disclosure, or to discontinue it at any point, this should be reported to the DSL as soon as possible.
- 6.2.3 Where a child makes a disclosure of harm, staff should:
- listen carefully;
 - not show shock or disbelief;
 - not criticise the alleged perpetrator;
 - avoid asking leading questions;
 - reassure the individual that the allegation/complaint will be taken seriously and that they will be supported and kept safe;
 - ensure that the individual is not made to feel ashamed for making the report or given the impression that they are creating a problem by making the report;
 - not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child) and explain that the information needs to be passed to the appropriate person who will ensure that the correct action is taken;
 - consider how to care for the child, both practically and emotionally, after they have made the disclosure;
 - never investigate the matter themselves.
- 6.2.4 Staff should give children their full attention during disclosures, making notes only if this is appropriate and does not inhibit the disclosure. Staff should write down as much of the disclosure as possible immediately afterwards, using the child's own words wherever possible. The original notes must be signed and dated and passed to the DSL, to whom the matter should be reported immediately.
- 6.2.5 Where a disclosure relates to harmful sexual behaviours, if possible (and where this will not inhibit the disclosure), the disclosure should be managed with two members of staff present (preferably one of them being the DSL or DDSL).

6.3 What staff should do if a child is in immediate danger or at risk of harm

- 6.3.1 **If a child is in immediate danger or at risk of harm, a referral to Children's Social Care and/or the police must be made immediately.** (See the NPCC [guidance](#) 'When to call the police: guidance for schools and colleges'.) Referrals should follow the local referral process. The matter must be reported immediately and in person to the DSL or DDSL. If the DSL or DDSL are unavailable, anyone can make a referral. The DSL must be informed as soon as possible thereafter.
- 6.3.2 If, in exceptional circumstances, the referral cannot be made immediately, it must **always** be made within 24 hours (one working day) of staff being aware of the risk.

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- 6.3.3 The local authority social worker should acknowledge receipt to the referrer within 24 hours and make a decision about the next steps and type of response required. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

6.4 Contextual Safeguarding

- 6.4.1 Safeguarding incidents and/or behaviours can be associated with factors outside the School and can occur between children outside School. All staff, but especially the DSL and any deputies, should consider the context within which such incidents and/or behaviours occur.
- 6.4.2 The School will as part of the wider assessment of children, consider whether environmental factors are present in a child's life that are a threat to their safety and/or welfare.
- 6.4.3 The School will share as much information with Children's Social Care as possible as part of the referral process to enable consideration of all the available evidence and the full context of any abuse.

6.5 Early Help

- 6.5.1 Early help means providing support as soon as a problem emerges at any point in a child's life. Early intervention where concerns are identified can arrest deterioration in a child's welfare and can reduce the need for subsequent involvement of statutory agencies.
- 6.5.2 Effective early help relies upon the School and local agencies working together to:
- identify children and families who would benefit from early help;
 - undertake an assessment of the need for early help;
 - provide targeted early help services to address the assessed needs of a child and their family which focuses on activity to improve significantly the outcomes for the child.
- 6.5.3 Early Help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problems getting worse.
- 6.5.4 Any child may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child who:
- Is disabled or has certain health conditions and has specific additional needs;
 - Has special educational needs (whether or not they have a statutory education, health, and care plan);
 - Has a mental health need;
 - Is a young carer;

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- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- Is frequently missing/goes missing from care or from home;
- Is misusing drugs or alcohol themselves;
- Is at risk of modern slavery, trafficking, or sexual or criminal exploitation;
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- Has returned home to their family from care;
- Is showing early signs of abuse and/or neglect;
- Is at risk of being radicalised or exploited;
- Has a family member in prison, or is affected by parental offending;
- Is experiencing, or is at risk of experiencing family ostracism;
- Is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
- Is a privately fostered child;
- Has experiences multiple suspensions and/or is at risk of being permanently excluded from school;
- Has unexplainable or persistent absence from education, including persistent absences for part of the school day.

6.5.5 In the first instance, staff who consider that a pupil may benefit from early help should discuss this with the School's DSL. The DSL will consider the appropriate action to take in accordance with the referral threshold document for the local authority in which the child resides. The Thresholds of Need for the Greater Manchester local authorities can be found [here](#). The Manchester Early Help 'Practitioners Zone', can be found [here](#).

6.5.6 The DSL will support staff in liaising with external agencies and professionals in an inter-agency assessment as appropriate. If early help is appropriate, the matter will be kept under review and consideration given to a referral to children's social care if the pupil's situation does not appear to be improving.

6.6 What staff should do if a child may be at risk of radicalisation

6.6.1 Any concern that a child is at risk of radicalisation is a safeguarding concern, and staff must take the appropriate action in relation to safeguarding concerns as directed by this policy. Staff should follow the School's normal referral processes when there are concerns about children who may be at risk of being drawn into terrorism, as set out above.

6.6.2 **If a child is in immediate danger or at risk of harm, a referral to Children's Social Care and/or the police must be made immediately.** (See the NPCC [guidance](#) 'When to call the police: guidance for schools and colleges'.) Referrals should follow the local referral process. The matter must be reported immediately and in person to the DSL

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or DDSL. If the DSL or DDSL are unavailable, anyone can make a referral. The DSL must be informed as soon as possible thereafter.

- 6.6.3 All other concerns in relation to radicalisation must be reported as soon as possible to the DSL via a Note of Concern or, in the case of members of the pastoral team, via the School's safeguarding record-keeping system, CPOMS.
- 6.6.4 The DSL should establish the appropriate response, dependent on the level of risk. This may include referral to the Channel programme and/or children's social care.
- 6.6.5 The School, in recognition that pupils may be at risk of being drawn into terrorism or other forms of extremism, carries out appropriate risk assessments (following consultation with local partners) of the potential risks in the local area. Such risk assessments are discussed by the High Master, DSL and governor responsible for safeguarding to ensure the School's safeguarding arrangements are sufficiently robust to help prevent and protect children from being drawn into terrorism and are regularly revised. The School's Prevent risk assessment can be found in the Staff Guidance area of SharePoint.

6.7 What staff should do if they discover an act of Female Genital Mutilation ('FGM')

- 6.7.1 Staff must report to the police (by telephoning 101) cases where they discover that an act of FGM appears to have been carried out. They should consider and discuss any such case with DSL, and children's social care should be involved as appropriate.
- 6.7.2 If it is believed that a child may be at risk of immediate harm in relation to FGM, the police should be informed immediately (by telephoning 999). The DSL should be informed as soon as possible, and the matter discussed with Children's Social Care.
- 6.7.3 Staff are referred to Appendix 1 of this policy for further information in relation to FGM.

6.8 What staff should do if they have concerns that children are at risk from or involved with serious violent crime

- 6.8.1 All staff should be aware of indicators which may signal that children are at risk from or are involved with serious violent crime, examples of which can be found in Appendix 1.
- 6.8.2 **If a child is in immediate danger or at risk of harm, a referral to Children's Social Care and/or the police must be made immediately.** (See the NPCC [guidance](#) 'When to call the police: guidance for schools and colleges'.) Referrals should follow the local referral process. The matter must be reported immediately and in person to the DSL or DDSL. If the DSL or DDSL are unavailable, anyone can make a referral. The DSL must be informed as soon as possible thereafter.

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- 6.8.3 All other concerns in relation to serious violent crime must be reported as soon as possible to the DSL via a Note of Concern or, in the case of members of the pastoral team, via the School's safeguarding record-keeping system, CPOMS.

6.9 How should staff respond to an incident of nudes and semi-nudes being shared by pupils

- 6.9.1 All members of staff in an education setting have a duty to recognise and refer any incidents involving nudes and semi-nudes and will be equipped with the necessary safeguarding training and support to enable them to recognise concerns.
- 6.9.2 For this purpose, 'sharing nudes/semi-nudes' means the sending or posting of nude or semi-nude images, videos, or live streams by children under the age of 18 online. This could be via social media (including Snapchat), gaming platforms, chat apps (including WhatsApp and iMessage) or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The sharing of nudes and semi-nudes may happen publicly online, in 1:1 messaging or via group chats and/or via closed social media accounts. The images, videos or live streams may include more than one child.
- 6.9.3 Any direct disclosure by a child will be taken seriously and staff will ensure the child is feeling comfortable and will only ask appropriate and sensitive questions, in order to minimise further distress or trauma to them.
- 6.9.4 If staff are notified or become aware of an incident of nudes or semi-nudes being shared by a pupil or of a pupil, they should refer the incident to the DSL as soon as possible.
- 6.9.5 The DSL will follow the DDMSC / UKCIS guidance '*Sharing nudes and semi-nudes: advice for education settings working with children and young people*' (December 2020) when responding to a report of sharing nudes and/or semi-nudes.
- 6.9.6 Under no circumstances should staff view or have sent to them pictures or videos which could contain nude or semi-nude images of children. Any decision to view images will be taken by the DSL, with the guidance of the police if appropriate, in the light of the above guidance.
- 6.9.7 This DDMSC/UKCIS guidance does not apply to the sharing of images of children under 18 by an adult over 18 as this constitutes child sexual abuse. In the event that staff become aware of such an incident, they should notify the DSL immediately, who should always inform the police as a matter of urgency.
- 6.9.8 All incidents relating to nudes and semi-nudes being shared should be recorded, whether they have been referred externally or not. Schools must record the reason for not reporting incidents externally. Records will be kept in line with statutory

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requirements set out in *KCSIE* and local safeguarding procedures. No copies of imagery will be taken or retained, except under the instruction of the police.

6.10 What staff should do if a child is absent from education or goes missing from education (CME)

- 6.10.1 Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. It is important the school's response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.
- 6.10.2 The School systematically monitors pupil attendance in order to identify pupils who are absent from education, particularly for prolonged periods and/or on repeat occasions. Where pupils are experiencing absence of this nature or are missing from education, this is treated as a safeguarding matter. All reasonably possible enquiries will be made to establish the whereabouts and safety of the pupil, and external agencies will be contacted as appropriate.
- 6.10.3 The School shall inform the local authority of any pupil who is going to be added to or deleted from the School's admission register at non-standard transition points in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2006 (as amended). This will assist the local authority to:
- fulfil its duty to identify children of compulsory school age who are missing from education; and
 - follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect, exploitation or radicalisation.
- 6.10.4 School attendance registers are carefully monitored to identify any trends. The School will inform its local authority (Manchester), and the local authority where the child is normally resident, of any pupil who fails to attend school regularly, or has been absent without the School's permission for a continuous period of 10 school days or more.
- 6.10.5 The School's procedures for identifying children absent from education for prolonged periods and/or on repeat occasions, and for dealing with children who go missing from education, are:
- Where there are identified safeguarding risks in relation to a child, the Attendance Officer will notify the DSL and relevant members of the Pastoral Team should that child not be in school (whether with or without

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authorisation) on a daily or, in some cases, lesson-by-lesson basis so that safeguarding and welfare issues can be considered at an early stage;

- The Attendance Officer will attempt to contact the parents of an absent child for whom no notification of absence has been received, by all available means, on the day of the absence. She will inform the DSL and relevant members of the Pastoral Team should this absence remain unresolved after these attempts have been made;
- Members of the Pastoral Team scrutinise the attendance records of those under their care to identify children absent from education, and issues are taken up with parents and reported to the DSL where safeguarding concerns are identified;
- The DSL inspects the School's record of absences on a weekly basis to identify any pupils who have had a number of consecutive days of unauthorised absence so that further enquiries can be made;
- Where necessary, the DSL coordinates further attempts to establish the whereabouts of the child. This may include speaking to additional contacts, making enquiries with the child's friends, visiting the family home, and speaking with the child's neighbours;
- Should the child's whereabouts still not be established, or should the circumstances otherwise give rise to concern, the DSL will contact Children's Social Care in accordance with this policy;
- The parents of any missing child will be informed in writing of the intention to off-roll the child from school before the child is removed from the roll.

6.10.6 Where reasonably possible, the School will hold more than one emergency contact number for each pupil to provide the School with additional options to make contact with a responsible adult particularly when a child missing from education is also identified as a welfare and/or safeguarding concern.

6.10.7 Further detail about children absent from or missing education can also be found in Appendix 1 of this policy.

6.11 What staff should do if a child needs a social worker (Children in Need and Child Protection Plans)

6.11.1 Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect, exploitation and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health.

6.11.2 Local authorities should share the fact a child has a social worker, and the DSL should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes.

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- 6.11.3 Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

6.12 What staff should do if a child requires mental health support

- 6.12.1 Where the nature of the concern about a child's mental health constitutes a safeguarding matter, this should be dealt with in accordance with the provisions of this policy (see above), determined by level of risk.
- 6.12.2 The School has an important role to play in supporting the mental health and wellbeing of its pupils. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. The School aims to prevent health problems by promoting resilience as part of a whole school approach to social and emotional wellbeing of our pupils.
- 6.12.3 The DSL has undertaken Senior Mental Health Lead training and is the School's Mental Health Lead.
- 6.12.4 The School nurse is a trained counsellor and is able to support children with a variety of mental health concerns.
- 6.12.5 Staff can access information about Children's Mental Health via the Safeguarding and Child Protection hub on SharePoint. Information for pupils is available via the Welfare Hub on SharePoint.

6.13 What staff should do if they have concerns about safeguarding practices in the School

- 6.13.1 The School aims to ensure there is a culture of safety in which concerns are raised and there is an attitude of 'it could happen here'. Where staff have concerns about poor or unsafe practices and potential failures in the School's safeguarding systems, these should be raised in accordance with the School's whistleblowing procedures which can be found in the Staff Guidance area of SharePoint. There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.
- 6.13.2 If staff and volunteers feel unable to raise an issue with the School or feel that their genuine concerns are not being addressed, they may use other whistleblowing channels, such as the NSPCC whistleblowing advice line. Contact details for the NSPCC helpline can be found on the Key Contacts page at the start of this policy.

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7. CHILD ON CHILD ALLEGATIONS, INCLUDING CHILD ON CHILD SEXUAL VIOLENCE AND HARASSMENT

- 7.1 Child on child abuse is abuse by one or more children against another child. It can be standalone or as part of wider abuse and can happen both inside and outside of school, and online. It can manifest itself in many ways and can include abuse within intimate partner relationships, bullying (including cyber bullying, prejudice-based and discriminatory bullying), abuse within intimate partner relationships between peers, physical abuse (such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm), initiation/hazing type violence and rituals, upskirting, sexting, consensual and non-consensual sharing of nudes and/or semi-nudes, sexual assault, gender-based issues, sexual behaviours including child on child sexual violence and sexual harassment, 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. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.
- 7.2 These arrangements apply to all reports and concerns of child on child abuse, whether they have happened in school or outside of it, and/or online. Abuse that occurs online or outside of school should not be downplayed and should be treated equally seriously.
- 7.3 Where child on child abuse takes place between MGS pupils and pupils at other schools, the DSL will ensure that there is effective communication with the DSLs and relevant staff at those other schools so that the welfare needs of all pupils involved can be considered and met through a collaborative approach. It is recognised that most child on child sexual abuse and harassment is perpetrated by boys and that most victims are girls. The DSL maintains strong relationships with the DSLs at local girls' schools to ensure that any such conduct between pupils is dealt with promptly and effectively.
- 7.4 Staff should address inappropriate behaviour (even if it appears to be relatively innocuous) to help prevent problematic, abusive and/or violent behaviour in the future.
- 7.5 The School takes a zero-tolerance approach and abusive comments and interactions should never be passed off or dismissed as 'banter' or 'part of growing up'. Harmful sexual behaviours, including sexual comments, remarks or jokes and online sexual harassment, should not be dismissed as 'just having a laugh' or 'boys being boys'.
- 7.6 All physical behaviours that are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts must not be tolerated and must be reported to the DSL. Dismissing or tolerating such behaviours risks normalising them.

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- 7.7 The School recognises that even when there are no ongoing cases of child on child abuse in relation to pupils within the School, such abuse may still be taking place and simply not being reported.
- 7.8 The School will ensure that children are aware of how they can report abuse, and that they are aware of the procedures that the School will follow once a report has been made. These procedures will be well promoted and in a format that is easily accessible and easily understood by children.
- 7.9 The School recognises that a child is likely to disclose an allegation to someone they trust: this could be any member of staff. The School also recognises that children may not find it easy to tell staff about their abuse verbally and that instead they may show signs or act in ways they hope adults will notice and react to. It is recognised that an incident may come to a member of staff's attention through a report of a friend, or by overhearing conversations. It is therefore important that all staff are clear on the School's policy and procedures with regards to child on child abuse, and can recognise the indicators and signs of child on child abuse and know how to identify it and how to respond to reports.
- 7.10 The School recognises that a first disclosure to a trusted adult may only be the first incident reported, and that other incidents may have taken place. Staff will take all reports of abuse seriously regardless of how long it has taken for the child to come forward. Staff will act immediately and will support the victim when they raise a concern.
- 7.11 The School recognises that children with special educational needs and disabilities (SEND) or certain health conditions are three times more likely to be abused by their peers, can face additional safeguarding challenges and may be more prone to peer-on-peer group isolation or bullying (including prejudice-based bullying) than other children. The School delivers additional pastoral support for those children, primarily through the SEND Department, which provides safe physical space and close teacher supervision for these more-vulnerable pupils.
- 7.12 The School also recognises that certain children may face additional barriers to reporting an incident of abuse because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.
- 7.13 The School takes the following steps to minimise the risk of child on child abuse:
- It empowers pupils to recognise, respond to and report abusive behaviours through its PSHE and RSE programmes which are delivered throughout the School;
 - It cultivates an environment in which diversity is celebrated and in which there is zero tolerance of harmful or abusive behaviours;
 - Unacceptable behaviour is never excused as 'banter' or 'boys being boys';
 - It creates and maintains a clear code of conduct for pupil behaviour, which is drawn up through consultation with the pupils. It communicates these expectations to pupils and enforces these expectations systematically and fairly;

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- It trains staff to recognise and report behaviour indicative of harmful or abusive interactions between pupils;
- It responds swiftly to harmful and abusive behaviour;
- All incidents of child on child misconduct are recorded and reviewed, so that patterns of behaviour which may constitute bullying can be recognised, and so that trends of misconduct can be identified and addressed;
- Where abusive behaviour between pupils is identified and dealt with, a further check is normally conducted with the victim after approximately 6 weeks to ensure the matter is fully resolved.

- 7.14 Where any behaviour covered in this section gives rise to a safeguarding concern, this should be dealt with according to the provisions of Section 6 of this policy.
- 7.15 The victim may ask the School not to tell anyone about the sexual violence or sexual harassment. Advice should be sought from the DSL. Parents or carers should normally be informed unless doing so would put the victim at greater risk. The DSL's decision will take into account whether a crime may have been committed. Ultimately, the DSL will balance the victim's wishes against their duty to protect the victim and other children.
- 7.16 Police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. The normal expectation should be that reports of rape and assault by penetration will be passed to the police. Where a report has been made to the police, the School will consult the police and children's social care about what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers.
- 7.17 If the DSL decides to make a referral to children's social care and/or a report to the police against a victim's wishes, the reasons should be explained to the pupil and appropriate specialist support offered. The DSL may also decide that the children involved may benefit from early help, and may make the necessary referral in accordance with local authority procedures pertaining to that child's place of residence.
- 7.18 Children share nude or semi-nude imagery ('sexting') in circumstances which involve child on child abuse. The school will follow the procedures set out above in relation to the sharing of nude and semi-nude images, informed by the DDMSC / UKCIS guidance '*Sharing nudes and semi-nudes: advice for education settings working with children and young people*' (December 2020).
- 7.19 In the event of disclosures about child on child abuse, all children involved (victims and perpetrators) will be treated as being at risk, and safeguarding procedures in accordance with this policy will be followed. Victims will be supported by appropriate members of the pastoral team and/or the School's medical staff. Support from external agencies will be sought, as appropriate.
- 7.20 In relation to a report of sexual violence or sexual harassment, staff will reassure any victim that they are being taken seriously and that they will be supported and kept

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safe. The victim will never be made to feel ashamed for making a report nor will they be given the impression that they are creating a problem by reporting sexual violence or sexual harassment.

7.21 The School will explain to the child in a way that avoids alarming or distressing them that the law is in place to protect children rather than to criminalise them. The School will consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse.

7.22 When there has been a report of sexual violence, the DSL will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

- the victim;
- whether there may have been other victims;
- the alleged perpetrator(s); and
- all the other children (and, if appropriate, staff) at the School especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

Risk assessments will be recorded and kept under review.

7.23 The School acknowledges that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator(s). The DSL will consider the risks posed to pupils and put adequate measures in place to protect them and keep them safe and to ensure their educational attainment is not adversely affected as far as is possible. This may include careful consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing School premises (including during any before or after school-based activities), and School transport. The School will also consider the risks posed to the victim from other health needs, including physical, mental and sexual health problems, as well as unwanted pregnancy which may arise as a result of the incident, and will consider recommending additional support.

7.24 The School will consider intra familial harms and whether any support for siblings is necessary following an incident.

7.25 The School will keep a written record of all concerns, discussions and decisions made.

7.26 The School will reflect on reported concerns, including the decisions made and actions taken, in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the School's safeguarding system which may require additional training or amendments to relevant policies. Where a pattern is identified the School will decide on an appropriate course of action.

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

8. SAFEGUARDING CONCERNS OR ALLEGATIONS MADE ABOUT STAFF

8.1 Overview

8.1.1 If staff have concerns about the conduct of another member of staff, then these should be referred to the High Master. Where there are concerns about the High Master, these should be referred to the Chair of Governors. In the event of allegations of *abuse* being made against the High Master, staff are referred to the procedures below regarding managing allegations of *abuse* against staff. They should refer the matter directly to the Designated Officer (LADO) for Manchester.

8.1.2 The School's procedures for managing concerns or allegations against staff (including supply staff, volunteers and contractors) who are currently working in the School whether in a paid or unpaid capacity follows DfE statutory guidance and Manchester Safeguarding Partnership arrangements and applies when staff (including volunteers) have (or are alleged to have):

- Behaved in a way that has harmed a child, or may have harmed a child; and/or
- Possibly committed a criminal offence against or related to a child; and/or
- Behaved towards a child or children in a way that indicated that they may pose a risk of harm if they were to work regularly or closely with children; and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children, including behaviour that may have happened outside of school

This is referred to as the 'harm threshold'.

8.1.3 Allegations that do not meet the harm threshold should be dealt with using the School's procedure for handling low level concerns set out below.

8.1.4 Allegations against a teacher who is no longer teaching should be referred to the police. Historical (non-recent) allegations of abuse should be referred to the police and also the LADO. The LADO will coordinate with children social care and the police.

8.2 Managing allegations against staff where the alleged conduct may meet the harm threshold

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- 8.2.1 When dealing with an allegation about a staff member the School will apply common sense and judgment, deal with allegations quickly, fairly and consistently and will support the person subject to the allegation.
- 8.2.2 Allegations which appear to meet the harm threshold are to be reported straight away to the High Master. If an allegation is reported to the DSL, the DSL will inform the High Master. The High Master will act as or appoint a 'case manager' to oversee the School's response to the allegation.
- 8.2.3 Where the High Master is the subject of the allegation, the High Master must not be informed of the allegation prior to contact with the Chair of Governors and LADO. However, staff may consider discussing any concerns/allegations with the DSL and make any referral via him.
- 8.2.4 Where the case manager deems there to be an immediate risk to children or there is evidence of a possible criminal offence, or it is an emergency situation, the case manager should contact children's social care and, as appropriate, the police immediately.
- 8.2.5 The case manager should discuss the allegation with the LADO as soon as possible and consider the nature, content and context of the allegation to agree a course of action including any involvement of the police. All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed. The LADO should be informed within one working day of all allegations that come to the School's attention and appear to meet the harm threshold or that are made directly to the police and/or children's social care. The DSL is responsible for ensuring the child is not at risk.
- 8.2.6 Where the case manager is concerned about the welfare of other children in the community, or the member of staff's family, they will discuss these concerns with the LADO and make a risk assessment of the situation. It may be necessary for the LADO to make a referral to children's social care.
- 8.2.7 When to inform the individual who is the subject of the allegation will be considered on a case by case basis and with guidance from the LADO, and if appropriate, the police and/or children's social care. Subject to any objection, the case manager will ensure that the individual who is subject of the allegation is informed as soon as possible and given an explanation of the likely course or action. The case manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.
- 8.2.8 Suspension should not be an automatic response when an allegation is reported. It should be considered only in cases where there is cause to suspect a child or other children at the School is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. The case manager will give due weight to the views of the LADO, *WT* and *KCSIE* when making a decision about suspension (including with respect to considering alternatives). Where the individual is suspended, the case

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manager will confirm the decision within one working day. The case manager will ensure that the suspended individual knows who their point of contact in the School is, and will provide them with their contact details. The case manager will also record the rationale and justification for the suspension, including what alternatives were considered and why they were rejected.

- 8.2.9 The following alternative arrangements should be considered by the case manager before suspending a member of staff:
- redeployment within the School so that the individual does not have direct contact with the child or children concerned;
 - providing an assistant to be present when the individual has contact with children;
 - redeploying to alternative work in the School so the individual does not have unsupervised access to children;
 - moving the child or children to classes where they will not come into contact with the member of staff, but this decision should only be made if it is in the best interest of the child or children concerned and takes accounts of their views. It should be made after parents have been consulted and with it being made clear that this is not a punishment; or,
 - temporarily redeploying the member of staff to another role in a different location.

These alternatives allow time for an informed decision regarding the suspension. This will, however, depend upon the nature and seriousness of the allegation.

- 8.2.10 Where further enquiries are required to enable a decision about how to proceed, the LADO and case manager should discuss how and by whom the investigation will be undertaken. The LADO will provide advice and guidance to the School to ensure that an appropriate investigation is carried out. In straightforward cases, the investigation should usually be undertaken by a senior member of staff at the School. Where there is lack of resource, or the nature or complexity of the allegation requires it, an independent investigator may be appointed to undertake the investigation.
- 8.2.11 The case manager will ensure that parents are informed as soon as possible and kept informed about the progress of the case, subject to any advice from children's social care or the police. Parents and others will be made aware that there are restrictions on publishing information which may lead to the identification of the teacher subject to the allegation.
- 8.2.12 The case manager will monitor the progress of the case to ensure it is dealt with as quickly as possible in a thorough and fair process. The outcome of the investigation of an allegation will record whether it is substantiated (sufficient evidence to prove it), unsubstantiated (insufficient evidence either to prove or disprove it), false (sufficient evidence to disprove it), malicious (sufficient evidence to disprove it and that there has been a deliberate act to deceive or cause harm to the person subject of

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the allegation) or unfounded (to reflect cases where there is no evidence or proper basis which supports the allegation being made).

- 8.2.13 Reviews are conducted at fortnightly or monthly intervals, depending on the complexity of the case. The first review will take place no later than four weeks after the initial assessment and subsequent review dates will be set at the review meeting.
- 8.2.14 The case manager will discuss with the LADO whether a referral to the Disclosure and Barring Service or Teaching Regulation Agency should be made where an allegation is substantiated and the person is dismissed or the School ceases to use their services, or the person resigns or otherwise ceases to provide their services. The School has a legal obligation to report promptly to the Disclosure and Barring Service any person (whether employed, contracted, a volunteer or a student) who has harmed, or poses a risk of harm, to a child, or if there is reason to believe they have committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. Further, or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the School must consider making a referral to the Teaching Regulation Agency and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).
- 8.2.15 On conclusion of the case, the case manager should review the circumstances of the case with the LADO to determine whether there are any improvements to be made to the School's safeguarding procedures or practices to help prevent similar events in the future. Learning lessons where the allegation is concluded to be either, unfounded, false, malicious or unsubstantiated, the case manager (and if they have been involved, the LADO) should consider the facts and determine whether any lessons can be learned and if improvements can be made.
- 8.2.16 Where an individual is removed from regulated activity, or would have been removed had the individual not left, including when they are suspended, redeployed to work that is not regulated activity, are dismissed, or have resigned, and the individual has engaged in relevant conduct in relation to children and/or adults, and/or satisfied the harm test in relation to children and/or vulnerable adults, and/or been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence, the School will make a referral to the DBS.
- 8.2.17 The School has a duty of care to its staff, and whilst the welfare of a child is paramount, the School must offer appropriate welfare support to the adult subject to the investigation and potentially their family. The School will also make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered. Information will also not ordinarily be shared with other staff or with children or parents who are not directly involved in the investigation.

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- 8.2.18 Where initial discussions lead to no further action, the case manager and the LADO should record the decision and justification for it and agree on what information should be put in writing to the individual concerned, and by whom.
- 8.2.19 Allegations found to be malicious or false will be removed from the individual's personnel records unless the individual gives consent for retention of the information. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with *KCSIE* and a copy will only be provided to the individual concerned. The information to be kept on file includes a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, a note of any action taken, decisions reached and the outcomes, and a declaration on whether the information will be referred to in any future reference. All records should be retained until the accused has reached pension age, or for a period of 10 years from the date of the allegation, whichever is longer.
- 8.2.20 Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. If an allegation is shown to be deliberately invented or malicious, the DSL should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the High Master will consider whether any disciplinary action is appropriate against a pupil who made it in accordance with the School's behaviour policy; or whether the police should be asked to consider if action might be appropriate against the person responsible even if they are not a pupil.
- 8.2.21 In all cases where there are concerns or allegations of abuse, the School will make a serious incident report to the Charity Commission whenever the Commission's guidelines deem it appropriate to do so.

8.3 Managing allegations about supply teachers and contractors

- 8.3.1 The School's procedures for managing allegations against staff above also apply to staff not directly employed by the School, for example, supply teachers provided by an employment agency or business ('agencies'). The School will usually take the lead but agencies should be fully involved (because they have their own policies and procedures) and co-operate with any enquiries from the LADO, police and/or children's social care.
- 8.3.2 In no circumstances will the School decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. The School will discuss with the agency (or agencies where the supply teacher is working across a number of schools) whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

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- 8.3.3 The School will advise supply teachers being investigated to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the School during the investigation.
- 8.3.4 When using an agency, the School should inform the agency of its process for managing allegations but also take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.
- 8.3.5 Where the agency dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left the School first, the School must consider whether to refer the case to the Teaching Regulation Agency.

8.4 Managing 'low level concerns' about staff

- 8.4.1 A 'low level' concern is any concern that an adult working in or on behalf of the School may have acted in a way that:
- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
 - does not meet the harm threshold or is otherwise not considered serious enough to require a referral to the LADO.
- 8.4.2 A concern may be a low-level concern, no matter how small, even if it does no more than give a sense of unease or a 'nagging doubt'. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse (for example, grooming-type behaviours).
- 8.4.3 The fact that a concern is 'low-level' does not mean that it is insignificant. The School takes all concerns about safeguarding seriously and recognises that addressing even low-level concerns is important to create and embed a culture of openness, trust and transparency in which the School's values and expected behaviour of its staff are constantly lived, monitored and reinforced by all staff.
- 8.4.4 The School's Code of Conduct can be found in the Staff Guidance area of SharePoint. The aim of the Code of Conduct is to provide clear guidance about the standards of appropriate behaviour and actions of its staff so as to not place pupils or staff at risk of harm or staff at risk of allegation of harm to a pupil. All staff are expected to comply with the standards contained within this Code of Conduct at all times.

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- 8.4.5 The procedure for sharing low level concerns about a member of staff is contained within the School's separate Low-Level Concerns Policy which can be found in the Staff Guidance Section of SharePoint. The High Master is the ultimate decision-maker in respect of all low-level concerns.
- 8.4.6 Staff must share all concerns with the High Master (or in his absence the Deputy High Master or DSL) without delay so that they can be recorded and dealt with appropriately, sensitively, and proportionately and in a timely manner. Where a low-level concern is raised about the High Master, it should be referred to the Chair of Governors.
- 8.4.7 Staff are also encouraged to self-refer in the event that they have found themselves in a situation which may be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in a way that may be considered to fall below the expected professional standard. All concerns will be handled sensitively and will be dealt with appropriately and proportionately.
- 8.4.8 If a concern is raised by a third party, the High Master (or in his absence the Deputy High Master or DSL) will collect as much evidence as possible by speaking to the person who has raised the concern (if known), to the individual involved and any witnesses. The concern will be recorded in accordance with this policy, in the usual way.
- 8.4.9 The School will address unprofessional behaviour at an early stage and will support the individual to correct it.
- 8.4.10 All low-level concerns will be recorded in writing. The record will include details of the concern, the context within which the concern arose, and details of the action taken. The name of the reporting individual should also be included, unless they have asked to remain anonymous, which will be respected as far as reasonably possible. The records will be kept confidential, will be held securely and in compliance with the Data Protection Act 2018 and the UK GDPR at all times. All personal data processed in connection with the Low-Level Concerns Policy will be processed in accordance with the School's Privacy Notices and its Data Protection Policy.
- 8.4.11 Low-level concerns will not be included in references unless they relate to issues which would normally be disclosed, for example, misconduct or poor performance.
- 8.4.12 The School will also reflect on reported concerns in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the School's safeguarding system which may require additional training or modified policies. Where a pattern is identified, the School will decide on a course of action, either through its disciplinary procedures, or, where the pattern moved from a concern to meeting the harm threshold, it will follow the above procedure and refer the matter to the LADO.

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- 8.4.13 Where a low-level concern relates to a person employed by a supply agency or a contractor, the individual's employer will be notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.
- 8.4.14 If at any stage the School is in any doubt as to whether a low-level concern in fact meets the harm threshold, the High Master or the case manager appointed by him will consult with the LADO and take a more collaborative decision-making approach.

9. SAFER RECRUITMENT

- 9.1 The School is committed to safer recruitment processes to create a culture that safeguards and promotes the welfare of children in the School whilst deterring and preventing people who are unsuitable to work with children from applying or securing employment, or volunteering opportunities, within the School.
- 9.2 Members of the teaching and non-teaching staff at the School including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches are subject to the necessary statutory child protection checks before starting work, for example, right to work checks, additional overseas checks (if necessary), verifying identity, taking up references, checking work history and confirming medical fitness for the role. For most appointments, an enhanced DBS check with 'barred list' information will be appropriate. A DBS certificate will be obtained from the candidate before or as soon as practicable after appointment. Alternatively, if the applicant has subscribed to it and gives permission, the School may undertake an online update check through the DBS Update Service.
- 9.3 Full details of the School's safer recruitment procedures for checking the suitability of staff, governors and volunteers to work with children and young people is set out in the School's Safer Recruitment Policy, which can be found on the School's website.
- 9.4 The School's protocols for ensuring that any visiting speakers, whether invited by staff or pupils themselves, are suitable and appropriately supervised is set out in the School's Visitors Procedures, which can be found in the Staff Guidance section of SharePoint.
- 9.5 The School's procedures for managing contractors attending the School site can be found in the School's Visitors' Procedures, which can be found in the Staff Guidance section of SharePoint.

10. MANAGEMENT OF SAFEGUARDING

- 10.1 The School's DSL is Dan Farr. He is a member of the Senior Leadership Team.
- 10.2 Sam Crawshaw is the Deputy DSL and the person to whom reports should be made in the absence of the DSL. This ensures there is the required cover for the role at all times.
- 10.3 The DSL and Deputy DSL contact details can be found on the Key Contacts page at the start of this policy.

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- 10.4 The duties and responsibilities of the DSL outlined in this policy will be assumed by the Deputy DSL in his absence.
- 10.5 The DSL's role is to take lead responsibility for safeguarding and child protection matters in the School. The DSL's responsibility is to maintain an overview of safeguarding within the School, to open channels of communication with local statutory agencies, refer incidents to third parties (including the local authority children's services, the DBS, Channel and the police) where appropriate, to support staff in carrying out their safeguarding duties and to monitor the effectiveness of the School's policies and procedures in practice. The DSL will also take lead responsibility for online safety and understanding the filtering and monitoring systems and processes the School has in place.
- 10.6 The DSL works with the governors to review and update the School's safeguarding policy.
- 10.7 Where a pupil leaves the School, including for in-year transfers, the DSL will also ensure their child protection file is transferred to the new school (separately from the main pupil file) as soon as possible and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. The DSL will ensure secure transit and obtain confirmation of receipt.
- 10.8 In addition to the child protection file, the DSL should also consider if it would be appropriate to share any additional information with the new school in advance of a child leaving to help them put in place the right support to safeguard the child and to help the child thrive in the school.
- 10.9 The DSL regularly reviews the School's and his own practices, and the way in which staff respond to safeguarding concerns. This includes the personal and professional duty of all staff to report welfare and safeguarding concerns to the DSL, or in the absence of action, directly to local children's services.
- 10.10 During term time, the DSL and/or Deputy DSL will always be available (during school hours) for staff in the School to discuss any safeguarding concerns. If the DSL or Deputy DSL are not available in person, they can be contacted by telephone (via the number in the contacts section of this policy). Staff supervising out of hours activities can contact the DSL via telephone if he is unavailable in person. Out of term activities have a designated member of the Senior Leadership Team who should be contacted in the first instance. That member of the Senior Leadership is able to contact the DSL or Deputy DSL as appropriate.
- 10.11 The DSL should liaise with the three safeguarding partners and work with other agencies in line with *WT*.
- 10.12 The DSL's decisions about whether to involve the police will be informed by the NPCC guidance '*When to call the police*'. If the School has questions about any police investigation, the DSL will seek guidance from the police as appropriate.
- 10.13 The DSL is also the Senior Mental Health Lead. He will liaise with the School's medical staff (and SEND Department where appropriate), where safeguarding concerns are linked to mental health.

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- 10.14 The DSL should be confident as to what local specialist support is available to support all children involved in sexual violence and sexual harassment and be confident as to how to access this support when required.
- 10.15 Whilst the High Master should ensure that the policies and procedures adopted (particularly those concerning referrals of cases of suspected abuse, neglect and exploitation) are understood and followed by all staff, and the Governors are ultimately responsible for ensuring staff are competent, supported and regularly reviewed in relation to safeguarding, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this lead responsibility should not be delegated.
- 10.16 Full details of the DSL's role can be found at Annex C of *KCSIE*.

11. TRAINING

- 11.1 Induction and training are in line with advice from the Manchester Safeguarding Partnership.
- 11.2 All new staff, including temporary staff, will be provided with safeguarding and child protection induction training that includes:
- a copy of 'Keeping children safe in education 2023: Part one: Information for all school and college staff' (which includes 'Annex B: Further Information');
 - a copy of the Safeguarding and Child Protection Policy (including the policy and procedures to deal with child on child abuse);
 - a copy of the Behaviour, Rewards and Sanctions Policy and Anti-bullying policy (including measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying);
 - a copy of the Online Safety Policy;
 - a copy of the Staff Code of Conduct and Acceptable Use Policy (including staff/pupil relationships and communications including the use of social media);
 - the safeguarding response to children who go missing from education or who are absent from school, particularly repeatedly and/or for prolonged periods;
 - a copy of the Whistleblowing Policy;
 - online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring;
 - detailed in-person training which includes all statutory induction training content, discusses the role and identity of the DSL, and focuses on school procedures for dealing with safeguarding issues;
 - a copy of the 'Safeguarding at MGS' summary leaflet.
- 11.3 Volunteers will be provided with induction training that includes:
- a copy of 'Keeping children safe in education 2023: Part one: Information for all school and college staff' (which includes 'Annex B: Further Information');
 - a copy of the 'Volunteer Code of Conduct';
 - detailed in-person training which includes all statutory induction training content, discusses the role and identity of the DSL, and focuses on school procedures for dealing with safeguarding issues;

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- a copy of the 'Safeguarding at MGS' summary leaflet.

11.4 All staff are also required to:

- Read at least Part one of *KCSIE* and confirm that they have done so. Each time Part one of *KCSIE* is updated by the Department for Education, staff will be updated on the changes via in-person training and/or a written summary of key changes;
- Understand key information contained in Part one of *KCSIE*. The School will ensure staff understanding by requiring staff to complete a quiz on the contents of the document each time it is updated;
- Receive training in safeguarding and child protection regularly, in line with advice from the Manchester Safeguarding Partnership. Training will include online safety (including the expectations, applicable roles and responsibilities in relation to filtering and monitoring) and harmful sexual behaviours (including child on child sexual violence and harassment). It will also include Prevent awareness training to equip staff to raise concerns appropriately by ensuring all staff have the knowledge and confidence to identify children at risk of being drawn into terrorism; are able to challenge extremist ideas; and know how to refer children and young people for further help;
- Undertake regular informal updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively, including online. The School provides these via, for example, all-staff CPD, half-termly safeguarding bulletins and access to the Safeguarding Hub on SharePoint.

11.5 The governing body will ensure that all governors receive appropriate safeguarding and child protection (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the School are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.

11.6 The governing body are aware of their obligations under the Human Rights Act 1998 (HRA), the Equality Act 2010, the Data Protection Act 2018, the UK GDPR, and the Manchester Safeguarding Partnership safeguarding arrangements. Under the Human Rights Act 1998, it is unlawful for the School to act in a way that is incompatible with the European Convention on Human Rights (ECHR) Convention. Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach conventions set out in the European Convention on Human Rights (ECHR) Convention. The Data Protection Act 2018 and the UK GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. In addition, the governing body complies with the DfE's Data Protection guidance for schools, ensuring school staff, governors and trustees know how to comply with data protection law, develop their data policies and processes, what staff and pupil data to keep and the importance of good practices for preventing personal data breaches.

11.7 The DSL receives updated child protection training at least every two years to provide him with the knowledge and skills required to carry out the role. This includes local inter-agency working protocols, participation in child protection case

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conferences, supporting children in need, identifying children at risk of radicalisation, record keeping and promoting a culture of listening to children, training in the Manchester Safeguarding Partnership's approach to *Prevent* duties and harmful sexual behaviours. Further details of the required training content for the DSL are set out in Annex C of *KCSIE*.

- 11.8 In addition to his formal training, the DSL's knowledge and skills are updated at least annually to keep up with any developments relevant to his role. In particular, the School will support the DSL in developing his knowledge and skills to understand the views of children including to encourage a culture of listening to children and taking account of their wishes, as well as having an awareness of the difficulties children may face in approaching staff with a disclosure.
- 11.9 The Deputy DSL is trained to the same level as the DSL.

12. OVERSIGHT OF SAFEGUARDING, INCLUDING ARRANGEMENTS FOR REVIEWING POLICIES AND PROCEDURES

- 12.1 Kunal Hinduja is the board-level lead ('Safeguarding Governor') designated to take a lead in relation to responsibility for the safeguarding arrangements in the School. He is a member of the governing body.
- 12.2 The School's obligation to review safeguarding practices is a matter of its everyday concerns. The DSL will liaise with the Safeguarding Governor regularly. The DSL will also normally report directly to the governing body about safeguarding matters once each term.
- 12.3 A review of the School's safeguarding and child protection policies takes place at least annually, including an update and review of the effectiveness of procedures and their implementation, including lessons learnt. The annual review will normally include an audit of safeguarding practices and processes by the Safeguarding Governor. The Safeguarding Governor will report on this to the governing body, which will review its findings.
- 12.4 The School draws on the expertise of staff, including the DSL, in shaping the School's safeguarding arrangements and policies.
- 12.5 The School's safeguarding policies and procedures should be transparent, clear, and easy to understand for staff, pupils, parents, and carers.
- 12.6 If there has been a substantiated allegation against a member of staff, the School will work with the LADO to determine whether there are any improvements to be made to the School's procedures or practice to help prevent similar events in the future.

13. THE SCHOOL'S ARRANGEMENTS TO FULFIL OTHER SAFEGUARDING RESPONSIBILITIES

13.1 Teaching children how to keep safe

- 13.1.1 The governing body ensures that all pupils are taught about safeguarding, including online safety, through the curriculum and PSHE to help children to adjust their

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behaviours, both inside and outside of School, in order to reduce risks and build resilience, including to radicalisation. This includes teaching pupils about the safe use of electronic equipment and the internet and the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults.

- 13.1.2 The School recognises that a 'one size fits all' approach may not be appropriate for all children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed.
- 13.1.3 Internet safety (including when children are online at home) is an integral part of the School's Computing curriculum and is also embedded in PSHE and Relationships Education and Relationships and Sex Education (RSE).

13.2 Filtering and Monitoring

- 13.2.1 The School has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online when using the School's IT system. The School uses Lightspeed Systems technology to filter pupils' internet access and detect and report on signs that a pupil may be at risk. The DSL and Deputy DSL are alerted by the system to potential safeguarding concerns so that these can be managed swiftly. Parents are able to monitor children's ongoing online behaviours through access to the system.

- 13.2.2 Such systems aim to reduce pupil exposure to the following areas of risk:

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; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

conduct: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying, and

commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

- 13.2.3 The School recognises however that children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G) which means that children may consensually and/or non-consensually share indecent images, sexually harass their peers via mobile and smart technology, and view and share pornography and other harmful content whilst at school undetected.
- 13.2.4 The School ensures compliance with the DfE's 'filtering and monitoring standards for schools' by:

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- Identifying and assigning roles and responsibilities to manage filtering and monitoring systems;
- Reviewing the filtering and monitoring provision at least annually;
- Blocking harmful and inappropriate content without unreasonably impacting teaching and learning;
- Having effective monitoring strategies in place that meet our safeguarding needs.

13.2.5 Further detail of the School's policy and procedures in relation to online safety can be found in the School's Online Safety Policy on the School website, which also includes detail on the use of mobile and smart technology in School, including the School's management of the associated risks, and the School's filtering and monitoring arrangements to ensure that children are safe from harmful and inappropriate content, including terrorist and extremist material when accessing the internet through the School's systems. These systems will be reviewed at least annually.

13.2.6 The School will liaise with parents about the importance of children being safe online and about the systems the School uses to filter and monitor online use.

13.3 Relationships Education and Relationships and Sex Education (RSE)

13.3.1 Schools are under a statutory duty to deliver RSE. The School understands that preventative education is most effective in the context of a whole-school approach that prepares children for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment.

13.3.2 The School will have regard to the DfE's statutory guidance *Relationships Education, Relationships and Sex Education (RSE) and Health Education* when making arrangements for and teaching Relationships Education and RSE.

13.3.3 The School's provision for Relationship and Sex Education is contained in its Relationships and Sex Education Policy, which can be found on the School website.

13.4 Looked after children

13.4.1 The governing body ensures that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after by a local authority.

13.4.2 Jo Dobbs is the designated teacher who has responsibility for their welfare and progress. The School ensures that the designated teacher receives appropriate training in order to carry out her role.

13.5 Arrangements for visiting speakers

13.5.1 The School has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. The School's responsibility to pupils is to ensure that they can critically assess the information they receive as to its value to

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themselves, and that the information is aligned to the ethos and values of the School and British values.

- 13.5.2 The School is required to undertake a risk assessment before agreeing to a Visiting Speaker being allowed to attend the School. This will take into account any vetting requirements considered appropriate in the circumstances and may include a DBS check if relevant.
- 13.5.3 Visiting speakers will be expected to understand that, where appropriate and relevant, their session should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. In some cases, the School may request a copy of the Visiting Speaker's presentation and/or footage in advance of the session being provided.
- 13.5.4 Visiting Speakers, whilst on the School site, will be supervised by a School employee. The School shall also keep a formal register of visiting speakers.

13.6 Educational visits

- 13.6.1 The School's additional provisions pertaining to the safeguarding of children on Educational Visits are outlined in the School's Educational Visits Policy.

13.7 Host families – homestay during exchange visits

- 13.7.1 When arranging a homestay during exchange visits, the school will consider the suitability of the adults in the respective families who will be responsible for the visiting child during the stay.
- 13.7.2 Where the School arranges for a visiting child to be provided with care and accommodation in the home of a family to which the child is not related, the responsible adults will be engaging in regulated activity for the period of the stay.
- 13.7.3 The School will make a judgement, based on the evidence at its disposal, as to the suitability of the adults in those families responsible for the visiting child during the stay. To help inform its assessment, the Schools will obtain a DBS enhanced certificate with children's barred list information. This check will not only establish whether the adults are barred from engaging in regulated activity relating to children, but where criminal record information is disclosed it will also allow the School to consider, alongside all other intelligence that it has obtained, whether the adults would be suitable hosts for a child.
- 13.7.4 It is not possible for the School to obtain criminality information from the DBS about adults who provide homestays abroad. The School will liaise with partner schools abroad, to establish a shared understanding of, and agreement to, the arrangements in place for the visit. The School will risk-assess the arrangements to satisfy itself that these are appropriate and sufficient to effectively safeguard every child who will take part in the exchange. Parents should be made aware of the agreed arrangement.

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13. Use of school premises for non-school activities

- 13.8.1 Where the School hires, rents out school or otherwise provides School facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) it should ensure that appropriate arrangements are in place to keep children safe.
- 13.8.2 When services or activities are provided by the School, under the direct supervision or management of its staff, its normal arrangements for safeguarding and child protection will apply.
- 13.8.3 Where services or activities are provided separately by another body, the School will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with the School on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll.
- 13.8.4 The School should also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.
- 13.8.5 The School will ensure that the DSL or DDSL can be contacted and/or is available at all times the school premises is in use, whether that activity is a school or non-school activity and regardless as to whether the children attending are on the school roll. Should an allegation or concern be raised against an adult in relation to an incident that happened when an individual was using the school premises for the purposes of running activities for children and/or vulnerable adults, the School will follow the safeguarding procedures described in this policy, including informing the LADO.

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APPENDIX 1 –SIGNS AND TYPES OF ABUSE

Overview

All School staff should be aware that abuse, neglect, exploitation and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another therefore staff should always be vigilant and always raise any concerns with the DSL.

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between children outside of these environments. All staff, but especially the DSL, should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues and should recognise that children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently online and in daily life. Staff should be aware that children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

Behaviours linked to drug taking, alcohol abuse, truanting and sexting put children in danger. Safeguarding issues can also manifest themselves via child on child abuse, such as abuse within intimate partner relationships, bullying (including cyberbullying), gender-based violence/sexual assaults, sexting and upskirting. Safeguarding issues can also be linked to, for example, children missing education; child sexual exploitation; domestic violence; fabricated or induced illness; faith abuse (including ostracism of families); female genital mutilation; forced marriage; gangs and youth violence; gender-based violence / violence against women and girls; hate; mental health; preventing radicalisation; relationship abuse; sexting; consensual and non-consensual sharing of nudes and semi-nudes; and trafficking.

In all cases, if staff are unsure, they should always speak to the DSL.

Physical abuse

Physical abuse is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm to a child (including through corporal punishment). Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Signs of physical abuse may include:

- pressure marks from fingers

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- bruising in unlikely places
- injuries that form a shape or pattern
- scald marks and burning, including cigarette marks
- broken bones, bite marks
- poisoning or over-medicating
- injuries that are inconsistent with the explanation given
- bruising to babies that are immobile
- flinching when touched
- inability to recall how injuries occurred
- avoiding getting changed for sport or other activities
- wearing trousers and shirts or blouses with long sleeves even on hot sunny days
- reluctance to go home
- excessively eager to please
- being aggressive or withdrawn
- attempts to run away

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Signs of emotional abuse may include:

- self-harm
- delayed development
- avoiding home
- lack of trust in adults
- appearing anxious and/or withdrawn
- difficulty in forming relationships
- inappropriate attention-seeking behaviour
- unexplained underachievement at school
- running away from home or missing from school
- disturbed sleep including bedwetting and nightmares

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. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually

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inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Sexual abuse also includes sexual violence and sexual harassment (see below) which can occur between two children of any sex (also known as child on child abuse). This can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence involves sexual offences under the Sexual Offences Act 2003, such as rape, sexual assault, and assault by penetration. Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.

Signs of sexual abuse may include:

- a change in behaviour; a child may start to become withdrawn, become aggressive or have difficulty in sleeping
- sexual knowledge, language, and behaviours beyond their age
- self-harming
- fear or avoidance of being with a person or a group of people
- being withdrawn
- unexplained amounts of money
- disturbed sleep
- sexualised drawings
- physical problems such as soreness in the genital area, or sexually transmitted infections
- issues at school, such as difficulty in learning and concentrating

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 care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Signs of physical abuse may include:

- untreated medical conditions
- unkempt appearance and poor personal hygiene
- inadequate clothing
- untreated skin or hair problems (rashes, sores, flea bites, head lice)
- constantly hungry
- demanding constant attention and affection
- changes in behaviour such as becoming withdrawn, anxious and/or aggressive
- missing or irregularly attending school
- low self-esteem
- developmental delay

Sexual harassment

Sexual harassment is unwanted conduct of a sexual nature that can occur online and offline and both inside and outside of school. Sexual harassment

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is likely to violate a child's dignity, and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; sexual 'jokes' or taunting; physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes; or upskirting, and sharing of unwanted explicit content (for example displaying pictures, photos or drawings of a sexual nature); and online sexual harassment, which might include consensual or non-consensual sharing of sexual images and videos (often referred to as the sharing of nudes/semi-nudes, or sexting – see below); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

Sexual violence

Sexual violence refers to sexual offences under the Sexual Offences Act 2003, including rape, assault by penetration, sexual assault, and/or causing someone to engage in sexual activity without consent. Consent to sexual activity may be given to one sort of sexual activity, but not another, or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. A child under the age of 13 can never consent to any sexual activity. The age of consent is 16, and sexual intercourse without consent is rape.

Child on child sexual violence / harassment

Sexual violence and sexual harassment (as defined above) can occur between two children of any age and sex, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It is more likely that girls will be the victims of sexual violence and harassment, and it is more likely that it will be perpetrated by boys. It can however occur between children of any sex. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. Children who are victims of sexual violence and/or sexual harassment wherever it happens, will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college.

Harmful sexual behaviour

Harmful sexual behaviour is problematic, abusive and violent sexual behaviour which is developmentally inappropriate and may cause developmental damage. Harmful sexual behaviour can occur online and/or face-to-face. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' age difference, or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

Sharing nudes / semi-nudes

Sharing of nudes and/or semi-nudes is the sending or posting of nude or semi-nude images, videos, or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The sharing of nudes and semi-nudes

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can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts and may include images or footage of more than one child or young person.

Alternative terms used by children and young people may include 'dick pics' or 'pics' or may be referred to by adults or professionals as 'youth produced/involved sexual imagery', 'indecent imagery', 'image based sexual abuse' or 'sexting'.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- children and young people find nudes and semi-nudes online and share them claiming to be from a peer;
- children and young people digitally manipulate an image of a young person into an existing nude online;
- images created or shared are used to abuse peers e.g. by selling images online or obtaining images to share more widely without consent to publicly shame.

For this reason, incidents can either be classified as 'aggravated' or 'experimental'.

The DDCMS / UKIS guidance '*Sharing nudes and semi-nudes: advice for education settings working with children and young people*' sets out the classification of incidents, and how each should be handled.

Upskirting

Upskirting is a criminal offence and typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any sex can be a victim.

Serious violent crime

Indicators which may signal that children are at risk from, or are involved with serious violent crime include increased absence from School, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. All staff should be aware of the associated risks which increase the likelihood of involvement in serious violence (for example, being male, frequent absence from school or permanently excluded from school, experienced child maltreatment or having been involved in offending) and understand the measures in place to manage these.

Child Sexual Exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse (see above) which occurs where an individual or group takes advantage of an imbalance

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of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years (including 16 and 17 year olds who can legally consent to have sex) who has been coerced into engaging in sexual activities. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media). Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

The below CCE indicators can also be indicators of CSE, as can:

- children who have older boyfriends or girlfriends, and
- children who suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

The DfE has published guidance on this entitled '*Child sexual exploitation: guide for practitioners*'.

CSE may occur alone, or may overlap with CCE, and/or county lines, as well as other forms of abuse.

Child Criminal Exploitation

Child criminal exploitation (CCE) is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or (b) for the financial or other advantage (such as increased status) of the perpetrator or facilitator and/or (c) through violence or the threat of violence. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see below), forced to shoplift or pickpocket. They can also be forced or

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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 can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, their vulnerability as victims is not always recognised by adults and professionals (especially when they are older children). It is important in these circumstances that the child perpetrator is also recognised as a victim.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts, money, or new possessions;
- children who associate with other children involved in exploitation;
- children who suffer from changes in emotional wellbeing;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

The experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however staff 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.

CCE may occur alone, or may overlap with CSE, and/or county lines, as well as other forms of abuse.

Children who have been exploited will need additional support to help maintain them in education.

County lines County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs, using dedicated mobile phone lines or other form of “deal line”.

This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults exploited to sell drugs and move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children’s homes and care homes. Children are increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap

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towards victims (and their families) if they attempt to leave the county lines network.

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

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

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office.

Modern Slavery

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the National Referral Mechanism is available in the statutory guidance '*Modern slavery: how to identify and support victims (May 2022)*'.

Cybercrime

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

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

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

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If there are concerns about a child in this area, the DSL should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre - NCSC.gov.uk.

Mental health All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse, neglect or exploitation, or potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour, and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this policy, and speaking to the DSL.

The DfE has published advice and guidance on *Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools*. In addition, Public Health England has produced a range of resources to support secondary and senior school teachers to promote positive health, wellbeing and resilience among young people including its guidance *Promoting Children and Young People's Emotional Health and Wellbeing*. Its resources include social media, forming positive relationships, smoking and alcohol.

So-called 'honour-based' abuse So-called 'honour based' abuse encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing.

Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

FGM Female genital mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the

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female genital organs. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can also be found on pages 38-41 of the Multi-agency statutory guidance on FGM. Where a girl has already been subjected to FGM, she may:

- have difficulty walking, sitting, or standing and may even look uncomfortable;
- have frequent urinary, menstrual or stomach problems or spend longer than normal in the bathroom due to difficulties urinating;
- have prolonged or repeated absences from School and/or noticeable behaviour changes (e.g. withdrawal or depression) on her return;
- be reluctant to undergo medical examination.

If staff have a concern that a pupil may be at risk of FGM, they should speak to the DSL who will (where appropriate) activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and Children's Social Care.

There is a statutory duty on teachers to personally report to the police (by dialling 101) where they discover that FGM appears to have been carried out on a girl under 18. Unless the teacher has a good reason not to, they should still discuss any such case with the DSL and children's social care should be involved where appropriate. If the teacher is unsure whether this reporting duty applies, they should discuss their concerns with the DSL.

Where a teacher suspects that a pupil is at risk (i.e. where the teacher does not discover that an act of FGM appears to have already been carried out), they should follow the School's safeguarding procedures. The police should be contacted by dialling 999, where there may be an immediate risk of harm to the child.

Further information can be found in the *Multi-agency statutory guidance on female genital mutilation and the FGM resource pack*, particularly section 13.

Forced marriage and child marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage. There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found on pages 13-14 of the *Multi-agency guidelines: Handling cases of forced marriage*. Further information on forced marriage is available in guidance published by the Forced Marriage Unit. School staff can also contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fm@fco.gov.uk.

In February 2023, the minimum legal age for marriage was raised from 16 to 18 years old. It is now an offence to carry out any conduct whose purpose

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is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. The offence includes marriage *in non-legally binding ceremonies* ('traditional' ceremonies which would still be viewed as marriages by the parties and their families).

Radicalisation Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism.

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

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

Extremism involves vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs. 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.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's susceptibility. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home). As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include making a Prevent referral. DSLs and other senior leaders in colleges should familiar themselves with the Prevent duty guidance: for further education institutions in England and Wales. Staff should contact the DSL who should be aware of the local procedures in place, before making a Prevent referral.

In the event of a child leaving, the DSL should consider if it would be appropriate to share any information with the new school or college. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives at the new school.

SEND Pupils with SEND or certain health conditions can face additional safeguarding challenges. These children may not outwardly show signs of abuse and/or may have difficulties in communication about abuse or neglect, or bullying.

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These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- the potential for children with SEND or certain health conditions being disproportionately impacted by behaviours such as peer group isolation or bullying (including prejudice-based bullying), without outwardly showing any signs;
- communication barriers and difficulties in managing or reporting these challenges;
- being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in School or the consequences of doing so.

Staff will support such pupils in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL as appropriate.

Lesbian, gay, bisexual or gender questioning

A child being lesbian, gay, bisexual or gender questioning is not in itself an inherent risk factor for harm. However, they can sometimes be targeted by other children. In some cases, a pupil who is perceived by other children to be lesbian, gay or bisexual (whether they are or not) can be just as vulnerable as children who are.

When supporting a gender questioning child, the school will take a cautious approach and consider the broad range of the pupil's individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. The School will adopt (to the extent that it is reflected in KCSIE), the draft DfE guidance for schools and colleges in relation to Gender Questioning Children, when deciding how to proceed.

Risks can be compounded where children lack trusted adults with whom they can be open. The School endeavours to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff.

Domestic Abuse

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces 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. 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. The definition captures a range of different abusive behaviours, including but not limited to, psychological, sexual, physical, emotional, and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16

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or over and they must be “personally connected” (as defined in section 2 of the 2021 Act).

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

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio- economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

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

Domestic Abuse may lead to other safeguarding concerns and should therefore be managed under this policy.

School staff can contact Operation Encompass on 0204 513 9990 (8 am to 1pm, Monday to Friday) for advice in respect of children who have experienced domestic abuse.

Homelessness Being homeless, or at risk of homelessness presents a real risk to a child's welfare. The School should be aware of potential indicators of homelessness including household debt, rent arrears, domestic abuse, and anti-social behaviour, as well as a family being asked to leave a property. If staff are made aware or suspect that a pupil may be at risk of homelessness they should talk to the DSL in the first instance. Whilst referrals to the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not and should not replace a referral to external agencies where a child has been harmed or is at risk of harm, in accordance with this policy.

Children who are absent from education, and children missing Children being absent from school, particularly repeatedly and/or for prolonged periods, and children missing education, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse, neglect and exploitation such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk

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education (CME) of travelling to conflict zones, risk of female genital mutilation, so-called 'honour'-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future.

Staff must follow the School's procedures for dealing with children who are absent, particularly repeatedly and/or for long periods, or who go missing, particularly persistently. The School's procedure for dealing with children who go missing (CME) can be found above. All unexplained absences will be followed up in accordance with this policy.

Action should be taken in accordance with this policy if any absence of a pupil from the School gives rise to a concern about their welfare. The School's policy supports identification of abuse and provides preventative measures against the risk of the child being absent from school or going missing in the future. This applies when issues are first emerging as well as where children are already known to the local authority children's social care and need a social worker.

Child abduction and community safety

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

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

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org.

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11 year olds and 12-17 year olds available on the gov.uk website.

The guides explain each step of the process and the support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. The School may refer some parents and carers to this service where appropriate.

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Children with family members in prison Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation, and poor mental health. The National Information Centre on Children of Offenders (NICCO) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

APPENDIX 2: SAFEGUARDING AND CHILD PROTECTION FLOWCHART

