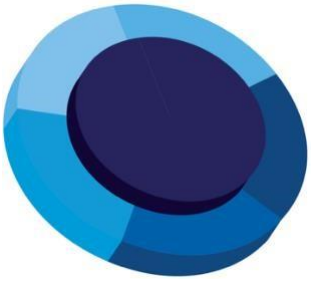
Harpurhey Alternative Provision School



Child Protection and Safeguarding Policy

KEY CONTACT DETAILS
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Harpurhey Alternative Provision School

SAFEGUARDING & CHILD PROTECTION POLICY

1. Aims

The school aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognizing and reporting safeguarding issues

2. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education 2023) and Working Together to Safeguard Children (2018), and the Governance Handbook. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following Government guidance and legislation:

- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- 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 mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- 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
- Teaching online safety in schools, which is the Government guidance supporting schools to teach pupils how to stay safe online when studying new and existing subjects

3. Definitions

Safeguarding and promoting the welfare of children means:

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

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

A **Child in Need** is defined under the Children Act 1989 as a child who is unlikely to achieve and 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 sers; or a child who is disabled.

Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

Upskirting typically when a photograph is taken under a person's clothing without them knowing, for sexual gratification or to cause the victim humiliation, distress or alarm.

Sharing of nudes and semi-nudes (also known as sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams **Children** includes everyone under the age of 18.

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education and will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The Manchester local authority (LA)
- A clinical commissioning group for an area within Manchester LA
- The chief officer of police for a police area within the Manchester LA

4. Equality statement

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to antidiscriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face as laid out by the Equality Act 2010.

We give special consideration to children who have protected characteristics which include:

- Have special educational needs (SEN) or disabilities (see section 9)

- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic abuse
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after

5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school. Our policy and procedures also apply to extended school and off-site activities.

5.1 All staff

All staff will read and understand part 1 and Annex A of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually. A signed record of completion is kept for all staff.

All staff are also expected to read annex B of KCSIE (about specific safeguarding issues).

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct policy, the role and identity of the designated safeguarding lead (DSL) and deputy DSL, the behaviour and antibullying policy, our Student Acceptable use of ICT policy, and the safeguarding response to children who go missing from education (Appendix 3)
- The early help process and their role in it, including identifying emerging problems and liaising with the DSL
- 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 supporting the DSL
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to

maintain an appropriate level of confidentiality while liaising with relevant professionals

- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation
- All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff are well placed to observe students day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where abuse and neglect have been suffered, or other potentially traumatic adverse childhood experiences (ACES), this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.
- All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. (Contextual safeguarding)

Section 13 and appendix 3 of this policy outline in more detail how staff are supported to carry out their role.

5.2 The designated safeguarding lead (DSL)

The DSL is Michael Hill, Headteacher for Student and Staff Wellbeing. The ADSL is Adam Randall. The DSL takes lead responsibility for child protection and wider safeguarding.

During term time, the DSL and ADSL will be available during school hours for staff to discuss any safeguarding concerns. Out-of-school hours, the DSL and ADSL can be contacted via the email (Including Operation Encompass alerts) and phone number at the end of this document.

The DSL and ADSL can be contacted out of hours, for non-emergencies, using the following email address: admin@haps.manchester.sch.uk

The DSL and ADSL is given the time, funding, training, resources and support to:

- Provide and support to other staff on child welfare and child protection matters
  - Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
  - Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme and/or police)

The DSL and ADSL also keeps the Headteacher informed of any issues, and liaises with local authority case managers and designated officers for child protection concerns as appropriate.

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

5.3 The Local governing body (LGB)

The LGB will approve this policy annually to ensure it complies with the law and hold the Headteacher to account for its implementation.

A Safeguarding lead governor has been appointed to monitor the effectiveness of this policy in conjunction with the LGB.

The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the Headteacher, where appropriate.

All governors will read Keeping Children Safe in Education. Please also refer to section 13.

5.4 The Headteacher

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

- Ensuring that staff (including temporary staff) and volunteers are informed of the systems which support safeguarding, including this policy, as part of their induction
- Communicating this policy to parents/carers when their child joins the school and via the school website
- Ensuring that the DSL and ADSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL and ADSL are absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate

6. Confidentiality

HAPS has the following principles with regards to sharing information within the school/partners, our 3 safeguarding partners and other educational providers:

- Timely information sharing is essential to effective safeguarding including for students moving onto College in order to ensure that the post 16 provider and their staff, know who these students 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 students in this group

might face and the additional academic support and adjustments that they could make to best support these students.

- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- The government's 'Information Sharing Ad for Safeguarding Practitioners' includes 7 'golden rules' for sharing information, and will support the DSL who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy)
- Confidentiality is also addressed in this policy with respect to record-keeping in section 12

7. Recognising abuse and taking action

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.

7.1 If a child is suffering or likely to suffer harm, or in immediate danger

Tell the DSL immediately. The DSL will then make a referral to children's social care and/or the police if they believe a child is suffering or likely to suffer from harm, or is in immediate danger.

7.2 If a child makes a disclosure to you

Staff need to be aware that the child may not feel ready or know how to make a disclosure and need to take steps to try to mitigate this.

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Type up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it. Typed accounts should be documented via email and should be signed and dated.

All children will have access to a safe space to speak or share their concerns. This will be for all children including LGBTQ+ pupils.

7.3 If you discover that FGM has taken place or a pupil is at risk of FGM

The Department for Education's Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 3.

Any teacher who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a **pupil under 18** must immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have good reason not to, they should also discuss the case with the **DSL** who will then involve children's social care as appropriate.

The duty for teachers mentioned above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out must speak to the DSL or ADSL and document these concerns in the usual way.

7.4 If you have concerns about a child

Figure 1 on page 7 illustrates the procedure to follow if you have any concerns about a child's welfare.

Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, **do not delay** and speak to a member of the senior leadership team for ad.

Early help

If early help is appropriate, the DSL will lead on liaising with other agencies and setting up an inter-agency assessment as appropriate.

The DSL and ADSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed. All Early Help referrals will be processed through a central referral.

Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL must follow up with the local authority if this information is not made available ensuring outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

All social care referrals will be processed through a central referral.

7.5 If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action. If in exceptional circumstances the DSL/deputy is not available, do not delay and speak to a member of the senior leadership team for ad.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which the
DSL and governors can call to raise concerns about extremism with respect to a pupil. An email may also be sent to counter.extremism@education.gov.uk, for emergencies only. Call 999 if:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

7.6 If you have a mental health concern

- Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- Staff are alert to the behavioural signs that suggest a child 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, they are advised to take immediate action by following the steps in section 7.4.
- If you have a mental health concern that is **not** also a safeguarding concern, staff are advised to speak to the DSL in order to agree a course of action.
- The HAPS will always refer to the Department for Education guidance on mental health and behaviour in schools where more guidance is required.

NOTE: If staff have any concerns about a child's welfare they should act on it. They should not assume a colleague or another professional will take action.

7.7 Concerns about a staff member or volunteer

If you have concerns about a member of staff or volunteer, or an allegation is made about a member of staff or volunteer posing a risk of harm to children, speak to the Headteacher. If the concerns/allegations are about the Headteacher, speak to the chair of governors. All low level concerns should be discussed with DSL and the DSL will decide on the action to be taken.

The Headteacher/chair of governors will then follow the procedures set out in our Complaints Policy, if appropriate.

7.8 Allegations of abuse made against other pupils

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up". It will be recognised that it can be seen as a breach of the child's rights as laid out in the Human Rights Act (1998).

We also recognise the gendered nature of peer-on-peer abuse (i.e. that it is more likely that girls will be victims and boys perpetrators). However, all peer-on-peer abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under our behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including sexting) If a pupil makes an allegation of abuse against another pupil:
- You must record the allegation and inform the DSL/deputy DSL, but do not investigate it
- The DSL will contact the local authority children's social care team and follow its ad, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed
- The DSL will contact formerly CAMHS, if appropriate

We will minimise the risk of peer-on-peer abuse by:

- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent (Relationships and sex education RSE 2020) including explaining that the law is there to protect them rather than criminalise them.
- Ensuring pupils know they can talk to staff confidentially and can report this via various online systems (CEOP)
- Ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- Having a visible presence of staff on duty at break times, lunchtimes and before/after school

7.9 Sharing of nudes and semi-nudes (also known as 'sexting')

Your responsibilities when responding to an incident

If you are made aware of an incident involving sexting (also known as 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

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

You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL or ADSL.

Review of incident

Following a report of an incident, the DSL or ADSL will determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- What further information is required to decide on the best response
- Whether the imagery has been shared widely.
- Whether immediate action should be taken to delete or remove images.
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents should be involved)

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

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the imagery is under 13

- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of the imagery

  (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the Headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care.

Further review of incident

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review holding interviews with the pupils involved (if appropriate) to establish the facts and assess the risks.

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents

The DSL and ADSL will inform parents at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm. **Referring to the police**

If it is necessary to refer an incident to the police, this will be done through dialing 101 and/or reporting this crime online. The log number is to be recorded.

Recording incidents

All sexting incidents and the decisions made in responding to them will be recorded. The record-keeping arrangements set out in section 12 of this policy also apply to recording incidents of sexting.

Curriculum coverage

Pupils are taught about the issues surrounding sexting as part of our PSHE education and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive
- Issues of legality
- The risk of damage to people's feelings and

reputation Pupils also learn the strategies and

skills needed to manage:

- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

This policy on sexting is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

7.10 Reporting systems for our pupils

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take.

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback

Our pupils feel safe in submitting any concerns as reassurances are always provided to them following any disclosures

8. Online safety and the use of mobile technology

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

To address this, our school aims to:

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

The 4 key categories of risk

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

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, 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 seminudes and/or pornography), sharing other explicit images and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

To meet our aims and address the risks above we will:

- Educate pupils about online safety as part of our curriculum. For example:
    - The safe use of social media, the internet and technology
    - Keeping personal information private
    - How to recognise unacceptable behaviour online
    - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyberbullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year.
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
    - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
    - Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- The DSL will take lead responsibility for the filtering and monitoring of IT use.
- All students are expected to hand in mobile phones on arrival to limit access to online information and any use of IT systems for educational purposes will be closely monitored by a member of staff at all times.

- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones

  Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation

- All administrative systems have two factor logins to protect data.
  - Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community
  - Staff retain the right to search pupils in line with the searching policy.

9. Notifying parents and carers

Where appropriate, we will discuss any concerns about a child with the child's parents. The DSL or ADSL will normally do this in the event of a suspicion or disclosure.

Other staff, such as Year Managers or other members of the Senior Leadership Team, will only talk to parents about any such concerns following consultation with the DSL/deputy DSL.

If we believe that notifying the parents would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, the DSL will notify the parents of all the children involved.

10. Pupils with special educational needs and disabilities

We recognise that pupils with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

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

We offer extra pastoral support for pupils with SEN and disabilities including specialist work with our Special Educational Needs Coordinator (SENCO) in the Learning Support base. We also have access to specialist external sers for SEN pupils as and

when required, including the Manchester QEST (Quality of Education Support Team), Speech and Language Therapist and Educational Psychologist Ser.

11. Pupils with a social worker

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support

12. Looked-after and previously looked-after children (Now referred to as Children that are looked after)

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- Appropriate staff have relevant information about a child's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant virtual school heads

We have appointed designated teachers, (Michael Hill – Headteacher/DSL, Adam Randall - ADSL), who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

The designated teachers are appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teachers will:

- Ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Work with the virtual school headteacher to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support lookedafter children and meet the needs identified in their personal education plans

13. Complaints and concerns about school safeguarding policies

13.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see Complaints Policy). The School will consider whether any member of staff has behaved or may have behaved in a way that indicates they may not be suitable to work with children. This may include incidents of domestic abuse or other incidents not involving children.

Whilst schools and colleges are not the employer of supply teachers, at The HAPS we will ensure all allegations are dealt with properly.

For further information, please refer to the PLT Disciplinary Policy.

13.2 Other complaints

Safeguarding-related complaints regarding pupils will be handled by the Headteacher and/or DSL who will in turn involve any other School staff or external agencies where relevant.

Complaints relating to our premises will be handled by the Headteacher with the involvement/support of the Pinnacle Trust Estates Team.

13.3 Whistle-blowing

Where a staff member feels unable to raise an issue with the DSL or Headteacher, or feels that their genuine concerns are not being addressed, external whistleblowing channels are open to them:

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk

For information about how the school will respond to such concerns and what protection is available to staff who report another member of staff, please refer to The HAPS Whistleblowing policy.

14. Record-keeping

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing.

Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

 Safeguarding records relating to individual children will be retained for 7 years after the child has left education. This is typically to the age of 25.

Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

If a child for whom the school has, or has had, safeguarding concerns transfers to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

The HAPS shares information with other agencies when this is appropriate, in line with our local safeguarding procedures.

In addition:

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and preemployment checks

Training

All staff

All staff members undertake safeguarding and child protection training at induction, including on whistleblowing procedures, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect.

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of our whole-school safeguarding approach and wider staff training, and curriculum planning
- Be in line with ad from our 3 local safeguarding partners
- Have regard to the Teachers' Standards to support the expectation that all teachers:
    - Manage behaviour effectively to ensure a good and safe environment
    - Have a clear understanding of the needs of all pupils

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

 Staff also receive regular safeguarding and child protection updates (for example, through emails and staff briefing) as required.

Contractors will also receive a safeguarding information document on arrival to the School.

Volunteers will receive appropriate training, if applicable to their role.

The DSL and deputy DSL

The DSL will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through LSCB meetings/email group, Safeguarding and Wellbeing forum groups and keeping up-to-date with the latest safeguarding developments).

They will also undertake Prevent Awareness training.

Governors

All governors receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

Recruitment – interview panels

Curriculum Vitaes (CVs) will not be accepted in the application process without a completed application form and online checks of the individual will be completed prior to interview.

At least one person conducting an interview for a post at the school will have undertaken safer recruitment training. This ensures that as a minimum, the contents of the Department for Education's statutory guidance and Keeping Children Safe in Education is covered, and is in line with local safeguarding procedures.

Monitoring arrangements

This policy will be reviewed **annually** by the Senior Leadership Team. After every review, it will be approved by the Local Governing Body.

Links with other policies

This policy links to the following policies and procedures:

- Behaviour and Anti-Bullying
- Emotional and Mental Wellbeing
- SEND
- Staff code of conduct

- Complaints
- Health and safety
- Attendance and punctuality
- Student ICT Acceptable use
- Equality Information Statement
- Relationship and Sex education
- Supporting pupils with medical conditions
- Accessibility
- Invacuation/Lockdown
- Educational Visits

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education 2023.

Appendix 1: types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

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

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- Seeing or hearing the ill-treatment of another

- Serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

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

- Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

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

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

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

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment

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

Appendix 2: safer recruitment and DBS checks – policy and procedures

 We will record all information on the checks carried out in the school's single central record (SCR). We follow requirements and best practice as set out below. The recruitment steps outlined below are based on part 3 of Keeping Children Safe in Education.

New staff

When appointing new staff, we will use an application form to:

- Verify their identity
- Obtain (via the applicant) an enhanced Disclosure and Barring Ser (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the
  UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic
  Area professional regulating authority, and criminal records checks or their equivalent
  - Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the secretary of state
  - As part of due diligence checks online searches will be made of any prospective candidates.

We will ask for written information about previous employment history and check that information is not contradictory or incomplete.

We will seek references on all short-listed candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments. The references requested will ask specific questions about the suitability of the applicant to work with children.

Regulated activity means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

Existing staff

If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- We believe the individual has engaged in relevant conduct; or
- The individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
- The 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

 Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

Trainee/student teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment

Governors

All governors will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.

The chair of the board will have their DBS check countersigned by the secretary of state.

All proprietors, trustees, local governors and members will also have the following checks:

- A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008).
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

Staff working in alternative/Collaborative provision settings

Where we place a pupil with an alternative/Collaborative provision provider, Positive Steps Manchester will liaise with the provider(s) to ensure they have carried out the appropriate safeguarding checks on individuals working there. This information will be shared with The HAPS.

- Adults who supervise pupils on work experience

When organising work experience, we will ensure that the policies and procedures of the provider are shared with the school before the placement begins, to ensure they are in place to protect children from harm.

The following definitions are from Working Together to Safeguard Children

Significant Harm The threshold that justifies compulsory intervention in family life and gives Local Authorities a duty to make enquiries to decide whether they should take action to safeguard or promote the welfare of a child who is suffering or likely to suffer significant harm.

Physical Abuse Physical abuse 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 an illness in a child.

Emotional Abuse Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Sexual Abuse Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative (e.g. rape, buggery or oral sex) or nonpenetrative acts. The activities may include non-contact activities, such as involving children in looking at, or in the production of, sexual online images, watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

Neglect Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a

 result of maternal substance abuse for example. Once a child is born, neglect may involve a parent or carer failing to:

 Provide adequate food and clothing, 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 caretakers).

 Ensure access to appropriate medical care or treatment.

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

Indicators of vulnerability to Radicalisation

 Pupil is distanced from their cultural/religious heritage and experience.

 Pupil demonstrates discomfort about their place in society.

 Pupil may be experiencing family tensions at home.

 Low self-esteem and sense of isolation.

 Pupil has distanced self from existing friendship groups and become involved with a different group of friends.

 Pupil may be searching for questions about their identity, faith and belonging.

 Pupil may have perceptions of injustice and rejects civic life.

 Pupil is accessing extremist websites and is in contact with extremist recruiters.

 Pupil justifies violence to solve societal issues.

 Significant changes in behaviour and/or appearance.

 Pupil uses extremist narratives and global ideology to explain personal disadvantage. **APPENDIX C**

A 'Good' Safeguarding School.

The leadership, staff and board of trustees are committed to a safe school which promotes the well-being and welfare of all its pupils, staff and visitors and the following is embedded into its vision, culture and practices:

ETHOS AND ENVIRONMENT

HAPS is a place where 'Every Child Matters'.

The environment is welcoming and pleasant and pupils, staff and visitors are greeted appropriately.

HAPS has pleasant and welcoming dining areas and encourages healthy eating.

Achievements and progress are regularly celebrated and pupils are encouraged to have high expectations of themselves and others and understand that long-term goals are worth working for.

Pupils feel valued and are open and confident in their relationships with staff and one another.

Pupil's work is displayed and changed regularly.

SITE SECURITY

- To ensure site security at times, the front doors to the school will be closed intermittently, this does not affect safety in a fire situation.
- Internal doors will sometimes be locked in the event of safeguarding those inside the room and to maintain good order; this does not affect safeguarding in a fire situation.
- All classroom internal door locks are accessible by students and staff as a 'thumb lock' and can be opened at any time from both students and staff at will from the inside of any classroom.

PRACTICES AND PROCEDURES

HAPS has a 'Safeguarding Policy' which all staff understand and practices are fully implemented.

Behaviour Management and Safeguarding protocols are in place and are clearly understood and followed by all.

Effective School Improvement Plan and effective school self-evaluation procedures are in place.

Appropriate Policies and Procedures are in place, understood and implemented by all staff.

HAPS takes account of the DDA and has made appropriate adjustments for staff and pupils.

 · All staff involved in safeguarding liaise regularly to ensure continuity in the support they provide.

 HAPS has an identified person who administers first aid.

 DBS checks are in place and regularly up-dated.

 Appropriate Risk Assessment procedures are in place and up-dated.

PROTOCOL

- In the event of a safeguarding concern, staff will report this through a Cause for Concern report to the DSL. Body maps are available on the system if it is a physical abuse/ injury concern.
- The DSL will action any further intervention dependent on the type of disclosure.
- In the event of the DSL & ADSL not being available, the Headteacher will be responsible for the safeguarding protocols and procedures.
- Relevant feedback will be available to staff after a safeguarding concern.
- The LADO will be contacted if the safeguarding concern involves a member of staff and it is deemed appropriate to do so.
- The DSL, ADSL and Headteacher holds the right to make safeguarding referrals independent of the Proprietor's view.

PUPIL TRACKING

- The progress and attendance of pupils at HAPS is carefully tracked and monitored and information shared with commissioning schools/institutions.
- Pupil tracking systems are in place and used effectively to monitor and track progress academically and intervene as required.
- Vulnerable groups are identified and tracked for progress, attainment and attendance.
- Effective transition for pupils takes place at all stages.

STAFF TRAINING

- The Leadership and Management of HAPS is trained in Safeguarding and is effective.
- A Senior Designated Person for Safeguarding is nominated and receives regular training and has access to appropriate supervision.
- Staff receive regular up-dated training on Safeguarding and identified staff receive higher level training as appropriate.

PUPIL ENGAGEMENT

 Pupil voice is valued is afforded respect and is involved appropriately in decision making.

 Pupils are given responsibility in supporting other pupils and are involved in routine organisational tasks and activities.

THE CURRICULUM

 The curriculum, organisation of teaching and learning and ethos in the provision contributes to teaching children and young people about safety issues, including road safety, accident prevention, substance misuse, sexual harassment, self-harm, Internet safety and building resilience.

- Within the subject of PSHE students are taught the importance of e-safety, with elements such as online grooming, sharing of explicit images and cyber bullying.
- Sexual health and safeguarding themselves in this manner is addressed also through PSHE and visiting speakers that are invited to the provision and embedded into the curricular.
- Child Sexual Exploitation is also covered in the curriculum.

 School has developed approaches to tackling all forms of bullying including, racist, homophobic and cyber-bullying. This includes tackling issues leading to grooming and child sexual exploitation and radicalisation

 There are formal and informal opportunities to praise reward and celebrate pupils behaviour and achievements in lessons, tutor groups, assemblies, dinner time, break time, before and after school, trips etc.

WORKING WITH PARENTS/CARERS AND OUTSIDE AGENCIES

 There is effective communication between HAPS staff, outside agencies and parent(s)/carer(s).

 Family intervention work is an integral part of HAPS support for children and families.

HAPS actively pursues all absence – they know which children are at risk of becoming/or are persistently absent – non-attendance is understood as a potential safeguarding issue.

 HAPS does exclude pupils but also tries to find alternative ways of supporting them.

 HAPS does not see pupils at risk of gang involvement, sexual exploitation, radicalisation or criminal activity as crime and disorder issues but as a

- ‘children in need’ issue and works closely with other partner agencies to safeguard them.

CONTACT DETAILS

Designated Safeguarding Lead: Michael Hill **(**Tel: 07432 506703)

Headteacher: Michael Hill (Tel: 07432 506703) m.hill@haps.manchester.sch.uk

ADSL: Adam Randall (07432 506703) a.randall@haps.manchester.sch.uk

Local Authority Designated Officer: Majella O’Hagan (0161 234 1214)

Monitoring, Evaluation and Review

The Local Advisory Board will review this policy every year and assess its implementation and effectiveness. The policy will be promoted and implemented throughout the School.

Adopted by HAPS	**September 2023**
Proprietor	**.....**
Headteacher	**.....**
Review date	**September 2024**