Pendle
Education Trust

Pendle Primary Academy

Child Protection and Safeguarding Policy

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Safeguarding Local Governor	Usman Rasul
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1. Context and Rationale

Pendle Primary Academy is a larger-than-average primary school. Situated in Brierfield, Lancashire, the school serves a diverse local community facing specific socio-economic challenges, where higher-than-average rates of local deprivation, domestic abuse, neglect and online safety concerns represent key safeguarding priorities. The school actively addresses these risks through targeted early intervention and close collaboration with local multi-agency partners, including participation in Operation Encompass.

The school's Designated Safeguarding Lead (DSL) team comprises all members of the SLT, including the SENDCo; EYFS and Key Stage leaders and the school's Wellbeing team. DSL names, roles and training details can be found at the end of the policy. The school uses the online CPOMS and Staff Safe systems to record and track Safeguarding concerns and incidents. The DSL team meet weekly at 'Inclusion Meetings' to ensure a complete picture of the safeguarding, mental health and other needs of any child identified by the school as being vulnerable is obtained. These meetings also allow the DSL team to explore the best actions to safeguard children and support families. The Wellbeing team, which includes the school's play therapist, family support worker and wellbeing support worker provide and Early Help to children and parents as well as therapeutic support to children. The school's play therapist also provides supervision and wellbeing support to school staff.

This policy applies to **all** members of the school community, including children, staff, members of the local academy council, trustees, volunteers, trainee teachers, placement students, visitors, contractors, agency and supply staff, and **anyone** working on behalf of the school. It sets out our expectations and responsibilities for safeguarding and promoting the welfare of all children.

This policy provides the legal and moral framework through which the school fulfils its safeguarding responsibilities and should be read in conjunction with current legislation, statutory guidance and local safeguarding arrangements, having due regard to the safeguarding procedures of other local authorities where relevant.

Commitment

Pendle Primary Academy is committed to safeguarding and promoting the physical, mental and emotional welfare of every child, both inside and outside of school. We recognise that safeguarding is **everyone's responsibility** and that the welfare of the child is paramount.

We are committed to providing a safe, supportive environment promoting an inclusive, anti-discriminatory culture where racism, and other forms of discriminatory behaviour are recognised, challenged and addresses as part of schools and colleges safeguarding responsibilities. All staff, local governors and trustees will ensure Pendle Primary Academy is an environment where all children and young people are respected, valued, listened to and supported to thrive. We recognise that effective safeguarding requires a whole-school approach and strong partnership working with children, families and other agencies.

Pendle Primary Academy recognise the importance of **Family Help** and providing support as soon as a need emerges at **any stage** of a child's life. We are committed to identifying concerns at the earliest opportunity and ensuring that children and families receive the right help, at the right time.

We recognise that **no single practitioner** can have a full picture of a child's circumstances and needs. Effective safeguarding requires timely information sharing, **professional curiosity**, **professional challenge** and effective multi-agency working to ensure children and families receive the right help at the right time. All staff should understand their responsibility to act on concerns and that **anyone** can make a referral to Children's Social Care where there are concerns about a child's welfare or safety.

Pendle Primary Academy provides Early Years Foundation Stage (EYFS) provision for children under the age of five and safeguarding arrangements will be implemented in accordance with the EYFS Statutory Framework, including the safeguarding training requirements for staff and Designated Safeguarding Leads set out within the framework: Early years foundation stage (EYFS) statutory framework - GOV.UK

All staff, volunteers, local governors and trustees have a responsibility to contribute to a strong safeguarding culture and to take appropriate action where there are concerns about a child's welfare or safety.

Pendle Primary Academy will work in accordance with current safeguarding legislation, statutory guidance and local safeguarding arrangements, including the procedures of the Lancashire Children's Safeguarding Assurance Partnership (CSAP): Lancashire Safeguarding Partnership

Occasionally it may be necessary to work alongside, or make referrals to, safeguarding partners in neighbouring local authority areas where children reside outside Lancashire. In these circumstances, we will ensure knowledge of the relevant local safeguarding arrangements and procedures.

Children are taught about safeguarding, including online safety, through the curriculum and wider school life. This helps children to recognise risk, build resilience, understand how to keep themselves safe and know where to go for help and support.

The school recognises that children may be vulnerable to abuse, neglect, exploitation and other safeguarding risks both within and outside the school, at home and online.

Pendle Primary Academy recognises the benefits of Family Help and early intervention. The school will work with children, families and partner agencies to identify emerging needs and provide appropriate support through school-based provision and referral to Family Help and other services where required. Where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, the school will act in accordance with local safeguarding procedures and statutory guidance.

Pendle Primary Academy fully recognises the contribution we can make to protect children from harm and to support and promote the welfare of all children who are pupils at our school. We foster a strong safeguarding culture where children feel safe to speak, are encouraged to share their views and concerns, and know they will be listened to, taken seriously and supported.

2. Definitions

This policy sets out how Pendle Primary Academy safeguards and promotes the welfare of all pupils, who are referred to as 'children' in this policy.

The terms **"children"** and **"child"** means everyone under the age of 18.

The Department for Education (DfE) Keeping Children Safe in Education (KCSiE) September 2026, defines safeguarding and promoting the welfare of children as:

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

Child protection is part of safeguarding and promoting the welfare of children. It refers to activity undertaken to protect specific children who are suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside of the school or home, including in foster care and residential care, as well as online.

Abuse, neglect and exploitation

Abuse, neglect, exploitation, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap.

The definitions of abuse and the four categories of abuse are taken from statutory guidance and are defined as:

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

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

Sexual abuse: involves forcing, causing or inciting a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, such as acts of penetration, whether that is with part of a person's body or an object (e.g. rape or assault by penetration) and non-penetrative acts such as masturbation, kissing, rubbing, and touching over clothing. Sexual abuse 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. Sexual abuse can take place online, as well as offline, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Children can be sexually abused within the family, an institution or a community setting, and are more likely to know their abuser than not. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school procedures for dealing with it.

There are specific offences for children under 13, who can never provide valid consent to sexual activity and there are specific offences which make clear that sexual activity with a child under 16 is an offence, regardless of whether they agreed to that activity.

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

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

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

For the purposes of this policy, **"sexual violence"** refers to specific sexual offences under the Sexual Offences Act 2003 as described below:

- **Rape:** A person (A) commits an offence of rape if they intentionally penetrate the vagina, anus or mouth of another person (B) with their penis, B does not consent to the penetration, and A does not reasonably believe that B consents.

- **Assault by penetration:** A person (A) commits an offence if they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents.

- **Sexual assault:** A person (A) commits an offence of sexual assault if they intentionally touch another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents.

- **Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if they intentionally cause another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

Sexual Harassment refers to 'unwanted conduct of a sexual nature' which can occur both online and offline and inside and outside of school. In this context it specifically relates to child-on-child sexual harassment. Such behaviour can:

- violate a child's dignity;

- make them feel intimidated, degraded or humiliated, and;

- create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, examples of sexual harassment can include:

- sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothing or appearance and using sexualised names;

- sexual "jokes" or taunting;

- physical behaviour, such as deliberately brushing against someone, or interfering with someone's clothes;

- displaying pictures, photos or drawings of a sexual nature;

- upskirting (this is a criminal offence).

Online sexual harassment, which may occur independently, or as a broader pattern of sexual harassment and/or sexual violence. This may include:

- consensual and non-consensual making or sharing of nudes or semi-nudes. UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people provides detailed advice for schools and colleges;

- sharing of unwanted explicit content;

- sexualised online bullying;

- unwanted sexual comments and messages, including, on social media;
- sexual exploitation; coercion and threats, and;
- coercing others into sharing images of themselves or performing acts they're not comfortable with online.

School should assess when such behaviour crosses into sexual violence – it is important to talk to and consider the experience of the victim.

It is important that schools and colleges consider sexual harassment in broad terms. If left unchallenged, it can foster a culture that normalises inappropriate behaviour and increases the risk of leading to sexual violence.

Upskirting is a form of voyeurism involving taking, recording or sharing an image under a person's clothing without their consent and without a reasonable belief that they consent. The purpose may be to obtain sexual gratification or to cause the victim humiliation, alarm or distress. Upskirting is a criminal offence under the Voyeurism (Offences) Act 2019. Anyone, including children and adults of any sex, can be a victim.

Consensual and non-consensual sharing of **nudes and semi-nudes** includes the creation, sharing, possession, or distribution of nude or semi-nude images, videos, or live streams by children under 18 years of age, including content that has been generated or altered using AI. Previously referred to as **"sexting**" or **"youth-produced sexual imagery**", this behaviour may occur online or offline and can be shared between children or via digital platforms. This definition does not include children sharing adult pornography or exchanging messages that do not contain nude, semi-nude, or sexually explicit images.

Sharing nudes and semi-nudes: advice for education settings working with children and young people (updated March 2024) - GOV.UK

Indecent imagery is defined as an image which meets one or more of the following criteria:

- nude or semi-nude sexual posing;
- a child touching themselves in a sexual way;
- any sexual activity involving a child;
- someone hurting a child sexually;
- sexual activity that involves animals.

UKCIS states the term 'indecent images', also include pseudo-images (which are computer-generated images) that otherwise appear to be a photograph or video and may also be known as "Deep fakes" and "deep nudes". These may be created using tools such as photo/video editing software, deep fake apps and generators (to combine and superimpose existing images or videos onto other images and videos), and AI text-to-image generators.

Consent is defined as having the freedom and capacity to choose to engage in sexual activity. Consent may be given to one sort of sexual activity but not another and can be withdrawn at any time during sexual activity and each time activity occurs. A person only consents to a sexual activity if they agree by choice to that activity and has the freedom and capacity to make that choice. Children under the age of 13 can never consent to any sexual activity. The age of consent is 16.

3. Legislation and Guidance

This policy has due regard to all relevant legislation, statutory guidance and non-statutory guidance, including, but not limited to:

Legislation

- Children Act 1989 / 2004
- Safeguarding Vulnerable Groups Act 2006
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Education Act 2002
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
- Apprenticeships, Children and Learning Act 2009
- Equality Act 2010
- Counter-Terrorism and Security Act 2015
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021
- Marriage and Civil Partnership (Minimum Age) Act 2022
- Victims and Prisoners Act 2024
- Crime and Policing Act 2026
- Terrorism (Protection of Premises) Act 2025 (Martyn's Law)
- Children's Wellbeing and Schools Act 2026
- Childcare Act 2006
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018

Statutory guidance

- HM Government Multi-agency statutory guidance on female genital mutilation
- HM Government Multi-agency practice guidelines: Handling cases of Forced Marriage
- HM Government Channel Duty Guidance: Protecting people vulnerable to being drawn into terrorism

- Home Office and Foreign, Commonwealth and Development Office Multi-agency statutory guidance for dealing with forced marriage and multi-agency practice guidelines: Handling cases of forced marriage
- DfE Keeping Children Safe in Education
- DfE Working Together to Safeguard Children
- Home Office Domestic Abuse guidance
- DfE The Prevent Duty Guidance
- DfE Disqualification under the Childcare Act 2006
- DfE Academy Trust Handbook
- DfE Working together to improve school attendance
- DfE - Supporting Pupils with Medical Conditions at School
- DfE – Allergy safety in schools
- DfE - Suspension and Permanent Exclusion Guidance
- DfE – Restrictive interventions including Use of Reasonable Force in Schools
- DfE - Mobile Phones in Schools
- EYFS Statutory Framework

Non-Statutory Guidance

- DfE What to do if you're worried a child is being abused
- DfE Information sharing: advice for safeguarding practitioners providing safeguarding services to children, young people, parents and carers
- DfE Academy Trust governance
- DfE Child sexual exploitation
- DfE Recruit teachers from overseas
- DfE Behaviour in schools
- DfE Teachers' Standards
- DfE Meeting digital and technology standards in schools and colleges'
- Department of Health and Social Care Virginity testing and hymenoplasty: multi-agency guidance
- DfE Sharing nudes and semi-nudes: advice for education settings working with children and young people'
- National Police Chiefs' Council (NPCC) - When to Call the Police
- Safer Recruitment Consortium - Guidance for Safer Working Practice for Adults Working with Children and Young People in Education Settings

Local Guidance and Procedures

- Lancashire Child Safeguarding Assurance Partnership Procedures
- Working Well with Children and Families in Lancashire
- Lancashire Continuum of Need
- Other relevant safeguarding partnership arrangements

Where children live outside Lancashire, the school will also have regard to the safeguarding arrangements, threshold guidance and procedures of the relevant local authority and safeguarding partnership(s).

Policies and documents

This policy should be read alongside other school policies, procedures and guidance relating to safeguarding and the welfare of children, including:

- Allergy Safety Policy
- Attendance Policy
- Prevent Duty Risk Assessment and Procedure
- Behaviour, Anti-Bullying, Searching, Screening and Confiscation Policy
- Child-on-Child Abuse Procedure
- De-escalation and Restrictive Intervention Policy
- Intimate Care Policy
- Online Safety Policy
- Relationships and Health Education Policy
- Supporting Pupils with Medical Needs Policy
- PET Complaints Procedure
- PET Data Protection Policy
- PET Procedures for Dealing with Allegations of Abuse Against Staff
- PET Recruitment and Selection Policy
- PET Social Media Policy
- PET Staff Code of Conduct
- PET Technical Security Policy
- PET Whistleblowing Policy

4. Roles and responsibilities

Safeguarding and promoting the welfare of children is **everyone's responsibility**. Everyone who comes into contact with children and their families has a role to play in safeguarding children and creating a culture in which children feel safe, respected and able to access support when needed.

The school's safeguarding arrangements are underpinned by the principle that the best interests of the child are paramount, and that effective safeguarding requires a whole-school approach.

Pendle Education Trust Trust Board are responsible for:

- safeguarding and promoting the welfare of children;
- ensuring safeguarding and child protection policies and procedures are in place, reviewed regularly and implemented effectively;

- having regard to any statutory guidance on safeguarding issued by the Secretary of State for Education;
- being aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements;
- ensuring the school has appropriate safeguarding, safer recruitment, online safety, filtering and monitoring, and child protection arrangements;
- ensuring there is an effective whole-school safeguarding culture in which safeguarding is everyone's responsibility;
- ensuring the DSL is appropriately trained, supported and resourced to fulfil their responsibilities effectively;
- receiving appropriate safeguarding training to enable them to provide effective challenge and oversight;
- ensuring appropriate arrangements are in place to manage allegations and concerns about adults working with children;
- monitoring the effectiveness of safeguarding arrangements and seek assurance that policies and procedures are operating effectively.

The Principal has a duty to:

- ensure all safeguarding policies and procedures are implemented consistently and effectively;
- read, understand and apply statutory guidance relating to safeguarding children, ensuring that practice across the school by all staff and volunteers remains in line with guidance and this policy;
- promote a strong safeguarding culture where children feel safe and concerns are identified and acted upon promptly;
- ensure all staff and volunteers receive appropriate safeguarding training, induction and regular updates;
- work closely with the DSL, Local Academy Council and Board of Trustees to ensure safeguarding responsibilities are fulfilled;
- ensure the DSL has the skills and experience, status and authority in school, and that they are given the training, time, resources, funding and support to fulfil their role effectively;
- ensure appropriate action is taken to address safeguarding concerns and that safeguarding requirements are reflected in school improvement and quality assurance processes.

The Designated Safeguarding Lead (DSL) has a duty to:

- lead safeguarding and child protection arrangements within the school, including online safety and understand filtering and monitoring systems, as set out within KCSiE, detailed in Annex B.
- work collaboratively with the Principal, Local Academy Council and Board of Trustees to support a strong safeguarding culture and ensure safeguarding arrangements are effective and compliant with statutory requirements.

All Staff have a responsibility to:

- provide a safe environment in which children can learn;
- **read, understand and apply** statutory guidance (including part one of KCSiE), relating to safeguarding children and comply with the school's safeguarding policies and procedures **(including those staff who do not work directly with children);**
- be alert to signs of abuse, neglect, exploitation and other safeguarding concerns;
- maintain an attitude of "it could happen here" where safeguarding is concerned;
- act in the best interests of the child at all times;
- report any safeguarding concerns as soon as they are identified and follow procedures set out in the Local Children's Safeguarding Partnership, including concerns identified outside of school hours;
- recognise and identify children who may benefit from Early / Family Help, providing support as soon as problems emerge at any point in a child's life, from the foundation years through to the teenage years, through timely, evidence-informed intervention to prevent concerns from escalating and reduce the risk of harm;
- understand that anyone can make a referral to Children's Social Care where they believe a child is at risk of harm;
- understand the importance of information sharing, professional curiosity and professional challenge;
- support children's social care and other agencies following a referral.

Teaching Staff and those involved in teaching work have a responsibility to:

- safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties (as set out in The Teachers Standards 2012);
- report known cases of female genital mutilation (FGM) to the police.

Working Together: The school recognises that children are best protected when professionals, families and agencies work together effectively. We will work in partnership with parents, carers and relevant agencies to safeguard and promote the welfare of children. The school has due regard to Working Together to Safeguard Children 2026.

Where there are concerns about a child's welfare, confidentiality cannot always be guaranteed, and information will be shared where it is lawful and appropriate to do so in order to safeguard children.

Further Information: School will have due regard to the safeguarding role descriptions as detailed in *Keeping Children Safe in Education 2026*, particularly Part Two and Annex B.

Training and Induction

All staff, including temporary staff, volunteers and local governors, will receive appropriate safeguarding and child protection induction and training. Safeguarding training and updates will be provided regularly to ensure staff knowledge and practice remain current and in line with statutory guidance, local procedures and emerging safeguarding issues. The school will maintain records of all safeguarding induction, training and updates.

The Trust board remain responsible for ensuring that **all** safeguarding information, policies, procedures and guidance required by KCSiE and other relevant statutory guidance are included within staff induction arrangements. *See also the Policies and Procedures section for further information.*

All staff should be aware of systems within their school or college which support safeguarding, and these should be explained to them as part of staff induction. This should include the:

- Child protection and safeguarding policy;
- Behaviour, Anti-Bullying, Searching, Screening and Confiscation Policy;
- Child-on-child Abuse procedures;
- Staff Code of Conduct;
- PET Whistleblowing Policy;
- Attendance policy, which includes the safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods, and;
- Role of the DSL (including the identity of the DSL and any deputies).

Following induction, the school recognises the importance of ensuring that safeguarding training remains effective and responsive to local and national safeguarding developments.

The school will ensure that:

- all staff and volunteers receive safeguarding and child protection training appropriate to their role and at least annually;
- all staff receive regular safeguarding and child protection updates, including updates on local safeguarding arrangements, emerging risks and changes to statutory guidance;
- all staff are provided with, and expected to read and understand, safeguarding updates issued by the DSL;

- the DSL and Deputy DSL(s) undertake DSL training to provide them with the knowledge and skills required to carry out the role and update their knowledge and skills at least biennially;
- Local Academy Council members and Trustees receive safeguarding training appropriate to their strategic role (at induction) to enable them to provide appropriate oversight, and this will include online safety training. This will be updated regularly;
- safer recruitment training is undertaken by appropriate staff involved in recruitment processes;
- staff receive additional safeguarding training relevant to the needs and context of the school, which may include online safety, child-on-child abuse, harmful sexual behaviour, domestic abuse, exploitation, attendance, mental health, serious violence, FGM and other emerging safeguarding issues;
- staff, local governors, trustees and volunteers will receive Prevent awareness training appropriate to their role and in accordance with statutory expectations and identified local need on induction and at least biennially;
- all staff receive whole-school allergy awareness training at least annually;
- staff are encouraged to discuss any safeguarding training needs or gaps in knowledge with the DSL;
- staff are provided with opportunities to contribute to and inform the school's safeguarding arrangements;
- comprehensive records are maintained of safeguarding training, induction and updates.

Pendle Primary Academy provides Early Years Foundation Stage (EYFS) provision. We will ensure compliance with the safeguarding and welfare requirements of the EYFS statutory framework. Pendle Primary Academy will ensure that staff working within the EYFS, including the DSL and any deputies, receive safeguarding training appropriate to their role and that all EYFS safeguarding requirements are implemented and reviewed in line with current statutory guidance: Early years foundation stage (EYFS) statutory framework - GOV.UK

5. Multi-Agency Working

Pendle Primary Academy recognises that safeguarding and promoting the welfare of children is **everyone's responsibility** and that effective safeguarding requires a coordinated, multi-agency approach. The school will work in partnership with safeguarding partners and other agencies in accordance with statutory guidance and local multi-agency safeguarding arrangements.

The school is aware of and will act in accordance with the local safeguarding arrangements published by Lancashire Safeguarding Children Partnership. School staff will be supported to

understand and fulfil their role within these arrangements and will engage in multi-agency working to safeguard and promote the welfare of children.

The school will work collaboratively with Family Help services, Children's Social Care, health services, police, education services and other relevant agencies, including those from other local authority areas where required to identify needs, provide support, share information appropriately and contribute to assessments, plans and interventions for children and families.

Where concerns about a child's welfare are identified, the school will work with relevant agencies to ensure children and families receive the right help at the right time. This may include Early Help, Family Help, Child in Need support, Child Protection intervention or other statutory services, as appropriate.

Where a child may be in need of support from Children's Social Care, the school will co-operate with requests for information and enable access for local authority Children's Social Care practitioners to undertake or consider assessments under Sections 17 and 47 of the Children Act 1989.

The school recognises the importance of effective multi-agency working in identifying, assessing and responding to all forms of abuse, neglect and exploitation, including child criminal exploitation (CCE) and child sexual exploitation (CSE).

Further information regarding local multi-agency safeguarding arrangements can be found via the Lancashire Safeguarding Children Partnership (LSCP). Schools should also have due regard to the principles and expectations set out in Working Together to Safeguard Children, which underpins effective multi-agency working and information sharing to safeguard and promote the welfare of children.

6. Information Sharing and Information Sharing Duty

The school recognises that timely, accurate and proportionate information sharing is essential for effective safeguarding and promoting the welfare of children. The school will have due regard to Keeping Children Safe in Education, Working Together to Safeguard Children and relevant information sharing guidance.

The Pendle Education Trust board should ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the data protection laws. Understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows, where appropriate, practitioners to share special category personal data without the need for consent. Fears, about sharing information must not be allowed to stand in the way of the need to safeguard and protect children.

Staff will share information with relevant professionals and agencies in accordance with safeguarding responsibilities, local procedures and statutory guidance. Where there are concerns about a child's safety, welfare or wellbeing, staff will act promptly and share information where appropriate.

If staff are uncertain about whether information should be shared, they should seek advice from the DSL or a Deputy DSL. The school recognises that, in many circumstances, consent is not required to share information to safeguard and promote the welfare of a child.

The school will ensure that staff receive appropriate information sharing guidance and training as part of safeguarding induction and ongoing safeguarding updates.

7. Early Help, Family Help and Vulnerability

Early help means providing support as soon as a problem or need emerges, at any point in a child's life. Staff at Pendle Primary Academy recognise that all staff have a role in identifying children and families who may benefit from Early Help, Family Help and other services.

All staff should understand the school's Early Help and Family Help arrangements, local threshold guidance, referral pathways and safeguarding processes. Staff should be aware of the indicators of abuse, neglect and exploitation, the support available to children and families at different levels of need, and the procedures for raising concerns and seeking advice from the DSL.

All children and families are individual and unique and may, at times, benefit from help and support. This may include universal services, community-based Early Help, targeted Family Help, or statutory intervention where required.

Children and families can experience vulnerability at different times in their lives. Vulnerability may be temporary, emerging or long-term and can be influenced by a range of factors, including individual circumstances, family circumstances, health needs, lived experiences or environmental factors. Identifying vulnerability early and responding with appropriate support can help prevent needs from escalating and improve outcomes for children and families.

Whilst any child or family may benefit from support, staff at Pendle Primary Academy will be particularly alert to the potential need for Early Help, Family Help and additional support for children who:

- are disabled or have certain health conditions and/or specific additional needs;
- have Special Educational Needs (whether or not they have a statutory Education, Health and Care Plan);
- has a mental health need;
- are young carers;
- are pregnant and/or is a parent themselves;
- have exhibited early signs of abusive, violent and/or harmful behaviours;
- are showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;

- have been repeatedly removed from the classroom, experienced multiple suspensions, are on a part-time timetable, are at risk of permanent exclusion, or are attending Alternative Provision or a Pupil Referral Unit;
- are frequently missing/goes missing from education, home or care;
- are at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation;
- are at risk of being radicalised into terrorism;
- have a parent or carer in custody, or is affected by parental offending;
- are in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- are misusing alcohol and other drugs themselves;
- are at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced marriage;
- are a privately fostered child.

The DSL will support staff in decision making where there are indicators of need for support before statutory intervention. Operational tasks including liaising with other agencies and setting up an inter-agency assessment may be delegated to a trained member of staff where appropriate, with the oversight of the DSL. The local Family Help process will be followed as required.

Support before statutory intervention requires explicit consent from an adult with parental responsibility, or the child themselves were deemed to be able to give consent in line with age, development and competency. Where consent is not forthcoming, school will continue to work closely with the family in their best interests to support identified need.

Staff within Pendle Primary Academy may be required to support other agencies and professionals in community-based Early Help or Family Help assessment, in some cases acting as the lead practitioner for Early Help.

While Pendle Primary Academy is committed to multi-agency working and actively contributing to Family Help and statutory processes, school staff – including the DSL and deputies – will not act as the nominated **Lead Practitioner** for Family Help (Level 3 of Lancashire CON) or Section 17 (Child in Need) plans.

This position is maintained to ensure the child's safety and best interests are not compromised, based on the following operational boundaries:

- **Operational Availability:** School staff operate on a term-time-only schedule. Family Help and Child in Need support requires continuous year-round oversight, monitoring, and lead management, which school staff cannot provide during holiday periods.

- **Access to Information Systems:** School staff do not have access to multi-agency case management or social care information-sharing databases required to co-ordinate, track, and record interventions across external agencies.

- **DSL Strategic Capacity:** The role of the Lead Practitioner for statutory-level cases involves significant administrative, care-planning, and multi-agency coordination duties. Expecting school staff to undertake this volume of case management limits their operational capacity to fulfil their primary statutory duty: managing immediate, daily safeguarding concerns of the children in school.

Pendle Primary Academy staff will continue to fully participate as key partner members of the Team Around the Family (TAF) or Child in Need (CiN) meetings. Staff will attend meetings, complete school-based assessments, share relevant educational and welfare information, and deliver agreed school-based interventions, while expecting the Lead Practitioner role to be held by an appropriately resourced Child and Family Wellbeing Service practitioner or Local Authority social worker.

Where a child is receiving support under Family Help services and there is cause to suspect the child is at risk of significant harm, a referral to statutory services under Section 47 will be made by school in line with local child protection procedures.

Further information relating to Early Help, Family Help, local threshold guidance, referral pathways and multi-agency safeguarding procedures in Lancashire can be accessed using the links below:

Early Help Assessment - information for professionals - Lancashire County Council

Lancashire Safeguarding Partnership - Early Help & Support for Families

Lancashire Safeguarding Partnership - Children's Policies and Procedures

8. Specific Safeguarding Issues

All staff should be aware of the indicators of abuse, neglect, exploitation and modern slavery, recognising that children can be at risk of harm both inside and outside the home, within their communities and online. Exercising professional curiosity and maintaining an awareness of safeguarding risks are vital to the early identification of abuse and neglect. This enables staff to recognise children who may benefit from Family Help, Early Help or safeguarding intervention and ensure they receive the right help at the right time.

There are specific and emerging ways in which children can be abused, exploited or placed at risk of harm. In line with Keeping Children Safe in Education 2026, all staff should be aware of the safeguarding issues outlined in **Annex A** and understand their responsibility to remain vigilant, exercise professional curiosity and report concerns promptly to the DSL. The safeguarding issues outlined below are not exhaustive and may include, but are not limited to:

8.1 Child-on-Child Abuse (including harassment and violence)

Child-on-child abuse is defined as abuse that occurs between children who are under 18 years of age.

All staff should be aware that children can abuse other children of any age and gender, (often referred to as child-on-child abuse) and that it can happen both inside and outside of school or college, home and online. As part of this, schools should also try to be alert to when children might be at highest risk around the school day (for example immediately after school). All staff will be aware of the indicators of child-on-child abuse, how to identify it, and how to respond to reports (whether these concerns are thought to have taken place on or off-site). All staff will also recognise that even if no cases have been reported, this is not an indicator that child-on-child abuse is not occurring. All staff will speak to the DSL if they have any concerns about child-on-child abuse.

All staff will understand the importance of challenge inappropriate behaviour between children and will not tolerate abuse as “just banter”, "just having a laugh" or “part of growing up” or "boys being boys" can lead to a culture of unacceptable behaviour, misogyny, and an unsafe environment for children and a culture that normalises abuse leading to children accepting and not coming forward to report it.

All staff should be aware that child-on-child abuse is a safeguarding issue for all children involved. This includes both the child who has experienced harm and the child whose behaviour has caused concern. A safeguarding response will be required for each child involved in an incident.

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

- **bullying**, including cyberbullying, prejudice-based and discriminatory bullying;
- **discriminatory behaviour**, including racism, faith-targeted abuse, and other prejudice-based incidents;
- **abuse in intimate personal relationships** between children (sometimes known as ‘teenage relationship abuse’);
- **physical abuse** such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- **serious physical assault** and **harm**, or the threat of harm with a **weapon**;
- **sexual violence** such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- **sexual harassment** such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in **sexual activity** without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party, consensual and non-consensual **making or sharing** of nudes and semi-nudes (this may also include AI generated images);

- **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, and;

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

All staff should recognise that children may experience prejudice-based harm, including racism, faith-based prejudice, and other forms of discrimination. Such experiences may affect a child's welfare, wellbeing, mental health, and willingness to seek help. Staff should be alert to the signs and impact of prejudice-based harm and ensure that concerns are considered within safeguarding practice where appropriate.

Harmful Sexual Behaviour (HSB) is an umbrella term used to describe sexual behaviours displayed by children that are developmentally inappropriate, problematic, abusive or violent. HSB can occur online, offline or in a combination of both. All concerns relating to HSB should be considered within a safeguarding and child protection context and responded to in accordance with the school's safeguarding procedures.

All staff will be clear about the school's policies and procedures relating to child-on-child abuse and the important role they play in preventing, identifying and responding to concerns. Staff will be alert to behaviours and indicators that may signal risk, recognising that early identification and timely, appropriate intervention can be crucial in preventing harmful behaviour from escalating and reducing the risk of abuse or violence occurring.

All staff should be aware that children may not always be able, or ready, to report abuse directly. Concerns may come to light through changes in behaviour, presentation, attendance, emotional wellbeing, online activity, disclosures made by peers, or through observations by staff. Any concerns about a child's welfare should be taken seriously and acted upon without delay.

Preventing Child-on-Child Abuse

In addition to the measures outlined above, the school adopts a proactive and preventative whole-school approach to minimising the risk of child-on-child abuse and creating a safe, respectful and inclusive environment for all children.

The school will:

- Promote a culture of respect, kindness, equality and inclusion in which inappropriate, harmful, abusive, discriminatory, sexist or misogynistic language and behaviour are consistently challenged.

- Deliver an age-appropriate curriculum, including Relationships and Health Education, PSHE and Online Safety education, which supports children to understand healthy relationships, consent, boundaries, respectful behaviour and how to seek support.

- Ensure children are regularly reminded of the different ways in which they can report concerns about themselves or others and that concerns will be taken seriously.

- Maintain appropriate supervision arrangements, particularly during unstructured times of the school day and in areas identified through risk assessment and safeguarding monitoring.

- Implement a robust approach to online safety, including effective filtering and monitoring systems, education around safe online behaviours and appropriate responses to harmful online conduct.

- Regularly review safeguarding records, incidents, trends and patterns relating to child-on-child abuse to identify emerging concerns and inform preventative strategies.

- Use lessons learned from safeguarding concerns, child-voice, local intelligence and national safeguarding developments to strengthen policies, procedures, staff training and curriculum provision.

- Work with parents, carers and relevant partner agencies where appropriate to promote child safety and wellbeing and reduce the risk of harm.

- Deploy the dedicated school wellbeing team to deliver targeted interventions and robust pastoral support, ensuring that we actively uphold our core aims of creating a secure, nurturing environment where every child feels heard, valued, and connected.

- Apply all school behaviour policies consistently and effectively, cultivating a predictable and safe environment where high standards of conduct are maintained.

- Integrate accessible, child-friendly online reporting mechanisms directly via the PPA Stars mini-site, empowering children to confidently report safeguarding or online safety concerns outside of school hours.

- Systematically capture and champion child voice through active engagement with school ambassadors and the administration of child surveys and child voice opportunities, utilising these direct insights to strengthen our safety procedures and refine our curriculum offer.

All staff should be aware that children with Special Educational Needs and Disabilities (SEND) can face additional safeguarding challenges and may be at increased risk of abuse and harm. Staff will not assume that indicators of possible abuse, neglect or exploitation relate solely to a child's SEND and will always consider whether further exploration, support or intervention is required.

All staff should recognise that some children may be at increased risk of harm, abuse or discrimination based on their protected characteristics, perceived differences or vulnerabilities. This can include children who are lesbian, gay, bisexual or questioning their identity, as well as those who are perceived by others to be so and that that for some (but not all) forms of child-on-child abuse it is more likely that girls will be victims and boys' perpetrators, but that all child-on-child abuse is unacceptable and will be taken seriously.

The school will foster a culture of respect and inclusion and will challenge discriminatory language, prejudice, harassment and harmful behaviours. Incidents of sexual violence and sexual harassment will not be tolerated or dismissed as banter, part of growing up or having

a laugh and will be responded to consistently, regardless of the sex, gender or characteristics of those involved.

Through the curriculum and wider school life, children will be taught about consent, healthy relationships, boundaries, respect and inclusion in an age and developmentally appropriate manner.

All staff should recognise that the absence of reported incidents does not necessarily mean that child-on-child abuse is not taking place. Staff should remain vigilant and maintain an attitude of "it could happen here".

Children will be taught how to recognise, and report concerns and how any reports will be responded to and managed. This includes concerns about their own welfare, concerns about friends or peers, and concerns relating to child-on-child abuse. Children will be reassured that they will be listened to, taken seriously, supported and kept safe. The school has a number of systems and processes available to support children to share their concerns and seek help and children are regularly reminded of the various ways they can report concerns about their own welfare or that of their peers. The school reinforces a culture of trust, guaranteeing that all reported concerns are taken seriously, supported, and acted upon.

The effectiveness of these arrangements will be regularly reviewed by the DSL and senior leaders through child voice, safeguarding monitoring, feedback and lessons learned from safeguarding concerns and incidents, to ensure that children feel safe, are able to report concerns and receive an appropriate response.

The school's arrangements for preventing, identifying and responding to child-on-child abuse are set out within this Child Protection and Safeguarding policy. These arrangements should be read alongside the school's Behaviour, Anti-Bullying, Searching, Screening and Confiscation policy and Child-on-Child Abuse procedures.

Following a report of child-on-child sexual harassment, assault, violence or harmful sexual behaviour, the DSL or deputy DSL will make an immediate risk and needs assessment, considering:

- the wishes of the child who has/may have been harmed;
- the child who has/may have caused harm including their vulnerability and potential of being a victim themselves;
- the nature and seriousness of the alleged incident
- the ages of the children involved;
- the developmental stages of the children involved;
- any power imbalance between the children;
- whether the incident is a one-off occurrence or part of a sustained pattern of behaviour;
- whether there are ongoing risks to the victim, other children, staff or the wider school community;

- any contextual safeguarding concerns;
- the support needs of all children involved;
- whether the behaviour may be indicative of unmet needs, harmful sexual behaviour or other safeguarding concerns requiring further assessment and intervention.

Pendle Primary Academy will refer to Keeping Children Safe in Education Part 5 and the school's Child-on-Child Abuse Procedure for detailed guidance on managing such incidents.

Child-on-child abuse, including sexual harassment and sexual violence, **will not be tolerated** within the school.

School will also have regard to relevant Department for Education guidance and their own equality and inclusion policies when supporting children with individual vulnerabilities or protected characteristics.

Where concerns involve harmful sexual behaviour (HSB), advice and support may be sought from AIM-trained safeguarding professionals. Schools with AIM-trained DSLs or Deputy DSLs may use AIM resources and approaches within their own setting to support assessment and decision-making. Where appropriate, AIM Checklists and Risk Assessment Management Plans (RAMPs) may be used to help understand the nature of the behaviour, assess risk and protective factors, inform safety planning and identify appropriate support and intervention, taking account of the age, developmental stage, understanding and circumstances of the child(ren) involved.

However, all cases that are assessed using the AIM Assessment and categorised as abusive/violent (including all reports of rape or penetration with an object), will be referred to the Police and Children's Social Care.

The school will aim to work openly and collaboratively with children, parents and carers wherever appropriate. School will always aim to be transparent and share information with families, however there may be circumstances where advice is sought on what information can be shared by school. This may mean that families are not immediately informed where a concern has been reported or were doing so may place a child at increased risk or compromise an investigation.

Where required, risk assessments and safety plans will be completed, informed by the views and experiences of the children involved and developed in partnership with parents, carers and relevant agencies where appropriate. These will be shared with relevant staff on a need-to-know basis and reviewed regularly, and at least half-termly, to ensure they remain effective and reflect any changes in risk, need or circumstances.

The DSL will work closely with other agencies where needed and ensure ongoing multi-agency work to support all parties involved.

Advice can be sought from Lucy Faithful Foundation for concerns around any type of sexual abuse, including child on child abuse and harmful sexual behaviour. Shore Space is a useful resource for children worried about sexual behaviour.

In line with the Crime and Policing Act 2026, this policy incorporates measures arising from the Independent Inquiry into Child Sexual Abuse (IICSA), including the **new mandatory reporting duty** for child sexual abuse and the introduction of the Child Criminal Exploitation (CCE) offence: Crime and Policing Act 2026: overarching factsheet - GOV.UK

8.2 Domestic abuse

In line with the Domestic Abuse Act 2021, **domestic abuse** is defined as abusive behaviour of a person towards another person where both are aged 16 or over and are personally connected. **Abusive behaviour** includes physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological or emotional abuse, or another form of abuse.

The school will recognise the serious, long lasting emotional impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of domestic abuse as recognised in the Domestic Abuse Act 2021.

Types of domestic abuse include intimate partner violence, abuse by family members, child to parent or care giver abuse. All staff will be aware of the signs of domestic abuse and will report concerns immediately to the DSL.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'. More information on teenage relationship abuse is available at Safe Young Lives.

Where concerns about domestic abuse are raised, the DSL in school will consider the concerns in line with local safeguarding procedures. If a child has been harmed or is at risk of harm, a referral should be made to children's social care immediately, and, if appropriate, to the police.

8.3 Operation Encompass

Operation Encompass is a national information-sharing scheme between the Police and relevant education settings operating across England and Wales. The Police have a statutory duty to notify a child's education setting (under the victim and Prisoners Act 2024), and where relevant the local authority, where they have reasonable grounds to believe that a child may be a victim of domestic abuse or other potential crimes.

This includes children connected to a household where police have attended a domestic abuse incident, children who were not physically present, and children who may reside in another household temporarily or permanently.

Children are recognised as victims of domestic abuse in their own right in the Domestic Abuse Act 2021.

Pendle Primary Academy is committed to Operation Encompass, and the timely sharing of information between Police and schools following incidents of domestic abuse and other police-attended incidents that may have an impact on a child. The school will ensure that all stakeholders are informed of its participation in the initiative and its role in supporting children who may be victims of domestic abuse or affected by other significant incidents. The school will consider each notification appropriately in relation to the best way to support the child and family.

Advice may be sought from the Police and/or Children's Social Care or the Operation Encompass Helpline following a report being received to ensure that the safety and welfare of the child is paramount. School are aware that any actions taken should be considered in terms of risk and care should be given to ensure that action does not increase risk to the child/victims.

The Operation Encompass notification is stored in line with all other confidential safeguarding and child protection information on CPOMS.

The key adult for Operation Encompass in school is: Catherine Jermyn, DSL.

Advice on supporting children experiencing domestic abuse is available via the Operation Encompass Helpline: 0204 513 9990.

More information about the scheme can be found: Operation Encompass

8.4 Child Exploitation (CE)

Child Exploitation is an umbrella term which covers the two commonly known types of exploitation, child criminal exploitation (CCE) and child sexual exploitation (CSE).

Pendle Primary Academy recognises that all forms of child exploitation are criminal. For the purposes of this policy, we will define CCE and CSE.

Child Criminal Exploitation (CCE) is defined as a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity, for any of the following reasons:

- In exchange for something the victim needs or wants;
- For the financial advantage or other advantage of the perpetrator or facilitator;
- Through violence or the threat of violence (this could be online or through technology).

Specific forms of CCE can include:

- Being forced or manipulated into transporting drugs or money through county lines;
- Working in cannabis factories;
- Shoplifting or pickpocketing;
- Committing vehicle crime;
- Committing, or threatening to commit, serious violence to others.

The school will recognise that children involved in CCE are victims themselves, regardless of whether they have committed crimes, and even if the criminal activity appears consensual as it is not possible for a child to consent to be exploited, abused or trafficked, and they may not recognise that it is happening to them. The school will also recognise that children of any gender are at risk of CCE.

School staff will be aware of the indicators that a child is the victim of CCE, including:

- Associating with other children involved in exploitation;
- Suffering from changes in emotional wellbeing;
- Misusing drugs or alcohol;
- Going missing for periods of time or regularly coming home late;
- Regularly missing school or education;
- Appearing with unexplained gifts, money or new possessions.

Criminal exploitation of children can include **County Lines**. This is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or criminal networks / gangs groom and exploit children to carry drugs and money into one or more areas. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked or the purpose of transporting drugs and a referral to the National Referral Mechanism by first responders should be considered in addition to normal safeguarding procedures. School would liaise with a 'First responder Organisation' as details in part 4 of the guidance, to support and request a referral to the NRM.

As well as the general indicators for CCE, school staff will be aware of the specific indicators that a child may be involved in county lines, including:

- Going missing and subsequently being found in areas away from their home.
- Having been the victim or perpetrator of serious violence, e.g. knife crime.
- Receiving requests for drugs via a phone line, moving drugs, collecting money.
- Being found in accommodation they have no connection.
- Owing a 'debt bond' to their exploiters.
- Having their bank account used to facilitate drug dealing.

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

It occurs where an individual, a group or an organised network and 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.

The school will recognise that CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge, e.g. through others sharing videos or images of them on social media. The school will recognise that CSE can affect any child who has been coerced, manipulated or deceived into engaging in sexual activities, even if the activity appears consensual; this includes pupils aged 16- and 17-years-old who can legally consent to sexual activity. The school will also recognise that children may not realise they are being exploited and they believe they are in a genuine romantic relationship.

As with CCE, victims are not always recognised and can be criminalised for actions they take whilst under coercion. This remains a significant concern, as professionals continue to encounter cases where children are manipulated, groomed, and exploited without fully understanding the abuse they are experiencing.

School staff will be aware of the key indicators that a child is the victim of CSE, including:

- Appearing with unexplained gifts, money or new possessions;
- Associating with other children involved in exploitation;
- Suffering from changes in emotional wellbeing;
- Misusing drugs or alcohol;
- Going missing for periods of time or regularly coming home late;
- Regularly missing school or education or not taking part;
- Having older boyfriends or girlfriends;
- Suffering from sexually transmitted infections;
- Displaying sexual behaviours beyond expected sexual development;
- Becoming pregnant.

All staff will consider the language and terms used when raising concerns and providing ongoing support to children who have experienced abuse through exploitation to ensure victims are not unintentionally blamed or seen as active participants in their own abuse.

Where CSE, or the risk of it, is suspected, staff will discuss the case with the DSL. If after discussion a concern remains, local safeguarding procedures will be triggered.

8.5 Modern Slavery and the National Referral Mechanism

Modern slavery encompasses exploitation, including sexual exploitation, criminal financial exploitation, human trafficking and slavery, servitude and forced or compulsory labour.

Exploitation can take many forms, including forced labour, slavery, servitude, forced criminality and the removal of organs.

The National Referral Mechanism (NRM) is the UK framework (under s49 of the Modern Slavery Act 2015) for identifying and supporting potential victims of exploitation and modern slavery.

Further information on the indicators of exploitation and modern slavery, support available to victims, referral pathways to the NRM and professional training resources can be found in the statutory guidance here: National referral mechanism guidance: adult (England and Wales) - GOV.UK

Where there are reasonable grounds to believe that a child may be a victim of slavery or human trafficking, the school will liaise with relevant agencies and an authorised *'First Responder Organisation',* in accordance with part 4 of the statutory guidance, as schools are not designated First Responders and therefore cannot make referrals directly to the NRM.

Staff should be aware that modern slavery is a form of child abuse and may be linked to, or occur alongside, other forms of abuse, neglect and exploitation, including CCE, CSE, county lines activity and trafficking. **Professional curiosity is essential** in identifying children who may be at risk, as they may not recognise their experiences as harmful or be able to disclose them.

8.6 Honour or Faith-Based Abuse

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

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

All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

Staff will be alert to the possibility of a child being at risk of HBA or already having suffered HBA and if staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they will speak to the DSL (or a deputy).

As appropriate, the DSL (or a deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with the Police and local authority children's social care.

Female Genital Mutilation (FGM) is defined as all procedures involving the partial or total removal of the external female genitalia or any other injury to the female genital organs for non-medical reasons. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

All staff should be aware of the indicators that a child may be at risk of, or affected by, Female Genital Mutilation (FGM). Whilst the presence of a single indicator may not in itself indicate risk, a combination of factors may suggest that further exploration is required. NSPCC guidance: Female Genital Mutilation | NSPCC

Staff will exercise professional curiosity, be sensitive when discussing concerns and recognise that a child may not be aware that they are at risk of FGM. Any concerns will be reported in line with the school's safeguarding and child protection procedures.

Further information can be found in the multi-agency statutory guidance on female genital mutilation and the Female genital mutilation: resource pack particularly section 13.

FGM mandatory reporting duty for teachers: Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a **statutory duty upon teachers** in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Teachers who fail to report such cases may face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining children; however, where a teacher discovers that an act of FGM appears to have been carried out, they must make a report to the police in accordance with statutory guidance. Unless there is a good reason not to do so, teachers should also inform the school's DSL as soon as possible so that appropriate safeguarding support can be considered.

NB: This mandatory reporting duty does not apply to cases where FGM is suspected, where a child may be at risk of FGM, or where the victim is aged 18 or over. In such circumstances, staff should follow the school's child protection and local safeguarding procedures.

Forced marriage is defined as a marriage that is entered into without the full and free consent of one or both parties, and where violence, threats or any other form of coercion is used to cause a person to enter into the marriage. Threats can be physical, emotional, or psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent, (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices to coerce a person into marriage, along with threats that can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent

Forced marriage is a crime in the UK and a form of honour-based' abuse (HBA).

Staff who have any concerns regarding a child who may have undergone, is currently undergoing, or is at risk of forced marriage will speak to the DSL and local safeguarding procedures will be followed – this could include referral to CSC, the police or the Forced Marriage Unit. It will be made clear to staff members that they should not approach the child's family or those with influence in the community, without the express consent of the child, as this will alert them to the concerns and may place the child in further danger.

8.7 Preventing Radicalisation

For the purposes of this policy, "**extremism"** is defined by the government as the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

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

For the purposes of this policy, **"radicalisation"** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

For the purposes of this policy, "**terrorism"** refers to an action that endangers or causes serious violence to a person or people, serious damage to property, or seriously interferes with or disrupts an electronic system. The use or threat of these actions must be designed to influence the government or intimidate the public and be made for the purpose of advancing a political, religious or ideological cause.

Protecting children from the risk of radicalisation is part of the school's wider safeguarding duties. Pendle Primary Academy will actively assess the risk of children being radicalised and drawn into extremism and/or terrorism. The school will ensure procedures are in place for staff to be alert to changes in children's behaviour which could indicate that they may need help or protection. The school Academy will also ensure that staff can use their professional judgement to identify children who may be at risk of radicalisation and act appropriately, which may include contacting the DSL or making a referral to Channel and are aware how to do so. The school will work with local safeguarding arrangements as appropriate to ensure awareness of local and national incidents that may heighten the activity of extreme groups or cause increased curiosity of children.

Pendle Primary Academy will ensure that they engage with parents and families, as they are in a key position to spot signs of radicalisation. In doing so, the school will assist and advise family members who raise concerns and provide information for support mechanisms. Any concerns over radicalisation will be discussed with the child's parents, unless the school has reason to believe that the child would be placed at risk as a result.

The DSL, who is also the Prevent Lead, will undertake the Lancashire Prevent partnership in depth training, available via the Lancashire Prevent partnership website www.lancashirepreventpartnership.org.uk. All other staff will complete the online Home Office Prevent training on induction.

The DSL and the Prevent Lead are able to provide advice and support to other staff on how to protect children against the risk of radicalisation and will ensure that all staff, local governors and trustees have received appropriate and up-to date training that is refreshed at least every two years. Pendle Primary Academy will ensure all staff receive face-to-face training biennially with all classroom-based staff completing Home Office online Prevent training on the alternate year.

The school's Online Safety policy and PET Technical Security policy will support the safeguarding of children online by ensuring they cannot access terrorist and extremist material when using the internet in school and that suitable filtering and monitoring software and supervision is in place. Systems are regularly tested using testfiltering.com filter checking utility, recording the results and addressing issues as required.

8.8 Prevent Duty

Under section 26 of the Counterterrorism and Security Act 2015, all schools are subject to a duty to have "due regard to the need to prevent people from being drawn into terrorism", known as the "**Prevent Duty",** forming part of the school's wider safeguarding obligations.

Pendle Primary Academy will ensure that all staff, local governors, trustees and volunteers receive appropriate Prevent training and are aware of the indicators of radicalisation and extremism, local referral pathways and safeguarding procedures.

Concerns will be reported and managed in accordance with school procedures and guidance provided by the Lancashire Prevent Partnership.

The School Prevent Lead is:	Catherine Jermyn
Prevent Local Governor Lead	Usman Rasul
Prevent Curriculum Lead	Catherine Jermyn

8.9 Mental Health

All staff should be aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered, or is at risk of suffering, abuse, neglect, exploitation or other adverse childhood experiences.

Staff should not attempt to diagnose mental health conditions or disorders. However, they should be alert to children whose behaviour, presentation, emotional wellbeing or attendance may suggest they are experiencing mental health difficulties or may be at risk of developing them. Staff should also recognise that experiences such as abuse, neglect, domestic abuse, bullying, bereavement, trauma and other adverse experiences can have a significant impact on a child's mental health, behaviour and educational outcomes.

If staff have a concern about a child's mental health that is also a safeguarding concern, they must follow the school's safeguarding and child protection procedures and report their concerns without delay to the DSL or deputy.

School will ensure that staff are aware of the support available to children and families, including pastoral support, Early Help services, mental health in schools support teams (MHST), school nursing services, Child and Adolescent Mental Health Services (CAMHS), and other relevant local health and wellbeing services.

An open and supportive culture should be promoted within the school, where children feel able to discuss their emotional wellbeing and seek help when needed. School will work collaboratively with parents, carers and relevant agencies to identify and provide appropriate support at the earliest opportunity.

Where there are concerns that a child may be at immediate risk of harm to themselves or others, school will take prompt action to ensure the child's safety, including seeking urgent medical assistance by contacting emergency services, or arrange for them to be taken to Urgent Care / A&E immediately by a parent/carer or other suitable person.

If a child needs urgent help for their mental health, but it is not an emergency, staff can get help from NHS 111 online or by telephone, as appropriate.

8.10 Private Fostering

Private fostering occurs when a child under 16 years old (or under 18 if they have a disability or special educational needs) lives with someone who is not a close relative for 28 days or more. If the arrangement is for less than 28 days for one stay but a number of stays add up to 28 days or more, e.g. a child lives with extended family for weekdays and returns to their parents' care at weekends, this would also be considered as private fostering. If a UK

homestay lasts 28 days or longer, it may also be considered private fostering under the Children Act 1989.

When a school becomes aware that a child is being privately fostered, they must inform Children's Social Care (CSC) promptly so that the local authority/CSC can carry out the necessary checks and ensure the child's welfare.

Where a private fostering agreement is confirmed, the child will remain open to CSC throughout the duration of the agreement. It is a criminal offence not to notify the Local Authority in cases of private fostering.

Lancashire Safeguarding Partnership - Private Fostering

8.11 Children with Family Members in Prison

Children with family members in prison are at increased risk of poverty, stigma, isolation and poor mental health. Schools will not always be informed when a family member receives a custodial sentence, but where they are informed there will be an offer of support in line with their needs and wishes.

School and college staff should be aware that children who have experienced parental imprisonment are more likely to be absent (or excluded) than their peers, to experience mental ill health and drug and alcohol misuse; they are also less likely to be in education, training or employment in later life. Staff should understand the need for tailored, trauma informed and sensitive support that can help mitigate potential harm and help encourage stability.

Families can access support from The Prisoner Family Helpline which is free and confidential for families who are in contact with the criminal justice system in England and Wales.

8.12 Behaviour as an Indicator of Concern

Staff should be alert to changes in a child's behaviour, presentation, attendance, engagement, emotional wellbeing, relationships or conduct, including any sudden deterioration. Behaviour should not be viewed in isolation, and staff should consider whether it may be linked to an underlying safeguarding concern.

School and college staff should recognise that changes in behaviour may indicate that a child has experienced, or is experiencing, abuse, neglect, exploitation, trauma, mental health difficulties, or other safeguarding concerns. Behavioural changes may be a sign that a child needs early help, support or protection.

All staff receive safeguarding training that includes understanding behaviour as a potential indicator of need, vulnerability or risk. When responding to behavioural incidents, staff will demonstrate professional curiosity, consider the wider context, and explore whether there may be underlying safeguarding concerns contributing to the child's behaviour.

Where concerns arise, the DSL will consider the child's experiences and circumstances both within and beyond the school, including factors relating to their home life, peer relationships, community experiences and online activity, where appropriate. Information will be considered as part of a wider assessment of the child's needs and vulnerability.

Any action taken in response to behaviour will be proportionate, support the child's welfare and safety, and take account of any identified safeguarding needs. Behaviour management approaches, interventions and sanctions will be applied fairly and will not place a child at increased risk of harm, re-traumatisation, exclusion from support, or further vulnerability.

8.13 Safeguarding Adults at Risk

The school recognise that staff may have contact with adults at risk (previously referenced as vulnerable adults), including students aged 18 and over, parents/carers, volunteers and other adults within the school community. Where concerns arise regarding the safety, wellbeing, abuse, neglect, exploitation or self-neglect of an adult at risk, staff should report these concerns to the DSL or deputy. Appropriate advice will be sought, and referrals made to Adult Social Care, the Police or other relevant agencies where necessary.

Adults at Risk with SEND or Additional Needs

The school also recognise that some adults with Special Educational Needs and Disabilities (SEND), learning difficulties, communication needs, or other vulnerabilities may require additional safeguarding consideration. Staff should be mindful that an individual's developmental understanding, communication abilities, capacity, awareness of risk, or ability to seek help may differ from their chronological age. These factors may increase vulnerability to abuse, neglect, exploitation, coercion or undue influence.

When considering concerns relating to adults at risk with SEND or additional needs, staff should take a person-centred approach, consider individual communication and support needs, and ensure concerns are reported and responded to appropriately in line with local safeguarding adults' procedures.

Further guidance is available within the Care Act 2014, Care and Support Statutory Guidance, Mental Capacity Act 2005, Lancashire Safeguarding Adults Board procedures and other local multi-agency safeguarding adults' guidance.

- Care Act 2014
- Care and Support Statutory Guidance
- Mental Capacity Act 2005 and Code of Practice
- Equality Act 2010
- Local Multi-Agency Safeguarding Adults Procedures
- Lancashire Safeguarding Adults Board Policies and Procedures (or the relevant Safeguarding Adults Board where the adult ordinarily resides)
- Social Care Institute for Excellence (SCIE) Adult Safeguarding Resources

Where concerns relate to an adult at risk who ordinarily resides within another Local Authority area, is a boarding student, an international student, or attends the setting whilst living away from home, the school will work with the relevant safeguarding adults' services, local authority, health services, police and other agencies as appropriate. Referrals and information sharing will be undertaken in accordance with the safeguarding arrangements applicable to the area in which the adult ordinarily resides or where the concern has arisen.
Safeguarding Adults at Risk Definitions & Terminology - ACT

9. Children Potentially at Greater Risk of Harm

School and college staff should be aware that some children can be at greater risk of harm or face additional barriers to recognising, reporting or disclosing abuse, neglect and other safeguarding concerns. Staff should take these vulnerabilities into account when identifying concerns, assessing risk and providing support. Additional safeguarding considerations for these groups are outlined below.

9.1 Children Absent from School

Staff will be aware a child being absent from school is a potential indicator of abuse or neglect and, as such, these children are particularly at risk of being victims of harm, sexual and criminal exploitation, female genital mutilation, honour or faith-based abuse or risk of forced marriage, or radicalisation. It may also indicate mental health problems and risk of substance abuse.

All staff have a responsibility to remain vigilant and monitor attendance. Any concerns regarding persistent, repeated, or unexplained absence must be reported to the DSL without delay. Appropriate action will be taken in accordance with the school's Attendance Policy and safeguarding procedures.

The school's Senior Attendance Champion is Joanne Birmingham, who will monitor daily attendance, identify unexplained absences and emerging patterns of concern, and work with relevant staff to secure regular attendance. Where safeguarding concerns are identified or suspected, these will be shared promptly with the DSL. The DSL will ensure that attendance is considered as part of any safeguarding assessment, that appropriate interventions are implemented, and that attendance concerns are managed in accordance with safeguarding procedures and the school's Attendance Policy.

Where attendance does not improve despite appropriate Early Help and intervention, the school will work with the Local Authority Attendance Team and other relevant agencies, following local escalation procedures and Lancashire County Council's Working Well with Children and Families Threshold Guidance, to ensure that children and families receive the right help at the right time.

All staff will receive regular safeguarding and attendance training to help them understand the links between attendance, welfare and safeguarding, recognise the potential indicators of abuse, neglect, exploitation and harm, and understand their responsibilities for reporting concerns in line with the school's safeguarding procedures and the principles outlined in Working Together to Improve School Attendance.

The school recognises that improving attendance is a shared responsibility and will work collaboratively with children, families, the Local Authority and partner agencies to promote good attendance and address barriers to education.

In line with statutory guidance, the school will, wherever reasonably possible, **hold more than one emergency contact number for each child.** This supports effective safeguarding and welfare arrangements and helps ensure that a responsible adult can be contacted promptly where a child is absent or there are concerns about their safety or wellbeing.

Where a child's absence is unexplained, the school will take reasonable steps to establish their whereabouts and welfare, including attempting to contact all available emergency

contacts. When concerns about a child's safety, welfare or whereabouts remain, the school may undertake a home visit as part of its safeguarding response. Home visits may be unannounced where this is considered necessary to establish that the child is safe and well.

If the school is unable to establish contact with the child or family, or if there are concerns that a child may be at risk of harm, appropriate action will be taken in accordance with safeguarding procedures. This may include requesting a welfare check from the Police and/or making a referral to Children's Social Care where there are concerns about a child's safety or welfare.

Pendle Primary Academy will follow local guidance when children go missing from care, home and education: Children Missing from Care, Home and Education

9.2 Alternative Provision

Where a school plac9.2es a child with an alternative provision provider, the school continues to be responsible for the safeguarding of that child. The school will obtain written confirmation from the alternative provision provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that the school would otherwise perform in respect of its own staff. This includes written confirmation that the alternative provider will inform the commissioning school of any arrangements that may put the child at risk (i.e. staff changes), so that the commissioning school can assure itself that appropriate safeguarding checks have been carried out on new staff. These records will be appropriately stored and regularly reviewed.

9.3 Children Attending an Approved Educational Activity

Where children attend off-site educational activities, unregistered alternative provision, work experience or other approved educational activities, Pendle Primary Academy will maintain appropriate safeguarding arrangements, risk assessments, attendance monitoring and communication processes to ensure children remain safe while away from the school site.

Further information relating to attendance recording and approved educational activities can be found within the school's Attendance Policy and current Department for Education attendance guidance.

9.4 Children from Black, Asian, Minoritised Ethnic and Diverse Communities

Children and families may experience additional barriers to accessing support or may be disproportionately affected by discrimination, prejudice, stereotyping, bias and inequalities. These experiences can impact how children are perceived, identified and supported by services.

Staff will be aware that safeguarding incidents and behaviours can be associated with factors outside the school environment and can be influenced by a child's individual circumstances, lived experiences, culture, ethnicity, religion, disability, sex, sexual orientation, gender identity or socio-economic circumstances.

The school is committed to providing an inclusive and anti-discriminatory environment where all children are valued, respected and safeguarded. There is no place for racism, discrimination, prejudice or harassment of any kind.

Staff will receive appropriate training and support to recognise and challenge discrimination, stereotypes, prejudice and bias, including unconscious bias and adultification. Staff will remain professionally curious and will consider the individual needs, experiences and identity of each child to ensure that children receive support, protection and intervention appropriate to their needs.

The school recognises that children from Black, Asian and minoritised ethnic communities, including Gypsy, Roma and Traveller communities, may experience particular barriers or vulnerabilities. Staff will work in partnership with children, families and agencies to ensure that all children are listened to, understood and provided with equitable access to support and safeguarding services.

9.5 Pregnancy

KCSiE 2026 highlights that staff should be particularly alert to the potential need for additional support for children who are pregnant and/or are parents themselves. School and college staff should consider the individual needs, welfare, vulnerability and support requirements of these children and ensure appropriate safeguarding, pastoral and multi-agency support is in place where required.

Concealed and Denied Pregnancy

While not a specific safeguarding issue identified within KCSiE 2026, Lancashire Safeguarding Children's Partnership recognises that concealed and denied pregnancy can present significant safeguarding concerns for both the young person and the unborn child. School staff should exercise professional curiosity where there are indicators that a pregnancy may be concealed or denied and should follow local safeguarding procedures, seeking advice from safeguarding leads and partner agencies as appropriate.

A **concealed** pregnancy is when:

- An expectant mother knows she is pregnant but does not tell any professional; or
- An expectant mother tells another professional but conceals the fact that she is not accessing antenatal care; or
- An expectant mother tells another person or persons, and they conceal the fact from all health agencies.

A **denied** pregnancy is when an expectant mother is unaware of or unable to accept the existence of her pregnancy. Physical changes to the body may not be present or misconstrued; they may be intellectually aware of the pregnancy but continue to think, feel and behave as though they were not pregnant.

There may be a number of reasons why a pregnancy is concealed or denied, including but not limited to fear of stigma or shame, in cases of rape, sexual or domestic abuse, forced or sham marriage, fear of a child being removed or asylum seekers and illegal immigrants who may be reluctant to come to the attention of authorities. This may also be due to mental illness, substance misuse or as a result of a history of loss of a child or children. In some cases, the expectant mother may be truly unaware that she is pregnant, or she may be in denial of her pregnancy.

Where there is a suspicion of a concealed or denied pregnancy, Pendle Primary Academy **will follow** the procedures set out by our local Safeguarding Children Partnership arrangements.

Blackburn with Darwen, Blackpool and Lancashire Children's Safeguarding Assurance Partnership

10. Serious Violence

All staff should be aware of the signs that may indicate a child is at risk from, or involved in, serious violence. Staff should be able to recognise these indicators and understand the appropriateness of timely information sharing and intervention. Such indicators may include, but are not limited to:

- Increased absence from school.
- A change in friendships.
- Relationships with older individuals or groups.
- A significant decline in academic performance.
- Signs of self-harm.
- A significant change in wellbeing.
- Signs of assault.
- Unexplained injuries.
- Unexplained gifts or new possessions.

Whilst there may be an innocent explanation, these can also be indicators that a child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation, including county lines activity.

Staff will be made aware of some of the most significant risk factors that could increase a child's vulnerability to becoming involved in serious violence. These risk factors include, but are not limited to:

- Being male.
- Having been frequently absent from school.
- Disrupted education through permanent exclusion, suspensions, attending alternative provision or being on a reduced timetable.
- Having experienced child maltreatment or trauma.
- Having been involved in offending, such as theft or robbery.
- Having used drugs or alcohol in early adolescence.
- Having previously been a victim or previously perpetrated violence.

Staff should also be aware that violence can often peak in the hours just before or just after school, when children are travelling to and from school and can concentrate in particular places. These times can be particularly risky for children involved in serious violence. Schools should try to understand where these places are, with a view to working with partners to promote safety for children. Listening to children and consulting with staff can help establish when and where they feel unsafe. Working with wider partners can also help build understanding of the local context beyond the school and help co-ordinate a collective safeguarding response around the school day.

The DSL will consider appropriate support and intervention for children who may be at risk of serious violence, criminal exploitation or associated harms, particularly at key points when concerns emerge, or risks escalate. Support may include access to a trusted adult, pastoral support, targeted interventions such as social and emotional wellbeing support, mentoring, therapeutic services, early help and referral to relevant specialist agencies, where appropriate.

Details on evidenced based approaches, (i.e. 'what works' centre for preventing violence) can be found at Youth Endowment Fund.

Where a child is thought to be a risk of significant harm, local safeguarding arrangements will be followed with a report to the Police and Children's Social Care.

School will also consider the Home Office and Ministry of Justice's Government Guidance for Child Knife Possession Offences, which outlines the Government's expectations when a child is found in possession of a knife or bladed article. The guidance emphasises the need for a swift, robust, evidence-based and thorough response to ensure that the child receives timely and appropriate support, reducing the risk of reoffending.

11. Online Safety

Pendle Primary Academy recognises that online safety is a safeguarding issue and an integral part of its safeguarding arrangements. The school is committed to creating a safe online environment and will have due regard to KCSiE, relevant statutory guidance and its Online Safety policy.

Technology is a significant component in many safeguarding and wellbeing issues, and children can be exposed to abuse, exploitation and harm online as well as offline. Staff will be aware of a range of online risks, including child-on-child abuse, cyberbullying, online grooming, exploitation, harmful content, cybercrime, financially motivated sexual extortion (sextortion), harmful online communities and communication (COM) groups, radicalisation, misinformation, disinformation and the misuse of artificial intelligence (AI). Staff will remain vigilant to emerging online trends and concerns and will respond in line with the school's safeguarding procedures and relevant national guidance.

As part of a broad and balanced curriculum, children will be taught about online safety and the safe, responsible and respectful use of technology. This will include understanding and managing risks associated with the four areas of online risk:

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

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

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

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

The school, alongside the Pendle Education Trust (PET) IT Team, will ensure that appropriate filtering and monitoring systems are in place on **ALL** school owned devices, systems and networks, including desktop computers, laptops, tablets, mobile devices and internet-enabled technology. Filtering and monitoring systems are reviewed termly at PET Online Safety Group meetings with a member of the PET IT Team and DSL present. This will ensure filtering and monitoring systems remain effective, proportionate and appropriate to the safeguarding needs of children. The minutes of this meeting, along with any necessary actions, will be shared with the PET Safeguarding Trustee. Any inappropriate access, behaviour, activity or searches identified through filtering and monitoring systems will be responded to promptly and managed in accordance with the school's safeguarding procedures.

Staff will be aware that filtering and monitoring systems are only one part of the school's approach to online safety. Effective safeguarding also requires ongoing staff vigilance, professional curiosity, education, supervision and appropriate intervention where concerns are identified. Staff must not rely solely on technology to safeguard children.

The school will maintain appropriate communication with parents and carers to reinforce online safety messages and support them in understanding how children access and use online services, digital technologies and devices safely inside and outside of school.

11.1 Artificial Intelligence, Filtering and Monitoring

All staff will understand their roles and responsibilities in relation to online safety, including the school's filtering and monitoring arrangements, and will know how to identify, respond to and escalate concerns. Staff will receive information regarding filtering and monitoring as part of induction and through regular safeguarding updates.

The school will ensure that it meets the filtering and monitoring standards published by the DfE.

The school will ensure that staff remain aware of emerging online risks, trends and technologies, including those involving artificial intelligence (AI), online communication platforms and groups, online exploitation, cybercrime and other emerging safeguarding concerns.

Pendle Primary Academy is aware of the DfE guidance on the Generative Use of AI in Education 2025 and where Generative Artificial Intelligence (AI) tools are used within the school or college, leaders will ensure that all staff understand the associated safeguarding, privacy, data protection, online safety and professional conduct considerations. Staff will be supported through appropriate guidance, training and policies to ensure the safe, appropriate and lawful use of AI technologies.

Where the school becomes aware of an online safety incident that has occurred outside of the setting, it will be managed in accordance with the Child Protection and Safeguarding policy, Online Safety policy and Behaviour, Anti-Bullying, Searching, Screening and Confiscation policy, where appropriate.

Further information regarding the school's approach to online safety, including filtering and monitoring arrangements, can be found within the Online Safety and PET Technical Security policies.

11.2 Remote Education, Virtual Lessons and Live Streaming

Where remote education is used, Pendle Primary Academy will ensure appropriate safeguarding arrangements are in place and will follow current Department for Education guidance on safeguarding and remote education. Parents and carers will be supported to understand how children access online learning, the platforms being used and the measures in place to help keep children safe online.

Safeguarding and remote education - GOV.UK and Providing remote education: guidance for schools - GOV.UK

12. Personal electronic devices

The use of mobile phones, personal electronic devices and devices with image-capturing capabilities by staff, supply staff, volunteers and visitors will be managed in accordance with the school's safeguarding arrangements and Staff Code of Conduct and Behaviour, Anti-Bullying, Searching, Screening and Confiscation policy. Children are not permitted to bring personal electronic devices into school under any circumstances.

The school recognises that technology provides significant educational and communication benefits, but that inappropriate use may present safeguarding, privacy and online safety risks. All staff should remain vigilant to concerns relating to the use of electronic devices and report any safeguarding concerns relating to children, staff, volunteers or visitors to the Principal and/or DSL in line with school procedures.

The school will:

- obtain appropriate consent for the taking and use of photographs and/or videos of children in accordance with data protection, safeguarding and school procedures;
- ensure that staff, volunteers and visitors **do not** use personal devices to photograph, record or store images of children unless explicitly authorised to do so by the Principal or DSL in accordance with school procedures;

- ensure that all staff, visitors, supply staff and volunteers comply with the relevant PET Acceptable Use Agreement, Code of Conduct and associated online safety procedures and policies;
- maintain clear expectations regarding the use of personal and school-issued devices to promote the safety and wellbeing of children;
- ensure concerns regarding the misuse of technology, including the inappropriate use of mobile phones, cameras, tablets, wearable technology or artificial intelligence tools, are reported and managed in accordance with safeguarding procedures;
- encourage and maintain clear expectations that children apply the school's #BESAFE rules when using personal electronic devices outside of school.

Where photographs and videos will involve children who are CLA (Child Looked After), adopted children, or children for whom there are security concerns, the Principal will liaise with the DSL to determine the steps involved. The DSL will, in known cases of children who are CLA or who have been adopted, liaise with the children's social workers, carers or adoptive parents to assess the needs and risks associated with the taking and publication of photographs and video of these children.

In line with government expectations regarding mobile phone use in schools, the school will have clear arrangements in place governing the use of mobile phones and other personal devices during the school day.

Staff working within EYFS provision will ensure that mobile phones and personal electronic devices are stored securely and are inaccessible to children. Personal electronic devices, including smart watches with image-capturing functionality and smart glasses, must not be used in areas accessed by children, except were authorised in accordance with EYFS requirements and school procedures.

Electronic devices, including school-issued devices**, must not** be used in areas where personal or intimate care is taking place unless there are clear operational reasons and appropriate safeguards are in place. Any concerns regarding the presence or misuse of electronic devices in such areas must be reported immediately to the Principal and/or DSL.

13. Nudes and Semi-nudes (including where generated by AI)

School staff should be aware to treat the consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual images) as a safeguarding concern. This includes where images have been digitally altered or wholly generated using artificial intelligence, including what are sometimes described as 'deep fakes' or 'deep nudes'.

Staff will receive appropriate training around how to deal with instances of sharing nudes and semi-nudes, including those altered or created by AI, in the school community, including how to respond and report concerns.

Staff should be aware that creating, possessing, and distributing indecent imagery of children, including images altered or generated using AI, is a criminal offence, regardless of whether

the imagery is created, possessed, and distributed by the individual depicted; however, staff will work with external agencies so that children are not unnecessarily criminalised.

Where a member of staff becomes aware of an incidence of sharing nudes and/or semi-nudes, they will refer this to the DSL as soon as possible. Where a child confides in a staff member about the circulation of indecent imagery, including altered or generated using AI, depicting them or someone else, the staff member will:

- Respond empathically and sensitively to the child without blaming or shaming anyone involved and reassuring them that they can receive support from the school's DSL.
- Refrain from viewing, copying, printing, sharing, storing or saving the imagery.
- Inform the school's DSL immediately if they accidentally view an indecent image and seek support.
- Explain to the child that the incident will need to be reported.
- Report the incident to the school's DSL.

Where required, school may refer to the Police and CSC and may need confiscate phones/electronic devices to support any potential investigation. School will consider whether there is any ongoing risk to the child/ren involved and what support they may benefit from.

School will make children aware of the Report Remove tool and support them to use this.

See also further guidance and support: Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK

14. Children who have a Social Worker

Children may require the support of a social worker due to safeguarding or welfare concerns. These experiences can make children more vulnerable to harm, exploitation, abuse, neglect, and poor educational outcomes.

The DSL will work closely with the Local Authority and, where appropriate, hold and use information about children who have, or have had, a social worker. This information will be used to help identify and address additional safeguarding needs and to promote the child's welfare, safety, and educational outcomes.

Knowing that a child has a social worker can assist schools in making informed decisions about the support they may need. This may include responding appropriately to unauthorised absence, providing targeted pastoral or academic support, and considering any additional interventions required to improve attendance, behaviour, wellbeing, and achievement.

The school recognises that children with a social worker are a group who may be vulnerable and that effective information sharing and multi-agency working are essential in ensuring they receive the help and support they need.

15. Elective Home Education

Parents have the right to choose Elective Home Education (EHE) for their child. However, the school recognises that, in some circumstances, children who are educated at home may be less visible to the universal and targeted services that support, safeguard and promote their welfare.

In accordance with the Education (Pupil Registration) (England) Regulations 2006, the school will notify the Local Authority of all deletions from the admissions register as required by statutory guidance.

Where a parent expresses an intention to remove their child from school to electively home educate, the school will, wherever possible, work in partnership with the Local Authority and other relevant professionals to discuss the decision with the family before it is finalised. Particular consideration will be given where the child has Special Educational Needs and/or Disabilities (SEND), is vulnerable, is in receipt of support from Children's Social Care, or has an Education, Health and Care Plan (EHCP).

Where a child is removed from roll for Elective Home Education and there are existing or emerging safeguarding concerns, the school will ensure that relevant information is shared with the Local Authority and other appropriate agencies in line with safeguarding and information-sharing procedures.

The school remains committed to supporting the welfare and educational needs of children within its community. Families seeking advice, information, or support regarding Elective Home Education, re-engagement with education or assistance in accessing suitable educational provision, or signposting to accessing appropriate services and/or support can contact the school directly via:

Email: office@pendleprimaryacademy.co.uk

16. Children in the Care / Previously in the Care of the Local Authority / Children in Kinship Care

Children looked after, previously looked after children and children living in kinship care may face additional barriers to education, attendance, wellbeing and safeguarding. Many children become looked after as a result of abuse, neglect, exploitation and other adverse childhood experiences, and may remain vulnerable despite the support available to them.

The school will ensure that staff who need to know have access to relevant information about a child's circumstances in order to safeguard and promote their welfare. This may include:

- the child's legal status and care arrangements;
- contact arrangements with parents and others who hold parental responsibility;
- the level of authority delegated to carers;
- the identity and contact details of the child's social worker, where applicable;
- details of any professionals involved with the child and family;

- information relating to the child's education, wellbeing and safeguarding needs.

The school will ensure that staff understand their responsibilities in relation to children looked after, previously looked after children and children living in kinship care and will have due regard to relevant statutory guidance and local procedures.

The DSL, is also the Designated Teacher and will maintain effective links with the relevant Virtual School and relevant agencies to promote positive educational outcomes, contribute to Personal Education Plans (PEPs), other planning and effective safeguarding arrangements for these children in accordance with local authority and placing authority requirements.

The school recognises that some children may be living in kinship care arrangements, including under a Special Guardianship Order (SGO), Child Arrangements Order (CAO) or other private family arrangement. These children may require additional support and safeguarding consideration. Where appropriate, the school will obtain and retain relevant documentation to verify parental responsibility, delegated authority and care arrangements, ensuring that information is recorded and shared securely in accordance with data protection and safeguarding requirements.

17. Young Carers

Pendle Primary Academy will be alert to the needs of young carers, recognising that caring responsibilities can impact attendance, attainment, behaviour and wellbeing. Early identification is essential to ensure that young carers receive timely and appropriate support, including support from Early Help, Family Help and relevant partner agencies where required.

18. Children with Special Educational Needs and Disabilities or Health Issues

Children with Special Educational Needs and Disabilities (SEND), including those with and without an Education, Health and Care Plan (EHCP), and those with certain medical conditions or physical health needs, can face additional safeguarding challenges both online and offline.

Pendle Primary Academy recognises that additional barriers may exist when identifying and responding to abuse, neglect and exploitation within this group. Staff will be aware that:

- indicators of possible abuse, neglect or exploitation, such as behaviour, mood, attendance concerns or injury, should not automatically be assumed to relate to a child or young person's SEND, disability, medical condition or health need without further exploration;
- children with SEND or certain medical conditions may be more vulnerable to bullying, including prejudice-based bullying, child-on-child abuse and exploitation;
- they may be disproportionately impacted by safeguarding concerns whilst displaying fewer outward signs of distress;
- communication barriers may affect their ability to recognise, understand, disclose or report abuse and seek help;

- some children may require intimate or personal care and may be more dependent on adults to meet their daily needs;
- social isolation or difficulties in forming and maintaining relationships may increase vulnerability;
- some children may experience difficulties understanding risk, healthy relationships, consent, or distinguishing between fact and fiction, particularly within online environments.

The school will ensure that the wishes, feelings and lived experiences of children with SEND, medical conditions or physical health needs are taken into account when responding to safeguarding concerns. Appropriate communication support and reasonable adjustments will be provided where required to enable children to be heard and understood.

Any safeguarding concerns involving a child with SEND, medical conditions or physical health needs will involve close liaison between the DSL or deputy DSL and the SENDCo, together with parents/carers and other relevant professionals where appropriate.

The school will consider whether additional pastoral support, communication support, reasonable adjustments or safeguarding measures are required to support the safety, wellbeing and educational outcomes of children with SEND, medical conditions or physical health needs.

19. LGBTQ+ Children and Young People

The fact that a child may be LGBTQ+ is not, in itself, an inherent risk factor for harm. However, staff will be aware that LGBTQ+ children can be targeted by others and may experience bullying, harassment, discrimination or prejudice-based abuse. Staff will also be aware that, in some cases, a child who is perceived by others to be LGBTQ+ (whether they are or not) can be just as vulnerable as those who identify as LGBTQ+.

Staff will recognise that the risks to these children can be compounded where they do not have a trusted adult with whom they can speak. The school will endeavour to reduce any additional barriers faced by these children and provide a safe, inclusive environment in which they feel able to share concerns and access support when required.

Where a child is questioning their gender, the school will respond in a sensitive, respectful and child-centred manner, ensuring that the child's welfare remains the paramount consideration at all times. Any concerns, disclosures or requests relating to a child questioning their gender will be considered through the school's safeguarding processes and led by the DSL where appropriate. The school will have regard to the statutory guidance set out in KCSiE 2026 and any associated DfE guidance when making decisions, ensuring that the best interests, wellbeing and safety of the child and other children are carefully considered. Parents/carers will normally be involved in decision-making unless there is reason to believe that doing so would place the child at risk of harm, in which case safeguarding procedures will be followed. All cases will be assessed individually, with decisions recorded and reviewed as appropriate.

20. Adverse Childhood Experiences and Trauma

The school recognises that children who have experienced adverse childhood experiences (ACEs), trauma, abuse, neglect or other significant life events may be at increased risk of developing difficulties relating to their emotional wellbeing, mental health, relationships, behaviour, attendance, learning and development.

Staff will be supported to understand the potential impact of trauma and adversity on children and will seek to consider the child's lived experiences when identifying needs and planning support.

Where a child is known, or believed, to have experienced trauma, appropriate support will be considered in line with their individual needs, safeguarding arrangements and relevant guidance. This may include the provision of pastoral support, reasonable adjustments and multi-agency working with relevant professionals and services.

The school recognises that some children may have experienced trauma that is not known or disclosed. Staff will maintain professional curiosity, remain alert to indicators of need and seek to build trusted relationships which enable children access help and support when required.

We acknowledge that children who have experienced adverse childhood experiences and trauma may be at increased risk of developing health and social difficulties.

All staff will be made aware of the long-lasting impact of experiencing adversity and the lasting effect trauma can have on a child's development.

Where a child is known to have experienced trauma, appropriate arrangements will be made to provide support based on the needs of the child and in line with all relevant guidance and policies. This may include close multi-agency working with external services. Gemma Duxbury, DDSL and Play Therapist, who is a member of the school wellbeing team, completed Developmental Trauma for Professionals training from Beacon House in Autumn 2025 and will lead on providing support in school for children known or believed to have experienced trauma.

Further information regarding trauma-informed practice and supporting children who have experienced adversity can be found via the UK Trauma Council resources: Guidance on creating the best environment for recovery - UK Trauma Council

21. Safeguarding in Extra-curricular Activities and External Providers

Extra-curricular activities and clubs hosted by external bodies, (for example to community groups, sports associations, and service providers to run community or extra-curricular activities or out-of-hours / holiday clubs), will work in collaboration with the school to effectively safeguard children and will adhere to local safeguarding arrangements.

Staff and volunteers running extra-curricular activities and clubs are aware of their safeguarding responsibilities and promote the welfare of children. Paid and volunteer staff understand how they should respond to child protection concerns and how to make a referral to CSC or the Police, if necessary.

Pendle Primary Academy will always consider safeguarding arrangements when an extra-curricular activity or club is arranged in view of DSL availability or ensuring that a transfer of control document has been completed for external agencies and the school is satisfied that the agency has appropriate safeguarding policies and procedures in place.

Where PET hires or rents out school facilities or the school premises to organisations or individuals, e.g. for providers to run community or extra-curricular activities or out-of-hours / holiday clubs, it will ensure that appropriate safeguarding arrangements are in place to keep children safe. The school will refer to the DfE's guidance on keeping children safe in out-of-school settings in these circumstances.

Where the school provides the activities under the direct supervision or management of school staff, school child protection arrangements will apply. Where activities are provided separately by another body, this may not be the case; therefore, the Principal will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place, **including inspecting these as needed**. The Principal will also ensure that there are arrangements in place to liaise with the school on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll. The Principal will ensure safeguarding requirements are included in any transfer of control agreement, i.e. a lease or hire agreement, as a condition of use and occupation of the premises and specify that failure to comply with this would lead to termination of the agreement.

22. Managing Referrals

All staff members, in particular the DSL, will be aware of the LA's arrangements in place for managing referrals. The DSL will provide staff members with clarity and support where needed. When making a referral to CSC or other external agencies, information will be shared in line with confidentiality requirements and will only be shared where necessary to do so.

The DSL is expected to refer cases:

- of suspected abuse and neglect to the local authority children's social care as required and support staff who make referrals to local authority children's social care;
- to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme;
- where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required, and;
- where a crime may have been committed to the Police as required. NPCC - When to call the Police should help staff understand when to consider calling the Police and what to expect when working with the Police.

The DSL will work alongside external agencies, maintaining continuous liaison, including multi-agency liaison where appropriate, in order to ensure the wellbeing of the children involved. The DSL or deputy will work closely with the Police to ensure the school does not jeopardise any criminal proceedings, and to obtain help and support as necessary.

Where a child has been harmed or is in immediate danger or at risk of harm, the referrer will be notified of the action that will be taken within one working day of a referral being made. Where this information is not forthcoming, the referrer will contact the assigned social worker for more information.

The school will not wait for the start or outcome of an investigation before protecting the victim and other children: this applies to criminal investigations as well as those made by CSC. Where CSC decide that a statutory investigation is not appropriate, the school will consider referring the incident again if it is believed that the child is at risk of harm. Where CSC decide that a statutory investigation is not appropriate, and the school agrees with this decision, the school will consider the use of other support mechanisms, such as Early Help and pastoral support.

At all stages of the reporting and referral process, the child will be informed of the decisions made, actions taken and reasons for doing so at an age and developmentally appropriate level. Discussions of concerns with parents will only take place where this would not put the child or others at potential risk of harm. The school will work closely with parents to ensure that the child, as well as their family, understands the arrangements in place, such as in-school interventions, is effectively supported, and knows where they can access additional support.

If the school are dissatisfied, local escalation procedures will be followed. Lancashire Conflict Resolution Policy

23. Allegations Against Staff: Whistleblowing and Low-Level Concerns

There are clear policies in line with those from the CSAP (Children's Safeguarding Assurance Partnership) for dealing with allegations against people who work with children.

All allegations against staff, supply staff, trainee teachers, volunteers, contractors and any person who may use or hire the school premises, will be managed in line with the PET Whistleblowing Policy – a copy of which will be provided to, and understood by, all staff at induction. The school will ensure all allegations against staff, including those who are not employees of the school, are dealt with appropriately and that the school liaises with the relevant parties.

When managing allegations against staff, the school will recognise the distinction between concerns / allegations that **may** meet the harm threshold and concerns / allegations that **do not**, referred to for the purpose of this policy as “low-level concerns”.

Allegations that meet the harm threshold include instances where staff have:

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

All staff at Pendle Primary Academy will be made aware of these procedures and receive training on reporting concerns, including being aware of the role of the Local Authority Designated officer (LADO) and the following expectations and protocol:

- ALL staff and volunteers are aware that they must refer allegations or concerns around staff (including supply staff, trainee teachers, volunteers and contractors) conduct to the Principal otherwise knowns as the "case manager".
- ALL staff and volunteers are aware of the requirement to, and process of referring allegations or concerns around the Principal to the Chief Education Officer and how to contact them.
- The Principal (or the Chief Education Officer where the concern is about the Principal) will make a referral to the LADO when they feel the threshold of harm has been met.
- CSAP procedures for dealing with allegations against staff will be followed. Allegations Against Staff or Volunteers
- ALL staff and volunteers remember that the welfare of the child is paramount and that they have a duty to inform the Principal if any adult's conduct gives cause for concern.
- All staff recognise the importance of sharing and reporting low-level concerns (see below guidance on low-level concerns) surrounding staff or any adult in a position of trust to the Principal.
- ALL staff are aware of the PET Whistleblowing Policy, which enables staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place.
- Staff are fully aware of Guidance for Safer Working Practice 2022 and PET Staff Code of Conduct and are aware of professional expectations of their own behaviour and conduct.
- Further information, LADO referral information and flowchart of how allegations are managed: Local Authority Designated Officer (LADO) - Lancashire County Council includes the threshold matrix.
- Referrals will be made using the required format below when necessary.

  https://my.apps.lancashire.gov.uk/w/webpage/request?form=management_of_allegations_notification

Pendle Primary Academy recognises that children may make disclosures against someone who is in a position of trust / is working or volunteering with children, not in the school setting. This may be an adult in a place of worship, a sports coach or a club leader. After ensuring that the child is safe, we recognise that we must refer to the LADO and share information.

Where a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them.

General advice for whistleblowing can be found here.

NSPCC whistleblowing advice line: Click here for website Tel: 0800 028 0285

Lancashire LADO – email: LADO.admin@lancashire.gov.uk Tel: 01772 536 694

Where the initial discussion leads to no further action, the "case manager" and the LADO will:

- record the decision and justification for it, and
- agree on what information should be put in writing to the individual concerned and by whom.

Low Level Concerns

Pendle Primary Academy ensure that all staff are clear about what appropriate behaviour is and are confident in distinguishing expected and appropriate behaviours from inappropriate, problematic or concerning behaviour in themselves and others and how to report **low level concerns** around staff behaviour or conduct.

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

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

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

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

Pendle Primary Academy will promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or Pendle Education Trust (including supply teachers, trainee teachers, volunteers, contractors or those that have hired/let the premises) are dealt with promptly and appropriately. Pendle Primary Academy will strive to embed a culture of openness, trust and transparency in which the school's values and expected behaviour set out in the staff code of conduct are lived, monitored and reinforced constantly by all staff.

Pendle Primary Academy will ensure that staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

All staff are clear on how to report low level concerns and will be empowered to do so.

Staff must report their concerns to the Principal, Simon Thompson. Concerns about the Principal must be referred to the PET Chief Education Officer. Guidance from KCSiE will be followed in view of recording and storage of such concerns.

If in doubt whether the concern is a low-level concern, Principal will consult with LADO for guidance.

The Trust Executive Team will ensure low level concern procedures and staff behaviour expectations are clearly addressed within the staff Code of Conduct and procedures are implemented effectively, ensuring that appropriate action is taken in a timely manner to safeguard children and facilitate a whole school approach to dealing with any concerns.

24. Safer Recruitment, Single Central Record and Referral to the DBS

Pendle Primary Academy is committed to keeping children safe by ensuring that adults who work or volunteer in school are safe to do so. We therefore ensure that:

- KCSiE 2026, Part 3 guidance is adhered to, to ensure that there is a strong reference and commitment to safeguarding during advertisement, selection and recruitment of new staff.
- An enhanced DBS check with barred list information will be undertaken for all staff members engaged in regulated activity. A person will be considered to be in 'regulated activity' if, as a result of their work, they:
    - Are responsible on a daily basis for teaching, training, instructing or the care or supervision of children.
    - Regularly work in the school at times when children are on the premises.
    - Regularly come into contact with children under 18 years of age.

      **Regular is defined as; at least 3 times in a 30-day period.*
- PET will conduct the appropriate pre-employment checks for all prospective employees.

The school will ensure that:

- The appropriate DBS and suitability checks will be carried out for all local governors, trustees and members, volunteers, and contractors. The DfE's DBS Workforce Guides will be consulted when determining whether a position fits the child workforce criteria.
- The original DBS certificate is seen for all appointees to the school, even where the on-line DBS system indicates that the check is clear.
- There are sufficient staff who have undertaken appropriate Safer Recruitment training in the last 5 years and reached the required standard as verified by the

course facilitators, to enable at least one person on every recruitment panel to be appropriately trained and there are at least 2 people on each selection panel.

- Written assurances will be obtained from agencies and other employers that provide staff to work in school, to confirm that appropriate pre- employment checks have been undertaken in line with KCSiE 2026.

- Individual identity checks will be undertaken on those staff detailed above to ensure they are employees of the named agency/employer.

- Conduct an online search of shortlisted candidates in line with KCSIE 2026 requirements. This may help identify any incidents or issues that have happened and are publicly available online and will inform shortlisted candidates of this procedure.

- A transfer of control agreement will be used where other agencies/organisations use school premises and are not operating under school's safeguarding policies and procedures.

- Adults who are involved in the management or provision of childcare of children in Early Years, or in out of school provision for children up to 8 years old, will make a declaration that they are not disqualified under the Child Care Act 2006.

- When an issue is declared, advice will be sought from Ofsted about the need to apply for a waiver. If a waiver is necessary, a risk assessment will be carried out and proportionate measures put in place until a waiver has been issued or matters resolved. If it is not resolved, this must be reported to disqualification@ofsted.gov.uk

- Advice will be sought from Human Resources or Local Authority Designated Officers if any staff are unclear about any aspects of Safer Recruitment.

Referral to the DBS

The Pendle Primary Academy recognises its legal duty to make a referral to the Disclosure and Barring Service (DBS) where an individual has harmed, or poses a risk of harm to, a child, and the criteria for a referral are met.

A referral to the DBS will be made where a person has been removed from regulated activity, or would have been removed had they not resigned, retired, left their employment, or otherwise ceased to provide their services, because they have harmed, or posed a risk of harm to, a child. Referrals will also be considered where there is reason to believe that an individual has committed a relevant offence.

The Principal will ensure that referrals to the DBS, Teaching Regulation Agency (TRA), and any other relevant bodies are made in accordance with statutory guidance and within required timescales.

The school will work with the Local Authority Designated Officer (LADO), Police, Children's Social Care and other relevant agencies, as appropriate, when managing allegations and concerns about adults working with children.

Single Central Record (SCR)

The school maintains a Single Central Record (SCR) in accordance with the requirements of KCSiE. The SCR contains the information required by Part Three of KCSiE and is kept up-to-date, regularly reviewed and made available to those entitled to inspect it.

25. Monitoring and Review

This policy will be reviewed **at least annually** by the Local Academy Council together with the DSL, to ensure it remains compliant with current legislation, statutory guidance and local safeguarding procedures. The policy will also be reviewed and updated as required to reflect emerging safeguarding issues, changes in guidance, and lessons learned from safeguarding practice, reviews and audits.

Any amendments to this policy will be communicated to all staff, volunteers and relevant stakeholders. All staff are required to read, understand and adhere to the safeguarding procedures contained within this policy and will be made aware of any updates through induction, training and ongoing safeguarding communications.

The next scheduled review date for this policy is: September 2027.

26. Key Contacts, Roles and Training

Designated Safeguarding Lead	Catherine Jermyn, Assistant Principal	Advanced DSL training 9th October 2025 Renewal: October 2027
Deputy DSLs	Simon Thompson, Principal	DSL training 21st September 2026 Renewal: September 2028
	Clare Smalley, SENDCo	DSL training 9th October 2025 Renewal: October 2027
	Joanne Birmingham, Lead Practitioner & Senior Attendance Champion	DSL training 21st September 2026 Renewal: September 2028
	Lydia McMinn, EYFS Leader	DSL training 9th October 2025 Renewal: October 2027
	Julie Gill, KS1 Leader	DSL training 21st September 2026 Renewal: September 2028
	Bethany Garden, KS2 Leader	DSL training 13th October 2026 Renewal: October 2028
	Gemma Duxbury, Play Therapist	DSL training 9th October 2025 Renewal: October 2027
	Iram Bi, Family Support Worker	DSL training 21st September 2026 Renewal: September 2028
	Lisa Jones, Wellbeing Support Worker	DSL training 21st September 2026 Renewal: September 2028
	Jonathan Baxter, PE Coach	DSL training 9th October 2025 Renewal: October 2027
Prevent Lead	Catherine Jermyn	DSL Prevent in Practice Training 12th February 2025
Operation Encompass Lead	Catherine Jermyn	Operation Encompass Key Adult Briefing
Safeguarding Local Governor	Usman Rasul	Modern Governor – Safeguarding and Governance Training 9th October 2025 Renewal: October 2027
PET Chief Education Officer	Lynne Blomley	Advanced DSL training 9th October 2025 Renewal: October 2027

Lancashire Safeguarding Contacts	Details
Safeguarding in Education Officers Victoria Wallace, Mechelle Lewis, Sarah Holyhead, Natalie Barton, Leonie Watson	Safeguarding in Education Advice Line 01772 531196
MASH Education Officers Matt Chipchase, Adrienne Fox	0300 123 6720 mash.education@lancashire.gov.uk
LADO - Local Authority Designated Officers	01772 536694 LADO.admin@lancashire.gov.uk
MASH - Multi-Agency Safeguarding Hub	0300 123 6720 0300 123 6722 (out of hours)
Lancashire Prevent Team	01254 585260 Prevent.team@blackburn.gov.uk