

**SAFEGUARDING & CHILD PROTECTION**

**POLICY AND PROCEDURE**

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Distribution List after review:	All Staff, Contractors and Volunteers

## Summary of Who to Contact in an Emergency

### USEFUL CONTACT DETAILS

- Integrated Front door- Targeted Early Help and Children’s Social Care: 01204 331500
- Emergency Duty Team – Out of Hours: 01204 337777
- Children’s Social Care- Child Protection Unit: 01204 337479
- Local Authority Designated Officer (LADO): 01204 337474 / 07824 541233
- Jo Nicholson - Safeguarding in Education Team: 07917 072223 / 01204 337472
- Natalie France– Safeguarding in Education Team: 07384 234744 / 01204 331314
- Lindsay Nelson- Virtual School Head 07385 361924
- Shona Green – Bolton Safeguarding Children Partnership Officer 01204 337964
- Craig Swinton – Child Missing Education 01204 334036
- Police – Safeguarding Vulnerable Persons Unit: 0161 856 6583
- Police Public Protection Investigation Unit (Child protection): 0161 856 7949
- Bolton Prevent Lead – Carlo Schroder ([carlo.schroder@bolton.gov.uk](mailto:carlo.schroder@bolton.gov.uk))

At Patterdale, to report child protection concerns, call the Hub on 0333 240 1727

### The Designated Safeguarding Leads and Deputies within the Foundation are as follows:

#### Senior Boys’ School:

Mrs Brandon is the designated teacher responsible for promoting the educational achievement of children in the Senior Boys’ School who are looked after and for keeping them safe.

**Mr Paul Davidson (DSL (for Boys Division DfE no. 350/6014) and Prevent Lead)** on 01204 840201 extension 253, [PGD@boltonschool.org](mailto:PGD@boltonschool.org)

Mrs Helen Brandon (**Deputy DSL and Prevent Lead**) on 01204 840201 extension 211, [HMB@boltonschool.org](mailto:HMB@boltonschool.org)

Dr Fraser Mullins (**Deputy DSL**) on 01204 840201 extension 381, [FHM@boltonschool.org](mailto:FHM@boltonschool.org)

Mr Martin Prentki (**Deputy DSL**) on 01204 840201 extension 304, [mhjp@boltonschool.org](mailto:mhjp@boltonschool.org)

#### Senior Girls’ School:

Mrs Green is the designated teacher responsible for promoting the educational achievement of children in the Senior Girls’ School who are looked after and for keeping them safe.

**Mrs Abigail Green (DSL (for Girls Division DfE no. 350/6015) and Prevent Lead)** on 01204 840201 extension 279, [agreen@boltonschool.org](mailto:agreen@boltonschool.org)

Mrs Tessa Delves (**Deputy DSL**) on 01204 840201 extension 322, [tdelves@boltonschool.org.uk](mailto:tdelves@boltonschool.org.uk)

Mrs Melissa Wright (**Deputy DSL**) on 01204 840201 extension 481, [mwright@boltonschool.org.uk](mailto:mwright@boltonschool.org.uk)

Primary Division (Junior Boys, Junior Girls, Infants, Nursery, Kidzone and BSSL)

Mrs Sue Faulkner is the designated teacher responsible for promoting the educational achievement of children in the Primary Division who are looked after and for keeping them safe. Mrs Faulkner Has DSL and Prevent Lead oversight of the whole Primary Division. She can be contacted on 01204 840201 extension 270, [SF@boltonschool.org](mailto:SF@boltonschool.org)

Junior Boys' School:

**Mrs Grace Fletcher (Deputy DSL and Prevent Lead)**, on 01204 840201 extension 223, [GFletcher@boltonschool.org](mailto:GFletcher@boltonschool.org)

**Miss Millie Brisk (Deputy DSL)**, on 01204 840201 extension 223, [MLB@boltonschool.org](mailto:MLB@boltonschool.org)

Junior Girls' School:

**Mrs Helen Holt (Deputy DSL and Prevent Lead)**, on 01204 840201 extension 414, [hholt@boltonschool.org](mailto:hholt@boltonschool.org)

**Mrs Laura Parrish (Deputy DSL)** on 01204 840201 extension 545 or 540, [lparrish@boltonschool.org](mailto:lparrish@boltonschool.org).

Beech House Infant School, including Early Years Foundation Stage (EYFS):

**Mrs Karen Shaw (DSL and Prevent Lead)** 01204 434759 extension 502 [kshaw@boltonschool.org.uk](mailto:kshaw@boltonschool.org.uk)

**Mrs Emma Fox (Deputy DSL)** 01204 434759 extension 502 [clfox@boltonschool.org.uk](mailto:clfox@boltonschool.org.uk)

Nursery, (Early Years Foundation Stage)

**Mrs Jill Sunter (DSL and Prevent Lead)**, on 01204 840201 extension 520, [JSunter@boltonschool.org.uk](mailto:JSunter@boltonschool.org.uk)

**Mrs Allyson Hunt (Deputy DSL)** on 01204 840201 extension 522, [AHunt@boltonschool.org](mailto:AHunt@boltonschool.org)

Kidzone, including Early Years Foundation Stage:

**Mrs Pauline Palmer (Deputy DSL and Prevent Lead)**, on 01204 840201 extension 532,

**Miss Kelley Green (Deputy DSL)** on 01204 840201 extension 532

BSSL Leisure:

**Mrs Charlene Griffiths-Jackson (DSL and Prevent Lead)**, on 01204 434797 (or internal extension 430) [cjackson@bssleisure.com](mailto:cjackson@bssleisure.com)

**Miss Selina Monsen (Deputy DSL)** extension 318, [smonsens@bssleisure.com](mailto:smonsens@bssleisure.com)

Patterdale Hall: Safeguarding concerns about a child or young person at Patterdale Hall should be reported to **Mr Tim Taylor, Manager, or Mr Hallam Elliker, Activities Manager**, on 01768 482233 or speed dial 459 from School, [ttaylor@patterdalehall.org.uk](mailto:ttaylor@patterdalehall.org.uk) or [helliker@patterdalehall.org.uk](mailto:helliker@patterdalehall.org.uk). If the child or young person is from Bolton School, the Patterdale Hall Manager will then inform the relevant Designated Safeguarding Lead at School. If the child or young person is *not* from Bolton School, the Patterdale Hall Manager will liaise with the accompanying teacher/member of staff so that he/she may deal with the matter in line with their own institution's procedures. Mr Tim Taylor is the Prevent Lead.

**NB: Any member of staff (regardless of where in the organisation they work) should first raise the concern with the relevant Designated Safeguarding Lead (or their Deputy) in that part of the School or Foundation named above. If that is not relevant (e.g. due to the concern not being about a Bolton School pupil) or not possible if the DSL or Deputy DSL cannot be contacted, then the member of staff should ring social services directly.**

The **Governors have a nominated Governor**, Dr Victoria Gibson, to assist all Governors in carrying out their responsibilities for Child Protection matters. Contact details may be obtained by telephoning Mrs Debra Hardman, P.A. to the Clerk and Treasurer, on 01204 840201 extension 411. She is assisted by Mrs. Joy Bailey who can also be contacted through the P.A. to the Clerk and Treasurer.

The Foundation is a large and complex organisation. In order to fully promote the wellbeing of children each different setting has a number of trained staff with safeguarding responsibilities. The Foundation DSL Team comprises the three lead DSLs, those for Senior Boys, Senior Girls and the Primary Division. They have access to all safeguarding records and meet regularly to discuss case studies and trends. Where a safeguarding concern has impact across multiple settings for example where siblings are involved or in the case of child-on-child abuse across settings the Foundation DSL Team will assign a lead DSL for that case.

### **Introduction**

The Bolton School Foundation is committed to safeguarding children and young people, and we expect everyone who works in the Foundation to share this commitment. Foundation Staff take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them. **We will always act in the best interest of the child.**

This Safeguarding and Child Protection Policy is applicable to all on and off-site activities undertaken by pupils or other children and young people whilst they are the responsibility of the Bolton School Foundation, including at Patterdale Hall, the Nursery or Kidzone.\* Following a detailed risk assessment it has been authorised by the Governing Body and is available on the School's website. This policy can be made available in large print or another accessible format if required. (\*Please note that *separate* safeguarding arrangements are in place for the 19th Bolton (Bolton School) Scout Group, which are carefully monitored by Greater Manchester North, Scout Association.)

This Safeguarding Policy draws upon the duties conferred by:

- the Children's Acts 1989 and 2004
- S157/175 of the 2002 Education Act; SS94 (1 & 2) of the Education and Skills Act 2008.
- The Early Years Foundation Stage (Welfare Requirements) Regulations 2017 made under Section 40 of the Childcare Act 2006.
- S10 of the Childcare Act 2010.
- the Education (Independent Schools Standards) (England) Regulations.
- The Human Rights Act 1998
- The Equality Act 2010
- Domestic Abuse Act 2021
- The Children and Families Act 2014
- The Children and Social Work Act, 2017 and the Statutory Framework for the Early Years Foundation Stage (EYFS).

It also has regard to the following:

- 'Working Together to Safeguard Children 2026'.
- 'Working together to improve school attendance – August 2024'

- Keeping Children Safe in Education (KCSIE September 2025)
- Guidance for Safer Working Practice for those Working with Children and Young People in Education Settings, October 2015
- procedures produced by the Manchester Safeguarding Partnership and the Bolton Local Authority Children and Young People's Plan and Framework for Action.

The Foundation also has regard to the advice contained in the DfE's 'What to do if you're worried a child is being abused (July 2015)' and 'Information Sharing Advice for Safeguarding Practitioners' 'Relationships Education, Relationships and Sex education (RSE) and Health Education (2019) and the Statutory guidance issued under section 29 of the Counter-Terrorism and Security Act 2015 regarding the 'Prevent' Strategy including 'The use of social media for on-line radicalisation (2015). The Policy and relevant procedures are reviewed at least annually and may be amended when appropriate; in particular, should any deficiencies or weaknesses in Safeguarding arrangements become apparent, remedial measures will be taken without delay.

The Foundation also holds the following documents which should be read in conjunction with this policy:

- Whistleblowing policy
- Behaviour of Staff policy
- Safeguarding Allegation Management Procedure
- Educational Visits policy
- Responding to Reports of Sexual Violence policy
- Sharing Nudes policy
- Safer Recruitment policies
- Anti-Bullying strategies
- Radicalisation Risk Assessment

### **What are Safeguarding and Child Protection?**

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 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
- promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children
- taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.

Safeguarding children's welfare encompasses matters such as bullying, mental health and health and safety, together with a range of other issues, e.g. arranging to meet the needs of children with a disability, (including any pupil with SEND or with an EHC plan), medical conditions, (including historical) mental health issues (including current or historical self-harm or body image issues), first aid, school security, drugs and

substance misuse. Details of the Foundation's policies in these areas are contained in other documents which can be found on the website or obtained on request from the relevant School/ setting.

**Child Protection** is one part of safeguarding and promoting children's welfare and refers to the activity that is undertaken to protect children who are suffering or at risk of suffering significant harm (requiring immediate referral to Children's Social Care) as well as to children in need of Early Help and additional support in order to thrive (requiring inter-agency assessment).

The Foundation has a zero-tolerance approach to child-on-child abuse.

### **Aims of this Policy**

The purpose of this policy is to:

- Describe what should be done, in accordance with locally agreed inter-agency procedures, if anyone in the Foundation has a concern about the safety or welfare of a child who attends the school or takes part in an activity organised by the Foundation, including in the EYFS settings.
- Identify the names of responsible persons in the Foundation and explain the purpose of their role.
- Explain what constitutes abuse, neglect and exploitation, including Child Sexual Exploitation, Female Genital Mutilation and Radicalisation
- Identify the particular attention that should be paid to those children who fall into a category which might be deemed 'vulnerable'.
- Inform staff and volunteers how referrals are dealt with when they are passed on to the relevant person.
- Refer staff to other policies and practices which deal with Safeguarding and Child Protection Issues
- Set out expectations in respect of staff training and induction.
- Outline how the implementation of this policy will be monitored.
- Clarify the procedures and practices in place to ensure that children are kept safe and that their welfare is upheld in the everyday life of the Bolton School Foundation, including in the EYFS settings.
- Clarify the responsibilities of the Designated Safeguarding Leads and Deputies within the Foundation, including how their work conforms to local requirements.
- Provide a summary of information regarding referrals and an up-to-date list of telephone numbers with important points of contact.
- Provide information about the Foundation's responsibilities in line with the Prevent Strategy
- Provide information about the Foundation's responsibilities in relation to e-Safety.

As indicated above, other relevant documentation can be found in the Personnel section of the policy store and includes:

- The Safer Recruitment and Application Procedures plus the associated Guidance about Pre-Appointment Checks and Vetting and Forms for the Pre-Appointment Checks of Contractors and Supply staff.
- The Behaviour Policy for Staff, Volunteers, Contractors and Other Adults.
- The Employees' Handbook.
- The Whistleblowing Policy.

- The Foundation's Health and Safety Policies (including First Aid, Medical, School Security and Drugs Policies).

In addition, there are Anti-bullying and Behaviour Management Policies produced by the different settings in the Foundation. There are Foundation Policies for attendance, responding to reports from children and young people of incidents of Sexual Violence, Harassment and Misconduct and for responding to sharing nudes and semi-nude images and videos.

### **How the Foundation Supports the Welfare of the Child in Everyday Situations**

The Bolton School Foundation takes seriously its duty of pastoral care and is proactive in seeking to prevent children becoming the victims of abuse, neglect or exploitation. It does this in a number of ways:

- By ensuring that the Safeguarding and protection of children in the Foundation are the active responsibility of the whole community, and that those responsible for taking action make sure their approach is child-centred, acting always in the best interests of the child.
- By the Governors ensuring that there is in place an effective Safeguarding/ Child Protection Policy in line with the guidance and procedures of the Bolton Safeguarding Children Partnership, whose arrangements are fully implemented in practice and reviewed at least annually.
- By the Governors ensuring that an appropriate senior member of staff from the leadership team are appointed as DSLs for each division or school.
- By ensuring that people looking after children are suitable, including in the EYFS settings, and that 'Safer Recruitment' Policy and Procedures help deter, reject or identify people who might abuse children e.g. making appropriate pre-appointment checks when appointing members of staff/ volunteers/ contractors/ supply staff in accordance with national requirements, including checking that those working in early and later years child care are not disqualified from working in childcare;
- By ensuring that Induction processes for staff include training in the Safeguarding & Child Protection Policy; online safety; the Pupil Behaviour Policy for the relevant School/setting; the Behaviour Policy for Staff, Volunteers, Contractors and Other Adults; the safeguarding response to children who go missing from education; the role of the DSL and any Deputies.
- By putting in place appropriate safeguarding responses to children who go missing from education, including providing information to local authorities when a child leaves the Foundation.
- By notifying the LA if the School knows of or becomes aware of private fostering arrangements.
- Through the creation of an open culture which respects all individuals' rights and discourages bullying and discrimination of all kinds, supported by a Whistleblowing Policy which details procedures for individuals to report concerns.
- By informing children of their rights to be free from harm and encouraging them to talk to staff if they have any concerns.
- By reassuring and responding proactively to any report of sexual violence and sexual harassment.
- By helping children and young people within the School/ setting to keep themselves safe, including on-line, through programmes of Personal, Social, Health, and Economic Education at an age- appropriate level, to promote self-esteem and social inclusion.

- By using assemblies and curriculum time where appropriate to help children understand the risks posed by those who use the internet and social media to bully, groom or abuse other people.
- By training all staff in aspects of Safeguarding and Child Protection, including: how to look out for signs of abuse and neglect, particularly in children who are too young to voice their concerns; how to identify children or young people at risk of radicalisation; and how to promote e-safety among children and young people, as well as teaching them how to keep safe off line;
- By adopting robust systems which deter possible abusers and will manage effectively any allegations or concerns about abuse if they arise.
- By sharing information as appropriate with other professionals and local agencies.
- By ensuring appropriate staff have the information they need in relation to a child's looked after legal status, including details of the child's social worker and 'virtual head'.
- By ensuring that the DSL has details of the Personal Adviser appointed to guide and support care leavers.
- By working proactively to fulfil its duties with regard to the Prevent Strategy.
- By adopting robust e-safety policies and procedures with appropriate filters and monitoring systems in place.
- By limiting and/or banning pupils' access to mobile 'phones during the school day, in accordance with each School's rules and regulations.
- By adhering to statutory guidance on monitoring attendance and informing the local authority of any pupil absent for ten consecutive unauthorised days or fifteen consecutive days due to illness.
- By following all local and national guidance with regard to children in the EYFS settings, e.g. ensuring that Bolton Council and Ofsted would be informed of any serious accident, serious illness, serious injury to or the death of any child within our care and of the actions taken within 14 days were such an event to happen.
- By notifying Ofsted and Bolton Council Environmental Health Team of any food poisoning affecting two or more children cared for on the premises in any EYFS setting, should such an event occur.
- By reviewing the safeguarding policies and procedures of any external agency hiring Foundation facilities and ensuring they are in line with the Foundation policy. Any allegation received by the Foundation regarding an external agency will be treated in the same way as an allegation to Foundation staff and the LADO informed as soon as is practicable.

## Types of Abuse and Neglect

**Abuse:** *a form of maltreatment of a child. Anybody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Types of abuse may overlap.*

**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.*

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

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.
- Feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction.
- It may involve seeing or hearing the ill-treatment of another, 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 activity may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.
- They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually 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.

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

- Protect a child from physical and emotional harm or danger.
- Provide adequate food, clothing and shelter including exclusion from home.
- Ensure adequate supervision (including the use of inadequate caregivers or children being left unattended or abandoned at home).
- Ensure access to appropriate medical care, treatment, and/or education.

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

### Indicators of abuse and neglect

A child may:

- Show unexplained or suspicious injuries such as bruising, cuts or burns, particularly if situated on a part of the body not normally prone to such injuries.
- Have an injury for which the explanation seems inconsistent.
- Describe what appears to be an abusive act in which they were involved – verbally or in written form such as an essay or drawing.
- Show unexplained changes in behaviour - e.g., becoming very quiet, withdrawn, or displaying sudden outbursts of temper or hysteria. Academic work may suddenly deteriorate.
- Demonstrate age-inappropriate sexual awareness.
- Engage in sexually explicit behaviour in games/PE or other areas.
- Be distrustful of adults.
- Have difficulty in making friends or be prevented from socialising with other children.
- Showing signs of depression, self-injury, suicidal tendencies
- Not being taken to medical appointments
- Lose weight for no apparent reason.
- Become increasingly dirty or unkempt, with inadequate or damaged clothing.

The above list is not exhaustive and the presence of one or more of the indicators will not be proof that abuse is actually taking place. It is **not** the responsibility of members of staff to decide that abuse is occurring, but it is their responsibility to act on any concerns.

Specific Safeguarding Issues that can put children at risk of harm: drug-taking, alcohol abuse, missing education, sexting.

Manifestations of Safeguarding Issues as Child-on-Child Abuse: may include some of: bullying, cyberbullying, physical abuse (including hitting, kicking, shaking, biting, hair-pulling or other forms of causing physical harm), sexual violence and sexual harassment, upskirting, sexting, initiation/ hazing type violence and rituals.

Some indicators of abuse or neglect which staff or volunteers should report to the DSL or Deputy if they have concerns about them in relation to any particular child(ren) may include:

- Unexplained or suspicious injuries (e.g. bruising, cuts or burns), particularly if situated on a part of the body not normally prone to such injuries.
- A written, oral or drawn description/ depiction by a child of what appears to be an abusive act in which they were involved.
- Unexplained changes in behaviour such as withdrawal/ sudden outbursts of temper.
- Suspected drug taking, alcohol abuse, truanting and sexting.
- Unexplainable and/or persistent absences from education
- Sudden poor performance in educational/ other achievement.
- Age-inappropriate sexual awareness, for example in language or knowledge.

- Sexually precocious and/or explicit behaviour, for example sexualised drawing or play at a precocious age.
- Distrustful behaviour with adults, particularly those with whom a close relationship would normally be expected.
- Difficulty in forming relationships and making friends.
- Difficulty in sleeping.
- Problems with soiling/ wetting, particularly when toileting has not previously been an issue.
- Psychosomatic symptoms, including headaches and abdominal pains.
- Signs of depression and/or suicidal tendencies.
- Deliberate self-harm, including the development of an eating disorder.
- Becoming increasingly unkempt.
- Running away or trying to do so.

In addition to these types of abuse and neglect, there is a need to be alert to the following specific Safeguarding issues:

### **Child Sexual Exploitation (CSE):**

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse 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. Victims can be exploited even when activity appears consensual, and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

CSE can affect any child or young person (male or female) under the age of 18, including those over 16 who can legally consent to have sex. It can include both contact and non-contact sexual activity. It may occur without the young person's knowledge (e.g. others posting their images online). It can be perpetrated by individuals or groups, males and females, children and adults.

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Indicators of child sexual exploitation may include:

- Acquisition of money, clothes, mobile phones, etc. without plausible explanation.
- Gang-association and/or isolation from peers/social networks.
- Exclusion or unexplained absences from school, college or work.
- Leaving home/care without explanation and persistently going missing or returning late.

- Excessive receipt of texts/phone calls.
- Returning home under the influence of drugs/alcohol.
- Inappropriate sexualised behaviour for age/sexually transmitted infections.
- Evidence of/suspicions of physical or sexual assault.
- Relationships with controlling or significantly older individuals or groups.
- Multiple callers (unknown adults or peers).
- Frequenting areas known for sex work.
- Concerning use of internet or other social media.
- Increasing secretiveness around behaviours; and
- Self-harm or significant changes in emotional well-being.

Potential vulnerabilities include:

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

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

More information can be found in: Child sexual exploitation: Definition and a guide for practitioners (DfE 2017)

**Child Criminal Exploitation:** CCE occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence.

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions.
- children who associate with other young people involved in exploitation.
- children who suffer from changes in emotional well-being.
- children who misuse drugs and alcohol.

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

**County Lines:** County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”.

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children’s homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism 103 should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

**Domestic Abuse/ Violence:** In April 2021, the Domestic Abuse Act 2021 received Royal Assent and introduced a statutory definition for the first time.

#### Definition

The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other:

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

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

The definition of Domestic Abuse applies to children if they see or hear, or experience the effects of, the abuse; and they are related to the abusive person. The definition can be found here: <https://www.legislation.gov.uk/ukpga/2021/17/part/1/enacted>

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

regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

The Bolton School Foundation is signed up to Operation Encompass. Where local Police forces will share information about domestic incidents so that pastoral support can be implemented swiftly.

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

**Homelessness:** May be of the family or a 16/17-year-old who is living independently of the family.

**Faith Abuse:** This is child abuse which is linked to faith or belief. This includes belief in concepts of witchcraft and spirit possession, demons or the devil acting through children or leading them astray (traditionally seen in some Christian beliefs), the evil eye or djinns (traditionally known in some Islamic faith contexts) and dakini (in the Hindu context); ritual or muti murders where the killing of children is believed to bring supernatural benefits or the use of their body parts is believed to produce potent magical remedies; and use of belief in magic or witchcraft to create fear in children to make them more compliant when they are being trafficked for domestic slavery or sexual exploitation. This is not an exhaustive list and there will be other examples where children have been harmed when adults think that their actions have brought bad fortune, such as telephoning a wrong number which is believed by some to allow malevolent spirits to enter the home.

**Gangs and Serious Youth Violence:** A gang is defined as a group of young people, especially young men, who spend time together, often fighting with other groups and behaving badly. Youth violence refers to harmful behaviours that can start early and continue into young adulthood. The young person can be a victim, an offender, or a witness to the violence. Youth violence includes various behaviours including some violent acts such as bullying, slapping, or hitting. These behaviours can cause more emotional harm than physical harm. Others, such as robbery and assault (with or without weapons) can lead to serious injury or even death.

Some indicators that a young person may be at risk from or involvement with serious violent crime may include:

- increased absence from school.
- a change in friendships or relationships with older individuals or groups.
- a significant decline in performance.
- signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries.
- unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

**Hate Crimes/Hate Incidents:** Hate crimes are any crimes that are targeted at a person because of hostility or prejudice towards that person's disability, race or ethnicity, religion or belief, sexual orientation, transgender identity. A victim does not have to be a member of the group at which the hostility is targeted; anyone can be a victim of a hate crime. Hate incidents may feel like crimes to those who suffer them and can often escalate to crimes or tension in a community. These incidents may include verbal abuse, e.g. name calling, physical assault, e.g. being spat at or kicked, domestic abuse, harassment and damage to property.

**So called Honour Based Abuse (HBA):** So-called 'honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. Often a wider family or community is in play. All forms of so called HBA are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt staff should speak to the designated safeguarding lead as a matter of urgency. Staff need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

There are a range of potential indicators that a child may be at risk of HBA. Guidance on the warning signs that FGM or forced marriage may be about to take place, or may have already taken place, can be found on pages 38-41 of the Multi agency statutory guidance on FGM, (pages 59 – 61 focus on the role of schools) and pages 13 – 14 of the Multi-agency guidelines: Handling cases of forced marriage.

**Female Genital Mutilation (FGM):** Female Genital Mutilation (sometimes known as female circumcision) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK, but it is sometimes practised in about thirty African countries as well as in parts of the Middle East and Asia. The procedure may be carried out when the girl is new-born, during childhood or adolescence, at marriage or at first pregnancy but the majority of cases are thought to occur when the girl is between the ages of 5 and 8 years old. Staff and volunteers need to be alert to the possibility of a girl being at risk of or already having suffered FGM. They should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

Risk factors for FGM include:

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

Symptoms of FGM

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-school to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM. Staff should not assume that FGM only happens outside the UK.

Indications that FGM may have already taken place may include:

- difficulty walking, sitting or standing and may even look uncomfortable.
- spending longer than normal in the bathroom or toilet due to difficulties urinating.
- spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- frequent urinary, menstrual or stomach problems.

- prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return
- reluctance to undergo normal medical examinations.
- confiding in a professional without being explicit about the problem due to embarrassment or fear.
- talking about pain or discomfort between her legs

NB Whilst all staff should speak to the DSL about any concerns regarding FGM, there is a specific **legal** duty on teachers (The Serious Crime Act 2015). If a teacher, in the course of their work in the profession, discovers that an act of female genital mutilation (FGM) appears to have been carried out on a girl under the age of 18, the teacher **must** report this personally to the police.

(NB It will be rare for teachers to see visual evidence, and they should not be examining pupils). The HM Government document 'Multi-agency statutory guidance on FGM, the Home Office document 'Mandatory Reporting of Female Genital Mutilation – procedural information' and the FGM Fact Sheet provide more information;

### **Mental Health**

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.

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

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

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this policy and referral to the designated safeguarding lead or a deputy.

The Department for Education has published advice and guidance on 'Preventing and Tackling Bullying', and 'Mental Health and Behaviour in Schools'. In addition, Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among young people including its guidance 'Promoting children and young people's emotional health and wellbeing'. Its resources include social media, forming positive relationships, smoking and alcohol. See 'Rise Above' for links to all materials and lesson plans.

**Preventing Radicalisation:** The Counter Terrorism and Security Act 2015 places a duty on specified authorities, including education providers, to have regard to the need to prevent children, young people and adults from being drawn into terrorism or extremist views (the 'Prevent' Duty). Where staff are concerned that children and young people are developing extremist views or show signs of becoming radicalised, they should discuss this with the Designated Safeguarding Lead. The Designated Safeguarding Lead has received training about the Prevent Duty and tackling extremism and is able to support staff with any concerns they may have.

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

Staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral.

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

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

**Extremism** is the vocal or active opposition to our Fundamental Values, including the rule of law, individual liberty, and the mutual respect and tolerance of different faiths and beliefs.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people. As with other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection.

Where radicalisation is suspected, the appropriate lead on 'Prevent' should be informed in order that s/he may consult with the local 'Prevent' and/or 'Channel' team. Further details are outlined in Appendix 1 of this document, including contact numbers for immediate referral.

School staff should understand when it is appropriate to make a referral to the Channel programme, which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages.

**Trafficking and Slavery:** The Modern Slavery Act 2015 consolidates current offences of trafficking and slavery. Trafficking of persons means the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Children are trafficked for many reasons, including sexual exploitation, domestic servitude, labour exploitation, criminal exploitation e.g. benefit fraud and involvement in criminal activity such as pick-pocketing, theft and working in cannabis farms. They may also be involved in organ harvesting.

**Child on Child Abuse (including harassment and violence):** Children can abuse other children both in school and outside of school, in a number of ways, including (but not limited to):

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

In the event of disclosures about child-on-child abuse, all children involved, whether perpetrator(s) or victim(s), will be treated as being potentially 'at risk'. A child-on-child abuse incident will be treated as a child protection concern when there is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm'. They must be formally recorded on CPOMS. Any students making disclosures require reassurance they are being taken seriously and they will be kept safe and supported. Foundation staff have been trained to understand that there are barriers to reporting this kind of incident; it is essential to be vigilant and be clear to children how they can report incident and be supported.

Although that for some (but not all) forms of child-on-child abuse it is more likely that girls will be victims and boys' perpetrators all child-on-child abuse is unacceptable and will be taken seriously.

It is acknowledged that if there are no reported cases of child-on-child abuse such abuse may still be taking place and is simply not being reported.

**Sexual violence and sexual harassment** can occur between two or more children of any age or gender. Violence and harassment exist in a continuum and may overlap; they can be on or offline. Girls, children with SEND or LGBT children are at greatest risk. All staff must make it clear at all times that sexual violence and harassment are not acceptable; they must not be tolerated as 'part of growing up' or 'boys will be boys'. All such behaviours must be challenged and dealt with, so that they are not 'normalised'. Sexual violence includes rape, assault by penetration, sexual assault (i.e. if a person intentionally touches another person in a sexual way and the person touched has not freely consented to such touching and/or is not capable of giving such consent). Sexual harassment includes sexual comments/ jokes, online behaviour such as the non-consensual sharing of images, unwanted sexual comments, or sexual exploitation/ threats.

'Upskirting' is a criminal offence. It is an act of taking a photograph, without their consent, permission or knowledge, from underneath a person's clothing (not necessarily a skirt) with the intent of viewing their genitals. The purpose may be sexual gratification, or to cause the victim distress and alarm. Anyone, of any gender, can be a victim. In the event of child-on-child abuse, the perpetrator and victim will receive support from the DSL or Deputy DSL at the School, as well as from outside agencies as appropriate. Depending on the circumstances a pupil against whom an allegation of abuse has been made may be suspended from the

School during the investigation of such allegations and the appropriate school or setting's anti bullying policy, Behaviour and discipline policies, including sanctions, will apply. (All these policies may be found on the School website.)

KCSIE 2025 Part 5 and the separate guidance 'Sexual violence and sexual harassment between children in schools and colleges' sets out how schools and colleges should respond to reports of sexual violence and sexual harassment. When dealing with a report of sexual harassment or sexual violence, including child on child harassment/ violence, follow the Foundation Policy for responding to reports from children and young people of incidents of Sexual Violence, Harassment and Misconduct.

In cases where nudes or semi-nudes have been shared, we follow guidance given to schools and colleges by the UK Council for Internet Safety (UKCIS): Sharing nudes and semi-nudes (December 2020) and the Foundation policy for responding to sharing nudes and semi-nude images and videos.

**Forced Marriage:** A forced marriage is a crime in England. It is where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. The pressure put on people to marry against their will can be physical (including threats, actual physical violence and sexual violence) or emotional and psychological (for example, when someone is made to feel like they're bringing shame on their family). Financial abuse (taking your wages or not giving you any money) can also be a factor.

**Child Missing from Education (CME):** A child going missing from education (particularly repeatedly) is a potential indicator of abuse or neglect (including sexual and/or criminal exploitation), mental health needs, risk of substance abuse. All staff should be alert to the risk of children in their immediate care going missing from education, particularly on repeat occasions, and alert the relevant Designated Safeguarding Lead or Deputy DSL to any concerns which they have.

We will always follow up with parents/carers when pupils are not at school. This means we need to have a least two up to date contacts numbers for parents/carers. Parents should remember to update the school as soon as possible if the numbers change.

In response to the guidance in Keeping Children Safe in Education the school has:

1. Staff who understand what to do when children do not attend regularly.
2. Appropriate policies, procedures and responses for pupils who go missing from education (especially on repeat occasions).
3. Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.
4. Procedures to inform the local authority when we plan to take pupils off-roll when they:
  - a. leave school to be home educated.
  - b. move away from the school's location.
  - c. remain medically unfit beyond compulsory school age.
  - d. are in custody for four months or more (and will not return to school afterwards); or e. are permanently excluded.

The Designated Safeguarding Lead of each School must inform Bolton Local Authority of any pupil who is going to be deleted from the admission register if the child: has been taken out of school by his/her parents and is being educated outside the school system e.g. home education; has ceased to attend school and no longer lives within reasonable distance of Bolton School; has been certified by the School Medical Officer as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age; is

in custody for a period of more than four months due to a final court order and the School does not reasonably believe they will be returning at the end of that period; or, has been permanently excluded. This should be done as soon as the grounds for deletion are met, but no later than deleting the pupil's name from the register.

We will ensure that pupils who are expected to attend the school but fail to take up the place will be referred to the local authority. When a pupil leaves the school, we will record the name of the pupil's new school and their expected start date. In addition, the DSL of each School must inform Bolton Local Authority of any pupil who fails to attend school regularly or has been absent without the school's permission for a continuous period of 10 school days or more. NB Individual schools and settings within the Foundation have separate policies and/or guidance on what to do if a child goes missing or is not collected on time.

**Private Fostering:** A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes halfsiblings and stepparents; it does not include great-aunts or uncles, great grandparents or cousins. Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.

Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.

School staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The school itself has a duty to inform the local authority of the private fostering arrangements.

On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered.

Children with Family Members in Prison: Such children are at risk of poor outcomes including poverty, stigma, isolation, and poor mental health.

### **Why you might have concerns about a child or young person**

There are many indicators that may lead to concerns and staff should always report any concerns. Some examples of indicators are given here but these are not the only examples that exist.

**E.g. 1 You might be aware that a child/ young person has particular vulnerabilities**

Any child may benefit from Early Help (see below), but all staff should be particularly alert to the potential need for Early Help for a child:

- 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 in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care,
- has experienced multiple suspensions, is at risk of being permanently excluded from school
- 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.

**E.g. 2 A child/ young person might share information with you as an individual member of staff/ volunteer about something which causes you concern:**

A child or young person may speak to you in person to disclose information or s/he may do or say something in your presence which has the effect of disclosing information about possible abuse and/or neglect. If this happens, you must always act on this information, however slight it may seem, by reporting what you are told/ hear/ observe to the DSL or Deputy DSL (or the Head /Clerk and Treasurer in cases of allegations of abuse against another member of staff/ volunteer (including a Governor)/ contractor or pupil) as quickly as possible. It is not appropriate for you to make a decision whether or not abuse/ neglect has taken place- you must pass the information on to the relevant person.

**When a child or young person shares information with you about abuse or neglect, including a report of sexual violence or harassment, you should follow these guidelines:**

- Recognise that the child or young person has come to you as someone they trust.
- Reassure the victim that they are being taken seriously and that they will be supported and kept safe- do not make them feel ashamed or a nuisance for reporting the matter.
- Do not promise confidentiality but share the information only with those people who are necessary in order to progress it and tell the child/ young person what the next steps will be and who the report will be passed to.
- Listen to him/her very carefully and non-judgementally.
- Allow him/her freely to recall significant events, keeping questions to the absolute minimum necessary to ensure that you have a clear and accurate understanding of what has been said - be aware that this account may have a crucial role to play in subsequent events.

- Avoid asking 'leading' questions, i.e. a question which suggests its own answer- remember, what you say at this point may have an impact on the outcome for the child so stick to 'where', 'when', 'what', etc.
- Keep your own emotions in check and control any personal reaction you might have; maintain an open mind throughout.
- Take the child/ young person to the school nurse if possible and if there is a medical need, but on no account examine any injury yourself.
- Make a record of the information given; this will be stored on CPOMS. KCSIE September 2025 indicates that best practice is to wait until the end of the report and immediately write a thorough summary. This allows you to devote your full attention to the child and to listen to what they are saying. It may be appropriate for you to make notes during the report (especially if a second adult is present). However, if making notes, you need to remain engaged with the child and not appear distracted by the notetaking. Either way, it is essential that a written record is made. These will be stored on CPOMS. Only record the facts as the child presents them- do not include your personal opinion. Include the date, time, place and the full names of all the people present. Record the child's/ young person's demeanour and behaviour as well as what is said. Note down any questions you asked as well as what the child said. **Remember that such reports might be part of a statutory assessment by children's social care and/or part of a criminal investigation.**

Sign the record and keep it securely before handing it to the DSL as soon as possible.

- If there is material to be handed over, for example scribbled notes, mobile phones containing text messages, or clothing, keep this evidence carefully and hand it to the DSL as soon as possible.
  - Explain that help may be required to keep the child/ young person safe, but do not at this stage ask him/her to repeat their account of events to anyone else as this may impact or negate the value of any best evidence interview.
  - Do not talk about what you have heard or seen to anyone other than in professional conversation with the relevant persons.
  - You must then pass this information on as a matter of urgency to the relevant person. S/he will take from you all the notes you have made and any relevant items which you have been given.
- o For complaints or suspicions of abuse or neglect by persons who do not work in the Foundation, the relevant person is the Designated Safeguarding Lead or his/her Deputy.
  - o If the information includes an allegation against a member of staff, including the Designated Safeguarding Leads and Deputies, it must be passed to the Head/ Clerk and Treasurer or their Deputy. (For further information, including with regard to allegations against the Head / Clerk and Treasurer/ Governors, see Section C below).

When dealing with a report of sexual harassment or sexual violence, including child on child harassment/ violence, follow the Foundation Policy for responding to reports from children and young people of incidents of Sexual Violence, Harassment and Misconduct.

### **Why Children may not feel ready to talk about their experiences**

All staff should be 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 being 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. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

#### **E.g.4 You might spot a possible indicator of maltreatment, abuse or neglect.**

To help you understand the types of abuse which exist and possible indicators of maltreatment, please use the table below. *Be aware, however, that no such list is comprehensive and any concerns on your part about a child's welfare should be shared with the DSL or Deputy.* In particular, abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label: in most cases, multiple issues will overlap with one another.

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments. All staff should be aware that children may be harmed by witnessing harm to others, for example, in domestic abuse. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

In addition, some children are deemed particularly vulnerable and so particular vigilance must be exercised where they are concerned. At the Bolton School Foundation, we recognise that when a child has a social worker, it is an indicator that the child is more at risk than most pupils. This may mean that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health. We take these needs into account when making plans to support pupils who have a social worker. Where children have an allocated Social Worker, this should inform decisions about how the promotion of their welfare, through pastoral and academic support, will run alongside action by statutory services.

- **Children Subject to a Child Protection Plan:** any incidents or concerns involving these children must be reported immediately to the allocated Social Worker.
- **Looked After Children:** any incidents or concerns must be brought to the notice of the Designated Person with responsibility for children in public care (Mrs Helen Brandon in the Boys' Division Senior School, Mrs Abigail Green in the Girls' Division Senior School and Mrs Sue Faulkner in the Primary Division).
- **Children living in a household where violence is an issue:** any pastoral concerns must be referred to the appropriate Designated Safeguarding Lead.
- **Children requiring mental health support:** Schools and colleges have an important role to play in supporting the mental health and wellbeing of their pupils. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. More information can be found in the DFE 'Mental Health and Behaviour in Schools' guidance. All concerns must be referred to the appropriate Designated Safeguarding Lead.

In addition, extra support and protection may be required for children who are vulnerable by virtue of disability, mental health issues, homelessness, refugee/ asylum seeker status, alcoholism or substance abuse within the family, as well as those who are young carers or who have English as a Second Language.

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

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

At the Bolton School Foundation we provide bespoke pastoral support for these children], along with ensuring any appropriate support for communication is in place.

### **What you should do if you have concerns about a child in need or at risk**

If you have concerns of any nature about a child's welfare, you must pass these on immediately, even if you are not entirely sure of your grounds for concern. Record your concerns using CPOMS (Child Protection Online Management System) or inform a member of the safeguarding team that you do not have access to CPOMS so that they will ensure it is recorded on CPOMS.

The normal procedure is to speak without delay to the appropriate Designated Safeguarding Lead (DSL) or their Deputy within the Foundation. Concerns should be recorded using CPOMS (Child Protection Online Management System). Options will then include a) managing any support for the child internally via the School's/ setting's pastoral support processes; b) an Early Help assessment; or c) a referral for statutory services, for example as the child might be in need, is in need, is suffering or is likely to suffer harm. Parental consent is not required for referral to statutory agencies.

The DSL or Deputy should always be available to discuss safeguarding concerns. If, in exceptional circumstances, s/he is not available, *do not allow this to delay appropriate action from being taken*. Speak to another member of the Senior Leadership Team or take advice from local children's social care and inform the DSL as soon as is practically possible.

In particular, if there is a risk of *immediate serious harm* to a child and it is not possible to report to the DSL, then **you yourself** should make a referral to Social Care immediately: **Anyone can make a referral**. You will find the relevant contact details on the final page of the main document. You must then inform the Designated Safeguarding Lead, Head, or other senior member of staff as soon as possible. (For concerns about radicalisation, see Appendix 1 for contact details).

It is important to act on and refer signs of abuse or neglect at the earliest opportunity so that risks are addressed, early help is provided, and issues are prevented from escalating. If a situation does not improve, you are required to demand that your concerns are reassessed and to challenge inaction.

## **What Happens Next?**

If Early Help is appropriate, the DSL (or deputy) will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Any such cases should be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services, if the child's situation does not appear to be improving or is getting worse.

**Where a child is suffering or is likely to suffer from harm, it is important that a referral to children's social care (and, if appropriate, the police\*) is made immediately.** Referrals should follow the local authority's referral process. Referrals are normally to Bolton or, if advised by Bolton, to the area in which the child lives. The online tool 'Report child abuse to local council' <https://www.gov.uk/report-child-abuse-to-local-council> directs to the relevant local children's social care contact number. (\*NB Concerns will be referred to the Police if a child is in urgent danger, for example if a pupil is thought to be at immediate risk because of a family member's violence/ intoxication/ substance abuse/ mental illness or threats to remove the child during the school day.)

The local authority should make a decision within one working day of a referral being made about the type of response required and should let the referrer know the outcome. This will include determining whether:

- the child requires immediate protection and urgent action is required.
- whether the child is in need and should be assessed under section 17.
- there is reasonable cause to suspect the child is suffering, or likely to suffer, significant harm, and whether enquiries must be made, and the child assessed under section 47.
- any services required by the child and family and what type of services; and
- further specialist assessments are required in order to help the local authority to decide what further action to take.

NB. School/ Setting staff should follow up on a referral if this information is not forthcoming. If a statutory assessment is required, they should support that assessment. If, after a referral, the child's situation does not appear to be improving, the referrer should consider following local escalations procedures to ensure the child's situation improves.

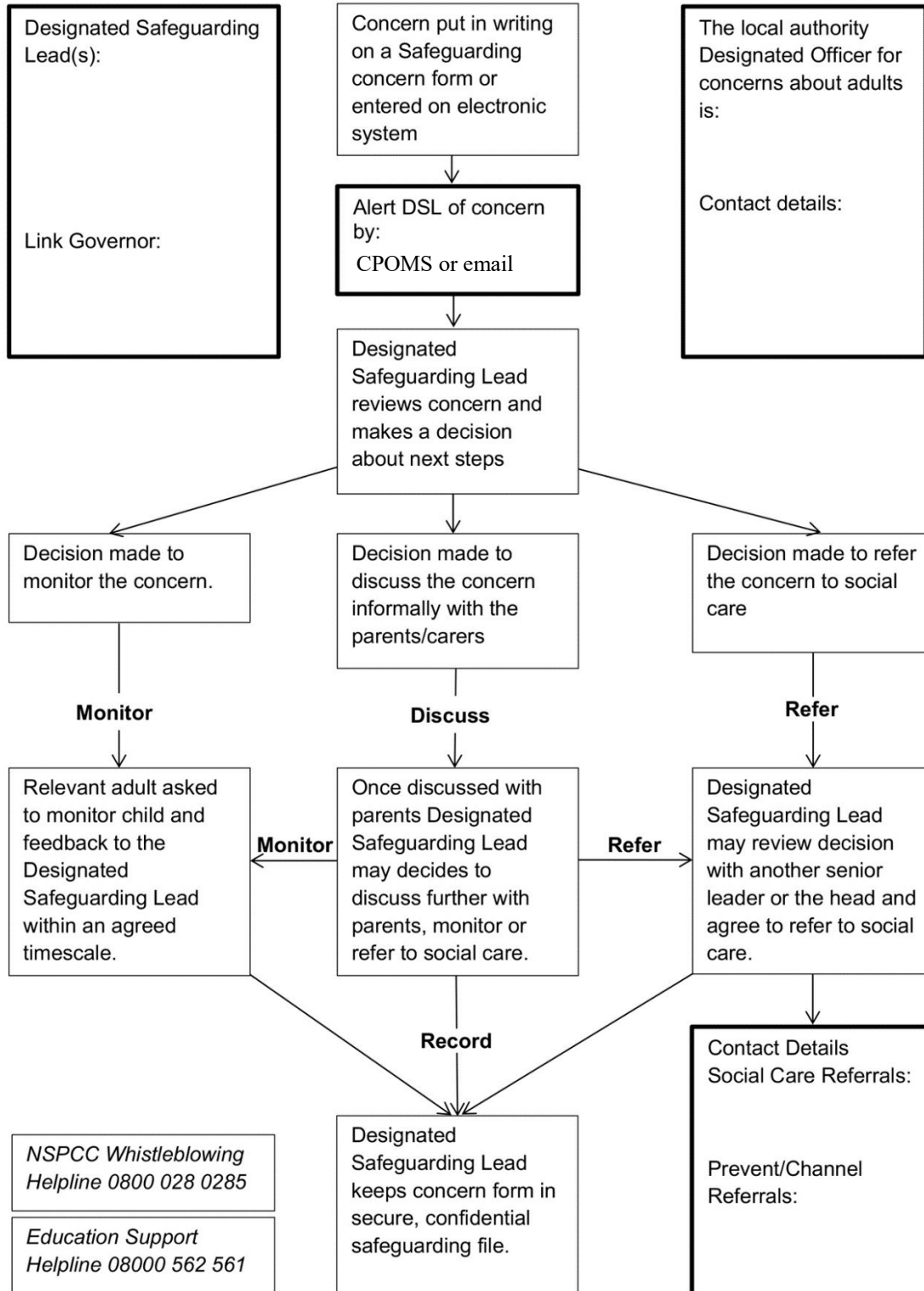
All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. If in doubt about recording requirements, staff should discuss with the designated safeguarding lead (or deputy).

Social Care staff may decide to begin a child protection investigation, in which case their procedures will apply. In either case the child's wishes or feelings will be taken into account when determining what action to take and what services to provide to protect the child by ensuring there are systems in place for the child to express their views and give feedback.

In the course of an investigation, Social Care Staff or the Police may wish to speak to a child, without parental knowledge or consent. The Head, Clerk and Treasurer, or their deputies, acting 'in loco parentis', will have discretion to agree to this in order to allow the authorities to explore concerns and determine whether there are grounds for further action. In these cases the Head, Clerk and Treasurer or their deputies will ensure that the child's welfare is secured and that they have access to a trusted adult.

(NB: The Head / Clerk and Treasurer or their deputies will not allow a child to be removed from School premises without either parental consent; an order of the Court, Emergency Protection Order, Interim Care Order or Police Protection Order; or the child's own consent (providing the child is of an age and understanding to give informed consent)).

## FLOW CHART FOR RAISING SAFEGUARDING CONCERNS ABOUT A CHILD



## Allegations Against Staff/Supply Teachers/ Volunteers/Contractors/Others; Staff Behaviour, Recruitment & Training

All employees, volunteers, contractors or Governors have a responsibility to be alert to children’s needs and any risk of harm that individual abusers or potential abusers may pose to children. They have a duty to report and refer to an appropriate and more senior colleague any concerns (however minor they appear to be) about the behaviour/ conduct/ attitudes of any other adult currently working in the Foundation in an employed, contractual or voluntary capacity. Such concerns should be passed on without delay so that the behaviour/ conduct/ attitudes can be investigated and remedial action, if appropriate, can be taken swiftly.

Concerns may be the result of: observation of another adult’s conduct; comments made by another adult; an allegation or direct disclosure by a child or children; indirect disclosure e.g. through children’s written work, art work or through their friends; an allegation or complaint from a parent or carer to a member of school staff, Children’s Social Care office, or the Police; reports by other colleagues or agencies; anonymous reports; other reasons.

**If the concern suggests that a member of staff, contractor or volunteer has or may have:**

- a) behaved in a way that has harmed a child or may have harmed a child (whether at work or outside work).
- b) possibly committed a criminal offence against a child or related to a child (whether at work or outside work).
- c) behaved towards a child or children in a way that indicated s/he may pose a risk of harm to children (whether at work or outside work).
- d) behaved or may have behaved in a way that indicates they may not be suitable to work with children (whether at work or outside work).

**then this concern must be passed on as follows in the table below, without informing the person involved in the concern. Such concerns should be passed on without delay so that the person receiving the report can in turn pass them on swiftly to the Safeguarding in Education Officer or LADO.**

Concern/ Allegation about	Report to
Any adult working for/in the Boys’ Division (Senior School) as an employee/ contractor/ volunteer, including the Designated Senior Lead for Safeguarding but excluding the Head.	<b>Mr Nic Ford, Head of Boys’ Division</b> Mr Ford can be reached on 01204 840201 extension 328/ <a href="mailto:nlf@boltonschool.org.uk">nlf@boltonschool.org.uk</a> (or in his absence the Head of Foundation, Mr Britton can be reached on 01204 840201 extension 204/ <a href="mailto:pjb@boltonschool.org/">pjb@boltonschool.org/</a> mobile number out of hours 07824 645810.)
Any adult working for/ at Patterdale Hall as an employee/ contractor/ volunteer, including the Designated Senior Lead for Safeguarding	<b>Mr Philip Britton, Head of Foundation, or, in his absence, Mrs Cathy Fox, the Clerk &amp; Treasurer</b> Mr Britton can be reached on 01204 840201 extension 204/ <a href="mailto:pjb@boltonschool.org/">pjb@boltonschool.org/</a> mobile number out of hours 07824 645810. Mrs Fox can be reached on 01204 840201 extension 205/ <a href="mailto:clfox@boltonschool.org.uk">clfox@boltonschool.org.uk</a>
Any adult working for/ in the Girls’ Division Senior School as an employee/ contractor/ volunteer,	<b>Mrs Lynne Kyle, Head of Girls’ Division,</b>

including the Designated Senior Lead for Safeguarding but excluding the Head.	Mrs Kyle can be reached on 01204 840201 extension 214 <a href="mailto:lkyle@boltonschool.org.uk">lkyle@boltonschool.org.uk</a> (or in her absence the Head of Foundation, Mr Britton can be reached on 01204 840201 extension 204/ <a href="mailto:pjb@boltonschool.org/">pjb@boltonschool.org/</a> mobile number out of hours 07824645810.)
Any adult working for/ at Kidzone, the Nursery (including the Pre-School Class), Beech House, Hesketh House or Park Road as an employee/ contractor/ volunteer, including the Heads of Schools.	<b>Mrs Sue Faulkner, Head of the Primary Division,</b> Mrs Faulkner can be reached on 01204 840201 extension 270 <a href="mailto:sf@boltonschool.org/">sf@boltonschool.org/</a> (or in her absence the Head of Foundation, Mr Britton can be reached on 01204 840201 extension 204/ <a href="mailto:pjb@boltonschool.org/">pjb@boltonschool.org/</a> mobile number out of hours 07824 645810.)
Any adult working for/ in Foundation Services or BSSL, (except Kidzone and Patterdale Hall), including the Deputy Designated Senior Lead for Safeguarding but excluding the Clerk and Treasurer	<b>Mrs Cathy Fox, Clerk and Treasurer</b> Mrs Fox can be reached on 01204 840201 extension 205/ <a href="mailto:clfox@boltonschool.org.uk">clfox@boltonschool.org.uk</a> (or in her absence the Head of Foundation, Mr Britton can be reached on 01204 840201 extension 204/ <a href="mailto:pjb@boltonschool.org/">pjb@boltonschool.org/</a> mobile number out of hours 07824645810.)
The Clerk and Treasurer, the Head of the Primary Division, Head of Boys' Division (Senior School), and the Head of Girls' Division (Senior School).	<b>Mr Philip Britton, Head of Foundation,</b> Mr Britton can be reached on 01204 840201 extension 204/ <a href="mailto:pjb@boltonschool.org/">pjb@boltonschool.org/</a> mobile number out of hours 07824645810.
The Head of Foundation or Member of the Governing Body	The Chairman of Governors, Mr Ian Riley, or, in his absence, an appropriate Vice Chairs (Mr Tim Taylor, Ms Amanda Valentine or Mrs Joy Bailey) without first notifying the Head of Foundation or the Governor whom the concern or allegation is regarding . Contact details for the Chairman and the Vice Chairs may be obtained by telephoning Mrs Debra Hardman, P.A. to the Clerk and Treasurer, on 01204 840201 extension 411.
The Chairman of Governors	The Local Authority Designated Officer should be informed, without first informing the Chairman of Governors.
	The person in the column above will also inform the Governors with responsibility for Safeguarding, Dr Victoria Gibson and Mrs Joy Bailey

\*Staff in the Foundation may if they wish discuss any concerns about another adult with the appropriate Designated Safeguarding Lead and make any referral to the appropriate person (in the right hand column below) via the Designated Safeguarding Lead, as long as the concern/ allegation is not about the DSL and as long as this discussion does not delay the process unduly.)

NB The duty to report applies *irrespective* of whether the harm or abuse or allegation relating to any person inflicting harm or abuse to a child occurs on premises owned by the Foundation, at home or elsewhere. Allegations received against a teacher who is no longer teaching will be referred to the Police, as will any historical allegations. All referrals will be recorded by the Head of Foundation on CPOMS StaffSafe irrespective of the outcome.

NB 2 If a member of staff alleges that s/he has been or was a victim of child abuse, this will normally be dealt with by the Designated Safeguarding Lead or their Deputy and will be referred to the Police, by agreement with the member of staff, and dealt with according to Police procedures. If the alleged perpetrator is known to currently have contact with children, then in addition this will be reported to Children's Social Care where the alleged perpetrator lives and the LADO where the alleged perpetrator works. Further information can be found at the link below:

[http://greatermanchesterscb.proceduresonline.com/chapters/p\\_adults\\_dis\\_ch\\_sex\\_ab.html](http://greatermanchesterscb.proceduresonline.com/chapters/p_adults_dis_ch_sex_ab.html)

**Details of allegation management can be found in the separate document titled "F Managing Safeguarding Allegations Procedure"**

**Staff/ Supply Teachers/ Volunteers' Behaviour**

All staff, paid and unpaid, and volunteers are expected to adhere to The Behaviour Policy for Staff, Volunteers, Contractors and Other Adults in respect of their contact with pupils and families. This policy includes guidance on staff/pupil relationships and communication, including the use of technology and social media, and working in one-to-one situations with children and young people among other potentially difficult issues. There is also additional guidance in the Employee Handbook and the separate handbooks and policies for the different schools and settings, for example about changing arrangements in the Infants' School, Nursery and Kidzone.

Members of staff, volunteers or contractors working in the Early Years Settings must not take images other than on school equipment and when authorized to do so for educational purposes by their line manager. Images taken must be stored securely on school equipment at all times. Staff members may not take home any device which has an image of a child on it. Images are deleted from school equipment as soon as they are no longer required for educational purposes.

Contractors, volunteers and visitors are not allowed to take images in the Nursery (including the Nursery Class), Kidzone, or Beech House, unless given specific authorization by the Setting Manager (or her Deputy) or the Head/Services Bursar. Members of staff, volunteers (including Sixth Form volunteers), contractors and visitors (other than parents) are required to ensure that they do not have their own phone on their person when in an EYFS setting. Parents are not asked to leave their phone but are reminded during performances or other activities that they must not video or take pictures of other people's children without the parents' permission.

**Physical Contact with Pupils**

Whilst it would be unrealistic and undesirable to ban all physical contact between adults and children, staff and volunteers are expected to exercise caution and to avoid placing themselves in a position where their actions might be open to criticism or misinterpretation. Any physical contact adults have with children must be both appropriate and proportionate to the circumstances. Where an incident occurs which might

be misconstrued or in the exceptional circumstances where it becomes necessary for a member of the teaching staff or an appropriate member of support staff to use 'reasonable force' to restrain a child or young person for their own protection or for others' safety, this will be appropriately recorded and reported to the relevant Head or Nursery/ Kidzone Manager, in accordance with the Staff Behaviour Policy, the Employee Handbook and the separate handbooks and policies for the different schools/ Nursery/ Kidzone.

Reasonable Force means 'using no more force than is needed' and may involve passive physical contact (e.g. standing between pupils or blocking a pupil's path) or active physical contact (e.g. leading a pupil by the arm out of the classroom.) When using reasonable force in response to risks presented by incidents involving children with SEN or disabilities or with medical conditions, the additional vulnerability of these children must be considered. The Protocols for Restraining a Child and for Searching a Child Without Parental Consent (including more vulnerable children) can be found at the end of the Behaviour of Staff policy.

The administration of corporal punishment to a child during any activity, whether or not within the Foundation's premises, is strictly prohibited.

Separate policies outline recommended practices with regard to first aid, personal care, medical care and attention and these policies should be consulted to help safeguard children requiring such interventions.

### **Sexual Offences Act and Those in a Position of Trust or Authority**

As a result of their knowledge, position and/or the authority invested in their role, all adults working with children are in positions of trust in relation to the children in their care. Broadly speaking, a relationship of trust can be described as one in which one party is in a position of power or influence over the other by virtue of their work or the nature of their activity. It is vital for all those in positions of trust to understand the power this can give them over those they care for and the responsibility they must exercise as a consequence of this relationship so that they do not breach this trust.

A relationship between an adult and a child cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people. Colleagues have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification. Similarly, they have a duty to ensure that relationships between adults and children are conducted on the basis of mutual respect.

Any person working in the Foundation is made aware that, under the Sexual Offences Act 2003, it is an offence for a person over 18 (e.g. teacher, supply teacher, or any other member of staff or volunteer) to have a sexual relationship with a child or young person under 18 where the employee/volunteer is in a position of trust or authority in respect of that child, even if the relationship is consensual. This applies where the child is in full-time education and the person works or volunteers in the same establishment as the child, even if they do not teach the child. It also applies in situations where the child or young person has used the facilities of the Foundation, for example Patterdale Hall, and where the member of staff or volunteers is, or has been, in a position of trust in respect of that child; again, even if the relationship is consensual.

## **Staff/ Supply Teachers/ Volunteers' Suitability including regulated activity, supervision, and checks regarding work experience, homestays**

Bolton School ensures that all persons, including paid staff, volunteers and contractors, undergo a rigorous checking process before they are allowed to commence work at the Foundation. The Foundation's safer recruitment and selection policies and procedure, written in line with the guidance contained in the document 'Keeping Children Safe in Education' will be followed.

### **Staff Training in Safeguarding including at Induction**

Induction Safeguarding Training must include: the Foundation's Safeguarding & Child Protection procedures and policy; on-line safety; the role and identity of the DSL(s) and deputy; KCSIE part one (all staff); KCSIE Annex C (leaders and those who work directly with children); the pupil behaviour policy in the relevant School/ setting (as determined by the line manager); the Child Missing in Education Policy in the relevant School/ setting; the Behaviour Policy for Staff, Supply Teachers, Volunteers, Contractors and Other Adults.

Safeguarding training so that all staff understand and discharge their role and responsibilities in this area is a mandatory element of the induction programme for all new staff and volunteers, including peripatetic teachers, coaches, invigilators, trainees or pupils paid to work at the school (for example as after-school carers). New staff and volunteers joining in September take part in the annual training and are inducted into this Policy. At other times of the year staff and volunteers who will work closely with children in an unsupervised manner (including all teachers) are required to undertake the LA's online training, which can be found at <https://boltoncouncilwebteam.co.uk/onlinecourses/>, preferably before they commence their duties and definitely within the first two days of service. They will also be inducted into this Policy by one of the DSLs. Other staff, who do not have unsupervised direct contact with children will have the same training within the first five days of service, if they haven't completed it prior to starting work. All new staff are also expected to read, (and implement the provisions of), the Behaviour Policy for Staff, Volunteers, Contractors and Other Adults, the Whistleblowing Policy, Part One of Keeping Children Safe in Education and to sign to confirm that they have done this.

Temporary staff and volunteers will be provided with induction training that includes child protection and safeguarding and they will be inducted into the school's arrangements and this Policy. They will also be required to read the School's Behaviour Policy for Staff, Volunteers, Contractors and Other Adults and Keeping Children Safe in Education - Part One and to sign to confirm they have done this.

The training of staff working in the EYFS settings meets the requirements and includes information about emergency evacuation procedures, the equality policy and health and safety issues, in addition to safeguarding and child protection.

It is the responsibility of the individual's line manager to ensure that induction training happens in a timely manner and that the relevant information and certificate, (if appropriate) is sent to the Personnel Department so that the details can be recorded by them.

The Designated Safeguarding Lead and any deputies will undergo inter-agency training to provide them with the knowledge and skills required to carry out the role. The training will be updated at least every two years. In addition to their formal training, as set out above, their knowledge and skills will be updated,

(for example via e-bulletins, meeting other designated safeguarding leads, or taking time to read and digest safeguarding developments), at regular intervals, but at least annually, to keep up with any developments relevant to their role.

In order to comply with the Bolton Safeguarding Partner's recommendations every member of staff and volunteer receives updated training to equip them with the knowledge and skills necessary to carry out their responsibilities. In addition, all staff members will receive safeguarding and child protection updates, via email and staff meetings, as required and at least annually, to provide them with the relevant skills and knowledge to understand and discharge their role to safeguard children effectively. Each September, an in-house training session is delivered by one of the DSLs, or an external trainer, to all staff.

Safer Recruitment training is available to all relevant staff and governors who are involved in the recruitment process.

A confidential staff care scheme is also available for staff affected by high level child protection issues.

### **How are Safeguarding and Child Protection Procedures Reviewed in the Foundation?**

At the conclusion of a case the Local Authority's **Safeguarding in Education Officer will review the circumstances** of the case with the Head, Clerk and Treasurer or Chairman of Governors as appropriate, or their deputies to determine whether there are any improvements to be made to the School's procedures or practice to help prevent similar events in the future.

The Governors have nominated Governors, Dr Victoria Gibson and Mrs Joy Bailey, to support all Governors in carrying out their responsibilities for Child Protection matters. Contact details may be obtained by telephoning Mrs Debra Hardman, P.A. to the Clerk and Treasurer, on 01204 840201 extension 411. The role of the Safeguarding Governor includes liaising with the Bolton Safeguarding Children Partnership and other agencies. Dr Victoria Gibson and Mrs Joy Bailey, along with the Designated Safeguarding Leads and the Heads undertake a formal annual review of the School's policy and procedures relating to Safeguarding and Child Protection, and how the duties of those responsible have been discharged, and bring to the Governing Body any major issues arising from the review, including any proposed changes in relation to the child protection procedure.

All Governors receive safeguarding training through AGBIS upon induction which is regularly updated. Records of this training are maintained by the School's Clerk and Treasurer.

Following the conclusion of a case or the Governors' review of Safeguarding and Child Protection Procedures, the Governors and in particular the nominated Governor for Child Protection, along with members of the Executive Committee, will ensure that any deficiencies or weaknesses in the training provided for staff or in the School's procedures will be remedied without delay. Governors undertake a regular review of the School's online filtering systems and their effectiveness. It is acknowledged by Foundation staff and the Governing Body that should there be no reports of child-on-child abuse at any point in time that does not mean that it is not happening. The Foundation has policies and strategies for dealing with bullying and the sharing of nude photographs which should be read in conjunction with this policy.

## The Prevent Strategy

*(This section is underpinned by the Statutory guidance issued under section 29 of the Counter-Terrorism and Security Act 2015.)*

The national Prevent Strategy aims to stop people becoming terrorists or supporting terrorism. The Bolton School Foundation, working with other local partners, families and communities, seeks to play a key role in ensuring that the children and young people who attend the schools/ settings or use its services are safe from the threat of terrorism. Prevent is part of the Foundation's wider responsibility for Safeguarding and this policy is therefore linked to the Foundation Policy for Safeguarding and Child Protection.

The Prevent strategy identifies that young people are more likely to be vulnerable to violent extremist or terrorist narratives, including non-violent extremism which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. The Government's Prevent Strategy defines extremism 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 believe that Bolton School should be a safe place where children and young people can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of the terrorist ideology, and learn how to challenge such ideas.

In order to fulfil our Prevent Duty, we undertake to do the following:

- Actively promote Fundamental British Values, including mutual respect, tolerance and democratic participation, as part of our wider SMSC/ PSHEE programmes as well as within other subject areas and assemblies.
- Encourage children and young people to develop strategies to manage risk, resist pressure and make safe choices.
- Respect learner and staff diversity, encouraging freedom and openness.
- Effectively engage with parents/carers.
- Assist and advise families who raise concerns and point them in the direction of the correct support mechanisms.
- Assess the risk of children in our schools/ settings/ activities being drawn into terrorism.
- Maintain robust safeguarding policies which take in to account the policies and procedures set out by Bolton Safeguarding Partners and identify extremism/ radicalisation as issues to be reported promptly to the Staff lead.
- Identify a nominated Staff Lead to communicate and promote the importance of the Prevent duty.
- Train staff so that they have the knowledge and confidence to identify children at risk of being drawn into terrorism, and to challenge extremist ideas which can be used to legitimise terrorism.
- Conduct due diligence checks on groups/ individuals seeking to hire or use school premises.
- Conduct due diligence checks on visitors to school, particularly visiting speakers, whether invited by children or staff.
- Conduct due diligence checks on contractors working on the school sites.
- Ensure children are safe from terrorist and extremist material when accessing the internet in School.
- Review our policies at least annually.

## Possible Indicators of Risk

- Racist graffiti/ symbols/ comments made in School.
- Speaking out or writing in favour of extremist ideas in schoolwork.
- Extreme comments shared on social media.
- Distribution of extreme or terrorist propaganda among other pupils.
- Vulnerable students being influenced by others (although we are aware of a need to avoid oversimplified assessments of who might be 'vulnerable'), because of the existence of one or more factors, which may include:
  - An identity crisis, involving an individual's distance from their cultural/ religious heritage, including peer/ family/ faith group rejection.
  - A personal crisis, including family tension/ social isolation/ friendship issues.
  - Personal circumstances, such as migration, experience of racism; ○ Unmet aspirations; ○ Criminality.
  - Experience of poverty, disadvantage, discrimination or social exclusion.
- Association with those known to be involved in extremism (including via the internet).
- A significant shift in the child/ young person's behaviour or outward appearance, particularly involving conflict with his/her family and/or faith group.
- Travel for extended periods of time to international locations known to be associated with extremism.
- Disguising of a child's identity, e.g. in documentation.
- A simplistic or flawed understanding of religious/ political/ global issues.
- A significant adult or other in the child/ young person's life who has extremist views or sympathies.
- Critical risk factors, being:
  - Contact with extremist recruiters.
  - Articulation of support for extremist causes/ leaders
  - The possession of extremist literature.
  - Using extremist narratives and a global ideology to explain personal disadvantage.
  - Justifying the use of violence to solve societal issues.
  - Membership of extremist organisations.

## Supportive Interventions

- Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for the Foundation to make referrals if there are concerns that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages. [Channel.project@gmp.police.uk](mailto:Channel.project@gmp.police.uk) [gmchannel@manchester.gov.uk](mailto:gmchannel@manchester.gov.uk). To discuss concerns before making a referral please contact the CTPNW on 0161 856 6362.
- Should concerns require support from other agencies, the following are ways in which terrorism and extremism can be reported:

- Anti-terrorist hotline: 0800 789 321 ○ Crime stoppers: 0800 555 111 ○ Relevant police force: 101
- [www.gov.uk/report-suspicious-activity-to-mi5](http://www.gov.uk/report-suspicious-activity-to-mi5)
  
- To report any online terrorist-related material: [www.gov.uk/report-terrorism](http://www.gov.uk/report-terrorism)
- For non-emergency advice for staff and Governors the DfE have a dedicated telephone helpline and mail box: 02073407264 and [counter-extremism@education.gsi.gov.uk](mailto:counter-extremism@education.gsi.gov.uk)
- Other links to information include:  
<https://www.gov.uk/government/publications/channel-guidance> and  
<http://educateagainsthate.com/> and  
[http://course.ncalt.com/Channel\\_General\\_Awareness/01/index.html](http://course.ncalt.com/Channel_General_Awareness/01/index.html) and  
<https://www.gov.uk/government/publications/prevent-duty-guidance>

## Appendix 1

### Role and Responsibilities of the Designated Safeguarding Lead for Child Protection

The Senior Officers on behalf of the Governing Body ensure that the Foundation designates appropriate senior members of staff to take lead responsibility for Safeguarding and Child Protection. These people have the status and authority within their respective schools and within the Foundation to carry out the duties of the post, including committing resources and, where appropriate, supporting and directing other staff, and taking part in strategy discussions and inter-agency meetings.

The Designated Safeguarding Leads have one or more Deputy Designated Safeguarding lead(s) who are trained to the same standard as the Designated Safeguarding lead. The activities of the Designated Safeguarding lead can be delegated to appropriately trained deputies, but the ultimate **lead responsibility** for child protection, as set out above, remains with the Designated Safeguarding lead; this **lead responsibility cannot** be delegated.

The broad areas of responsibility for the Designated Safeguarding Lead are to:

#### Manage Referrals

- Refer cases of suspected abuse to the local authority children's social care as required.

The DSL will refer all cases of suspected abuse to the relevant Local Authority Children's Services Social Care ***within 24 hours of a disclosure or suspicion of abuse***. If the child is in immediate danger, the police will be notified as they alone have the power to remove a child to a place of safety without recourse to courts.

Referrals should be made to the Children's Services, Social Care as early in the day as possible to allow a co-ordinated and considered response. Referrals should be made by telephone and are then normally followed up in writing using the Integrated Front Door Form within two working days. *It is the responsibility of the Designated Safeguarding Lead to ensure that appropriate advice is obtained from the Children's Services, Social Care Department and that the relevant paperwork is completed.* The assessment process is documented in The Bolton Safeguarding Partner's Framework for Action and Early Help Framework. The DSL should complete the Early Help Assessment and Action Plan Form.

The DSL should also:

- Support staff who make referrals to local authority children's social care.
- Refer cases to the Channel programme where there is a radicalisation concern as required, and support staff who make referrals to the Channel programme.
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service.
- Refer cases where a crime may have been committed to the Police or work in partnership with local prevent coordinators to prevent people from being drawn into terrorism.

## **Work with Others**

- Liaise with the Heads to inform them of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Know which children have a social worker.
- As required, liaise with the case manager and the designated officer at the local authority for child protection concerns in cases which concern a staff member.
- Liaise with staff (especially pastoral staff, school nurses, IT technicians and SENCOS or their equivalent in each school/ setting) on matters of safety and safeguarding (including online and digital safety).
- To understand and ensure that children have an appropriate adult in Police interviews.
- Liaise with relevant agencies when deciding to make a referral.
- Help to promote educational outcomes by sharing 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 leadership staff.
- Liaise with colleagues and the relevant Heads as appropriate to ensure that pastoral and other policies and procedures in place are sufficiently robust to support safeguarding and child protection with particular regard to on-line safety, child on child abuse, sexual harassment and any local issues which emerge.
- From June 2021, the Virtual Headteacher has responsibility to promote the education of children who have a social worker. The DSL will complete necessary documentation and attend meetings to assist in this process.
- Act as a source of support, advice and expertise to staff on matters of safety and safeguarding as well as the Prevent Strategy.
- In cases involving the Early Years Foundation Stage, including Beech House, the Nursery or Kidzone, Ofsted must be informed of any allegations of serious harm or abuse by any person working or looking after children at the premises (whether that allegation relates to harm or abuse committed on the premises or elsewhere), or any other abuse which is alleged to have taken place on the premises, and of the action taken in respect of the allegations. This will be done, as soon as is reasonably practicable, but at the latest within 14 days of a disclosure or suspicion of abuse.

## **Undertake Training**

The Designated Safeguarding Lead, and Deputies undergo appropriate training in child protection and inter agency working (provided by the local social services department in Bolton or an external agency acceptable to the Bolton Safeguarding Partners) to provide them with the knowledge and skills they need to carry out the role and in line with Annex C of KCSIE 2025. This training is updated at least every two years in order to allow the DSL and Deputy DSL to do the following:

- Understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements.
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- Be aware of any local issues regarding Child Protection (e.g. gangs, grooming, local communities in which FGM and/or forced marriage is a potential risk)

- Ensure each member of staff has access to and understands the Foundation’s Safeguarding and Child Protection Policy and Procedures, especially new, temporary and part-time staff.
- Be alert to the specific needs of children in need, those with special educational needs and disabilities and young carers.
- Be able to keep detailed, accurate, secure written records of concerns and referrals.
- Understand and support the school with regards to the requirements of the Prevent duty and be able to provide advice and support to staff on protecting children from the risk of radicalisation.
- Be able to understand and mitigate the unique risks associated with online safety.
- Recognise and mitigate the additional risks that children with SEN and disabilities face online, e.g. from grooming and radicalisation.
- Obtain access to resources and attend any relevant or refresher training courses.
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the Foundation may put in place to protect them.
- Understand how the online filtering and monitoring processes are working and review their effectiveness.

In addition to the formal training set out above, their knowledge and skills is refreshed (via e-bulletins, meeting other designated safeguarding leads, or by taking time to read and digest safeguarding developments) at regular intervals, as required, but at least annually, to allow them time to understand and keep up with any developments relevant to their role. The Designated Safeguarding Lead should also undertake Prevent Awareness training.

### **Raise Awareness**

The Designated Safeguarding Lead should

- Ensure the Foundation’s policies are known, understood and used appropriately.
- Ensure the Foundation’s Safeguarding and Child Protection Policy is reviewed annually, as a minimum and the procedures and implementation are updated and reviewed regularly, and work with the Governing Body regarding this.
- Ensure the Safeguarding and Child Protection Policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the Foundation in this.
- Ensure the pupils are informed, in an age-appropriate way about who to talk to in the event that they wish to disclose information concerning a Child Protection matter.
- Link with the Bolton Safeguarding Children Partnership to make sure staff are aware of training opportunities and the latest local policies on local safeguarding arrangements.

### **Maintain and Transfer Records**

The Designated Safeguarding Leads and Deputies should ensure that their part of the Foundation maintains confidential child protection records as necessary. The Foundation will keep all child protection records confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children, taking in to account the Foundation’s obligations under Data Protection laws. Keeping Children Safe in Education makes it clear that ‘Data Protection laws do not prevent the sharing of information for the purposes of keeping children safe.’ There is clarification that ‘This includes allowing practitioners to share information without consent...’. The Foundation has also been guided by the document ‘Information sharing: advice for practitioners providing safeguarding services’. The

Foundation will cooperate with police and children's social care to ensure that all relevant information is shared for the purposes of child protection investigations under section 47 of the Children Act 1989 and in accordance with the requirements of 'Working Together to Safeguard Children, 2026.'

If a pupil moves to another school, the Safeguarding in Education Officer at the Local Authority will be informed and any child protection information will be passed via the Safeguarding in Education Officer to a named person at the new school, ensuring secure transit and confirmation of receipt. In addition to the child protection file, the DSL should also consider if it would be appropriate to share any information with the new School/ College in advance of a child leaving.

When a pupil reaches the end of his/her school career, any child protection information will be held securely by School for an indefinite period.

### **Availability**

The Designated Safeguarding Lead (or a deputy) in each school setting is always available (during school hours) for staff in the school to discuss any safeguarding concerns. The Designated Safeguarding lead in the Nursery and Kidzone is also available when the Nursery or Kidzone are open during the school holidays. In exceptional circumstances, availability via phone and or Zoom/ Teams or other such media is acceptable.

## Appendix 2

### Key Definitions and Further Information About Issues Mentioned in this Policy

**A child**, as in the Children Acts 1989 and 2004 is anyone who has not reached their 18<sup>th</sup> birthday. The commitment to safeguarding and promoting the welfare of children however will extend to all children who visit Bolton School, including those who have reached the age of 18 and in some cases, past pupils of Bolton School or past users of the Nursery or Kidzone who are aged 18 years or younger.

**A Child In Need** is defined under section 17(10) of the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health or development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled.

**Early help** means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter three of 'Working together to safeguard children' provides detailed guidance on the early help process.

**Extremism** goes beyond terrorism and includes people who target the vulnerable, including the young by seeking to sow division between communities on the basis of race, faith or denomination; justify discrimination towards women and girls; persuade others that minorities are inferior; or argue against the primacy of democracy and the rule of law in society. Extremism is defined in the Counter Extremism Strategy 2015 as the vocal or active opposition to the British fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths or beliefs. Calls for the death of members of the armed forces is also regarded as extremist.

**Significant harm** is defined within The Children Act. 'Harm' means ill-treatment or the impairment of a person's physical or mental health or his/her development, whether physical, intellectual, emotional, social or behavioural. Ill-treatment includes sexual abuse and forms of ill-treatment which are not physical e.g. witnessing others being harmed. In cases where the question of whether harm suffered by a child is significant turns on the child's health or development, his/her health or development shall be compared with that which could reasonably be expected of a similar child.

Section 120 of the Adoption and Children Act added the following clarification of 'impairment': 'Including for example impairment suffered from seeing or hearing the ill treatment of another.'

The interpretation of whether or not a child is suffering significant harm will depend largely on professional judgement, based on the known facts. It can include inappropriate touching, an assault, or a series of compounding events e.g. bullying. Other factors to be considered include the age and vulnerability of the child, the degree of force used, the frequency of the harm, the nature of the harm in terms of ill treatment, and the impact on the child's health and development.

More information about information can be found by following the links below or consulting KCSIE.

## Appendix 3

### Bolton School E-Safety Information

Bolton School provides internet access for pupils and staff to raise educational standards, to promote pupil achievement, to support the professional work of staff and to enhance the school's management information and business administration systems.

We recognise that students have unlimited and unrestricted access to the internet via mobile phone networks. This access means some children, whilst at school or college, sexually harass their peers via data plans on 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.

At the Bolton School Foundation we recognise that technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; bullying; sexual predation - technology often provides the platform that facilitates harm. The Foundation has therefore developed an effective approach to online safety, including when students are online at home, which empowers each school/setting to protect and educate the whole school community in their use of technology and establishes mechanisms to identify, intervene and escalate any incident where appropriate.

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 material.
- contact: being subjected to harmful online interaction with other users.
- conduct: personal online behaviour that increases the likelihood of, or causes, harm.
- commerce: harmful personal behaviours e.g. identity theft, fraud, streaming child sex abuse, sextortion.

The School recognises Policies and procedures are in place to maintain online safety for both children and adults. These policies and practices are part of the school's wider safeguarding strategy.

All Junior and Senior School pupils are required to sign and observe the following Acceptable Use Policies:

- ICT AUP (signed when pupils join the School by both pupils and parents and updated by pupils as appropriate).
- iPad AUP (signed when pupils are first given their iPad by both pupils and parents and updated as appropriate).
- Social Networking Policy for Pupils.

All members of teaching staff and those support staff who have access to the Network at School are required to sign and/or observe the following Acceptable Use Policies:

- ICT AUP (signed when all members of staff are given access to the Network and updated as appropriate).
- iPad AUP (signed if and when members of staff are first given their iPad and updated as appropriate). - Acceptable Use of ICT Equipment and Systems Policy

- Acceptable Use Policy for Telephones, Smart Phones, Mobile Phones and Devices and Internet Telephony
- Acceptable Use of Internet and Social Networking Policy
- Acceptable Use Policy for iPads & Laptops
- Acceptable Use of Email Policy
- Data Security Policy

In addition, members of staff, volunteers and other adults are required to observe the Behaviour Policy for Staff, Volunteers, Contractors and Other Adults which includes information about appropriate on-line behaviour as well as the use of photographic, video and audio digital or analogue technology. Staff are made aware that a breach of this or other policies may result in disciplinary action. There is additional information for staff working in the Early Years Settings regarding the taking and storage of images.

### **Roles and Responsibilities for Online Safety**

The Foundation IT Manager has the responsibility of ensuring that the technical provision and ICT infrastructure across the Foundation have appropriate safeguards in place to filter and monitor appropriate content and to alert the school to any potential safeguarding issues.

In each school and setting, the Headteacher (or a member of his/her SLT) or the Manager (or her Deputy) has responsibility for:

- ensuring that all teaching and relevant support staff sign and uphold the relevant Acceptable Use Policies. The Clerk and Treasurer has the same responsibility for Foundation Services and BSSL Staff.
- ensuring that all pupils and parents sign and uphold the relevant Acceptable Use Policies.

If pupils/ children discover unsuitable sites, they are instructed to alert a member of the staff. Staff are then instructed to alert a member of SLT/ Management and/or the ICT staff.

The DSL, supported by the DDSL, has responsibility for ensuring that on-line safety is promoted by policies and procedures within school and that children, staff, and parents are made aware of how to safeguard themselves and others online.

### **Online Teaching and Learning Protocol**

The Foundation's Safeguarding Policy and the Acceptable Use IT Policy are still in effect whilst we are working from home. In addition to the protocols on distance learning, the following additional procedures must be implemented.

- Staff must not engage in live conversation with an individual pupil via telephone or online, by audio or video, unless specific consent for this has been obtained from the parents. If any conversation, as part of a group discussion or via email, gives immediate cause for concern over pupil welfare or other safeguarding nature, staff must email the details to the DSL.
- When using any technology which can use video, then Staff and pupils must wear suitable clothing, as should anyone else in the household.

- Any computers used should be in appropriate areas, for example, not in bedrooms; and where possible be against a neutral background. Language must be professional and appropriate, including that of any family members in the background.
- If a member of staff has any other concerns over the well-being of a pupil who is at home. s/he should make a referral to the DSL in the same way as they would in school. As usual, any concern over the conduct of a member of teaching staff must be reported to the Headteacher immediately.
- Staff must not use their own personal mobile phone to contact pupils. If a conversation is necessary with a parent, staff should ensure that their outgoing number is blocked.
- Staff must not use Social Media apps to contact students or parents.
- Staff must only use their school email account for contact and for setting up accounts on any software, app or file server.
- Staff must not retain the personal and contact details of pupils or parents on any personal device, computer or on paper. ISAMS should be used to retrieve information.

### **The School's Technical Provision & Infrastructure**

The school's internet access includes appropriate filtering systems. These systems are checked to ensure compliance with Department for Education filtering and monitoring standards recommendations and the school uses the SWGFL tool for checking reporting levels as recommended in KCSIE 2025. The school has systems for internet security, anti-virus protection, email filtering and web filtering, which monitor each and every web page, and email for unacceptable content, including extremist information or information about terrorism. The school reserves the right to use this system to monitor all information passed via the school network. Any material that the school believes is illegal will be referred on.

School iPads are filtered and managed by a mobile device management solution. Student iPads are configured with profiles that can not be removed. These iPad profiles lock the iPad to the school filtering system, preventing unacceptable content and enabling the School to manage the devices.

Emerging technologies will be examined for educational benefit and a risk assessment will be carried out before use in school is allowed.

The Lead DSL for each division will be trained to understand the filtering and monitoring systems and will ensure that these are fit for purpose. Ongoing monitoring of the effectiveness of the filtering systems will be reported at least annually to Governors by the IT Manager.

### **Education of the Pupils/Parents/Staff About E-Safety**

Pupils are taught in ICT and/or PSHEE lessons or sessions what internet use is acceptable and what is not as appropriate to their age and setting. In particular, they are informed that they must not reveal personal details (including their address or telephone number) or others' details in e-mail communication or via a personal web space; neither must they arrange to meet anyone. Pupils are taught to recognise when they are at risk and how to get help when they need it. They are encouraged to report all issues and concerns to a member of the pastoral team, who will escalate the matter to a member of the SLT and who, in turn, will pass the matter on to the Foundation Head of ICT Services.

Issues around Cyberbullying are discussed in PSHEE lessons and are included in the different schools'/ settings' Anti-bullying and Behaviour Management policies. Any form of bullying or harassment is strictly

forbidden, and sanctions are used as appropriate for those who engage in cyber/text bullying. When publishing material to websites and elsewhere, pupils are taught to consider the thoughts and feelings of those who might view the material. Action is also taken against any person who brings the school into disrepute through publication of inappropriate electronic materials/communications.

Pupils are taught that they may only use approved e-mail accounts on the school system and may only communicate to staff via school accounts. Pupils are required to inform a teacher if they receive an offensive e-mail. The teacher will then escalate by reporting to IT Services who will inform the relevant School Leadership.

Staff safeguarding training includes information about online safety.

Parents are given information about online safety at the annual Parents' Information Evenings, via documentation received about the iPads, and in other Divisional publications.

### **The Management of Personal Data**

The Foundation has appointed the Head of Compliance, Mr J D Williams, to be responsible for regulatory compliance concerning how the Foundation uses personal data and ensures that personal data is processed in compliance with the Foundation's Privacy Notice and Data Protection Law.