



Safeguarding and Child Protection Policy

For the avoidance of doubt where we refer to gender in this document this is to be taken as meaning gender identity and how an individual may or may not identify for gender purposes.

Policy Name	Safeguarding and Child Protection Policy
Owner	Vice Principal and Safeguarding Team
Statutory	Yes

Date Ratified	Review Due
September 2021	September 2022 Note; From LAK; Following the safeguarding audit I have updated the safeguarding policy with the recommendations give. See highlighted sections throughout the policy. Following the Directors meeting on 3.5.22 the above line has been added to the top of the policy – Policy Ratified by Directors 3.5.22



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Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Guilborough Academy		
Designated safeguarding lead (DSL) and PREVENT Lead	Mrs Angela Lakey	01604 740641 lakey@guilborough.northants.sch.uk
Deputy DSL	Miss Gabriella Keenes Miss Laura-Jayne Ward Mrs Nichola York Mr Nick Haddon	01604 740641



Naseby Church of England Primary Academy		
Designated Safeguarding Lead (DSL) and PREVENT Lead	Mrs Louise Cook	head@naseby-ce.northants-ecl.gov.uk 01604 740540
Deputy Designated Safeguarding Lead	Mrs Newlyn-Jones & Mrs Sarah Burdett	newlyn-jones@nasebyacademy.com burdett@nasebyacademy.com
Designated officer (Formerly Local authority Designated Officer - LADO)		LADOReferral@northamptonshire.gov.uk Administrator (to ask for a return call) 01604 364031
Chair of governors Guilsborough Academy	Mr Peter Moyes	c/o Clerk to the Governors 01604 740641
Chair of governors Naseby School	Mrs Jasmin Schelts	scheltsj@nasebyacademy.com
Channel helpline		020 7340 7264

1. Aims

We are committed to safeguarding children and young people and we expect everyone who works in our school to share this commitment.

Adults in our school take all welfare concerns seriously and encourage children and young people to talk about anything that worries them.

We will always act in the best interest of the child and if there is a safeguarding concern, governors and school leaders will ensure that the child's wishes and feelings will be taken into account when determining what action to take and what services to provide.

Systems are in place to enable children to express their views and feelings.

The school aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly training in recognising and reporting safeguarding issues as part of our culture of vigilance.
- A whole school approach to safeguarding (i.e. safeguarding culture) is clear and that safeguarding underpins all relevant systems and processes with a continuing commitment and ongoing vigilance.

2. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education \(2021\)](#) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/999348/Keeping_children_safe_in_education_2021.pdf and [Working Together to Safeguard Children \(2018\)](#), and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners – see Northamptonshire Safeguarding Partnership <http://www.northamptonshirescb.org.uk/>

This policy is also based on the following legislation:

Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school

[The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children

[Information sharing advice for safeguarding practitioners - GOV.UK \(www.gov.uk\)](#)

[Prevent duty guidance - GOV.UK \(www.gov.uk\)](#)

Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18

[Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM

[The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children

Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children

[Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

(Naseby Primary Academy Only)

The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the "2018 Childcare Disqualification Regulations") and [Childcare Act 2006](#), which set out who is disqualified from working with children

(Naseby Primary Academy Only)

This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#)

(Naseby Primary Academy Only)

Where appropriate, the policy reflects measures regarding serious violence. Further advice is provided in the Home Office's Preventing youth violence and gang involvement at <https://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence>; and its Criminal Exploitation of Children and vulnerable adults and county lines guidance; <https://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence>

This policy also complies with our funding agreement and articles of association.

3. Definitions

Safeguarding and promoting the welfare of children means:

Protecting children from maltreatment

Preventing impairment of children's mental and physical health or development

Ensuring that children grow up in circumstances consistent with the provision of safe and effective care

Taking action to enable all children to have the best outcomes

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

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



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

Nudes and Semi-Nudes (also known as youth produced sexual imagery) is the sharing of sexual imagery (photos or videos) by children

Children includes everyone under the age of 18.

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

These are West Northamptonshire Country Council, Northamptonshire Police and Northamptonshire Clinical Commissioning Groups (Nene CCG and Corby CCG).

4. Equality statement

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

5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

5.1 All staff

All staff will read and understand part 1 and Annex B of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education 2021, and review this guidance at least annually.

Staff not working directly with students will read and understand the condensed Part 1 document

All staff will be aware of the following policies and must complete annual reading of the policies in italics below:

Relationships and associations that staff have in school and outside (including online), may also have implication for the safeguarding of children in school. Where this is the case, the member of staff must inform the school. Section 8 staff code of conduct: Social contact and social networking is included in the annual reading.

Our systems and policies which support safeguarding, including this child protection and safeguarding policy include:

- Safer Recruitment Policy
- *Safeguarding policy*
- *Positive Behaviour Policy,*
- Physical Intervention Policy,
- Anti-Bullying Policy,
- *Staff Code of Conduct*
- *Whistleblowing policy*
- Use of communicative devices policy



- Peer on Peer Abuse
- Sexual violence and sexual harassment between students
- Supporting children with medical needs
- The role and identity of the designated safeguarding lead (DSL) and deputies,



- The Early Help Process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals. This includes Online Safety.
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), indicators of being at risk from or involved with serious violent crime, FGM, Children Missing in Education (CME) and radicalisation Section 15 and appendix 4 of this policy outline in more detail how staff are supported to do this.

5.2 The Designated Safeguarding Lead (DSL)

Guilsborough Academy:

The DSL is part of the Academy's Senior Leadership team – is Vice Principal Angela Lakey.

The DSL takes lead responsibility for child protection and wider safeguarding.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

A member of the Senior Leadership team of both schools will be available outside school hours and in holidays. All staff receive an out of school contact details for the DSL and Deputy DSL's on a dedicated information card.

When the DSL is absent, the Deputy DSL – Miss Gabriella Keenes (Assistant Principal), Miss Laura-Jayne Ward (Assistant Principal), Mr Haddon (Vice Principal) or Mrs Nichola York - Safeguarding and Home School Liaison Officer) – will act as cover.

Naseby Primary Academy The DSL is Head Teacher, Mrs Louise Cook . The DSL takes lead responsibility for child protection and wider safeguarding.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

A member of the Senior Leadership team of both schools will be available outside school hours and in holidays. All staff receive an out of school contact details for the DSL and Deputy DSL's on a dedicated information card

When the DSL is absent, the deputies – Mrs Sarah Burdett & Mrs Lorraine Newlyn-Jones will act as cover.

The DSL will be given the time, funding, training, resources and support to:

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



Work with others

- Liaise with the Principal/Head of School to inform them of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- As required, liaise with the Social Workers and Early Help Team at Northamptonshire Children's Trust. Regarding a staff member issues should be referred to the Local Officer (see above); and
- Liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies. Act as a source of support, advice and expertise for staff.

Undertake training

- The Designated Safeguarding Lead (and any Deputies) will undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years.
- The Designated Safeguarding Lead will undertake Prevent awareness training.
- In addition to the formal training set out above, their knowledge and skills will be refreshed (this might be via e-bulletins, meeting other Designated Safeguarding Leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role so they:
- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments;
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- Ensure each member of staff has access to and understands the school's safeguarding and child protection policy and procedures, especially new and part time staff;
- Are alert to the specific needs of children in need, those with special educational needs and young carers;
- Are able to keep detailed, accurate, secure written records of concerns and referrals;
- Understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- Obtain access to resources and attend any relevant or refresher training courses; and
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.



Raise Awareness

- The Designated Safeguarding Lead will ensure the school safeguarding and child protection policies are known, understood and used appropriately;
- Ensure the school's safeguarding and child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- Ensure the safeguarding and child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school or college in this; and
- Link with Northamptonshire Children's Safeguarding Partnership to make sure staff are aware of training opportunities and the latest local policies on safeguarding.
- Ensure that a child will not be academically disadvantaged if there are safeguarding issues.

The DSL will also keep the Principal / Head Teacher informed of any issues, and liaise with local authority case managers and Designated Officers for child protection concerns as appropriate.

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

5.3 The governing board

The governing board will approve this policy at each review, ensure it complies with the law and hold the Principal / Head Teacher to account for its implementation.

The governing board will appoint a senior board level (or equivalent) governor to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL.

The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the Principal / Head Teacher, where appropriate (see appendix 3).

All governors will read Keeping Children Safe in Education.

The Governing body ensures they facilitate a whole school approach to safeguarding.

Section 15 of this policy has information on how governors are supported to fulfil their role.

5.4 The Principal / Head Teacher

The Principal / Head Teacher is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction
- Communicating this policy to parents when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)

Naseby Primary Academy

- Ensuring the relevant staffing ratios are met, where applicable

Naseby Primary Academy

- Making sure each child in the Early Years Foundation Stage is assigned a key person



6. Confidentiality

Information sharing is vital in identifying and tackling all forms of abuse and neglect. GDPR does not prevent, or limit, the sharing of information for the purposes of keeping children safe. Lawful and secure information sharing between schools, Northamptonshire Children's Trust, and other local agencies, is essential for keeping children safe and ensuring they get the support they need.

The Data Protection Act 2018 introduced 'safeguarding' as a reason to be able to process sensitive, personal information, even without consent (DPA, Part 2,18; Schedule 8, 4)

When Designated Safeguarding Leads in schools are considering whether, or not, to share safeguarding information (especially with other agencies) Guilborough Academy / Naseby Primary Academy record who they are sharing that information with and for what reason. If we have taken a decision not to seek consent from the data subject and/or parent/carer that should also be recorded within the safeguarding file.

All relevant information can be shared without consent if to gain consent would place a child at risk.

Fears about sharing information **must not be allowed** to stand in the way of promoting the welfare and protecting the safety of children. As with all data sharing, appropriate organisational and technical safeguards should still be in place.

The Working Together to Safeguard Children statutory guidance states the following:

1. Effective sharing of information is essential for early identification of need, assessment, and service provision to keep children safe.
2. All professionals responsible for children should be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to local authority children's social care (e.g. they are being supported as a child in need or have a child protection plan). You should be alert to sharing important information about any adults with whom that child has contact, which may affect the child's safety or welfare.
3. Information sharing is also essential for the identification of patterns of behaviour when a child has gone missing, when multiple children appear associated to the same context or locations of risk, or in relation to children in the secure estate where there may be multiple local authorities involved in a child's care.
4. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children, which must always be the paramount concern.

To ensure effective safeguarding arrangements:

- The school's policy has clear processes and principles for sharing information. all professionals responsible for children should not assume that someone else will pass on information that they think may be critical to keeping a child safe.
- If a member of staff has concerns about a child's welfare and considers that they may be a child in need or that the child has suffered or is likely to suffer significant harm, then they should share the information with Northamptonshire Multi Agency Safeguarding Hub and/or the police.
- Staff should be particularly alert to the importance of sharing information when a child moves from one school to another, due to the risk that knowledge pertinent to keeping a child safe could be lost.



- School staff will aim to gain consent to share information, but not in the instance where to do so would place a child at increased risk of harm. In those cases, information may be shared without consent if you have good reasons to do so and believe that sharing the information will enhance the safeguarding of a child in a timely manner. When decisions are made to share or withhold information, we will record who has been given the information and why.

Safeguarding children raises issues of **confidentiality** that will be followed by all staff/volunteers in school:

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy)

Confidentiality is also addressed in this policy with respect to record-keeping in section 14, and allegations of abuse against staff in appendix 3

7. Recognising abuse and taking action

School and college staff are particularly important as they are in a position to identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating.

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

Please note – in this and subsequent sections, you should take any references to the DSL to mean "the DSL (or deputy DSL)".

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

If our staff have any concerns about a child's welfare, they should act on them immediately

If staff have a concern, they should follow this child protection policy and speak to the DSL (or deputy).

All Academy staff are particularly alert to the potential need for early help for a child who:

- Is disabled or has certain health conditions and has specific additional needs
- Has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- Has a mental health need
- Is a young carer



- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organized crime groups or county lines
- Is frequently missing/goes missing from care or from home
- Is at risk of modern slavery, trafficking, sexual or criminal exploitation
- Is at risk of being radicalised or exploited
- Has a family member in prison, or is affected by parental offending
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol themselves
- Has returned home to their family from care
- Is at risk of honour-based abuse such as Female Genital Mutilation or Forced Marriage
- Is a privately fostered child
- Is persistently absent from education

All staff are aware that technology is a significant component in many safeguarding and wellbeing issues and that children are at risk of abuse online, face to face and in many cases, both.

The DSL will decide on the most appropriate course of action and whether the concerns should be referred to Northamptonshire Children's Trust – referring to [Northamptonshire Threshold and Pathways Guidance](#). If it is decided to make a referral to Northamptonshire Children's Trust the parent will be informed, unless to do so would place the child at further risk or undermine the collection of evidence eg obtaining forensic evidence. All concerns, discussions and decisions will be recorded in writing. NB: Informing parents does not require seeking their consent to share the information with professionals who need to know.

The DSL should refer all cases of suspected abuse or neglect to the Multi Agency Safeguarding Hub (MASH), Police (cases where a crime may have been committed) and to the Channel programme where there is a radicalisation concern. Safeguarding Referrals must be made in one of the following ways:

- By telephone contact to the Multi-Agency Safeguarding Hub (MASH): 0300 126 7000
- By e-mail to: MASH@northamptonshire.gcsx.gov.uk
- By using the online referral form found at:
<http://www.northamptonshirescb.org.uk/more/borough-and-district-councils/how-to-make-an-online-referral/>
- In an emergency outside office hours, contact children's social care out of hours team on **01604 626938** or the Police
- If a child is in immediate danger at any time, left alone or missing, you should contact the police directly and/or an ambulance using 999

If a member of staff has been unable to locate the DSL or Deputy in an emergency situation they must tell the DSL (see section 5.2) as soon as possible.

Guidance can also be found at

<https://www.gov.uk/report-child-abuse-to-local-council>

7.2 If a child makes a disclosure to a member of staff

If a child discloses a safeguarding issue to a member of staff, our procedures are ::

- Listen to and believe the student. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret



- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- Sign and date the write-up and pass it on to the DSL.
- Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so

7.3 If a member of staff discovers that FGM has taken place or a pupil is at risk of FGM

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

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

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4.

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

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures.

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

Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out must speak to the DSL and follow our local safeguarding procedures.

In those circumstances, the member of staff should inform the DSL or Deputy in person and then log it on Myconcern, or on a cause for concern sheet (Naseby).

7.4 If a member of staff has concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

Figure 1 on page 11 illustrates the procedure they will follow if there are concerns about a child's welfare.

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

If in exceptional circumstances the DSL/Deputy DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care, the MASH on 0300 126 7000. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

In those exceptional circumstances, the member of staff will make a referral to the MASH directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible and report it on Myconcern (Guilborough only), or on a cause for concern sheet (Naseby).

Early help

If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

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

This will be initiated by the Student Support team or the Safeguarding hub in school (Guilsborough only).

Referral

If it is appropriate to refer the case to local authority children's social care or the police, in most cases the DSL will make the referral or in exceptional circumstances support the member of staff to do so.

If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

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

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

This is the link to the Northamptonshire Safeguarding Partnership which should be followed when school is concerned about an outcome from children's services.

<http://www.northamptonshirescb.org.uk/about-northamptonshire-safeguarding-children-partnership/policies/case-conflict-resolution-protocol/>.

7.5 If a member of staff has concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. The member of staff will speak to a member of the senior leadership team and/or seek advice from the local authority. Make a referral to local Northamptonshire Children's Trust directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

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

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, a member of staff will call 999 or the confidential anti-terrorist hotline on 0800 789 321 if they:

Think someone is in immediate danger

Think someone may be planning to travel to join an extremist group

See or hear something that may be terrorist-related



7.6 If a child has a mental health concern

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

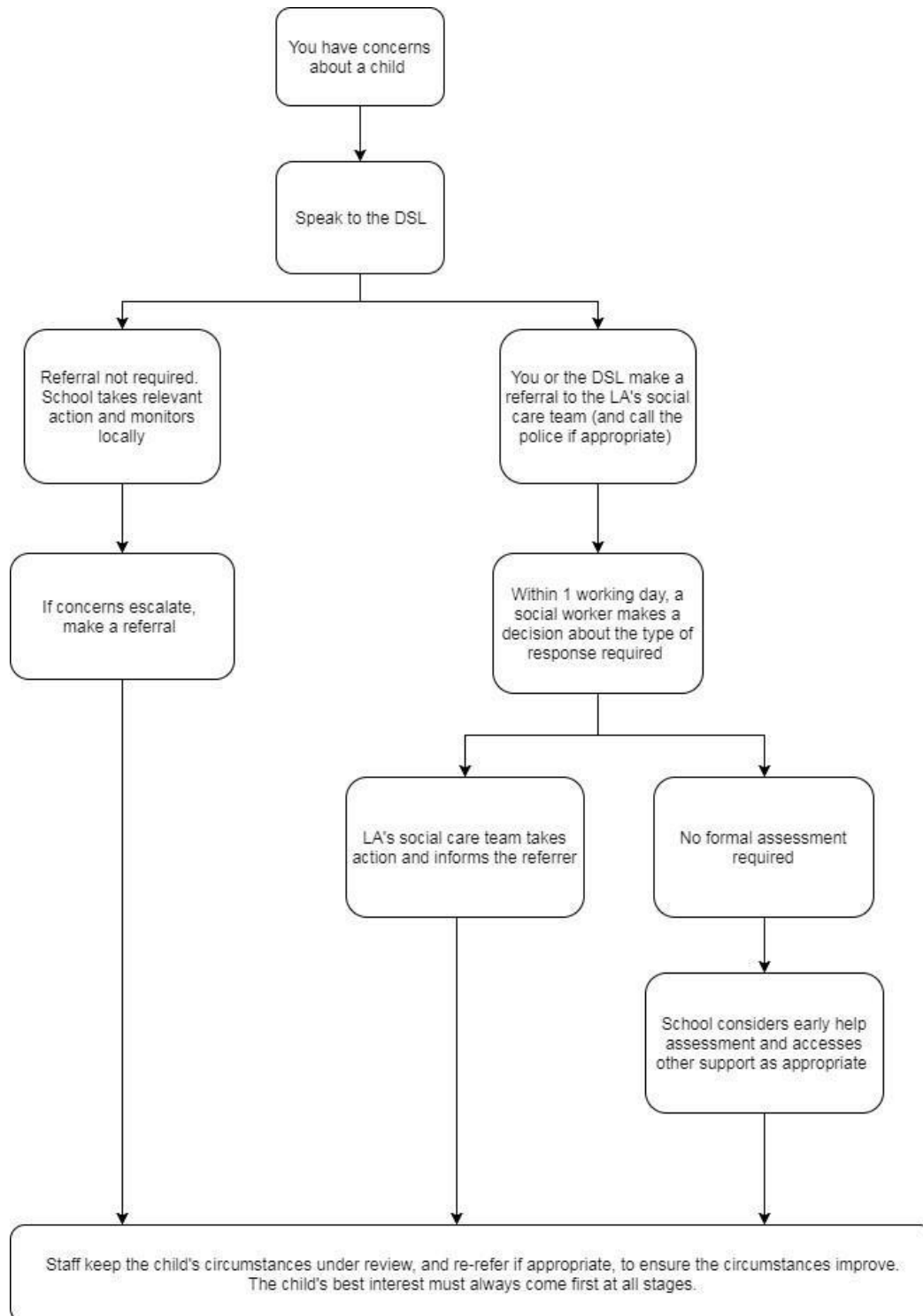
School staff are not expected or trained to diagnose mental health conditions or issues, but are alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If a member of staff has a mental health concern about a child that is also a safeguarding concern, they will take immediate action by following the steps in section 7.4.

If a member of staff has a mental health concern that is **not** also a safeguarding concern, they will speak to the DSL to agree a course of action. Please refer to the Student Support team or the Safeguarding hub, who will speak to parents about a referral to the Children and Adolescent Mental Health team (Guilsborough) or Head Teacher (Naseby).

See also the Department for Education guidance on [mental health and behaviour in schools](#) for more information.

Figure 1: procedure if you have concerns about a child’s welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)





7.7 Concerns about a staff member, supply teacher or volunteer

If a member of staff has concerns about a member of staff (including a supply teacher or volunteer), or an allegation is made about a member of staff (including a supply teacher or volunteer) posing a risk of harm to children, they must speak to the Principal / Head Teacher.

If the concerns/allegations are about the Principal / Head Teacher, they must speak to the chair of governors.

The Principal / Head Teacher / Chair of Governors will then follow the procedures set out in appendix 3, if appropriate.

Low -Level Concerns

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out at paragraph 338 of KCSIE Sept 2021. 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 allegations threshold or is otherwise not considered serious enough to consider a referral to the Designated officer (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;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

If you have a low level concern report to the Principal/Head Teacher who will address the behaviour, review any previous records to look for patterns, clusters or concerns and if needed the Principal may report to the Designated Officer (LADO)

7.8 Allegations of abuse from one student or students from one student against another student(s) towards another student or another student(s)

See Guilsborough Academy policies:

- Sexual Violence & Sexual Harassment policy
- Peer on Peer Abuse Policy

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up".

All peer-on-peer abuse is unacceptable and will always be taken seriously.

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

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including Nudes and Semi-Nudes)
- Involves intimate personal abuse



- Can be part of child criminal and child sexual exploitation

See Appendix 4 for further information of how the Academy will deal with these incidents

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

- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images
- Being vigilant to issues that particularly affect different genders
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensuring pupils know they can talk to staff confidentially
- Ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

The Academy will refer to: [Metropolitan Police booklet on Safeguarding children from Sexual Violence, Child Sexual Exploitation and Harmful Practices.pdf](#)

7.9 Nudes and semi-nudes (previously referred to as sexting)

If a member of staff is made aware of an incident relating to inappropriate images they will report it to the DSL immediately.

They will not:

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

The student should be told that the member of staff needs to report the incident and reassure the student(s) that they will receive support and help from the DSL.

See further procedures in Appendix 4 under Peer on Peer Abuse

7.10 Opportunities to teach safeguarding and online safety Make link to policy

Children are taught about safeguarding, including online safety, as part of our Life Skills and RSE and Health Education (Guilborough Academy) programme.

Our staff are aware of the signs of cyberbullying and other online risks and there is filtering and monitoring software to support children and staff.

- Children and young people accessing remote learning receive guidance on keeping safe online and know how to raise concerns with the school, [Childline](#), the [UK Safer Internet Centre](#) and [CEOP](#).
- Parents and carers receive information about keeping children safe online with peers, the school, other education offers they may access and the wider internet community including information provided by:
 - [Internet matters](#) - for support for parents and carers to keep their children safe online
 - [London Grid for Learning](#) - for support for parents and carers to keep their children safe online
 - [Net-aware](#) - for support for parents and careers from the NSPCC
 - [Parent info](#) - for support for parents and carers to keep their children safe online
 - [Thinkuknow](#) - for advice from the National Crime Agency to stay safe online
 - [UK Safer Internet Centre](#) - advice for parents and carers

Free additional support for staff in responding to online safety issues can be accessed from the [Professionals Online Safety Helpline at the UK Safer Internet Centre](#)

Staff who need to interact with children online through remote learning will continue to look out for signs a child may be at risk. If a staff member is concerned about a child, that staff member will follow the approach set out in this annex and report that concern to the DSL or to a deputy DSL through **myconcern** or on a cause for concern sheet (Naseby).

8. Notifying parents

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



Other staff will only talk to parents about any such concerns following consultation with the DSL.

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

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

9. Students with special educational needs and disabilities

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

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

We offer extra pastoral support for students with SEN and disabilities. This includes:

The SEN department, the child's key worker, the Student Support team and the Safeguarding hub will work together to provide support for our students with SEN and disabilities.

10. Students with a social worker

We recognise that when a child has a social worker, it is an indicator that the child is more at risk than most students. This may mean that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health.

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

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

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

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

11. Looked-after and previously looked-after children

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children (including children with a Special Guardian) previously looked-after children safe. In particular, we will ensure that:

Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements

The DSL has details of children's social workers and relevant virtual school heads.

We have appointed a designated teacher, (Guilsborough – Mrs Caroline Church and Naseby Primary Academy Head Teacher – Mrs Louise Cook, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).

The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

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

12. Mobile phones and cameras

Staff are allowed to bring their personal phones to school for their own use but will limit such use to non-contact time when pupils are not present. Staff members' personal phones will remain in their bags or cupboards during contact time with pupils. See Staff Code of Conduct 2021.

Staff will not take pictures or recordings of pupils on their personal phones or cameras.

We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the school.

See School policy: Use of Communicative Electronic Devices Policy sets out the Academy's rules regarding phones and other devices by students.

13. Complaints and concerns about school safeguarding policies

13.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).

13.2 Other complaints

See Complaints Policy

13.3 Whistle-blowing

The Multi Academy Trust (MAT) Director's policy and procedure for dealing with concerns raised by employees except allegations of child abuse against teachers and other staff and volunteers which will be dealt with under the "Managing Allegations Against Teachers and Other Staff Policy".

See Whistle-Blowing Policy

14. Record-keeping

We will hold records in line with our records retention schedule.

See Northamptonshire Safeguarding Partnership document:

Guidance on the Retention and Transfer of Child Protection Records for Educational Establishments in Northamptonshire

All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. If in doubt about recording requirements staff should discuss with the Designated Safeguarding Lead.

When a child has made a disclosure, the member of staff/volunteer should:

- Record as soon as possible after the conversation. Do not destroy the original notes in case they are needed by a court
- Record the date, time, place and any noticeable non-verbal behaviour and the words used by the child
- Draw a diagram to indicate the position of any injuries (Guilsborough only – see body map on Myconcern)
- Record statements and observations rather than interpretations or assumptions

Staff at Guilsborough Academy are able to log a concern on the MyConcern database, or on a pink paper Safeguarding Concern sheet.

Naseby CE Primary Academy staff should use the yellow Cause for Concern forms.

All records need to be given to the Designated Safeguarding Lead promptly. No copies should be retained by the member of staff or volunteer.

The Designated Safeguarding Lead will ensure that all safeguarding records are managed in accordance with the Education (Pupil Information) (England) Regulations 2005.

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

We will hold records in line with our records retention schedule.

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

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

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

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.

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

If the receiving school has Myconcern, records can be sent to them electronically on Myconcern.

See Record, Retention, Destruction and Archive policy

In addition:

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



Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff

15. Training

15.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from the 3 safeguarding partners.

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

Staff will also receive regular safeguarding and child protection updates (for example, through emails, e-bulletins and staff meetings) as required, but at least annually.

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

15.2 The DSL and Deputies

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

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake Prevent awareness training.

15.3 Governors

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

As the Chair of Governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Principal / Head Teacher, they receive training in managing allegations for this purpose.

15.4 Recruitment – interview panels

To reduce the risk of allegations, all staff should be aware of safer working practice and should be familiar with the guidance contained in the staff handbook/school code of conduct/staff behaviour policy and Safer Recruitment Consortium document ***Guidance for safer working practice for those working with children and young people in education settings (September 2019)***.

The document seeks to ensure that the responsibilities of school leaders towards children and staff are discharged by raising awareness of illegal, unsafe, unprofessional and unwise behaviour. This includes guidelines for staff on positive behaviour management in line with the ban on corporal punishment (School Standards and Framework Act 1998). Please see the school/college's positive behaviour policy for more information.

At least one person conducting any interview for a post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, Keeping Children Safe in Education, and will be in line with local safeguarding procedures. See Safer Recruitment Policy



15.5 Staff who have contact with pupils and families

All staff who have contact with children and families will have supervision which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

16. Monitoring arrangements

This policy will be reviewed **annually** by the Designated Safeguarding Lead. At every review, it will be approved by the full governing board.

17. Links with other policies

This policy links to the following policies and procedures:

- Safer Recruitment Policy,
- Positive Behaviour Policy,
- Physical Intervention Policy,
- Anti-Bullying Policy,
- Code of Conduct/Staff Behaviour Policy,
- Use of communicative electronic devices policy
- Peer on Peer Abuse
- Sexual violence and sexual harassment between students
- Supporting children with medical needs
- Attendance policy
- Complaints Procedure
- Health and Safety policy
- Data Protection policy
- Equality Objectives Duty Workbook and Plan
- Curriculum policy
- Online Safety Check

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education 2021

Appendix 1: types of abuse

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

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

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

Emotional abuse may involve:

Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person

Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate

Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction

Seeing or hearing the ill-treatment of another



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

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

Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing

Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

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

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

Provide adequate food, clothing and shelter (including exclusion from home or abandonment)

Protect a child from physical and emotional harm or danger

Ensure adequate supervision (including the use of inadequate care-givers)

Ensure access to appropriate medical care or treatment

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

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

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

New staff

When appointing new staff, we will:

Verify their identity

Obtain an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below).

Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available

Verify their mental and physical fitness to carry out their work responsibilities via a medical questionnaire.

Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 7 years afterwards

Verify their professional qualifications, as appropriate

Ensure they are not subject to a prohibition order if they are employed to be a teacher

Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent.

Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the secretary of state

At Naseby Primary Academy where pupils are aged under 8 years of age:



We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

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

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

Staff must inform the school of any change in status which would bring into question their ability to care for the under 8's as outlined in the legislation above.

Regulated activity means a person who will be:

Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or

Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or

Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

Existing staff

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

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

We believe the individual has engaged in [relevant conduct](#); or

The individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or

The 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and

The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

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

Contractors

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

An enhanced DBS check with barred list information for contractors engaging in regulated activity

An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors.

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

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

In school holidays and only where there are no students on site, there may be Contractors that do not hold DBS and who are left unsupervised.

(Naseby Primary Academy Only): For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Trainee/student teachers

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

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

In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

Volunteers

We will:

Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity

Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity

Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment

Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the **2018 Childcare Disqualification Regulations and Childcare Act 2006**. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

Governors

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

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

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

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

- A section 128 check (to check prohibition on participation in management under [section 128 of the Education and Skills Act 2008](#)). [Section 128 checks are only required for local governors if they have retained or been delegated any management responsibilities.]
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK
- The chair of the board will have their DBS check countersigned by the secretary of state.



- All governors will also have the following checks:
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK



Appendix 3: allegations of abuse made against staff

This section of this policy applies to all cases in which it is alleged that a current member of staff, including a supply teacher or volunteer, has:

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

It applies regardless of whether the alleged abuse took place in the school. Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the police.

We will deal with any allegation of abuse against a member of staff or volunteer very quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

Our procedures for dealing with allegations will be applied with common sense and judgement.

Suspension of the accused until the case is resolved

Suspension will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

Redeployment within the school so that the individual does not have direct contact with the child or children concerned

Providing an assistant to be present when the individual has contact with children

Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children

Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted

Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the Academy.

Definitions for outcomes of allegation investigations

Substantiated: there is sufficient evidence to prove the allegation

Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive

False: there is sufficient evidence to disprove the allegation

Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made



Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the Principal / Head Teacher (or chair of governors where the Principal / Head Teacher is the subject of the allegation) – the 'case manager' – will take the following steps:

Immediately discuss the allegation with the Designated Officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the Designated Officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the Designated Officer as soon as practicably possible after contacting the police)

Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the Designated Officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies

Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the Designated Officer, police and/or children's social care services, as appropriate

If immediate suspension is considered necessary, agree and record the rationale for this with the Designated Officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details

If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the Designated Officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation

If it is decided that further action is needed, take steps as agreed with the Designated Officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate

Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.

Other Support may be Union representation, counselling from Health Assured (0870240 2530)

Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice

Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)

Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on

the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the Governing Body will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Additional considerations for supply staff

If there are concerns or an allegation is made against someone not directly employed by the school, such as supply staff provided by an agency, we will take the actions below in addition to our standard procedures.

We will not decide to stop using a supply teacher due to safeguarding concerns without finding out the facts and liaising with our local authority Designated Officer to determine a suitable outcome

The governing board will discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, while the school carries out the investigation

We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the local authority Designated Officer as required

We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, we will institute appropriate action within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, we will hold this within 15 working days

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's Designated Officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the school's personnel adviser will discuss with the Designated Officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required. If they think that the individual has engaged in conduct that has harmed (or is likely to harm) a child, or if they think the person otherwise poses a risk of harm to a child, they must make a referral to the DBS.

If the individual concerned is a member of teaching staff, the case manager and personnel adviser will discuss with the Designated Officer whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated or malicious allegations

If an allegation is shown to be deliberately invented, or malicious, the Principal / Head Teacher, or other appropriate person in the case of an allegation against the Principal / Head Teacher, will consider whether any disciplinary action is appropriate against the pupil(s) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a pupil.

Confidentiality

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the local authority's Designated Officer, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. Such records will include:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken and decisions reached (and justification for these, as stated above)

If an allegation or concern is not found to have been malicious, the school will retain the records of the case on the individual's confidential personnel file, and provide a copy to the individual.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

References

When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

Learning lessons

After any cases where the allegations are *substantiated*, we will review the circumstances of the case with the local authority's Designated Officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

Staff working in alternative provision settings

Where we place a student with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

Adults who supervise pupils on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a student under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Students staying with host families

Where the school makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.



Appendix 4: specific safeguarding issues

Children missing from education

A child going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

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

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Child Sexual Exploitation (CSE)

Child sexual exploitation is a form of child sexual abuse, It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for financial advantage or increased status of the perpetrator or facilitator.

The sexual exploitation of children and young people under 18 involves exploitative situations, contexts and relationships where young people, (or a third person or persons) receive something, (e.g. food, accommodation, drugs, alcohol, cigarettes, affections, gifts, money) as a result of them performing and/or others performing on them, sexual activities. Child sexual exploitation can occur through the use of technology without the child's immediate recognition; for example being persuaded



to post sexual images on the internet/mobile phones without immediate payment or gain. In all cases those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidations are common, involvement in exploitative relationships being characterised in the main by the child's or young person's limited availability of choice, resulting from their social/economic and/or emotional vulnerability. (DCSF 2009).

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

- children who have older boyfriends or girlfriends; and
- children who suffer from sexually transmitted infections or become pregnant.

Key Facts about CSE

- Although children of all ages can be sexually abused, sexual exploitation often starts around the age of 10 years old. Girls are usually targeted from age 10 and boys from age 8.
- It affects both girls and boys and can happen in all communities.
- Children can be targeted by other children
- Any person can be targeted but there are some particularly vulnerable groups: Looked after Children, Children Leaving Care and Children with Disabilities.
- Victims of CSE may also be trafficked (locally, nationally and internationally).
- Over 70% of adults involved in prostitution were sexually exploited as children or teenagers.

Sexual violence or abuse against children represents a major public health and social welfare problem within UK society, affecting 16% of children under 16. That is approximately 2 million children.

The MAT's good practice includes:

- Training staff to recognise the symptoms and distinguish them from other forms of abuse
- Treating the child/young person as a victim of abuse
- Understanding the perspective/behaviour of the child/young person and be patient with them
- Helping the child/young person to recognise that they are being exploited
- Collating and recording as much information as possible
- Sharing information with other agencies and seek advice/refer to Social Care
- Having robust safeguarding policies and procedures in place which cover CSE
- Promoting and engaging in effective multi-agency working to prevent abuse
- Supporting victims move out of exploitation
- Cooperating to enable successful investigations and prosecutions of perpetrators

Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

- The abuse can be perpetrated by all genders, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. can affect any child or young person under the age of 18 years;
- It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

- The victim can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, ~~males or females~~, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

County Lines

Is a form of CCE. It is a geographically widespread form of harm involving drug networks or gangs who groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns.

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism¹⁰³ should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

Children who are young carers

Some young carers experience **bullying about the family member they care for**. Many young carers face difficulties in schools as they often fall behind with work due to their caring responsibilities. Attendance levels are often poor as young carers can feel very anxious about leaving their family member home alone.



Children with family members in prison

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



Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11-year olds [Guide 5-11 years](#) and 12-17 year olds [Guide 12-17 years](#). They explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

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

Private Fostering

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. (A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.)

Staff are aware of their mandatory duty to report if they suspect a student is being privately fostered. The DSL will make a referral to Children's service.

<http://www.northamptonshirescb.org.uk/schools/safeguarding-themes/private-fostering/>

Domestic Abuse

The cross-government definition of domestic abuse is:

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- psychological;
- physical;
- sexual;
- financial; and
- emotional

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

The DSL and deputies will provide support according to the child's needs and update records about their circumstances.

If the Police attend an incident of Domestic Abuse at a home where children live (whether they are present or not present) the children's school will be informed.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The Designated Safeguarding Lead (and any deputies) will support families in this situation by contacting the Local Housing Authority to raise/progress concerns at the earliest opportunity.

This support does not replace a referral to children's social care where a child has been harmed or is at risk of harm.

MAT staff are aware that indicators that a family may be at risk of homelessness can include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: [Homeless Reduction Act Factsheets](#). The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

Some 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances.

The Academy will support these young people by seeking the joint statutory guidance issues by the department and the Ministry of Housing, Communities and Local Government on the provision of accommodation for 16 and 17 year olds who may be homeless and/ or require accommodation.

So-called 'honour-based' abuse (including FGM and Forced Marriage)

So-called 'honour-based' violence (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. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

Actions

The MAT's procedure is:

- If staff have a concern regarding a child that might be at risk of HBV or who has suffered from HBA, they should speak to the designated safeguarding lead (or deputy).
- The DSL or Deputies will activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children's social care.



Female Genital Mutilation FGM

- Since 31 October 2015 there has been a mandatory reporting duty placed on **teachers** to report when they are aware that FGM has taken place
- Staff will inform the Designated Safeguarding Lead or deputies immediately and ensure that a report to the Police and Children's social care. In exceptional circumstances where the DSL or Deputies are not available, the member of staff will make these referrals themselves
- FGM is child abuse and a form of violence against women and girls, and therefore should be dealt with as part of existing child safeguarding/protection structures, policies and procedures.
- FGM is illegal in the UK. In England, Wales and Northern Ireland, the practice is illegal under the Female Genital Mutilation Act 2003.
- Other than in the excepted circumstances, it is an offence for **any person (regardless of their nationality or residence status)** to:
 - perform FGM in England, Wales or Northern Ireland (section 1 of the Act);
 - assist a girl to carry out FGM on herself in England, Wales or Northern Ireland (section 2 of the Act); and (from England, Wales or Northern Ireland) assist a non-UK person to carry out FGM outside the UK on a **UK national or permanent UK resident** (section 3 of the Act).

FGM Indicators that FGM has already occurred include:

- A student confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/student already being known to social services in relation to other safeguarding issues
- A girl:
 - Having difficulty walking, sitting or standing, or looking uncomfortable
 - Finding it hard to sit still for long periods of time (where this was not a problem previously)
 - Spending longer than normal in the bathroom or toilet due to difficulties urinating
 - Having frequent urinary, menstrual or stomach problems
 - Avoiding physical exercise or missing PE
 - Being repeatedly absent from school, or absent for a prolonged period
 - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
 - Being reluctant to undergo any medical examinations
 - Asking for help, but not being explicit about the problem
 - Talking about pain or discomfort between her legs

Potential signs that a pupil may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out



- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
 - Having a mother, older sibling or cousin who has undergone FGM
 - Having limited level of integration within UK society
 - Confiding to a professional that she is to have a “special procedure” or to attend a special occasion to “become a woman”
 - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period
 - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
 - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
 - Being unexpectedly absent from school
 - Having sections missing from her ‘red book’ (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication.

Breast Ironing

Breast ironing, also known as **breast flattening**,^[1] the process during which young pubescent girls’ breasts are ironed, massaged, flattened and/or pounded down over a period of time (sometimes years) in order for the breasts to disappear or delay the development of the breasts entirely..

It is usually performed by a close female relative of the girl who believes that it will make teenage girls look less “womanly” and prevent pregnancy and rape.

- Therefore allowing the girl to continue her education

prevent dishonour being brought upon the family if the girl begins sexual relations outside of marriage. Indications of breast ironing include:

- A girl is embarrassed about her body
- A girl is born to a woman who has undergone breast flattening
- A girl has an older sibling or cousin who has undergone breast flattening
- If there are references to breast flattening in conversation, for example a girl may tell other children about it
- A girl may request help from a teacher or another adult if she is aware or suspects that she is at immediate risk
- A girl from an affected community is withdrawn from PSHE and/or Sex and Relationship Education as her parents wish to keep her uninformed about her rights
- One or both parents or elder family members consider breast flattening integral to their cultural identity
- The family indicate that there are strong levels of influence held by elders who are involved in bringing up female children and support breast flattening
- A girl/family has limited level of integration within UK community
- Some girls may ask for help, perhaps talk about pain or discomfort in their chest area, but may not be explicit about the problem due to embarrassment or fear
- A girl may be fearful of changing for physical activities due to scars showing or bandages being visible



Although there is no specific law in the UK against breast ironing, it is a form of physical abuse and should be reported as such.

Further information can be found at the Northamptonshire Safeguarding Partnership website <http://www.northamptonshirescb.org.uk/about-northamptonshire-safeguarding-children-partnership/the-partnership/>

And at nationalfgmcentre.org.uk/breast-flattening

Forced Marriage (FM)

FM is now a specific offence under s121 of the Anti-Social Behaviour, Crime and Policing Act 2014 that came into force on 16 June 2014.

A FM is a marriage conducted without the valid consent of one or both parties, and where duress is a factor. Forced marriage is when someone faces physical pressure to marry (e.g. threats, physical violence or sexual violence) or emotional and psychological pressure (e.g. if someone is made to feel like they're bringing shame on their family). This is very different to an arranged marriage where both parties give consent.

FM is illegal in England and Wales and include

- taking someone overseas to force them to marry (whether or not the forced marriage takes place)
- marrying someone who lacks the mental capacity to consent to the marriage (whether they're pressured to or not)
- The Academy's staff will report any suspicion that a Forced Marriage is planned and the DSL will report it to the police and children's social care

Radicalisation (The Counter Terrorism & Security Act 2015)

Preventing radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups

Extremism is vocal or active opposition to fundamental values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces

Terrorism is an action that:

- Endangers or causes serious violence to a person/people;
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.



The Prevent Duty

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.



Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism.

Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required.

A representative from the school or college may be asked to attend the Channel panel to help with this assessment.

An individual's engagement with the programme is entirely voluntary at all stages. Guidance on Channel is available at:

<https://www.gov.uk/government/publications/channel-guidance>

The statutory guidance can be found on GOV.UK.

Peer on Peer Abuse

We recognise that children are capable of abusing their peers. This is generally referred to as peer on peer abuse and can take many forms.

This can include but is not limited to:

- Bullying including cyberbullying
- Sexual violence and sexual harassment
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm
- Nudes and Semi-Nudes
- Initiation/hazing type violence and rituals

Abuse is abuse and should never be tolerated or passed off as “banter” or “part of growing up”. Most cases of pupils hurting other pupils will be dealt with under the schools behaviour policy but this child protection and safeguarding policy will apply to any allegation that raises safeguarding concerns. This might include where the alleged behaviour:

- Is serious and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation or sexual abuse, such as indecent exposure, sexual assault, or sexually inappropriate pictures or videos (including Nudes and Semi-Nudes)

If one child or young person causes harm to another, this should not necessarily be dealt with as abuse. When considering whether behaviour is abusive, it is important to consider:

- Whether there is a large difference in power (for example age, size, ability, development) between the young people concerned; or
- Whether the perpetrator has repeatedly tried to harm one or more other children; or
- Whether there are concerns about the intention of the alleged perpetrator.

Peer on peer abuse can manifest itself in many ways and different gender issues can be prevalent. Severe harm may be caused to children by abusive and bullying behaviour of other children, which may be physical, sexual or emotional and can include gender based violence/sexual assaults, (Nudes and Semi-Nudes), domestic abuse, peer-on-peer exploitation, serious youth violence, sexual bullying or harmful sexual behaviour.



Sexual Violence & Sexual Harm

If a pupil makes an allegation of abuse against another pupil:

The member of staff will record the allegation and tell the DSL, but not investigate it themselves

The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence

The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed

The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

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

- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images
- Being vigilant to issues that particularly affect different genders
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensuring pupils know they can talk to staff confidentially
- Ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

The Academy will refer to: <https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges> The Academy will follow the guidance in Keeping Children Safe in Education 2021 when considering how to keep the alleged perpetrator(s) and victim apart.

The National Organisation for the Treatment of Abusers <https://www.nota.co.uk/>

<https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>

Guidance on responding to and managing Peer on Peer Abuse incidents can be found at:

[Sexual violence and sexual harassment between children in schools and colleges.pdf](#)
[Nudes and Semi-Nudes In Schools FINAL Jan17.pdf](#)

In order to minimise the risk of peer on peer abuse the school:

- Provides a developmentally appropriate PSHE curriculum which develops students understanding of acceptable behaviour and keeping themselves safe.
- Have systems in place for any student to raise concerns with staff, knowing that they will be listened to, believed and valued.
- Develop robust risk assessments where appropriate.
- Have relevant policies in place (e.g. behaviour policy).

Sexual violence and sexual harassment between children in schools and colleges

See Part 5 of Keeping Children Safe in Education 2021

<https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>

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

There is a separate Academy policy for Sexual Violence and Sexual Harassment Policy to complement this information further.

Guilsborough Academy Sexual

Sexual violence and sexual harassment can occur between two children of **any** age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that **all** victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

Sexual Violence and Sexual Harassment

What is Sexual Violence and Sexual Harassment?

Sexual violence

It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his 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: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his 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: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

What is consent? Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

Sexual Harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

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

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

It may include:

- non-consensual sharing of sexual images and videos;
- sexualised online bullying;
- unwanted sexual comments and messages, including, on social media; and
- sexual exploitation; coercion and threats
- Upskirts
- Upskirting generally involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence.
- Sharing Nudes and Semi-Nudes
- Incidents of sharing images of Nudes and Semi-Nudes incidents will be investigated as an incident of Peer on Peer abuse and the decisions made in responding to them will be recorded.

The response to a report of sexual violence or sexual harassment

The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

All staff will be trained to manage a report of sexual violence or harassment

We will also keep in mind that some students may face additional barriers to telling someone because of their disability, sex, ethnicity and/or sexual orientation

The DSL will make an immediate risk and needs assessment which will consider:

- the victim – especially their protection and support
- the alleged perpetrator(s)
- all the other children at the school, especially any actions that are appropriate to protect them.
-

The risk assessment will be recorded and reviewed – this will depend on whether other risk assessments will be required from other professional agencies involved, e.g. police and social workers **Initial review meeting**

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff. This meeting will consider the initial evidence and aim to determine:



- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- What further information is required to decide on the best response
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents should be involved)
- The DSL will make an immediate referral to police and/or children's social care if:
 - The incident involves an adult
 - There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)

If the abuse involves nudes or semi-nudes

- If images are involved, the DSL must decide whether it is necessary to view the imagery in order to safeguard the young person? **(in most cases, imagery should not be viewed)**
- Whether the imagery has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images from devices or online services
- What the DSL knows about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the imagery is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming)

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

Further review by the DSL

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review.

They will hold interviews with the pupils involved (if appropriate) to establish the facts and assess the risks.

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

Informing parents

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

Referring to the police

If it is necessary to refer an incident to the police, this will be done through Northamptonshire Police by dialling 101

Curriculum coverage

Students are taught about the issues surrounding Peer on Peer abuse including Nudes and Semi-Nudes as part of our Life Skills (PSHE) education, assemblies and IT lessons .

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive
- Issues of legality
- The risk of damage to people's feelings and reputation
- Pupils also learn the strategies and skills needed to manage:
- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of school's policies and procedures. If the visitor is unknown to the school, we will check their credentials and reason for visiting before allowing them to enter. . Visitors should be ready to produce identification.

Visitors are expected to sign the visitors' book and wear a visitor's badge, which are clearly identified by their red lanyard

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

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an enhanced DBS check with barred list information has been carried out

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

Guilborough MAT procedures regarding Non-collection of children

Guilborough MAT procedures regarding Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will:

- Complete an initial search of the school. Record the search
- Inform the Principal / Head Teacher and Designated Safeguarding Lead
- Call parents and inform them that their child is missing and ask them to contact the child on their mobile if possible. Record time of the phone call
- Inform parents that we will be calling the police. Record the time of the call and incident number.
- When the student is located, follow the behaviour procedures, where appropriate