

**REBUILDING CONFIDENCE
REIMAGINING EDUCATION RESTORING FUTURES
IMAGINE
“A BRIGHTER FUTURE”**



Child Protection and Safeguarding Policy

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This policy is written to comply with Keeping Children Safe in Education 2025, the Independent School Standards 2014, and the OFSTED framework.

Key Contacts

Role	Name	Contact Information
Designated Safeguarding Lead		
Deputy Designated Safeguarding Lead		
Designated Teacher		
Proprietor		
Local Support	Bury Multi-Agency Safeguarding Hub (MASH / EHASH)	0161 253 5678 childwellbeing@bury.gov.uk
	Children's Social Care – advice/referral (MASH / EHASH)	0161 253 5678 (office hours) 0161 253 6606 (out of hours)
	Emergency Duty Team (Out of Hours)	0161 253 6606
	Early Help / Locality Teams	0161 253 5200 earlyhelp@bury.gov.uk
	Local Authority Designated Officer (LADO) – Mark Gay	0161 253 5342 m.gay@bury.gov.uk
	Bury Safeguarding Partnership	0161 253 6153 BSP@bury.gov.uk
	Greater Manchester Police	101 (non-emergency) 999 (emergency)

Introduction and Ethos

Imagine Wellbeing recognises its statutory responsibility to safeguard and promote the welfare of all children. This is a core policy that forms part of the induction for all staff. All members of staff must have access to the policy and be able to demonstrate that they have read and understand their safeguarding responsibilities.

This policy is implemented in accordance with our compliance with the statutory guidance from the Department for Education, 'Keeping Children Safe in Education' (KCSIE 2025) and Working Together to Safeguard Children (2023), which require individual schools and colleges to have an effective child protection policy. We comply with this guidance and the arrangements agreed and published by our local safeguarding partners.

The procedures contained in this policy apply to all staff, including proprietors, senior leaders, and temporary or third-party agency staff, and are consistent with those outlined in KCSIE 2025.

Safeguarding is everybody's responsibility, and all those directly connected (staff, managers, leaders, parents, families, and pupils) are vital to the wider safeguarding system for children and play an essential role in making this community safe and secure. Imagine Wellbeing believes that the best interests of children always come first. All children (defined as those up to the age of 18) have a right to be heard and to have their wishes and feelings considered.

Staff working with children at Imagine Wellbeing will maintain an attitude of '**it could happen here**' regarding safeguarding. When concerned about a child's welfare, staff will always act in the child's best interests. If any member of our community has concerns about a child, they should act **immediately**.

No single practitioner can have a complete picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action. Through our day-to-day contact with pupils and direct work with families, staff notice possible indicators of abuse or neglect and consult with Children's Services in Bury (or in neighbouring authorities, depending on the child's area of residence). We recognise that we form part of the wider safeguarding system for children. This responsibility also means we are aware of the school staff's behaviour in safeguarding matters.

Imagine Wellbeing recognises the importance of providing an ethos and environment that will help children to be safe and feel safe. Children are respected and encouraged to talk openly, knowing that their voices will be heard.

Imagine Wellbeing will endeavour to support the welfare and safety of all students in the following ways:

- Ensuring that the child's welfare is of paramount importance, regardless of age, gender, ability, culture, race, language, religion or sexual identity, is treated equally and have equal rights to protection
- All staff are trained and can recognise the signs and symptoms of abuse and are aware of the school's procedures and lines of communication
- All staff act on concerns or disclosures that may suggest a child is at risk of harm
- Ensuring that children's mental and physical health or development does not impair their ability to be safe
- All staff are aware of Early Help and ensure that relevant referrals, assessments, and interventions take place
- Providing children with a balanced curriculum including PSHE (Personal, Social and Health Education); RSE (relationships and sex education) to help students stay safe, recognise when they don't feel safe and identify who they might / can talk to
- Work with parents to ensure that parents understand the school's responsibility to ensure the welfare of all children, including the need for referral to other agencies in some situations
- Keep confidential records which are stored securely and shared appropriately with other professionals
- The voice of the child is evident in case files and informs the school's policy developments

- Staff adhere to a Code of Conduct and understand what to do in the event of any allegations against any adult working in the setting
- Staff have received advice, support and training regarding adverse childhood experiences and trauma-informed practice through training
- Ensuring that the school practices safer recruitment processes in checking the suitability of staff, supply staff, volunteers, visitors/contractors, and parents about expected behaviour and our legal responsibility to safeguard and promote the welfare of all our children at our school

The policy is provided to all staff (including temporary staff and volunteers) at induction. The safeguarding induction will cover online safety, including expectations, applicable roles and responsibilities in relation to filtering and monitoring, and will explain the role of the Designated Safeguarding Lead (DSL). At induction, staff will be provided with the behaviour policy, anti-bullying policy, safeguarding response for those children who go missing from education and the staff code of conduct (including whistleblowing and social media).

In addition, all staff are provided with at least Part One of Keeping Children Safe in Education 2025 and Annexe B, and are required to sign to confirm that they have read and understood them. Annexe B contains additional information about specific abuse and safeguarding issues.

At Imagine Wellbeing, we recognise our responsibility under Section 175 of the Education and Inspections Act 2002 to have arrangements for safeguarding and promoting the welfare of children. The school's proprietors approve the S175/157 return to the Bury Safeguarding Children's Partnership annually.

Policy Context, Legislation and Statutory Guidance

DfE Keeping Children Safe in Education – September 2025 (KCSIE) [Keeping children safe in education 2025](#)

Working Together to Safeguard Children 2023 (WTSC)

https://assets.publishing.service.gov.uk/media/669e7501ab418ab055592a7b/Working_together_to_safeguard_children_2023.pdf

This policy has been developed in accordance with the principles established by the **Children Act 1989** and related guidance. This includes but is not limited to: <https://www.legislation.gov.uk/ukpga/1989/41/contents>

Section 5B (11) of the **Female Genital Mutilation Act 2003**, as inserted by section 74 of the **Serious Crime Act 2015**, which places a statutory duty on teachers to report to the Police where they discover that female genital (FGM) appears to have been carried out on a girl under 18. [Statutory Guidance on FGM](#), which sets out responsibilities with regard to safeguarding and supporting girls affected by FGM

<https://www.legislation.gov.uk/ukpga/2003/31/contents> <https://www.legislation.gov.uk/ukpga/2015/9/contents>

The Rehabilitation of Offenders Act 1974, which outlines when people with criminal offences can work with children <https://www.legislation.gov.uk/ukpga/1974/53>

Section 4 of the **Safeguarding Vulnerable Groups Act 2006**, which defines what 'regulated activity' is in relation to children <https://www.legislation.gov.uk/ukpga/2006/47/contents>

Statutory Guidance on The Prevent Duty, which explains schools' duties under the **Counter-Terrorism and Security Act 2015** with respect to protecting people from the risk of radicalisation and extremism <https://www.legislation.gov.uk/ukpga/2015/6/contents>

The Human Rights Act 1998, which explains that being subject to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR) <https://www.legislation.gov.uk/ukpga/1998/42/contents>

The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our SLT and Designated Teacher should carefully consider how they support our pupils in relation to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it is proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking action to support girls where there is evidence that they are being disproportionately subjected to sexual violence or harassment. <https://www.legislation.gov.uk/ukpga/2010/15/contents>

The Public Sector Equality Duty (PSED) requires us to have due regard to eliminating unlawful discrimination, harassment, and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, bi-phobic or transphobic bullying; or racial discrimination. <https://www.equalityhumanrights.com/guidance/public-sector-equality-duty-pсед>

Ofsted: **Education Inspection Framework** - Framework for the assessment of children in need and their families
[Education inspection framework: for use from November 2025 - GOV.UK](#)

Behaviour in Schools – Advice for Headteachers and school staff

https://assets.publishing.service.gov.uk/media/65ce3721e1bdec001a3221fe/Behaviour_in_schools_-_advice_for_headteachers_and_school_staff_Feb_2024.pdf

Promoting and supporting mental health and wellbeing in schools and colleges

<https://www.gov.uk/guidance/mental-health-and-wellbeing-support-in-schools-and-colleges>

Relationships Education, Relationships and Sex Education (RSE) and Health Education

https://assets.publishing.service.gov.uk/media/62cea352e90e071e789ea9bf/Relationships_Education_RSE_and_Health_Education.pdf

Bury Safeguarding Partnership – Children Bury Council safeguarding children information: [Education Safeguarding - Bury Council](#)

Bury Safeguarding Partnership – Allegations Management (LADO) Bury Council safeguarding children information: [lado-referral-form-dec-2023.docx](#)

The Education Act 2002 <https://www.legislation.gov.uk/ukpga/2002/32/contents>

Section 175 of the Education Act 2002 requires schools, local education authorities and further education institutions to make arrangements to safeguard and promote the welfare of all children who are pupils at a school or students under 18 years of age. Such arrangements must take into account any guidance issued by the Secretary of State.

The Education (Independent School Standards) Regulations (2014) <https://www.legislation.gov.uk/uksi/2014/3283>

The Non-Maintained Special Schools (England) Regulations 2015 <https://www.legislation.gov.uk/uksi/2015/728/contents/made>

Data Protection Act 2018 <https://www.legislation.gov.uk/ukpga/2018/12/contents/enacted>

UK Council for Internet Safety Guidance – Sharing nudes and semi-nudes: how to respond to an incident

<https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-how-to-respond-to-an-incident-overview>

Education for a Connected World

https://assets.publishing.service.gov.uk/media/5efa05b4e90e075c5492d58c/UKCIS_Education_for_a_Connected_World_.pdf

Aims of this Document

- To provide staff with the framework to safeguard and promote the welfare of children and, in doing so, ensure they meet their statutory responsibilities
- To ensure consistent good practice across the school
- To demonstrate our commitment to protecting children
- To raise the awareness of all staff of the need to safeguard all children and of their responsibilities in identifying and reporting possible cases of abuse
- To emphasise the need for good communication between all members of staff in matters relating to child protection
- To promote safe practice and encourage challenge for poor and unsafe practice
- To promote effective working relationships with other agencies involved with Safeguarding and promoting the welfare of children, especially with Children’s Social Care and the Police
- To ensure that all members of the school community are aware of our procedures for ensuring staff suitability to work with children
- To ensure that staff understand their responsibility to support children who have suffered abuse in accordance with their agreed plan, e.g. extra / targeted help, child in need/ child protection plan

Scope of this Policy

This policy applies to all members of the school community (including staff, pupils, volunteers, supply teachers, parents/carers, visitors, agency staff, and anyone working on behalf of Imagine Wellbeing).

This policy is consistent with Bury Safeguarding Children's Partnership child protection procedures.

Definition of Safeguarding and Related Terms

In line with KCSIE 2025, and the Working Together to Safeguard Children 2023 guidance –

Safeguarding and promoting the welfare of children is defined for the purposes of this policy as:

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

Child Protection is part of this definition and refers to activities undertaken to prevent children from suffering, or being at risk of suffering, significant harm.

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. Harm can include non-physical ill-treatment and the impact of witnessing others' ill-treatment. This can be particularly relevant, for example, in relation to the effects on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or by another child or children.

Staff refers to all those working for or on behalf of the school/education setting in either a paid or voluntary capacity, full-time or part-time. This also includes parent volunteers and Proprietors.

Child refers to all children who have not yet reached 18 years of age. On the whole, this will apply to pupils from our own school; however, the policy will extend to children visiting from other establishments.

Parent refers to birth parents and other adults who are in a parenting role, e.g. carers, stepparents, foster parents, and adoptive parents.

The following **three safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by Chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The Local Authority
- An integrated care board for an area within the LA
- The chief officer of police for a police area in the LA area

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

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

Early Help is defined as support for children of all ages that improves a family's resilience and outcomes, or reduces the likelihood that a problem will get worse.

Any child may benefit from early help, but all school and college 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
- is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care,
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child

Types of Abuse and Indicators

Sexual Abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.

The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include noncontact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).

Adult males do not solely perpetrate sexual abuse. Women can also commit acts of sexual abuse, as can other children.

Signs that may Indicate Sexual Abuse

- Sudden changes in behaviour and performance
- Displays of affection which are sexual and age-inappropriate
- Self-harm, self-mutilation or attempts at suicide
- Alluding to secrets which they cannot reveal
- Tendency to cling or need constant reassurance
- Regression to younger behaviour, for example, thumb sucking, playing with discarded toys, acting like a baby
- Distrust of familiar adults, e.g., anxiety of being left with relatives, a childminder or lodger
- Unexplained gifts or money
- Depression and withdrawal
- Fear of undressing for PE
- Sexually transmitted disease
- Fire setting

Physical Abuse

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

Signs that may Indicate Physical Abuse

- Bruises and abrasions around the face
- Damage or injury around the mouth
- Bilateral injuries such as two bruised eyes
- Bruising to the soft area of the face, such as the cheeks
- Fingertip bruising to the front or back of the torso

- Bite marks
- Burns or scalds (unusual patterns and spread of injuries)
- Deep contact burns, such as cigarette burns
- Injuries suggesting beatings (strap marks, welts)
- Covering arms and legs even when hot
- Aggressive behaviour or severe temper outbursts
- Injuries need to be accounted for. Inadequate, inconsistent, or overly plausible explanations, or a delay in seeking treatment, should signal concern.

Emotional Abuse

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet another person's needs.

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 beyond a child's developmental capabilities, as well as overprotection that limits exploration and learning or prevents the child from participating in everyday social interaction.

It may involve seeing or hearing the ill-treatment of another. It may involve severe bullying (including cyberbullying), causing children to feel frightened or in danger frequently, 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 that may Indicate Emotional Abuse

- Overreaction to mistakes
- Lack of self-confidence/esteem
- Sudden speech disorders
- Self-harming
- Eating disorders
- Extremes of passivity and/or aggression
- Compulsive stealing
- Drug, alcohol, solvent abuse
- Fear of parents being contacted
- Unwillingness or inability to play
- Excessive need for approval, attention, and affection

Neglect

The persistent failure to meet a child's basic physical and/or psychological needs is likely to result in the severe impairment of the child's health or development.

Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing, and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or provide access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Signs that may Indicate Neglect

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Inadequate clothing
- Frequent lateness or non-attendance
- Untreated medical problems
- Poor relationship with peers
- Compulsive stealing and scavenging
- Rocking, hair twisting and thumb sucking
- Running away
- Loss of weight or being constantly underweight
- Low self-esteem

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, unexplained and/or persistent absences from education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk. Below are some safeguarding issues and terms all staff should be aware of.

Imagine Wellbeing acknowledges that safeguarding includes a wide range of specific issues, including (but not limited to):

- Abuse and neglect
- Bullying, including cyberbullying
- Children with family members in prison
- Children absent from education
- Children missing education (CME)
- Child missing from home or care
- Child sexual exploitation (CSE)
- Child criminal exploitation (CCE)
- Contextual safeguarding (risks outside the family home)
- Online
- County lines and gangs
- Domestic abuse
- Drugs and alcohol misuse
- Fabricated or induced illness
- Faith abuse
- Gender based abuse and violence against women and girls
- Hate
- Homelessness
- Human trafficking and modern slavery
- Mental health
- Nude or semi-nude image sharing, aka youth-produced/involved sexual imagery or “sexting”
- Online safety
- Child on child abuse
- Radicalisation and extremism
- Private fostering
- Relationship abuse
- Serious violence
- Sexual violence and sexual harassment
- So-called honour-based abuse, including female genital mutilation (FGM) and forced marriage
- Upskirting – Imagine Wellbeing acknowledges this is now a criminal offence. This offence comes under the Voyeurism (Offences) Act 2019. Anyone, regardless of gender, can be a victim. (Also see Part 1 and Annexe B within ‘Keeping Children Safe in Education’ September 2025)

Relating Safeguarding Policies

This policy is actioned in conjunction with the policies as listed below:

- Behaviour Policy
- Suspension and Exclusion Policy
- Online safety
- Anti-bullying
- Data protection and GDPR
- Relationship and sex education (RSE)
- Health and safety
- Attendance
- Risk assessments (e.g., school trips, use of technology)
- First aid and accidents
- Managing allegations against staff
- Safer recruitment
- Whistleblowing

Key Responsibilities

Safeguarding and Child Protection is everyone’s responsibility. This policy applies to all managers, staff, volunteers, and those with governance responsibilities (proprietors) in the school and is consistent with the procedures of the three safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing students for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment.

The proprietor and leadership team have a strategic responsibility for our safeguarding arrangements and will comply with their duties under legislation. This also includes:

- Making sure that the school has appropriate filtering and monitoring systems in place and reviewing their effectiveness
- Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers about what needs to be done to support the school to meet these standards - making sure the DSL takes lead responsibility for understanding the filtering and monitoring systems in place as part of their role
- Making sure that all staff undergo safeguarding and child protection training, including online safety and that such training is regularly updated and is in line with advice from the safeguarding partners

Ensure staff understand their expectations, roles, and responsibilities regarding filtering and monitoring as part of safeguarding training.

The senior leadership team will ensure that the DSL is supported in their role and provided with sufficient time to appropriately support staff and children with any safeguarding and welfare concerns.

The Headteacher will ensure that our child protection and safeguarding policies and procedures are understood and followed by all staff.

Staff and proprietors should use the DfE's data protection guidance for schools to help them:

- Comply with data protection law
- Develop data policies and processes
- Know what staff and pupil data to keep
- Follow good practices for preventing personal data breaches

The Proprietors

- Will ensure that arrangements are made to safeguard and promote the welfare of pupils at the school, and any arrangements made have regard to any up-to-date guidance issued by the Secretary of State.
- Will approve the safeguarding policy at least annually, to ensure that it is entirely up to date, it complies with the law, and the proprietor will hold the headteacher, designated safeguarding lead (DSL), deputy designated safeguarding lead DDSL and all staff to account for its implementation.
- Will nominate a proprietor responsible for safeguarding and championing good practice, liaising with the headteacher regularly to ensure that the policy is implemented fully.
- Will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher
- Are aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and the school's multi-agency safeguarding arrangements
- Will ensure that the safeguarding policy contains appropriate contacts for external referrals
- Will ensure safer recruitment procedures are outlined within the policy and that these are adhered to
- Will ensure that the policy includes measures for internet safety, including a description of the use of filters and monitoring usage

Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Lead (DDSL)

Imagine Wellbeing has appointed a Designated Safeguarding Lead (DSL) and a Deputy Designated Safeguarding Lead (DDSL) from the leadership team in accordance with KCSIE September 2025 guidance. The DSL is responsible for matters relating to child protection and welfare.

DSL – _____ Email: _____

There will always be cover for this role. In the event that the Designated Safeguarding Lead is unavailable, the Deputy Designated Safeguarding Lead will provide cover.

In their absence, these matters will be dealt with by

DDSL – _____ Email: _____

We acknowledge the need for effective and appropriate communication between all staff members regarding safeguarding pupils. The Designated Safeguarding Lead will ensure a structured procedure is in place within the school to be followed in cases of suspected abuse.

The Designated Safeguarding Lead and the Deputy Designated Safeguarding Leads are responsible for the following:

Referrals

- Referring cases of suspected abuse or allegations to the relevant investigating agencies
- Acting as a source of support, advice and expertise within the school when deciding on the most appropriate course of action by liaising with relevant agencies
- Escalate inter-agency concerns and disagreements about a child's well-being
- Have a responsibility to ensure there is at least one key adult for 'Operation Encompass' and the point of contact for Child Exploitation
- Liaising with the headteacher (where the headteacher does not carry out the designated safeguarding lead role) to inform them of any issues and ongoing investigations. The designated safeguarding lead will ensure there is always cover for this role on the school site in the event of their absence
- Ensuring that a systematic means of monitoring children known or thought to be at risk of harm is in place and that the school contributes to assessments of need and actively supports multi-agency planning for those children
- To help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school and college leadership staff. Their role could include ensuring that the school and their staff know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to support these children best

Following any information raising concerns, the DSL will consider the following:

- any urgent medical needs of the child
- the immediate safety and well-being of the child
- discussing the matter with other agencies currently known to be involved with the child and family
- children's wishes and

feelings. Then decide:

- wherever possible, talk to parents, unless doing so may place a child at risk of significant harm, impede any police investigation and/or place the member of staff or others at risk
- whether to make a child protection referral because a child is suffering or is likely to suffer significant harm, and if this needs to be undertaken immediately
 - OR
- not to make a referral at this stage
- if further monitoring is necessary
- Would it be appropriate to invite the parent or carer to engage with a Team Around the Family assessment and/or make a referral for other services?

All information and actions taken, including the reasons for any decisions made, will be fully documented in the child's safeguarding file.

The DSL is not responsible for handling allegations against staff members. This is the responsibility of the headteacher, who will inform the Local Authority Designated Officer (LADO).

Low-level concerns reported to the headteacher should be shared with the safeguarding lead if they are deemed not to meet the LADO threshold of harm. The DSL should then keep a record of these concerns to identify a pattern of behaviour; these concerns should not be contained in the employee's file (see the separate policy on managing allegations against adults).

Raising Awareness

- Working with the proprietor of the school to ensure that the school's safeguarding policy is updated and reviewed annually
- Ensuring that to avoid conflict and mistrust, parents are aware that referrals may be made and of the role of the school in this process
- Ensuring that when children leave the school, their safeguarding/child protection file is discussed as soon

- as possible with the DSL at the new school
- Make sure the safeguarding/child protection file is transferred separately from the main pupil file within 5 days of transfer. It should be posted, recorded delivery to the DSL at the new school, sent electronically via CPOMs or delivered directly by hand and a signature received
- Where the new school is not known, alert the Education Welfare Service at Bury LA so that the child's name can be included on the database for missing pupils and appropriate action taken to ascertain the safety of the child
- Cascading safeguarding advice and guidance issued by the Safeguarding Children Partnership, and government guidance and legislation

The DSL and DDSL will ensure all staff and all proprietors have undertaken appropriate safeguarding training and work in line with school policy and KCSIE 2025 and WTSC 2023

Inter-agency Working and Information Sharing:

- Co-operate and comply with children's social care for enquiries under section 47 of the Children Act 1989.
- Advocate that the Data Protection Act 2018 and GDPR do not prevent or limit the sharing of information to keep children safe, including allowing practitioners to share information without consent (see KCSIE 2025).
- Complete reports and attend, or ensure other relevant staff members attend, child protection conferences, core group meetings and other multi-agency meetings, as required.
- Liaise with other agencies working with the child, share information as appropriate and contribute to assessments.

Training:

Undertake appropriate annual training (updated every two years for DSL and DDSL) to:

- be able to recognise signs of abuse and how to respond to them, including exceptional circumstances such as child sexual exploitation, female genital mutilation, fabricated or induced illness
- understand the assessment process for providing early help and intervention
- have a working knowledge of how the local authority conducts initial and review child protection (CP) case conferences and contribute effectively to these; and
- be alert to the specific needs of children in need (as specified in section 17 of the Children Act 1989), those with special educational needs, pregnant teenagers, young carers, those who are privately fostered, vulnerable to exploitation, racialisation and subject to listening or hearing to [domestic abuse](#).
- Ensure each member of staff has read and understood the school's child protection and safeguarding policy and procedures, including providing new staff members with induction on these matters. Induction and training must also include the school's behaviour policy and procedures for managing children who are [missing education](#), the staff code of conduct, and the child protection policy, dealing with disclosures, and managing allegations processes
- Organise face-to-face whole-school safeguarding training for all staff members at least every three years. Ensure staff members who miss the training receive it by other means, e.g., joining another school's training. The DSL must provide all staff members with safeguarding updates (for example, via email, e-bulletins and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively
- All staff should be aware of systems within their school that support safeguarding, which should be explained to them as part of staff induction. This should include the following:
 - Child protection - safeguarding policy
 - Behaviour policy
 - Staff code of conduct
 - Safeguarding response to children who go missing from education; and
 - role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies)
 - Ensure the school allocates time and resources yearly for relevant staff members to attend training and receive continuous professional development opportunities
 - Encourage a culture of listening to children and taking account of their wishes and feelings in any action the school takes to protect them
 - Maintain accurate records of staff recruitment, induction, ongoing training and continual professional development (CPD) concerning safeguarding

Designated Teacher

The Designated Teacher will work with the DSL to promote the best interests of looked-after and previously looked-after children, including sharing concerns where necessary.

The Designated Teacher will work in line with statutory safeguarding guidance (e.g., KCSIE 2025, Prevent Duty) and our safeguarding and child protection policies.

Designated Teacher – _____ Email: _____

The Headteacher

The headteacher (who may also be the DSL) is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers:
 - Are informed of our systems which support safeguarding, including this policy, as part of their induction
 - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers when their child joins the school and via the school website
- Ensuring that the DSLs and DDSLs have appropriate time, funding, training, and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training, including online safety, and updating the content of the training regularly
- Acting as the case manager in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate

Members of Staff

All staff will:

- Read and understand Part 1 and Annexe B of the Department for Education's statutory safeguarding
- Guidance, Keeping Children Safe in Education 2024 and review this guidance at least annually
- Sign a declaration at the beginning of each academic year to say that they have reviewed this guidance
- Be aware of online safety, which includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring
- Reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g., sites they need to visit or who they will be interacting with online)
- Provide a safe space for students who are lesbian, gay, bisexual or gender questioning to speak out and share their concerns
- Ensure that, if the DSL and DDSL are not present for whatever reason, they speak to a member of the SLT and/or take advice from the local authority children's social care if they have any concerns about a child

All members of staff have a responsibility to:

- Provide a safe environment in which children can learn
- Be aware of the indicators of abuse and neglect so that they can identify cases of children who may need help or protection.
- Know what to do if a child tells them that they are being abused or neglected, and understand the impact abuse and neglect can have upon a child
- Be able to identify and act upon indicators that children are, or are at risk of developing, mental health issues
- Be prepared to identify children who may benefit from early help
- Understand the early help process and their role in it
- Understand the school safeguarding policies and systems
- Undertake regular and appropriate training which is regularly updated. Training includes all areas listed in appendices 1 – 8
- Be aware of the local process of making referrals to children's social care and statutory assessment under the Children Act 1989
- Know how to maintain an appropriate level of confidentiality
- Reassure children who report concerns that they are being taken seriously and that they will be supported and kept safe

All staff will be aware of:

- Our systems, which support safeguarding, including the child protection and safeguarding policy, the staff code of conduct, the role and identity of the DSL and Deputies, the behaviour policy, the online safety policy, and the safeguarding response to children who are absent from / go missing from education
- The Early Help assessment process (sometimes known as the common assessment framework) and its role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do when they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific topics such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning can be targeted by other children
- What to look for to identify children who need help or protection

Children and Young People

Children and young people (pupils) have a right to

- Feel safe, be listened to, and have their wishes and feelings considered
- Confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback
- Contribute to the development of school safeguarding policies
- Receive help from a trusted adult
- Learn how to keep themselves safe, including online

Parents and Carers

Parents/carers have a responsibility to:

- Understand and adhere to the relevant Imagine Wellbeing policies and procedures
- Talk to their children about safeguarding issues and support Imagine Wellbeing in their safeguarding approaches
- Identify behaviours which could indicate that their child is at risk of harm, including online
- Seek help and support from Imagine Wellbeing or other agencies

Prevention

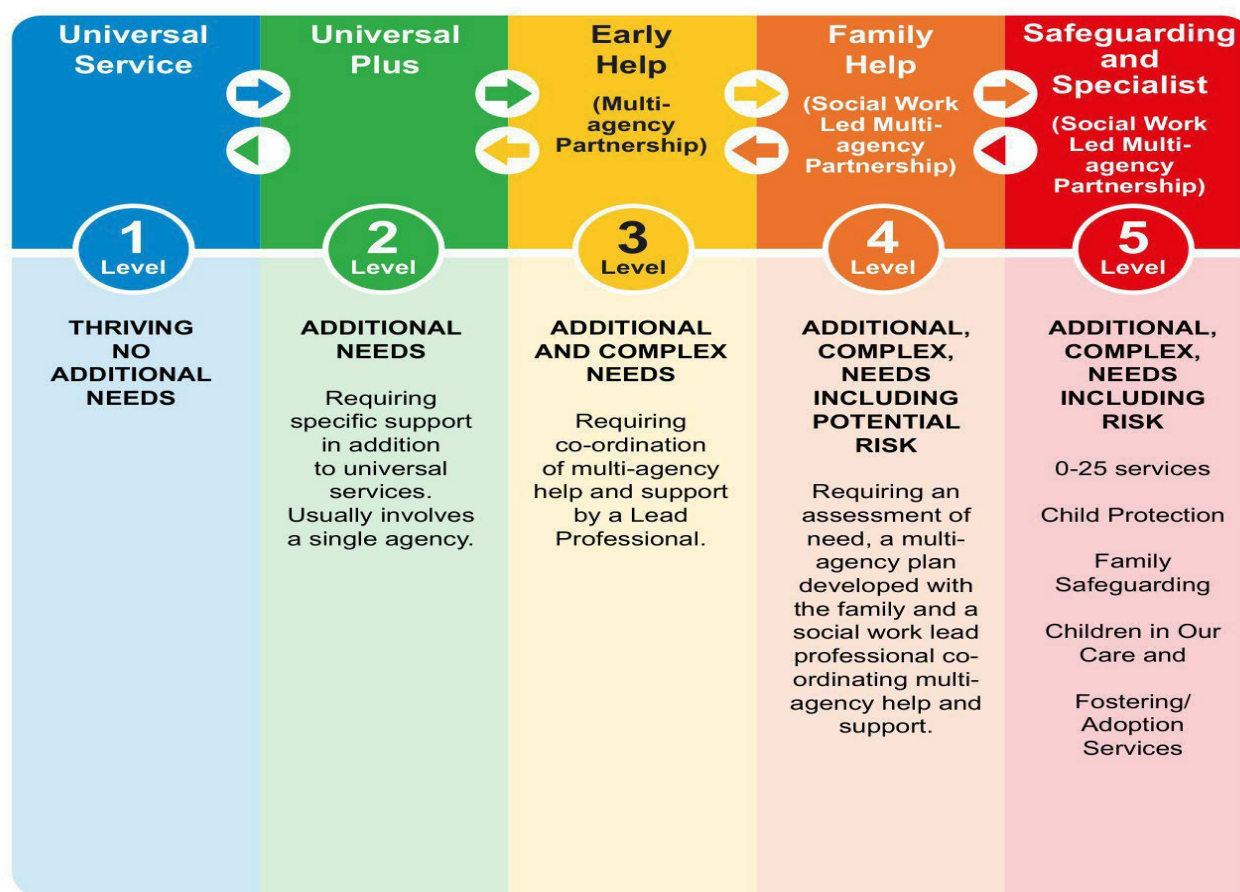
Children feel secure in a safe environment where they can learn and develop. We achieve this by ensuring that:

- Children develop realistic attitudes to their responsibilities in adult life and are equipped with the skills needed to keep themselves safe, including understanding and recognition of healthy/unhealthy relationships and support available
- Children are supported in recognising and managing risks in different situations, including on the internet; being able to judge what kind of physical contact is acceptable and unacceptable; recognising when pressure from others, including people they know, threatens their personal safety and well-being and supporting them in developing effective ways of resisting pressure
- All staff are aware of school guidance for their use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks
- Importance and prioritisation are given to equipping the children with the skills needed to stay safe, including providing opportunities for Personal, Social and Health Education and Relationships and Sex Education throughout the curriculum
- Appropriate filters and monitoring systems are in place; however, we are careful that "over-blocking" does not lead to unreasonable restrictions as to what children can be taught with regard to online teaching, remote learning and safeguarding
- All adults feel comfortable and supported to draw safeguarding issues to the attention of the headteacher and/or the DSL and can pose safeguarding questions with "respectful uncertainty" as part of their shared responsibility to safeguard children
- Emerging themes are proactively addressed and fed back to the local authority to ensure a coherent approach so that multi-agency awareness and strategies are developed

- There is a proactive approach to substance misuse. Issues of drugs and substance misuse are recorded, related policies are implemented, and a robust curriculum is delivered throughout the school.
- Support and planning for children in custody and their resettlement back into the school community is undertaken, where necessary, as part of our inclusive approach
- We comply with 'Working Together to Safeguard Children' 2023 and support the Bury Safeguarding Children's Partnership Right Help, Right Time - Delivering effective support for children and families in Bury West, Continuum of Need / Threshold Guidance. This document supports professionals to access the right help and support for children and their families at the right time
- We systematically monitor pupil welfare, keeping accurate records, speaking to parents and notifying appropriate agencies when necessary
- All staff are aware of children with circumstances which mean that they are more vulnerable to abuse/less able to access services quickly, and are proactive in recognising and identifying their needs
- All staff are aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or threatened; this could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. Staff determine how best to build trusted relationships with children and young people, facilitating communication while ensuring safer working practices.
- The child's voice is paramount; therefore, our pupils actively safeguard development. There is an established wellbeing ambassador pupil group/ pupil involvement mechanism which works with and challenges staff to develop aspects of safeguarding, e.g. through the curriculum, approaches and displays
- We consult with, listen to, and respond to pupils; our school's arrangements for this are providing support from the school's pastoral care worker, class/school, and all staff complete, at a minimum, mandatory safeguarding training.

Early Help

All school staff need to be aware of their responsibility to raise any concerns about a child as early as possible to prevent the situation from worsening. This may present as a change in a child's behaviour or appearance, or through a conversation with the family about home conditions, financial difficulties, speech and language difficulties, toileting issues, etc. Where this concern does not identify a safeguarding issue but could lead to more serious concerns if left, staff need to follow the procedures set out in the Team Around the Family (TAF) guidance to fulfil their duties at Universal Plus and Partnership Plus on the Continuum of Need. This may involve signposting to, or engaging with, more appropriate agencies for support, and may include the school acting as the lead person on a child's TAF. For complex needs, refer to the Integrated Access and Referral Team (I-ART) for support from the Early Help and Prevention service.



IW staff recognise that some children are more vulnerable to abuse, neglect and contextual safeguarding concerns and that additional barriers exist when recognising abuse for some children. We understand that this increase in risk is due more to societal attitudes and assumptions, or to child protection procedures that fail to acknowledge children’s diverse circumstances, rather than to the individual child’s personality, impairment, or circumstances. In some cases, possible indicators of abuse, such as a child’s mood, behaviour or injury, might be assumed to relate to the child’s impairment or disability rather than giving a cause for concern. A focus on the child’s disability, special educational needs, or situation may overlook the whole picture. In other cases, such as bullying, the child may be disproportionately impacted by the behaviour without outwardly showing any signs that they are experiencing it. Some children may also find it harder to disclose abuse due to communication barriers, lack of access to a trusted adult, or not being aware that what they are experiencing is abuse.

- Is disabled or has certain health conditions and has specific additional needs

- Has special educational needs (whether they have a statutory Education, Health and Care Plan or do not)
- Has a mental health need
- Is a young carer
- Is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups and county lines
- Is frequently missing/goes missing from education, care or home
- Has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit
- Is at risk of modern slavery, trafficking, sexual or criminal exploitation
- Is at risk of being radicalised or exploited
- Has a family member in prison or is affected by parental offending
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing alcohol and other drugs themselves
- Has returned home to their family from care
- Is at risk of 'honour'-based abuse such as female genital mutilation or forced marriage
- Is a 'privately fostered child' or
- Is persistently absent from education, including persistent absences for part of the school day

If there are concerns about a child's welfare that do not meet the thresholds of child abuse, the school will consider whether the Early Help approach should be considered. Staff are aware that early identification of concerns and the use of Early Help to develop a multi-agency plan for the child can reduce the risk of subsequent abuse.

The multi-agency threshold framework is a guidance tool that all agencies, professionals and volunteers can use to consider how best to meet the needs of individual children and young people. This support can be provided on a single-agency basis or a multi-agency basis. The stepped approach aims to reduce risk and vulnerability and meet needs at the appropriate support and/or intervention level. Access to effective early intervention and prevention services is essential to achieving this.

Our school will be an Operation Encompass school, which means we can provide proactive support to children and their families when domestic abuse is identified. A named key adult will act as the Operation Encompass point of contact. Staff receive safeguarding training at an appropriate level, and the DSL and Deputy DSL hold DSL training (Level 3 or equivalent).

If a staff member has concerns about a child, they must decide what action to take. Where possible, there should be a conversation with the DSL to agree on a course of action. However, any staff member can refer to Children's Social Care/Consult with Bury Consultation Service (I-Art)/contact the police. Other options could include referral to specialist services or early help services. They should be made in accordance with the referral threshold set by Bury's Safeguarding Children Partnership.

In the first instance, staff should discuss 'Early Help' requirements with the DSL. If early help is appropriate, the Designated Safeguarding Lead will support the staff member in liaising with other agencies and setting up an inter-agency assessment.

As staff may be required to support other agencies, practitioners, parents/carers, and children through an extra help or targeted help plan, all staff are aware of the relevant assessments and provide appropriate support when they undertake an early help assessment.

Concerns assessed as lower-tier targeted help level for complex early help concerns will be triaged and managed by the Family Help Front Door.

Where Early Help and/or other support is appropriate, we ensure that the child's situation is kept under constant review. If the child's situation doesn't appear to be improving, we take appropriate action. The children in our school are made aware that they can approach adults if they are worried or in difficulty. Adequate signposting to external sources of support and advice is provided for staff, parents, and pupils.

Early Help, Child in Need and Child Protection

In our school, we follow Bury's multi-agency safeguarding arrangements and practice standards, including professional challenge and escalation procedures, as published by the Bury Safeguarding Children Partnership. We use these standards to challenge other workers on behalf of children whose standards are not being met. [Resolving Professional Differences/Escalation Policy](#)

A child in need is defined under the Children Act (1989) as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled.

- [EHP Practice Standards Review - August 2023](#)

- Early Help / Locality Teams – Bury Council

Child Protection Procedures

Recognising Indicators of Abuse and Neglect

All staff at Imagine Wellbeing are made aware of the definitions and indicators of abuse and neglect as set out in Working Together to Safeguard Children (2023) and Keeping Children Safe in Education (September 2025). Our recording procedures are in line with those outlined in Bury's 'Recording and Reporting Guidance' 2024.

Imagine Wellbeing recognises that when assessing whether a child may be suffering actual or potential harm, there are four categories of abuse:

- Physical abuse
- Sexual abuse
- Emotional abuse
- Neglect

For further information, see Appendix 1.

Contextual Safeguarding

Contextual safeguarding is an approach to understanding and responding to young people's experiences of significant harm beyond their families. It recognises that different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships.

Therefore, children's social care practitioners, child protection systems and wider safeguarding partnerships need to engage with individuals and sectors that do influence/within extra-familial contexts, and recognise that the assessment of, and intervention within, these spaces is a critical part of safeguarding practices. Contextual safeguarding, therefore, expands the objectives of child protection systems in recognition that young people are vulnerable to abuse beyond their front doors.

www.contextualsafeguarding.org.uk

Imagine Wellbeing recognises that concerns may arise in many contexts and can vary significantly in nature and seriousness. The indicators of child abuse and neglect can vary from child to child. Children develop and mature at different rates, so what appears to be worrying behaviour for a younger child might be normal for an older child. It is essential to recognise that indicators of abuse and neglect do not automatically mean a child is being abused; however, all concerns should be taken seriously and will be explored by the DSL on a case-by-case basis.

In recognising and reporting concerns, staff have been made aware through training that some children may not feel ready or know how to tell someone they are being abused, exploited, or neglected. In some cases, this is because they do not think they have established a trusting relationship, either because of time constraints or because children may not have the 'words' to tell an adult. However, this should not prevent all staff from showing professional curiosity and from speaking to the designated safeguarding lead (DSL) about their concerns.

Imagine Wellbeing recognises that abuse, neglect, exploitation and safeguarding issues are rarely standalone events and cannot always be covered by one definition or one label alone. In many cases, multiple issues will overlap; therefore, staff will remain vigilant and raise concerns with a DSL.

Parental behaviours can indicate child abuse or neglect, so that staff will be alert to parent-child interactions or concerning parental behaviours; this could include parents who are under the influence of drugs or alcohol, or if there is a sudden change in their mental health.

Children may report abuse happening to themselves, their peers, or their family members. All reports made by children to staff will be taken seriously and will be responded to in line with this policy.

Safeguarding incidents and/or behaviours can be associated with factors and risks outside the school. Children can be 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 exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines, this is seen in context of our social setting which may include students who are in-care, at risk of local crime and or involved in gangs.

Technology can be a significant component in many safeguarding and well-being issues. Children are at risk of abuse online as well as face-to-face, and in many cases, abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online.

By understanding the indicators of abuse and neglect, we can respond to problems as early as possible and provide the right support and services for the child and their family.

All members of staff are expected to be aware of and follow this approach when they are concerned about a child:

- Be alert
- Question behaviours
- Ask for help
- Refer

Imagine Wellbeing recognises that some children have additional or complex needs and may require access to intensive or specialist services to support them.

Concerns about a Child – Recording and Reporting

Our recording procedures are in line with those outlined in Bury's "Recording and Reporting Guidance." 2024; the Designated Safeguarding Lead and the Deputy Lead are aware of this document.

Where a member of staff is concerned that a child is in immediate danger or at risk of harm, they should report this to the Designated Safeguarding Lead or their Deputy without delay. A written record of these concerns should be made as soon as possible after the disclosure/concern is raised; this must be on the same working day.

Where staff have conversations with a child who discloses abuse, they follow the basic principles:

- listen rather than directly question, remain calm
- never stop a child who is recalling significant events
- never ask a child if they are being abused
- make a record of the discussion to include time, place, persons present and what was said (child language – do not substitute words)
- advise you that you will have to pass the information on
- avoid coaching/prompting
- never take photographs of any injury
- never undress a child to examine them physically
- allow time and provide a haven / quiet area for future support
- at no time promise confidentiality to a child or adult
- all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward and that they will be supported and kept safe.
- nor should a victim ever be made to feel they are a problem or ashamed for making a report
- where abuse has occurred online or outside of the school or college, it will not be downplayed and will be treated equally seriously

Staff are aware that they should not question the child, except to respond with TED: Tell me what you mean by that, explain what you mean by that, describe that. Staff will observe and listen, but do not probe or ask leading questions.

The DSL will obtain key information and agree on relevant actions after a timely assessment.

We recognise that parents may hold key information about incidents/allegations; therefore, in most situations, the DSL will speak to the parents and obtain their consent to discuss the situation with others. Staff are aware that there will be very few instances in which speaking to the parents could further endanger the child. In those situations, they would still consult/refer, but would clearly record the reasons why they had not obtained parental consent.

The following situations are instances in which parental consent would not be gained prior to a referral:

- Discussion would impede a police investigation or social work enquiry
- Sexual abuse is suspected
- Organised or multiple abuse is suspected
- Fabrication or induced illness or perplexing presentations are suspected
- Honour-based abuse, e.g. forced marriage, FGM, etc., is a possibility/is suspected

Additional consideration regarding parental consent would be needed in the following circumstances, mainly if there are concerns around parental involvement or influence:

- Extremism or radicalisation is suspected
- County Lines activities are suspected

Staff are also aware that, even when the parent does not consent, the child's best interests are paramount and that they would therefore share their concerns. In addition, the referral will not be delayed if it has not been possible to contact the parents/carers.

Once a decision has been made on the next action for a non-urgent referral, the appropriate MASH/EHASH portal form must be completed. The following contact numbers can be used when it is felt that the child/young person has reached their threshold for support (upper-tier Targeted Help and Statutory/Specialist Help).

Immediate safeguarding concerns:

Telephone: i-Art 0161 253 5678 Email:
childwellbeing@bury.gov.uk

Emergency Duty Team

Telephone: (out of hours) on 0161 253 6606

If there is an urgent social care concern and the phone lines are out of order, the contingency number 07789287349 can be used.

Greater Manchester Police

Telephone: 845 458 0000 / 01244 350000 (999 in an emergency).

Anything you submit to Integrated Front Door (IFD) that is deemed to meet the threshold for social care will be processed within 2 hours or 24 hours, depending on the risk, in accordance with statutory guidelines.

Immediately, the Bury Consultation Service and/or the police will be consulted. Where a child lives in a different authority, the Designated Safeguarding Lead follows the procedures for that authority.

Where possible, we ensure that contacts with outside agencies are made through the DSL or their deputy; however, staff are aware that anyone can make this contact. When a member of staff makes contact, they ensure the Designated Safeguarding Lead is informed as soon as possible.

Our electronic safeguarding software (CPOMs) ensures the confidentiality of all safeguarding records. Any hard copies of documents or reports relating to Safeguarding and Child Protection concerns are kept in a separate, confidential file, securely stored away from the main pupil file. Authorisation to access these records is controlled by the Headteacher (DSL), and information should be kept confidential.

All records provide a factual, accurate, evidence-based account. They are signed, dated, and, where appropriate, witnessed.

The school ensures that safeguarding information, including Child Protection information, is stored and handled in line with the principles of the Data Protection Act 2018 and General Data Protection Regulation (GDPR), ensuring that information is:

- used fairly and lawfully
- for limited, specifically stated purposes
- used in a way that is adequate, relevant and not excessive
- accurate
- kept for no longer than necessary
- handled according to people's data protection rights
- kept safe and secure.

All records should be dated and signed, with the signatory's name clearly printed and filed chronologically. For electronic record-keeping systems, a separate signature is not necessary if individuals have their own login, and any changes to a record are automatically logged. All documents 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, decisions reached and the outcome.

The school ensures that safeguarding information, including Child Protection information, is stored and handled in line with the principles of the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information to keep children safe. Fears about sharing information must not stand in the way of safeguarding and promoting children's welfare and safety.

When children leave the school or college, the DSL should ensure their safeguarding file is transferred to the new school or college as soon as possible: within 5 days for an in-year transfer, or within the first 5 days of the new term. This allows the new school or college to have support when the child arrives.

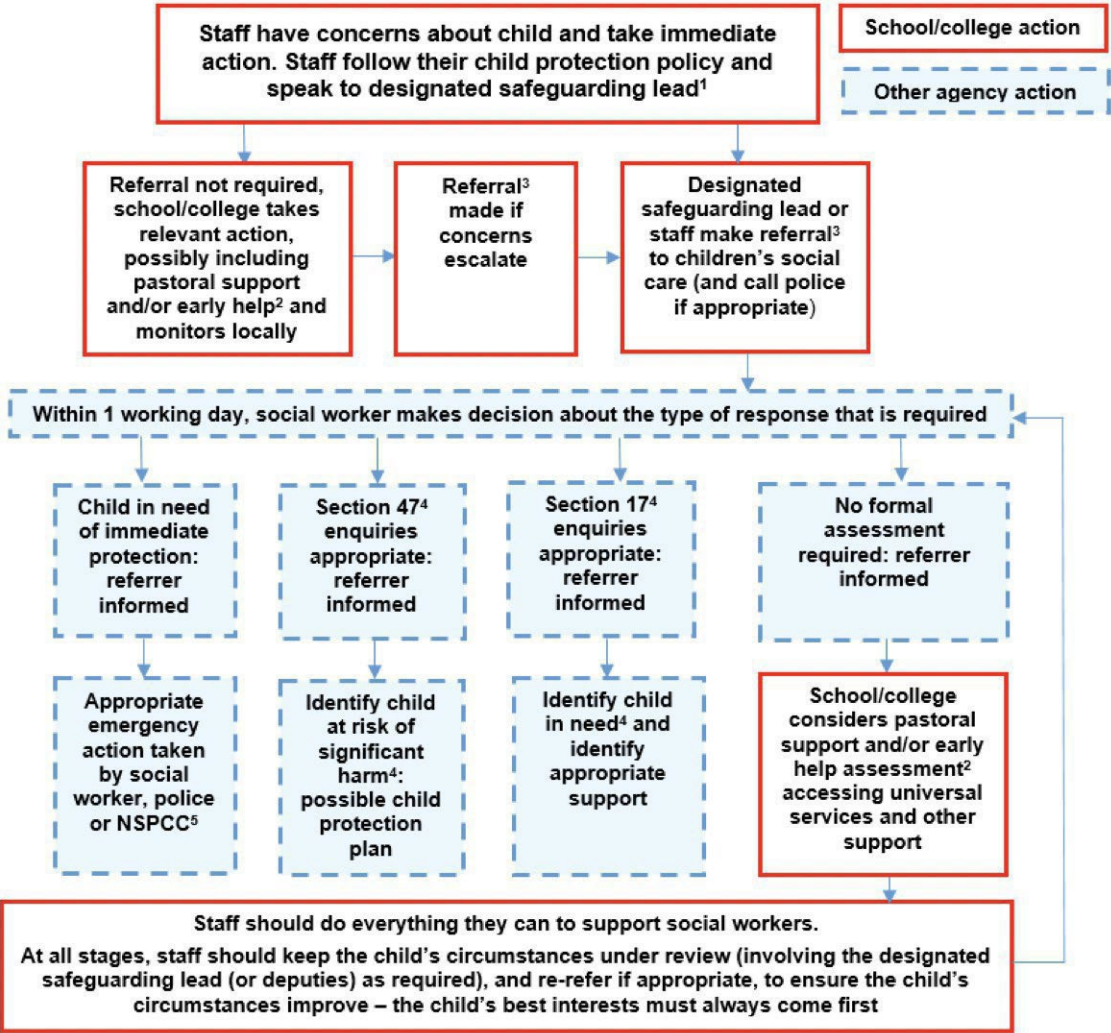
We also ensure that key workers or social workers are notified where a child leaves the school (as appropriate).

Multi-Agency Working

Imagine Wellbeing recognises and is committed to working within the Bury multi-agency safeguarding arrangements. The leadership team and DSL will work to establish strong, co-operative local relationships with professionals from other agencies, in line with statutory guidance.

We recognise the importance of multi-agency working and are committed to working alongside partner agencies to provide a coordinated response that promotes children's welfare and protects them from harm. This includes contributing to Bury processes as required. Such as participation in relevant safeguarding multi-agency plans and meetings, including child protection conferences, core groups, strategy meetings, child-in-need meetings, or other early help multi-agency meetings.

Actions where there are concerns about a child flow diagram



Confidentiality and Information Sharing

The Data Protection Act 2018 and the UK GDPR do not prevent the sharing of information for the purpose of keeping children safe, except where damage may be caused to a person or group. Fears about sharing information must not stand in the way of safeguarding and promoting the welfare and protecting the safety of children, and, where appropriate, the school will seek advice from senior management.

Imagine Wellbeing recognises our duty and powers to hold, use and share relevant information with appropriate agencies in matters relating to child protection at the earliest opportunity, as per the statutory guidance outlined in KCSIE 2025. The DSL should keep written records of all concerns, discussions, and decisions, including the rationale for those decisions. This should include instances where referrals were or were not made to another agency, such as LA children’s social care or the Prevent program.

Imagine Wellbeing has staff appropriately trained in data protection, as required by the General Data Protection Regulation (GDPR), to ensure our school complies with all confidentiality and information-sharing requirements.

The headteacher or DSL will disclose relevant safeguarding information about a learner on a ‘need to know’ basis.

All members of staff must be aware that whilst they have duties to keep any information confidential, in line with our confidentiality policy, they also have a professional responsibility to be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children; this may include sharing information with the DSL and with other agencies as appropriate. All staff are aware that they cannot promise confidentiality in situations which might compromise a child’s safety or well-being.

Complaints

All members of the Imagine Wellbeing community should feel able to raise or report any concerns about children's safety or potential failures in the school's safeguarding regime.

The school has a complaints procedure available to parents, learners, members of staff and visitors who wish to report concerns or complaints. Whilst we encourage members of our community to report concerns and complaints directly to us, we recognise this may not always be possible.

Children, young people, and adults who have experienced abuse at school can contact the NSPCC 'Report Abuse in Education' helpline on 0800 136 663 or via email: help@nspcc.org.uk

Staff can also access the NSPCC whistleblowing helpline if they are unable to raise concerns about child protection failures internally.

Staff can call 0800 028 0285 (8:00 am to 8:00 pm Monday to Friday) or email help@nspcc.org.uk.

The leadership team at Imagine Wellbeing will take all concerns reported to the school seriously and will consider and respond to all complaints in line with the relevant and appropriate process.

Anything that constitutes an allegation against a member of staff or a volunteer will be dealt with in accordance with the Local Authority Safeguarding Guidelines and reported to the LADO for advice and/or instruction.

Specific Safeguarding Issues

Imagine Wellbeing is aware of a range of specific safeguarding issues and situations that can put children at greater risk of harm. In addition to Part 1, DSLs and school leaders, and staff who work directly with children will read Annexe B of KCSIE 2025, which contains important additional information on specific forms of abuse and safeguarding issues.

If staff are unsure how to respond to specific safeguarding issues, they should follow the processes outlined in this policy and speak with the DSL or a Deputy.

Child-on-Child Abuse

All members of staff at Imagine Wellbeing recognise that children are capable of abusing their peers. All victims will be taken seriously and offered appropriate support, regardless of where the abuse takes place. There is a **zero-tolerance** approach.

Imagine Wellbeing recognises that child-on-child abuse can take many forms, including but not limited to:

- Bullying (including cyberbullying)
- Physical abuse, which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- Sexual violence and sexual harassment
- 'Upskirting', which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm. This is a criminal offence.
- Nude or semi-nude image sharing (also known as 'sexting' or youth-produced/involved sexual imagery)
- Initiation/hazing-type violence and rituals.

All staff have a role to play in challenging inappropriate behaviours between peers. Staff and leadership recognise that some child-on-child abuse issues may be affected by gender, age, ability, and culture of those involved (i.e., for gender-based abuse, girls are more likely to be victims and boys more likely to be perpetrators); however, all child-on-child abuse is unacceptable, and all reports will be taken seriously.

Imagine Wellbeing believes that abuse is abuse and it will never be tolerated or dismissed as "banter", "just having a laugh", "part of growing up" or "boys being boys" as this can lead to a culture of unacceptable behaviours and an unsafe environment for children. Imagine Wellbeing recognises that even if there are no reported cases of child-on-child abuse, such abuse is still likely to be taking place.

Concerns about pupils' behaviour and child-on-child abuse taking place off-site will be responded to as part of a partnership approach with pupils and parents/carers. Offsite behaviour concerns will be recorded and responded to in line with appropriate existing policies, such as the antibullying, acceptable use, and behaviour policies.

To minimise the risk of child-on-child abuse, Imagine Wellbeing will:

- Use the anti-bullying policy, including cyber-bullying
- Provide pastoral support for involved students
- Inform students through effective RSE. RSE at Imagine Wellbeing will be taught taking into account the pupils' additional needs and developmental stage
- Provide students with space and tools to report incidents to staff

Imagine Wellbeing wants children to feel able to confidently report abuse and know their concerns will be treated seriously. It is important that when staff have any concerns about child-on-child abuse, they should speak to their DSL. All allegations of child-on-child abuse will be reported to the DSL and will be recorded, investigated, and dealt with in line with associated Imagine Wellbeing policies, including child protection, anti-bullying, and behaviour. Pupils who experience abuse will be offered appropriate support, regardless of where the abuse takes place.

Alleged victims, perpetrators and any other child affected by child-on-child abuse may be supported by:

- Pastoral support, working with parents/carers, and in cases of sexual assault, informing the police and/or front door.

Child-on-Child Sexual Violence and Sexual Harassment

When responding to concerns relating to child-on-child sexual violence or sexual harassment, Imagine Wellbeing will follow the guidance outlined in part five of KCSIE 2025, which has incorporated the DfE guidance 'Sexual Violence and Sexual Harassment Between Children in Schools and Colleges'. Imagine Wellbeing will consider the risks regarding all students, especially vulnerable groups, under the Equality Act 2010.

Imagine Wellbeing recognises that sexual violence and sexual harassment can occur between two children of any age and sex. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It can occur online and face-to-face (both physically and verbally). Sexual violence and sexual harassment are never acceptable.

All victims of sexual violence or sexual harassment will be reassured that they are being taken seriously and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment, or be made to feel ashamed for making a report.

When there has been a report of sexual violence or harassment, the DSL will make an immediate risk and needs assessment, which will be considered on a case-by-case basis, that explores how best to support and protect the victim and the alleged perpetrator (and any other children involved/impacted). The risk and needs assessment will be recorded and kept under review. It will consider the victim (especially their protection and support), the alleged perpetrator, and all other children and staff, as well as any actions required to protect them.

Reports will initially be managed internally by the school and, where necessary, will be referred to integrated children's services and/or the police. The decision-making and required action taken will vary on a case-by-case basis.

Basis, but will be informed by the wishes of the victim, the nature of the alleged incident (including whether a crime may have been committed), the ages and developmental stages of the children involved, any power imbalance, if the alleged incident is a one-off or a sustained pattern of abuse, if there are any ongoing risks to the victim, other children or school staff, and any other related issues or wider context.

If at any stage the DSL is unsure how to proceed, they will seek advice from the education safeguarding service.

The school supports the inclusion of the DfE guidance Sexual Violence and Sexual Harassment between Children in Schools and Colleges by emphasising:

- The importance of explaining to children that the law is in place to protect rather than criminalise them
- The importance of understanding intra-familial harms, and any necessary support for siblings following incidents
- The need for schools and colleges to be part of discussions with statutory safeguarding partners.

Nude and/or Semi-nude Image Sharing by Children

Imagine Wellbeing recognises that consensual and nonconsensual sharing of nude and semi-nude images and/or videos (also known as youth-produced/involved sexual imagery or “sexting”) can be a safeguarding issue; all concerns will be reported to and dealt with by the DSL (or Deputy).

When made aware of concerns involving nude or semi-nude image taking/sharing involving children, staff are advised to:

- Report any concerns involving nude or semi-nude image sharing involving children to the DSL immediately.
- Never view, copy, print, share, store or save the imagery, or ask a child to share or download it – this may be illegal. If staff have already viewed the imagery by accident (e.g., if a child has shown it to them), this will be reported to the DSL immediately.
- Do not delete the imagery or ask the young person to delete it.
- Do not say or do anything to blame or shame any children involved.
- Explain to child(ren) involved that they will report the issue to the DSL and reassure them that they will receive appropriate support and help.
- Not ask the child or children involved in the incident to disclose information regarding the imagery and not share information about the incident with other members of staff, the child(ren) involved or their, or different, parents and/or carers. This is the responsibility of the DSL.

DSLs will respond to concerns as set out in the non-statutory UK Council for Internet Safety guidance, 'Sharing nudes and semi-nudes: advice for education settings working with children and young people', and the local Bury guidance. When made aware of a concern involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos:

- The DSL will hold an initial review meeting to explore the context and ensure appropriate and proportionate safeguarding action is taken in the best interests of any child involved. This may mean speaking with relevant staff and the children involved as appropriate.
- Parents and carers will be informed at an early stage and be involved in the process to best support children, unless there is a good reason to believe that involving them would put a child at risk of harm.
 - All decisions and actions taken will be recorded in line with our child protection procedures.
 - A referral will be made to MASH / EHASH and/or the police immediately if:
 - The incident involves an adult (over 18).
- There is reason to believe that a child has been coerced, blackmailed, or groomed, or there are concerns about their capacity to consent, for example, the age of the child, or they have special educational needs.
 - The image/videos involve sexual acts and a child under the age of 13, depict sexual acts which are unusual for the child's developmental stage, or are violent.
 - A child is at immediate risk of harm owing to the sharing of nudes and semi-nudes.

The DSL may choose to involve other agencies at any time if further information/concerns are disclosed at a later date. If DSLs are unsure how to proceed, they will seek advice from the education safeguarding service.

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

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

If staff are concerned that a child may be at risk of CSE or CCE, immediate action should be taken by speaking to the DSL or a Deputy.

Serious Violence

All staff are made aware of the indicators which may signal children are at risk from or are involved with serious violent crime. These may include unexplained gifts or new possessions, 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 substantial change in wellbeing, or signs of assault or unexplained injuries.

Any concerns regarding serious violence will be reported and responded to in line with other child protection concerns. The initial response to child victims is important, and staff will take any allegations seriously and work in ways that support children and keep them safe.

Gangs, County Lines, Serious Violence, Crime and Exploitation

Imagine Wellbeing recognises the impact of gangs, county lines, serious violence, crime, and exploitation. Any concerns regarding gangs, county lines, serious violence, crime, and exploitation will be reported and responded to in line with other child protection concerns.

The initial response to child victims is important, and staff will take any allegations seriously and work in ways that support children and keep them safe.

All staff have been trained and recognise the need to be vigilant for the signs that may include, but are not exclusively:

- Unexplained gifts/new possessions – these can indicate children have been approached by/involved with individuals associated with criminal networks/gangs
- Children who have unexplained and/or persistent absences from education repeatedly and/or for periods of time, or regularly come home late
- Children who regularly miss school or education, or do not take part in education
- Change in friendships/relationships with others/groups
- Children who associate with other young people involved in exploitation
- Children who suffer from changes in emotional well-being
- Significant decline in performance
- Signs of self-harm/significant change in wellbeing
- Signs of assault/unexplained injuries
- Go missing from school or home and are subsequently found in areas away from their own
- Have been the perpetrator or alleged perpetrator of serious violence (e.g. knife crime), as well as the victim

So-Called Honour-Based Abuse

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

All forms of HBA are abuse (regardless of the motivation), and concerns should be responded to in line with this policy. Staff will report any concerns about HBA to the DSL (or a Deputy).

Whilst all staff will speak to the DSL (or Deputy) regarding any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers.

- If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

Preventing Radicalisation

Imagine Wellbeing is aware of our duty under Section 26 of the Counterterrorism and Security Act 2015 (the CTSA 2015), to have "due regard to the need to prevent people from becoming terrorists or supporting terrorism", also known as the Prevent Duty and the specific obligations placed upon us as an education provider regarding risk assessments, working in partnership, staff training, and IT policies.

Imagine Wellbeing recognises that children are susceptible to radicalisation into terrorism, and staff will be alerted to changes in children's behaviour which could indicate that they may be in need of help or protection.

Staff will report any concerns to the DSL (or a Deputy), who is aware of the local procedures to follow.

Domestic abuse

Children can be traumatised by seeing, hearing or experiencing the effects of violence and abuse.

They may also be directly targeted by the abuser or take on a protective role and get caught in the middle. In the long term, this can lead to serious, long-lasting emotional and psychological impact on children. In some cases, children may blame themselves for the abuse or may have had to leave the family home as a result.

- Children who witness domestic abuse are also victims
- Witnessing domestic abuse can have a lasting impact on children
- Children can be victims in their own relationships, too

Cybercrime

Imagine Wellbeing recognises that children with skill and interest in computing and technology may inadvertently or deliberately stray into 'cyber-enabled' (crimes that can happen offline but are enabled at scale and at speed online) or 'cyber-dependent' (crimes that can be committed only by using a computer/internet-enabled device) cybercrime.

If staff are concerned that a child may be at risk of becoming involved in cyber-dependent cybercrime, the DSL will be informed. Consideration will be given to accessing local support and/or referring young people to the cyber choices programme, which aims to intervene when young people are at risk of committing, or being drawn into, low-level cyber-dependent offences, and to divert them to more positive uses of their skills and interests.

Where there are concerns about 'cyber-enabled' crime, such as fraud, purchasing of illegal drugs online, child sexual abuse and exploitation, or other areas of concern, such as online bullying or general online safety, they will be responded to in line with this and other appropriate policies.

Supporting Children Potentially at Greater Risk of Harm

Whilst all children should be protected, some groups of children are potentially at greater risk of harm.

Safeguarding Children with Special Educational Needs and Disabilities (SEND)

Imagine Wellbeing acknowledges that children with special educational needs and disabilities (SEND) and disabilities can face additional safeguarding challenges as they may have an impaired capacity to resist or avoid abuse. The DSL will work closely with the school leadership team to plan support as required. Imagine Wellbeing recognises that children with SEND may face additional communication barriers and experience difficulties in managing or reporting abuse or challenges.

Children with SEND will be appropriately supported to communicate, ensuring their voices are heard and acted upon.

All members of staff will be encouraged to appropriately explore possible indicators of abuse, such as behaviour, mood changes or injuries, and not to assume that they are related to the child's disability. Staff will be mindful that children with SEND, or certain medical conditions, may be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.

Members of staff are encouraged to be aware that children with SEND can be disproportionately impacted by safeguarding concerns, such as exploitation, peer group isolation or bullying, including prejudice-based bullying.

To address these additional challenges, our school will always consider implementing extra pastoral support and attention for children with SEND. The DSL will work closely with all staff to plan support as required.

Children Requiring Mental Health Support

All staff will be made 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 and exploitation. Staff are aware of how children's experiences can impact on their mental health, behaviour, and education.

Staff are aware that children's experiences, for example, where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, can impact on their mental health, behaviour, and education.

Staff 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.

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

Children Absent from or Missing from Education

Children absent, or missing from education, particularly repeatedly and/or for prolonged periods, can act as a vital warning sign to a range of safeguarding issues, including neglect, sexual abuse, and child sexual and criminal exploitation. Under Section 175 of the Education Act 2002, we have a duty to investigate any unexplained absences, especially as a child going missing from education is a potential indicator of abuse or neglect.

Where the school have concerns that a child is absent or missing from education, we will respond in line with our statutory duties and local policies.

Children Who Need a Social Worker

The DSL will hold details of social workers working with children in the school so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes.

Where children have a social worker, this will inform school decisions about their safety and welfare, for example, by responding to unauthorised absence and providing pastoral and/or academic support.

Looked After Children, Previously Looked After Children and Care Leavers

Imagine Wellbeing recognises that the common reason for children becoming looked after is as a result of abuse and/or neglect, and a previously looked-after child also potentially remains vulnerable.

The school has appointed a designated member of staff (Designated Teacher) to promote the educational achievement of registered pupils who are looked after or who have been previously looked after.

The designated member of staff will work with the DSL to ensure that appropriate staff have the information they need regarding a child's looked-after legal status, contact arrangements with birth parents or those with parental responsibility, care arrangements, and the levels of authority delegated to the carer by the authority responsible for the child.

Where a child is looked after, the DSL will hold details of the social worker and the name of the virtual school head in the authority that looks after the child.

Where the school believe a child is being cared for as part of a private fostering arrangement (occurs when a child under 16, or 18 if the child is disabled, is cared for and lives with an adult who is not a relative for 28 days or more) there is a duty to recognise these arrangements and inform the local authority via the 'front door'.

Where a child is leaving care, the DSL will hold details of the local authority personal advisor appointed to guide and support them, and will liaise with them as necessary regarding any concerns.

Child Identifying as Lesbian, Gay, Bisexual or Gender Questioning

Imagine Wellbeing recognises its obligation towards children identifying within the lesbian, gay, bisexual or gender questioning community. The school offers respect and a safe space for children to speak out and share their concerns with members of staff.

Safer Working Practices

Use of Mobile Phones, Cameras and Internet

The school and staff take safeguarding seriously and understand that this policy is overarching. We refer staff to the 'staff use of mobile phones and social media policy', 'code of conduct', and 'guidance for safer working practice for those working with children and young people in education settings 2022'.

Personal Mobiles and Electronic Devices

Personal mobile phones and recording devices (tablets, cameras, laptops, etc) are never used by staff at the school/setting. If staff have personal phones or devices, they are stored securely out of sight and switched off or set to silent during the teaching day. Electronic devices should be password-protected so unauthorised users cannot access content. The staff member is responsible for ensuring that no illegal or inappropriate content is stored or used on their device when they are on school grounds.

School Devices

School devices remain the property of Imagine Wellbeing, and staff who use them will follow the acceptable use policy and staff code of conduct.

Electronic devices should be password-protected so unauthorised users cannot access content.

Cameras, Photography and Images

Imagine Wellbeing will obtain parents' and carers' consent to take or publish photographs (for example, on our website, Facebook/Twitter pages, newspapers, or publications).

Staff will ensure that the IW-designated camera or recording devices (tablets, cameras, laptops, etc) are used when capturing evidence of work undertaken.

Online Safety

On school equipment, we ensure that appropriate filters and appropriate monitoring systems are in place.

We refer you to our online safety policy, which incorporates the 4Cs outlined in KCSIE 2025 to ensure an effective online policy.

The school's policy on the use of mobile and smart technology reflects that many children have unrestricted access to the internet via mobile phone networks (i.e., 3G, 4G, and 5G). This access means some children, whilst at school or college, sexually harass, bully, and control others via their mobile and smart technology, share indecent images consensually and non-consensually (often via large chat groups) and view and share pornography and other harmful content. Our acceptable use policy carefully considers how this is managed on the school premises.

Working off School Premises

Where staff take school computers/digital equipment or paper records off the school site, they do so with the understanding that they will abide by the acceptable use policy and staff code of conduct.

Staff are reminded that information, whether in paper or electronic form, is sensitive and protected under data protection and GDPR, and should be stored securely off the premises and during transportation.

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Staff are reminded that information, whether in paper or electronic form, is sensitive and protected under data protection and GDPR, and should be stored securely off the premises and during transportation.

Staff Engagement and Expectations

Staff Induction, Awareness and Training

Imagine Wellbeing acknowledges that the proprietor and school managers have enhanced responsibilities in respect of all safeguarding matters within the school and the wider organisation, and that they receive mandatory training to ensure they are kept up to date with changes and/or legal responsibilities.

All members of staff have been provided with a copy of Part 1 or Annexe B of 'Keeping Children Safe in Education' (2025), which covers safeguarding information for all staff.

- School leaders, including the DSL, will read the entire document.
- School leaders and all members of staff who work directly with children will access Annexe B within Keeping Children Safe in Education 2025.
- All members of staff have signed to confirm that they have read and understood the national guidance shared with them. This is then kept by the DSL.

The DSL will ensure that all new staff and volunteers (including agency and third-party staff) receive child protection training and information, including awareness of the school's internal safeguarding processes, as part of their induction. This will include a copy of relevant policies and guidance.

All staff members (including agency and third-party staff) will receive appropriate child protection training (including online safety) to ensure they are aware of a range of safeguarding issues; this training will be updated at least annually.

Safeguarding training for staff, including online safety training, will be integrated, aligned, and considered part of the whole-school safeguarding approach and wider staff training and curriculum planning.

In addition to specific child protection training, all staff will receive regular safeguarding and child protection updates at least annually and throughout the school year to provide them with relevant skills and knowledge to safeguard children effectively, e.g., via input from knowledgeable and experienced staff, and by inviting input at staff meetings and during training.

Staff will be encouraged to contribute to and shape the school's safeguarding arrangements and child protection policies, e.g., by providing input from knowledgeable and experienced staff, inviting input at staff meetings, and through training.

The DSL/headteacher will provide data for an annual report to the SLT detailing safeguarding training undertaken by all staff. It will maintain an up-to-date register of who has been trained.

The Proprietor will regularly complete appropriate safeguarding training covering their responsibilities.

Safer Working Practice

All members of staff are required to work in accordance with our clear guidelines on safer working practices, as outlined in the school's code of conduct.

The DSL will ensure that all staff and volunteers have read the child protection policy and the staff code of conduct and understand that their behaviour and practice must align with them.

Staff will be made aware of the school behaviour policy. Staff will manage behaviour effectively to ensure a good and safe educational environment and will have a clear understanding of the needs of all children. Physical interventions and/or use of reasonable force will be in line with our agreed policy and procedures and national guidance.

All staff will be made aware of the professional risks associated with using social media and electronic communication (such as email, mobile phones, texting, and social networking). Staff will adhere to relevant school policies, including the staff code of conduct, acceptable use policies, and social media policies.

Supervision and Support

The induction process will include familiarisation with child protection responsibilities and procedures to follow if staff have any concerns about a child's safety or welfare.

Imagine Wellbeing will provide appropriate supervision and support for all members of staff to ensure that:

- All staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children.
- The DSL in their safeguarding role supports all staff.
- All members of staff have regular reviews of their own practice to ensure they improve over time.

Any member of staff affected by issues arising from concerns for children's welfare or safety can seek support from the DSL.

The DSL will also put staff in touch with outside agencies for professional support if they so wish. Staff can also approach organisations such as their union, the Education Support Partnership, or other similar organisations directly.

Safer Recruitment

Safer Recruitment and Safeguarding Checks

Imagine Wellbeing is committed to fostering a safe culture and taking all necessary steps to recruit staff and volunteers who are safe to work with our learners and staff.

Imagine Wellbeing will follow relevant guidance in Keeping Children Safe in Education 2024 (Section 3 'Safer Recruitment') and from the Disclosure and Barring Service (DBS)

- The SLT are responsible for ensuring that Imagine Wellbeing follows safer recruitment processes outlined within KCSIE 2025.
- The SLT will ensure that at least one of the persons who conduct an interview has completed safer Recruitment training.
- The school maintains an accurate single central record (SCR) in line with statutory guidance.

Imagine Wellbeing ensures that appropriate checks are carried out to prevent individuals from being disqualified under the Childcare Disqualifications Regulations 2018. Imagine Wellbeing follows the statutory guidance on Disqualification outlined in the Childcare Act 2006, including the recording of those checks.

We advise all staff to disclose any reason that may affect their suitability to work with children, including convictions, cautions, court orders, reprimands, and warnings.

Additionally, as part of our due diligence, the school conducts online searches to identify any publicly available incidents or issues that may warrant further exploration during the interview prior to the appointment. Shortlisted candidates should be informed of this search being undertaken.

Where the school places a pupil with an alternative provision provider, the school will remain responsible for the child's safeguarding. The school will undertake appropriate checks to ensure the provider meets the pupil's needs, including written confirmation that appropriate safeguarding checks have been carried out on individuals working at the establishment. The school must be satisfied that the placement meets the pupil's needs.

When advertising for a vacancy, Imagine Wellbeing follows the process outlined in KCSIE 2025.

Online Safety

Imagine Wellbeing recognises that the use of technology presents challenges and risks to children and adults, both inside and outside of school. Imagine Wellbeing will empower, protect, and educate the community about their use of technology, and establish mechanisms to identify, intervene in, and escalate incidents where appropriate. The DSL has overall responsibility for online safeguarding at Imagine Wellbeing and will liaise with other staff members as necessary.

Imagine Wellbeing identifies that the breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- Content - being exposed to illegal, inappropriate, or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, and extremism
- Contact - being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- Conduct - personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending, and receiving explicit images (e.g., consensual, and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying
- Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

Imagine Wellbeing will ensure a comprehensive whole-school curriculum response is in place to enable all learners to understand and manage online risks effectively, as part of a broad and balanced curriculum. Teaching staff are provided with a copy of 'Education for a Connected World Framework' and DfE Teaching Online Safety in Schools' guidance. The 'Education for a Connected World Framework' is used alongside the computing curriculum to further pupils' knowledge, understanding, and skills in online safety.

Imagine Wellbeing will build a partnership approach to online safety and will support parents/carers to become aware and alert.

Imagine Wellbeing will ensure that online safety training for all staff is integrated, aligned, and incorporated into our overarching safeguarding approach.

Policies and Procedures

Imagine Wellbeing will ensure that online safety training for all staff is integrated, aligned, and incorporated into our overarching safeguarding approach.

Where necessary, concerns will be escalated and reported to relevant partner agencies in line with local policies and procedures.

Imagine Wellbeing uses a wide range of technology. This includes laptops, tablets and other digital devices, the internet, and email systems. All school-owned devices and systems will be used in accordance with our acceptable use policies and with appropriate safety and security measures in place.

We recognise the specific risks posed by mobile technology, including the use of mobile phones, cameras, and other electronic devices with imaging in the setting. We manage this in accordance with KCSIE 2025; the school has appropriate policies in place that are shared and understood by all members of the community.

Appropriate Filtering and Monitoring

Imagine Wellbeing will do all we reasonably can to limit children's exposure to online risks through our school IT systems and will ensure that appropriate filtering and monitoring systems are in place.

- If learners or staff discover unsuitable sites or material, they are required to: turn off the monitor/screen, report the concern immediately to a member of staff, report the URL of the site to technical staff and the DSL.
- All users will be informed that use of our systems can be monitored, and that monitoring will be in line with data protection, human rights, and privacy legislation.
- Filtering breaches or concerns identified through our monitoring approaches will be recorded and reported to the DSL and technical staff, as appropriate.
- Any access to material believed to be illegal will be reported immediately to the appropriate agencies.
- When implementing appropriate filtering and monitoring, Imagine Wellbeing will ensure that "over-blocking" does not lead to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding.

The DSL and DDSL have access to the filtering and monitoring portal to view any flagged or blocked sites that have been attempted. A weekly report is sent to the DSL, including any flagged searches or blocked sites.

Imagine Wellbeing acknowledges that whilst filtering and monitoring are important parts of our school's online safety responsibilities, they are only one part of our approach to online safety.

- Pupils will use appropriate search tools, apps and online resources as identified following an informed risk assessment.
- Pupils' internet use will be supervised by staff according to their age and ability.
- Pupils will be directed to use age-appropriate online resources and tools by staff.

Information Security and Access Management

Imagine Wellbeing is responsible for ensuring that appropriate security procedures are in place to safeguard our systems, staff, and pupils.

Imagine Wellbeing will periodically review the effectiveness of these procedures to keep up with evolving cybercrime technologies.

Staff Training

Imagine Wellbeing will ensure that all staff receive face-to-face online safeguarding training as part of induction, and that ongoing online safety training and updates will be integrated, aligned, and considered as part of our overarching safeguarding approach. Training for all staff will include online safety, covering expectations, roles, and responsibilities related to filtering and monitoring.

Imagine Wellbeing is a member of the National College, which includes National Online Safety. Staff access training through this portal and receive regular online safety updates and information.

Educating Pupils

Imagine Wellbeing will ensure a comprehensive whole-school curriculum response is in place to enable all pupils to learn about and manage online risks effectively, as part of providing a broad and balanced curriculum.

Working with Parents/Carers

Imagine Wellbeing will develop a partnership approach to online safety and support parents/carers to become aware of and alert to the potential online benefits and risks for children.

Weekly information guides are shared with parents/carers regarding a wide array of online safety topics. National Online Safety provides these and supports parents/carers by giving them the knowledge and understand to help keep children safe online.

Remote Learning

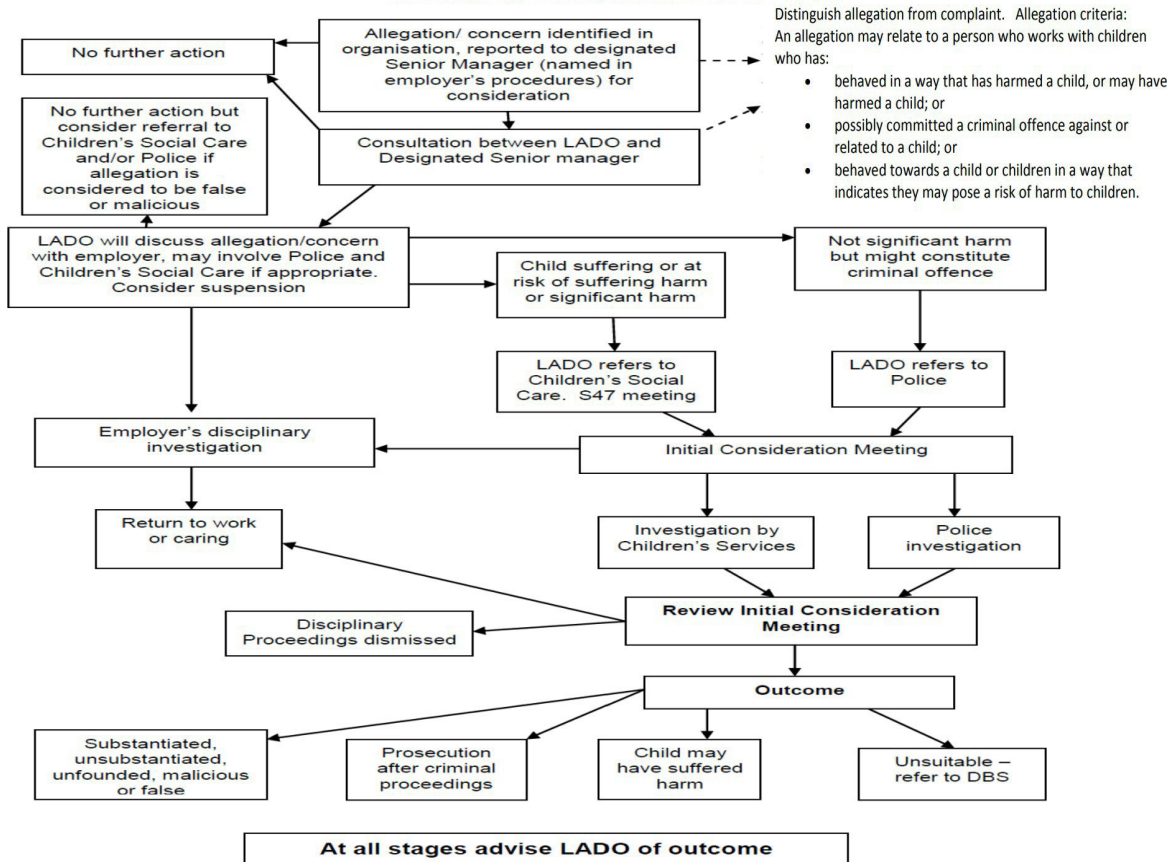
Pupils at Imagine Wellbeing access online learning only during lockdown or for long-term illness (or for a specific reason). The following safety rules apply:

- Imagine Wellbeing will ensure any remote sharing of information, communication and use of online learning tools and systems will comply with privacy and data protection requirements.
- All communication with pupils and parents/carers will take place using school-provided or approved communication channels; for example, school-provided email accounts and phone numbers and agreed systems. Any pre-existing relationships or situations that prevent compliance will be discussed with the DSL.
 - Staff and pupils will engage with remote teaching and learning in line with existing behaviour principles as set out in our school code of conduct, online safety policy and acceptable use policies.
 - Staff and pupils will be encouraged to report issues experienced at home, and concerns will be responded to in line with our child protection and other relevant policies.
- Parents/carers will be made aware of what their children are being asked to do online, including the sites they will be asked to access. School will continue to be clear about who from the school their child will be interacting with online.
- Parents/carers will be encouraged to ensure children are appropriately supervised online and that appropriate parental controls are implemented at home.

Allegations/Concerns Raised in Relation to Teachers, Including Supply Teachers, Other Staff, Volunteers, and Contractors

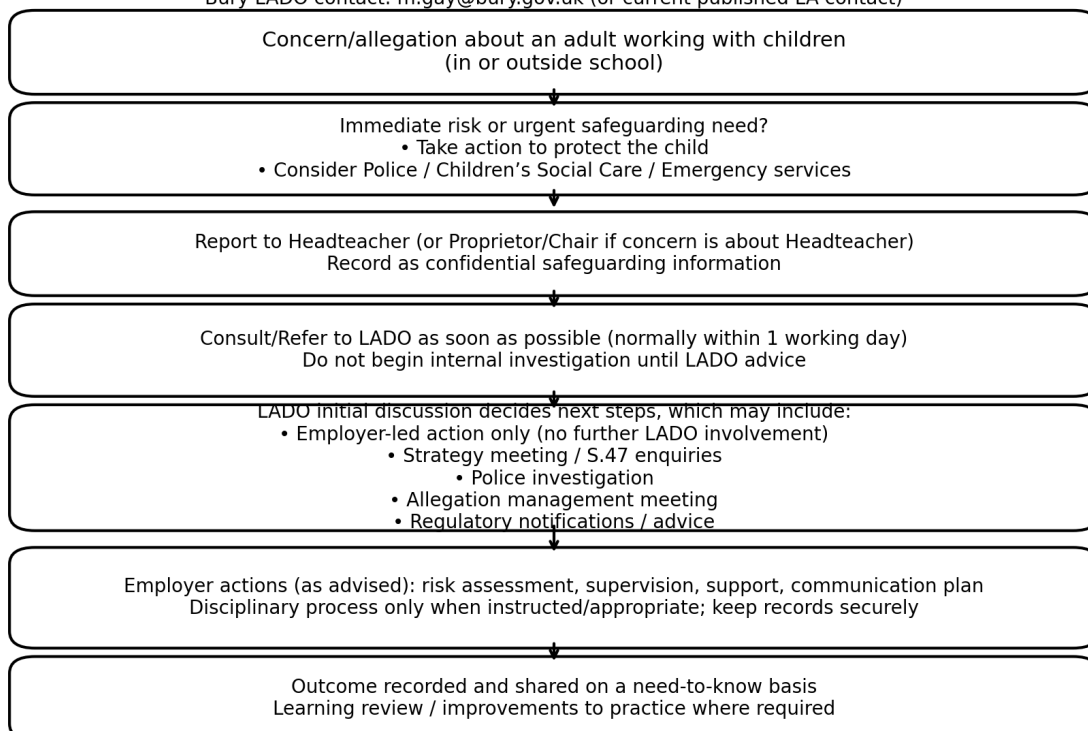
Children’s Services, the Local Area Designated Officer (LADO), and our Personnel/Human Resources advisor are consulted for support and advice whenever necessary.

Managing Allegations Flowchart



Managing Allegations (Position of Trust) - Bury

Bury LADO contact: m.gay@bury.gov.uk (or current published LA contact)



At IW, we recognise the possibility that adults working in the school, including directly employed staff, volunteers, governors and supply teachers, may harm children; that they may have:

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

The last bullet point above includes behaviour that may have occurred outside of school and may make an individual unsuitable to work with children; this is known as transferable risk.

Any concerns of this nature about the conduct of other adults should be taken to the Headteacher without delay or, where that is a concern about the Headteacher, to the Proprietor before these concerns are possibly shared with the LADO.

Staff are aware that this must be done on the same working day.

The school will not conduct an internal investigation until instructed by the LADO.

We make all staff aware of their duty to raise concerns. Where a staff member feels unable to raise an issue or believes their genuine concerns are not being addressed, other whistleblowing channels may be available to them. They have been made aware of those other support channels through staff briefings and through the whistleblowing policy, which is displayed in the toilets.

As part of our whole-school approach to safeguarding, we promote an open and transparent culture in which all concerns about adults working in or on behalf of the school (including supply teachers, volunteers, and contractors) are dealt with promptly and appropriately. This includes allegations that do not meet the harm threshold, also known as low-level concerns.

Low-level concerns

We understand that the term 'low-level' concern does not mean it is insignificant. A low-level concern is any concern, no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt', that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct
- outside of work
- does not meet the harm threshold or is otherwise not severe enough to consider a
- referral to the LADO.
- m.gay@bury.gov.uk

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

- being over-friendly with children
- having favourites
- taking photographs of children on their mobile phones, contrary to school policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- door, or
- humiliating pupils.

Such behaviour can exist on a broad 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.

Low-level concerns will be reported in the same way as concerns and allegations that meet the harm test, i.e., to the headteacher or proprietor if the concern is about the headteacher.

The school will respond to any allegations or concerns raised regarding a Proprietor, in line with the local Bury Allegations Arrangements and Part Four of KCSIE 2025.

Records of low-level concerns will be reviewed to identify and respond to potential patterns of concerning, problematic or inappropriate behaviour.

Where a pattern of behaviour is identified, the Headteacher will decide on a course of action. If the harm threshold is met, this might be internal disciplinary procedures or referral to the LADO.

The Headteacher will consider whether broader cultural issues within the school enabled the behaviour to occur and, if appropriate, whether policies could be revised or extra training delivered to minimise the risk of recurrence.

Relating to Organisations or Individuals using School Premises

Suppose the schools receive an allegation relating to an incident that happened when an individual or organisation was using their school premises to run activities for children (for example, community groups, sports associations, or service providers that run extracurricular activities), as with any safeguarding allegation. In that case, we will follow safeguarding policies and procedures, including informing the LADO.

Concerns That Meet The 'Harm Threshold'

Imagine Wellbeing recognises that it is possible for any member of staff, including volunteers, SLT, contractors, agency and third-party staff (including supply teachers), and visitors to behave in a way that indicates a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school or college. This includes when someone has:

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

Allegations against staff that meet this threshold will be referred immediately to the Headteacher/DSL, who will contact the Local Authority Designated Officer (LADO) to agree further action to be taken in respect of the child and staff member. In the event of allegations of abuse being made against the Headteacher/DSL, staff are advised that allegations should be reported to the Proprietor, who will contact the LADO.

Safe Culture

As part of our approach to safeguarding, Imagine Wellbeing has created and embedded a culture of openness, trust, and transparency in which our values and expected behaviour as set out in our code of conduct are constantly lived, monitored, and reinforced by all staff (including supply teachers, volunteers, and contractors) and where all concerns are dealt with promptly and appropriately.

All staff and volunteers should feel able to raise any concerns about poor or unsafe practice, or potential failures in the school's safeguarding regime. The senior leadership team at Imagine Wellbeing will take all concerns or allegations received seriously. All members of staff are made aware of the school's whistleblowing procedure. It is a disciplinary offence not to report concerns about a colleague's conduct that could place a child at risk. This is part of our ongoing culture of vigilance with staff about in- and out-of-school behaviours, including online.

Staff can access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding a child. Protection failures internally. Staff can call 0800 028 0285 (8:00 am to 8:00 pm Monday to Friday) or email help@nspcc.org.uk.

Imagine Wellbeing has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of several listed offences, and who has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff at our school, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO.

Unsubstantiated, Unfounded, False or Malicious Allegations

If an allegation is determined to be false, the LADO and the case manager will consider whether the child and/or the person who has made the allegation needs help or may have been abused by someone else. If an allegation is found to be deliberate, IW will consider whether to take disciplinary action.

Opportunities to Teach Safeguarding

Imagine Wellbeing will ensure that pupils are taught about safeguarding, including online safety, as part of its broad and balanced curriculum. This will include covering relevant issues through relationships and sex education.

We recognise that school plays an essential role in helping pupils understand and identify the parameters of appropriate child and adult behaviour, what is 'safe', when they and others close to them are not safe, and how to seek advice and support when they are concerned.

Our curriculum provides opportunities to increase self-awareness, self-esteem, social and emotional understanding, assertiveness, and decision-making, so that learners have a range of age-appropriate contacts and strategies to protect themselves and others.

We recognise that a one-size-fits-all approach may not be appropriate for all pupils, and a more personalised or contextualised approach for more vulnerable pupils, victims of abuse and some SEND children might be needed.

Our school systems support pupils to talk to a range of staff. Pupils will be listened to and heard, and their concerns will be taken seriously and acted upon as appropriate.

Physical Safety

Use of Reasonable Force

There may be circumstances when it is appropriate for staff to use reasonable force to safeguard children from harm. Further information regarding our approach and expectations can be found in our physical intervention policy.

The use of Premises by Other Organisations

Where services or activities are provided separately by another body using the school's facilities/premises, the Headteacher and SLT will seek written assurance that the organisation concerned has appropriate policies and procedures in place regarding safeguarding children and child protection, and that relevant safeguarding checks have been carried out in respect of staff and volunteers. If this assurance is not achieved, an application to use the premises will be refused.

Safeguarding requirements will be included in any transfer of control agreement (i.e., lease or hire agreement), as a condition of use and occupation of the premises. Failure to comply with this will lead to termination of the agreement.

If the school receives an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for pupils, we will follow our safeguarding policies and procedures and inform the local authority designated officer (LADO)

Site Security

All members of staff have a responsibility to remain aware of building and grounds security and to report any concerns that may arise.

Appropriate checks will be undertaken for visitors and volunteers entering the school, as outlined in national guidance. Visitors will be expected to sign in and out via the school visitors' log and to display a visitor's badge whilst on site.

Any individual who is not known or identifiable on site should be challenged for clarification and reassurance.

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

Local Support

All members of staff at Imagine Wellbeing are made aware of the local support available.

The school has a statutory duty to promote and safeguard the welfare of children and has due regard to guidance issued by the Department for Education. The school recognises its legal and moral duty to promote the well-being of children, protect them from maltreatment, and respond to child abuse, as well as its responsibility to follow the local inter-agency procedures of Bury Safeguarding Children Multi-Agency Partnership.

Education Safeguarding Service

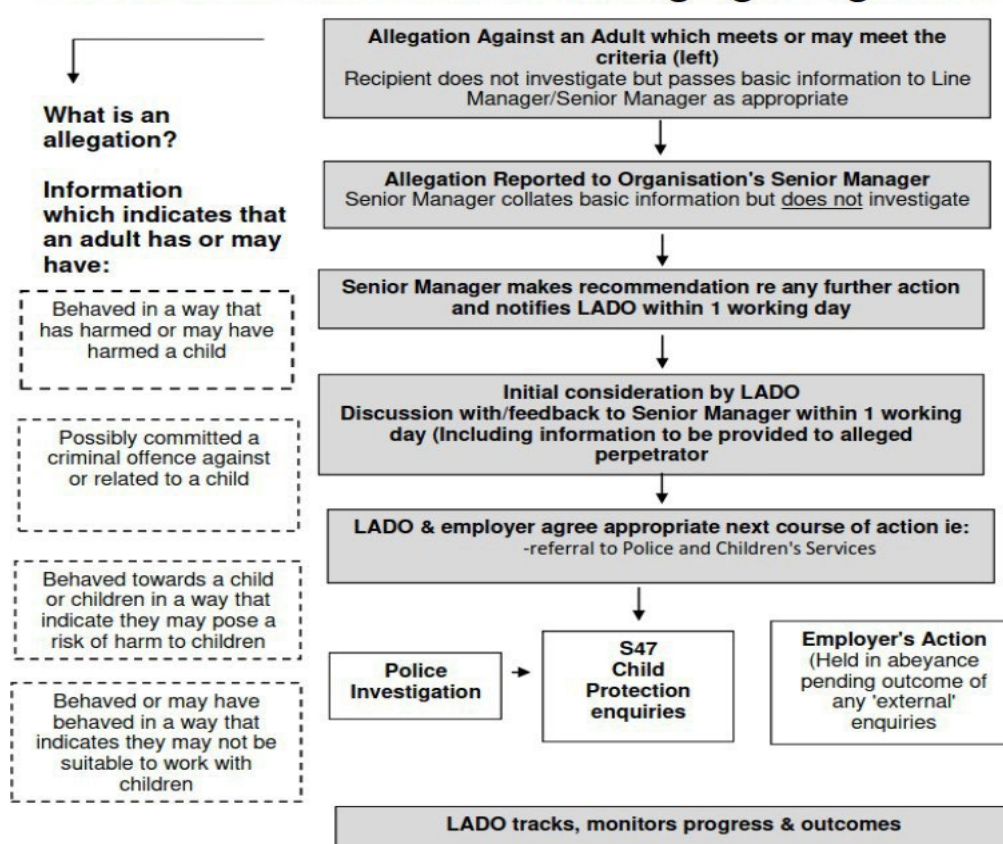
Area safeguarding advisor

- 0161 253 5678 (MASH / EHASH Monday to Thursday 8.30 am to 5 pm and Friday 8.30 am to 4.30 pm) or 0161 253 6606 (Out of Hours)
- Bury Council – report a child at risk (online referral form)

LADO

- LADO should be contacted at m.gay@bury.gov.uk
- The LADO procedures for Bury (see Resources section) provide guidance relevant to a wide range of situations in which an allegation or concern arises about the conduct of a person who works with children
- This includes: those in paid employment, including temporary, casual, and agency staff; volunteers; self-employed individuals; prospective adopters, or adult members of their household (Standard 22 Adoption: National Minimum Standards). A practical test for determining the applicability of the LADO procedures is whether the individual subject to the allegation or concern occupies a position of trust.
- Where the following threshold criteria apply, a referral to LADO should be made within 24 hours. An allegation relating to a person who works with children who has:
 - behaved in a way that has harmed a child, or may have harmed a child
 - possibly committed a criminal offence against or related to a child
 - behaved towards a child or children in a way that indicates they may pose a risk of harm to children
 - behaved or may have behaved in a way that indicates they may not be suitable to work with children
- The allegation could be about physical, sexual, emotional, or online abuse and neglect. The allegation can be recent and/or historical. It may relate to a single incident or be a cumulation of concerns. The suitability criteria may also cover other forms of behaviour and attitudes, either at or outside the workplace, particularly where this calls into question the values that govern the person's personal behaviour and/or area of work, or questions their ability to safeguard children.
- LADO referrals should be made by completing the LADO referral form and submitting it to m.gay@bury.gov.uk
- The LADO will hold an initial discussion with the school senior leader to consider the nature, content, and context of the allegation, and to agree on an appropriate course of action.
- The LADO may hold LADO meetings (also known as Position of Trust) to consider the allegation more fully. Detailed guidance on the Bury LADO procedures can be found here: Bury Council safeguarding children information: <https://www.bury.gov.uk/index.aspx?articleid=14807>
- See below for the Bury LADO Procedure

Flowchart: Procedure for Managing Allegations



- 101 or 999 if there is an immediate risk of harm

Links with other policies

This policy links to the following policies and procedures:

- Anti-bullying Policy
- Attendance Policy
- Complaints Policy
- Curriculum Policy
- Suspensions and Permanent Exclusions Policy
- First Aid Policy
- Health and Safety Policy
- Medicines Policy
- Online Safety Policy
- Physical Intervention Policy
- Behaviour Policy
- Risk Assessment Policy
- Safer Recruitment Policy
- Relationship and Sex Education Policy
- Staff code of conduct
- Whistleblowing

Additional Contact Information

- Main contact: 0808 800 5000 (help@nspcc.org.uk)
- Childline: 0800 1111
- FGM direct line: 0800 028 3550
- Gangs direct line: 0808 800 5000
- Whistleblowing advice line: 0800 028 0285
- Forced marriage unit 020 70080151 (fmufco.gov.uk)
- Tackling extremism and radicalisation (Prevent) counter.extremism@education.gsi.gov.uk 020 7340 7264

Policy Compliance, Monitoring and Review

Imagine Wellbeing will review this policy at least annually (as a minimum) and will update it as needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt. The policy will also be revised following any national or local updates, significant local or national safeguarding events and/or learning, and/or any changes to our own procedures.

All staff (including temporary/agency staff) will be provided with a copy of this policy and Part 1 and/or annex A of KCSIE September 2024 as appropriate.

Parents/carers can obtain a copy of the Imagine Wellbeing child protection and safeguarding policy and other related policies on request. Additionally, this policy is available on the Imagine Wellbeing website.

The policy forms part of our Imagine Wellbeing development plan. It will be reviewed annually by the senior leadership team (SLT), which is responsible for overseeing safeguarding and child protection systems.

The DSL and Headteacher will ensure regular reporting on safeguarding activity and systems to the senior management team. The SLT will not receive details of individual learners' situations or identifying features of families as part of its oversight responsibilities.

This policy is due to be renewed in September 2027.

Appendices

- Appendix 1: Specific Safeguarding Issues
- Appendix 2: Checking the Identity and Suitability of Visitors
- Appendix 3: Further Advice

Appendix 1 – Specific Safeguarding Issues

Sexual Violence and Sexual Harassment

Sexual violence and sexual harassment can occur between two or more children of any age and sex, from primary through to secondary stage and into college. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. 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. The boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred. The determination of whether behaviour is developmental, inappropriate, or abusive will hinge around the related concepts of valid consent, power imbalance and exploitation. This may include children and young people who exhibit a range of sexually problematic behaviour such as indecent exposure, obscene telephone calls, fetishism, bestiality and sexual abuse against adults, peers, or children. Staff should be vigilant to:

- Bullying (including cyberbullying)
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm • Sexual violence and sexual harassment
- Nude/or semi-nude image sharing by children - sexting (also known as youth-produced sexual imagery)
- Initiation/hazing-type violence and rituals
- Upskirting

Developmental Sexual Activity

Encompasses actions expected of children and young people as they move from infancy through to an adult understanding of their physical, emotional, and behavioural relationships with others. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and the seeking of consent.

Harmful Sexual Behaviour

It can be socially inappropriate, developmentally inappropriate, or both. When considering whether behaviour falls into this category, it is important to assess its adverse effects on any parties involved and the concerns it raises about a child or young person. It should be recognised that some actions may be motivated by information seeking but still cause significant upset, confusion, worry, or physical damage. It may also be that the behaviour is “acting out”, which may derive from other sexual situations to which the child or young person has been exposed. If an act appears to have been inappropriate, there may still be a need for some form of behaviour management or intervention. For some children, educational inputs may be enough to address the behaviour.

Abusive sexual activity includes any behaviour involving coercion, threats, aggression, together with secrecy, or where one participant relies on an unequal power base. To determine the nature of the incident, the following factors should be given consideration.

The presence of exploitation in terms of:

Equality – consider differentials of physical, cognitive, and emotional development, power and control and authority, passive, and assertive tendencies

Consent – agreement including all the following:

- Understanding that is proposed based on age, maturity, development level, functioning and experience
- Knowledge of society’s standards for what is being proposed
- Awareness of potential consequences and alternatives
- Assumption that agreements or disagreements will be respected equally
- Voluntary decision
- Mental competence

Coercion – the young perpetrator who abuses may use techniques like bribing, manipulation and emotional threats of secondary gains and losses, such as loss of love, friendship, etc. Some may use physical force, brutality, or the threat of these, regardless of the victim’s resistance.

In evaluating the sexual behaviour of children and young people, the above information should be used only as a guide.

Responding to reports of Sexual Violence and Sexual Harassment

Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. Pre-planning, practical training and effective policies will provide schools and colleges with the foundation for a calm, considered and appropriate response to any reports.

The initial response by a school or college to a child's report is incredibly important. How the school or college responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward. All victims must be reassured that they are taken seriously, regardless of how long it has taken them to come forward and that they will be supported and kept safe.

Staff taking a report should never promise confidentiality, as it is likely that it is in the victim's best interest to seek advice and guidance from others to provide support and engage appropriate agencies.

Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, schools and colleges should be aware of anonymity, witness support and the criminal process in general so they can offer support and act appropriately.

As a matter of effective safeguarding practice, schools and colleges should do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment.

Risk Assessment

When there has been a report of sexual violence, the designated safeguarding lead (or Deputy) should 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 for a report of sexual violence should consider:

- The victim, especially their protection and support
- Whether there may have been other victims
- The alleged perpetrator(s)
- All the other children (and if appropriate, adult students and staff) at the school or college, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms, and
- The time and location of the incident, and any action required to make the location safer.

Risk assessments should be recorded and kept under review.

Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE) and County Lines

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence.

CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for exploitation.

We know that different forms of harm often overlap and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation. In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection) and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator. Children can be exploited by adult males or females, individually or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, the child causing the harm must also be recognised as a victim.

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including,

- sexual identity
- cognitive ability
- learning difficulties
- communication ability
- physical strength
- status
- access to economic or other resources
- Some of the following can be indicators of both child criminal and sexual exploitation, where children:

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

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

Child Sexual Exploitation (CSE)

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

Child Sexual Exploitation (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.

Some additional specific indicators that may be present in CSE are children who:

- have older boyfriends or girlfriends
- suffer from sexually transmitted infections
- display sexual behaviours beyond expected sexual development
- become pregnant

Child Criminal Exploitation (CCE)

Some specific forms of CCE can include children

- being forced or manipulated into transporting drugs or money through county lines,
- working in cannabis factories,
- shoplifting or pickpocketing.
- They can also be forced or manipulated into committing a 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 forced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not consistently recognised by adults and professionals (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed to or consented to.

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

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 forms of “deal line”. This activity can happen locally and across the UK no specified travel distance is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure the compliance of victims. Children can be targeted and recruited into county lines in several locations, including schools (including special schools), further and higher educational institutions, pupil referral units, children’s homes, and care homes. Children are also increasingly being targeted and recruited online using social media.

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

As detailed above, several indicators for CSE and CCE may apply when children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing (from school, care or home) and are subsequently found in areas away from their home
- have been the victim, perpetrator, or alleged perpetrator of serious violence (e.g. knife crime)
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money

for drugs

- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or a hotel room where there is drug activity
- owe a 'debt bond' to their exploiters
- have their bank accounts used to facilitate drug dealing

Child Abduction and Community Safety Incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members, by people known but not related to the victim (such as neighbours, friends and acquaintances), and by strangers. 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 gain more independence (for example, when they start walking to school on their own), they need practical advice on how to stay safe. Many schools offer outdoor safety lessons led by teachers or local police officers. Lessons must 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.

So-called 'honour-based' abuse (including FGM and forced marriage)

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

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

Female Genital Mutilation (FGM)

Staff must be aware of FGM practices and the need to look for signs, symptoms, and other indicators of FGM. If a member of staff, in the course of their work, discovers that an act of FGM appears to have been carried out, the member of staff must report this to the police.

Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act 2003 ("the 2003 act"). It is a form of child abuse and violence against women. FGM comprises all procedures involving partial or total removal of the external female genitalia for non-medical reasons.

Section 5b of the 2003 Act 1 introduces a mandatory reporting duty that requires regulated health and social care professionals and teachers in England and Wales to report 'known' cases of FGM in under-18s that they identify in the course of their professional work to the police. The duty came into force on 31 October 2015. Whilst all staff should speak to the DSL regarding any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher MUST report this to the police.

What is FGM?

It involves procedures that intentionally alter/injure the female genital organs for non-medical reasons.

4 types of procedure:

- Type 1 clitoridectomy – partial/total removal of clitoris
- Type 2 excision –partial/total removal of clitoris and labia minora
- Type 3 infibulation entrance to the vagina is narrowed by repositioning the inner/outer labia
- Type 4: all other procedures that may include: pricking, piercing, incising, cauterising, and scraping the genital area.

Why is it carried out?

Belief that:

- FGM brings status/respect to the girl – social acceptance for marriage
- Preserves a girl's virginity
- Part of being a woman/rite of passage
- Upholds family honour
- Cleanses and purifies the girl
- Gives a sense of belonging to the community

- Fulfils a religious requirement
- Perpetuates a custom/tradition
- Helps girls be clean/hygienic
- Is cosmetically desirable
- Mistakenly believed to make childbirth easier

Is FGM legal?

FGM is internationally recognised as a violation of the human rights of girls and women. It is illegal in most countries, including the UK.

Circumstances and occurrences that may point to FGM happening are:

- Child talking about getting ready for a special ceremony
- Family taking a long trip abroad
- Child's family is from one of the 'at-risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leon, Egypt, Nigeria, Eritrea, as well as non-African communities including Yemeni, Afghani, Kurdistan, Indonesia, and Pakistan)
- Knowledge that the child's sibling has undergone FGM
- Child talks about going abroad to be 'cut' or to prepare for marriage
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues

A girl:

- Having a mother, older sibling or cousin who has undergone FGM
- Having a limited level of integration within UK society
- Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
- Being unexpectedly absent from school
- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

Signs that may indicate a child has undergone FGM:

- Prolonged absence from school and other activities
- Behaviour changes on return from a holiday abroad, such as being withdrawn and appearing subdued
- Bladder or menstrual problems
- Finding it challenging to sit still and looking uncomfortable
- Complaining about pain between the legs
- Mentioning something somebody did to them that they are not allowed to talk about
- Secretive behaviour, including isolating themselves from the group
- Reluctance to take part in physical activity
- Repeated urinal tract infection
- Disclosure

A girl:

- Having difficulty walking, sitting, or standing, or looking uncomfortable
- Finding it hard to sit still for long periods of time (where this was not a problem previously)
- Spending longer than usual in the bathroom or toilet due to difficulties urinating
- Having frequent urinary, menstrual or stomach problems
- Avoiding physical exercise or missing PE
- Being repeatedly absent from school, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or a significant change in behaviour
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

Forced marriage

Forcing a person into marriage is a crime.

A forced marriage is one entered into without the full and free consent of 1 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, emotional, or psychological.

It is illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not used.

Staff will receive training on forced marriage and the presenting symptoms. We are aware of the '1 chance' rule: we may have only 1 chance to speak to the potential victim and only 1 chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL. The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fm@fco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

The 'One Chance' rule

With FGM and Forced Marriage, there is the 'one chance' rule. It is essential that settings /schools/colleges act without delay and make a referral to children's services.

Breast Ironing, also known as Breast Flattening.

Staff have been made aware of an act of abuse performed on girls (from around the age of 9 years old) in which their breasts are ironed, massaged and/or pounded, burned with heated objects or covered with an elastic belt to prevent or delay the development of their breasts; the intention being to protect the child from rape, forced marriage, sexual harassment or removal from education. It is a practice in Cameroon, Nigeria and South Africa. The girl's mother often carries it out.

The staff would clearly follow our usual procedure for recording and reporting suspected abuse.

Domestic Violence

How does it affect children?

Children can be traumatised by seeing and hearing violence and abuse. They may also be directly targeted by the abuser or take on a protective role and get caught in the middle. In the long term, this can lead to serious, long-lasting emotional and psychological impact on children. In some cases, children may blame themselves for the abuse or may have had to leave the family home as a result.

What are the signs to look out for?

Children affected by domestic abuse reflect their distress in a variety of ways. They may change their usual behaviour, become withdrawn and tired, start wetting the bed, and have behavioural difficulties. They may not want to leave their house or may become reluctant to return. Others will excel, using their time in your care to escape their home life. None of these signs is exclusive to domestic abuse, so when you are considering changes in behaviours and concerns about a child, think about whether domestic abuse may be a factor.

What should I do if I suspect a family is affected by domestic abuse?

National domestic abuse helpline refuge runs the national domestic abuse helpline, available 24 hours a day, 0808 2000 247, and its website offers guidance and support for potential victims.

Refuge <https://www.refuge.org.uk/>

Operation Encompass helps police and schools work together to provide emotional and practical help for children. Police will inform the 'key adult' within the school if they have been called to an incident of domestic abuse, where there are children in the household, before registration the next day.

Indicators Of Susceptibility to Radicalisation and Extremism

Radicalisation is defined as the process of a person legitimising support for, or use of, terrorist violence. The government defines extremism in the Prevent strategy as:

Vocal or Active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

The Crown Prosecution Service defines extremism as: The demonstration of unacceptable behaviour by using any means or medium to express views which:

- Encourage, justify, or glorify terrorist violence in furtherance of particular beliefs.
- Seek to provoke others to terrorist acts.
- Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or

- Foster hatred which might lead to intercommunity violence in the UK.

There is no such thing as a “typical extremist”: those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

Pupils may become susceptible to radicalisation through a range of social, personal, and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that school staff are able to recognise those vulnerabilities.

Indicators of vulnerability include:

- Identity crisis – the student/pupil is distanced from their cultural/religious heritage and experiences discomfort about their place in society;
- Personal crisis – the student/pupil may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging;
- Personal circumstances – migration, local community tensions, and events affecting the student/pupil’s country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of government policy;
- Unmet aspirations – the student/pupil may have perceptions of injustice; a feeling of failure; rejection of civic life;
- Experiences of criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement/reintegration;
- Special educational need – students/pupils may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others
However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism. More critical risk factors could include:
Low risk behaviours include:
 - holding strong opinions or values (non-violent or non-extremist)
 - criticising government policies
 - adopting visible signs, for example, wearing clothing (non-violent or non-extremist), to express identity or sense of belonging
 - being adventurous on social media
 - taking a keen interest in national and international affairs
 - demonstrating support and supporting causes, for example, animal rights (non-violent)
 - showing new interest in a political ideology or religion
 - holding or expressing conservative values or practices, whether traditional, cultural or religious (unless they cause harm to a child or others, for example, female genital mutilation)
 At-risk behaviour includes:
 - being drawn to conspiracy theories
 - beginning to isolate themselves from family and friends
 - viewing or engaging with inappropriate online content and having uncontrolled or unsupervised access to the internet
 - expressing concerns about being victimised, for example, feeling under attack
 - discriminating against other individuals or groups of people
 - a sudden change in behaviour
 - showing interest in extremists or extreme groups
 - expressing views that divide us, for example, talking about ‘us’ and ‘them’.
 Medium risk behaviour includes:
 - legitimising the use of violence to defend ideology or cause
 - accessing extremist or terrorist websites, forums and publications
 - expressing dehumanising views
 - expressing an interest in travelling to a conflict zone
 - being in contact with a group or individuals known to support a violent extremist ideology, either online or in real life
 - expressing persistent intolerance towards groups of people perceived as ‘other’ - this may be based on protected characteristics such as gender, religion or ethnicity, but not exclusively
 - demonstrating a fixation with weaponry or explosives (this may include posing in concerning photographs or videos with weaponry), without an otherwise reasonable explanation
 - being obsessed with massacre, or extreme or mass violence, without targeting a particular group (for example, high school shootings)

High-risk criminal behaviour includes:

- verbally or physically attacking someone due to their race, religion, sexuality and so on
- committing violent acts guided by a violent extremist ideology or group
- taking part in any proscribed violent extremist group (financing, sharing material online, recruiting others and so on)

- having a 'kill list' or detailed plan to carry out mass violence
- producing or sharing terrorist material offline or online
- recruiting others to a proscribed terrorist group or organisation

Behaviours taken from 'Managing risk of radicalisation in your education setting, 2023'

The Prevent Duty ensures schools and colleges have 'due regard' to the need to prevent people from being drawn into terrorism.

Staff use their judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include the designated safeguarding lead (or deputy)/ SPOC (Single Point of Contact), making a https://Bury Council Prevent team: prevent@bury.gov.uk; GMP Prevent Team: 0161 856 6345; Act Early Support Line: 0800 0113764

If we suspect a child to be suffering or likely to suffer significant harm, including being radicalised, we would also contact: Bury Consultation Service (MASH / EHASH): 0161 253 5678

Option 3 – Bury – I-ART childwellbeing@bury.gov.uk and complete a Prevent referral on the stopadultabuse.org.uk website.

Channel is a voluntary, confidential support programme that provides early-stage support to individuals identified as susceptible to radicalisation. Prevent referrals may be passed to the multi-agency channel panel to determine whether individuals require support.

- Guidance on channel
- <https://www.gov.uk/government/publications/channel-and-prevent-multi-agency-panel-panel-guidance>
- Further information can be obtained from the Home Office website.

Child-on-Child Abuse

Child-on-child abuse is when children abuse other children.

This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the 2.

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that doesn't mean that this kind of abuse isn't happening.

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

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes, and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch
 - themselves sexually, or engage in sexual activity with a third party
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth-produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in this policy, as appropriate.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma and will offer them appropriate support.

Elective Home Education

Many home-educated children have positive learning experiences. We would expect the parents' The decision to home educate is to be made with their child's best education at its heart. However, this is not the case for all. Elective home education can mean that some children are not receiving a suitable education. Education and care are less visible in the services that are there to keep them safe and supported in line with their needs.

Imagine Wellbeing recognises that they must, in line with Education (Pupil Registration) (England) Regulations 2006, inform the local authority of all deletions from their admission register when a child is taken off roll.

Where a parent/carer has expressed their intention to remove a child from school to educate at home, it is recommended that local authorities, schools, and other key professionals work together to coordinate a meeting with parents/carers, where possible. This would be before a final decision has been made, to ensure that parents/carers have considered what is in each child's best interests. This is particularly important where a child has special educational needs or a disability, and/or has a social worker, and/or is otherwise vulnerable. Where a child has an Education, Health and Care plan, local authorities will need to review the plan, working closely with parents and carers. 182.

DfE guidance for local authorities on Elective home education sets out the role and responsibilities of local authorities, as well as their powers to engage with parents. Although this guidance is primarily aimed at local authorities, schools should also be familiar with it.

Cyberbullying

Central to our School's anti-bullying policy is the principle that 'bullying is always unacceptable' and that 'all pupils have a right not to be bullied'.

The school recognises that it must take note of bullying that occurs outside the school and spills over into the school.

So, we will respond to any bullying, including cyberbullying, that we become aware of and that is carried out by pupils when they are away from the site.

Cyberbullying is defined as "an aggressive, intentional act carried out by a group or individual using electronic forms of contact repeatedly over time against a victim who cannot easily defend himself/herself."

By cyber-bullying, we mean bullying by electronic media:

- bullying by text messages or calls on mobile phones
- the use of mobile phone cameras to cause distress, fear or humiliation
- posting threatening, abusive, defamatory or humiliating material on websites, including blogs, personal websites, social networking sites
- using e-mail to message others
- hijacking/cloning e-mail accounts
- making threatening, abusive, defamatory or humiliating remarks in online forums

If we become aware of any cyberbullying incidents, we will consider each case individually to determine whether a criminal act was committed. The school will pass on information to the police if it considers it appropriate or is required to do so.

Online Safety

Given the rapid pace of online change, some practitioners, parents, and carers have only a limited understanding of online risks and issues. Parents may underestimate how often their children encounter potentially harmful and inappropriate material online and may be unsure how to respond.

Some of the risks could be:

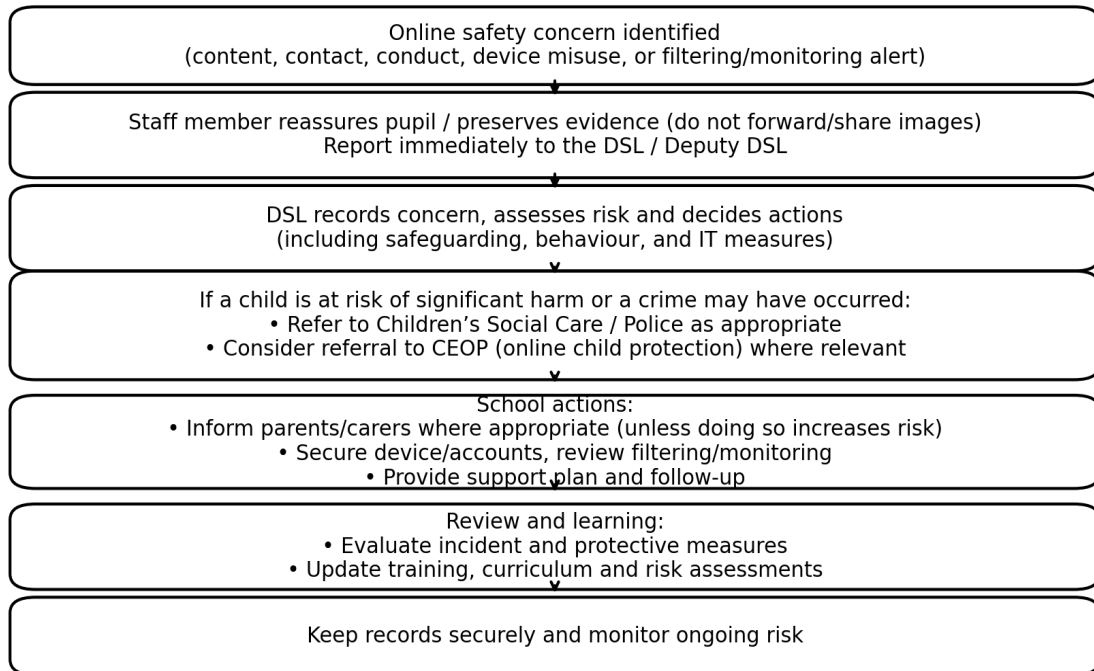
- content: being exposed to illegal, inappropriate or harmful content, for example, pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- contact: being subjected to harmful online interaction with other users; for example, peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying
- commerce - risks such as online gambling, inappropriate advertising, phishing, and financial scams. If you feel your pupils, staff, or others are at risk, please report it to the Anti-Phishing Working Group

The school, therefore, seeks to provide information and awareness to staff, pupils and their parents through:

- acceptable use agreements for children, teachers, parents/carers and governors

- curriculum activities involving raising awareness around staying safe online
- information included in letters, newsletters, and website
- parents' evenings/sessions
- high-profile events/campaigns, e.g. Safer Internet Day
- building awareness around information that is held on relevant websites and or publications
- social media policy

Online Safety Concern - Reporting and Response (School Procedure)



Cybercrime: Preventing young people from getting involved

Children are getting involved in cybercrime. Many do it for fun without realising the consequences of their actions—but the penalties can be severe. Cybercrime is a serious criminal offence under the Computer Misuse Act. If we become aware of any cybercrime incidents, we will consider each case individually to determine whether a criminal act may have been committed. The school will pass on information to the police if it considers it appropriate or is required to do so.

Risks associated with Gaming

Online gaming is an activity that most children and many adults engage in.

The school raise awareness by:

- talking to parents and carers about the games their children play and helping them identify whether they are appropriate
- supporting parents in identifying the most effective way of safeguarding their children by using parental controls and child safety mode
- talking to parents about setting boundaries and time limits when games are played
- highlighting relevant resources
- making our children aware of the dangers, including online grooming, and how to keep themselves safe, making our children aware of how to report concerns

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL and deputies will be aware of the contact details and referral routes to the local housing authority, so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

Modern Day Slavery, including Trafficking and the National Referral Mechanism

The Modern Slavery Act came into Force in 2015. 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.

Staff are aware that:

- A person commits an offence if they knowingly hold another person in slavery or servitude, or if they knowingly require another person to perform forced or compulsory labour
- It is an offence to arrange or facilitate a person's travel with a view to them being exploited. These are serious offences carrying a penalty of up to life imprisonment
- Any consent victims have given to their treatment will be irrelevant where they have been coerced, deceived or provided with payment or benefit to achieve that consent
- Children (under 18 years) are considered victims of trafficking, whether or not they have been coerced, deceived or paid to secure their compliance. They need only to have been recruited, transported or harboured for the purpose of exploitation

Trafficked Children

Human trafficking is defined by the United Nations, with respect to children, as "the recruitment, transport, transfer, harbouring or receipt of a person by such means as threat or use of force or other forms of coercion, of abduction, of fraud or deception for the purpose of exploitation."

Any child transported for exploitative reasons is considered to be a trafficking victim.

As a school, we are alert to the signs both for our children and for their families and are aware that this may be if they:

- Show signs of physical or sexual abuse, and/or has contracted a sexually transmitted infection or has an unwanted pregnancy
- Have a history with missing links and unexplained moves
- Are required to earn a minimum amount of money every day
- Work in various locations
- Have limited freedom of movement
- Appears to be missing for periods
- Are known to beg for money
- Are being cared for by adult/s who are not their parents, and the quality of the relationship between the child and their adult carers is not good
- Are one among several unrelated children found at one address
- Have not been registered with or attended a GP practice
- Are excessively afraid of being deported
- Look malnourished or unkempt
- Are withdrawn, anxious and unwilling to interact
- Are under the control and influence of others
- Live in cramped, dirty, overcrowded accommodation
- Have no access to or control over their passport or identity documents
- Appear scared, avoid eye contact, and can be untrusting
- Shows signs of abuse and/or has health issues

For those children who are internally trafficked within the UK, indicators include:

- Physical symptoms (bruising indicating either physical or sexual assault)
- Prevalence of a sexually transmitted infection or unwanted pregnancy
- Reports from reliable sources suggesting the likelihood of involvement in sexual exploitation / the child has been seen in places known to be used for sexual exploitation
- Evidence of drug, alcohol or substance misuse
- Being in the community in clothing unusual for a child, i.e. inappropriate for age/ borrowing clothing from older people
- Relationship with a significantly older partner
- Accounts of social activities, expensive clothes, mobile phones, etc, with no plausible explanation of the source of necessary funding
- Persistently missing, staying out overnight or returning late with no plausible explanation
- Returning after having been missing, looking well cared for despite not having been at home

- Having keys to premises other than those known about
- Low self-image, low self-esteem, self-harming behaviour, including cutting, overdosing, eating disorders, and promiscuity
- Truancy/disengagement with education
- Entering or leaving vehicles driven by unknown adults
- Going missing and being found in areas where the child has no known links
- Possible inappropriate internet use and forming online relationships, particularly with adults.

These behaviours themselves do not indicate that a child is being trafficked, but should be considered as indicators that this may be the case.

If staff believe that a child is being trafficked, this will be reported to the Designated Safeguarding Lead and will be reported as potential abuse.

Serious Violence

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include:

- Being male
- Having been frequently absent or permanently excluded from school
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

Appendix 2 – Checking the Identity and Suitability of Visitors

All visitors must verify their identity to the satisfaction of staff and leave their belongings, including their mobile phone(s), in a safe place during their visit.

If the visitor is unknown to the setting, we will verify their credentials and the reason for their visit before allowing them to enter. Visitors should be ready to produce identification.

Visitors are expected to sign the visitors' book and wear a visitor's badge.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite any speaker known to disseminate extremist views into the school, and carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or to radicalise pupils or staff.

Appendix 3 – Further Advice on Child Protection

Further advice on child protection is available from:

- NSPCC: <http://www.nspcc.org.uk/>
- Childline: <http://www.childline.org.uk/pages/home.aspx>
- Anti-Bullying Alliance: <http://anti-bullyingalliance.org.uk/>
- Beat Bullying: <http://www.beatbullying.org/>
- Childnet International - making the internet a great and safe place for children. Includes resources for professionals and parents <http://www.childnet.com/>

- Thinkuknow (includes resources for professionals and parents) <https://www.thinkuknow.co.uk/>
- Safer Internet Centre <http://www.saferinternet.org.uk/>
- Transgender <http://www.mermaidsuk.org.uk/> Schools transgender toolkit