

# SAFEGUARDING & CHILD PROTECTION POLICY

This section should be completed following ratification of the Policy.

Audience	DSL's & All Safeguarding Staff, Trust Leaders & Trustees, All staff & All Parents
Ratified	September 2024
Other Related Policies	Anti-Bullying Policy & Critical Incidents Policy
Policy Owner	Trust Safeguarding Team & ARC Committee
Review Frequency	Annually in September

## Ownership

Preston Hedges Trust is responsible for the production and maintenance of this document. It is issued by the Clerk, [clerk@prestonhedges.org](mailto:clerk@prestonhedges.org) to whom any change requests or queries should be directed.

## Glossary

Term	Description
DSL	Designated Safeguarding Lead
DDSL	Deputy Designated Safeguarding Lead
SCR	Single Central Record
KCSIE	Keeping Children Safe in Education
Must	A legal requirement to comply with legislation
Should	When the advice set out should be followed unless there is good reason not to
Proprietor	In this document is Preston Hedges Trust

***This policy must be adhered to by all the schools in the Trust. Local procedures and protocols are reflected. This is in line with KCSIE 2024***

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## 1. Aim and introduction

This guidance has been produced to help staff establish the safest possible learning and working environments. Its aims are to safeguard young people and ensure that staff understand appropriate and professional behaviours.

This guidance is to be used by each whole school community within the Trust including staff, volunteers, PTA members, supply, contractors and visitors to school.

It is written predominantly using the key documents – application of use should use any superseded documents during specific cases/ issues undertaken. Each school should ensure that they use the Trust guidance/ Safeguarding Policy, Keeping Children Safe in Education 2024, Sexual violence and sexual harassment between children in schools and colleges 2021, and all related documentation.

It is important that this document is used and then more detailed assessment of need made using the current Keeping Safe in Education, sexual violence and sexual harassment between children in schools and linked documents. The policy highlights key areas for which there is much more detailed information in noted documents.

As a Trust, we take safeguarding seriously and we ensure that safeguarding is at the heart of our schools. We ensure that we all have a strong safeguarding culture with the best interest of the children at the core of all of our systems, processes and policies ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. As a Trust, we have a Trust Safeguarding Partner, who will audit each school once a year on safeguarding practices, including the Single Central Record. The Trust Safeguarding Lead supports all DSLs and Deputy DSLs across the schools to ensure best practice is in place and training is up to date, termly meetings are

held and led by the Trust Safeguarding Lead. Our Trust Safeguarding training is regular, aligned and the same messages are being delivered with additional regional requirements. We ensure that all of our employees understand the importance of safeguarding and they understand that 'it can happen at our school'.

### **Definition of safeguarding (KCSIE 2024)**

This is now in line with the Working together to safeguard children 2023 guidance. Safeguarding and promoting the welfare of children is now defined as:

- Providing help and support to meet the needs of children as soon as problems emerge (this bullet point is new)
- Protecting children from maltreatment, **whether that is within or outside the home, including online** (this last part has been added)
- Preventing the impairment of children's mental and physical health or development
- Making sure that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

## **2. Documents & Legislation for reference**

Keeping Children Safe in Education [September 2024](#). Statutory Guidance for Schools (KCSIE), and updated linked guidance. Working Together to Safeguard Children 2024. Sexual violence and sexual harassment between children in schools [September 2021](#).

Most recent publication should always be accessed for the below:

Inspecting Safeguarding in the Early Years – [September 2021](#)

Revised Prevent Duty Guidance 2023

What to do if You're Worried a Child is Being Abused [March 2015](#)

Child sexual exploitation; definition and guide for practitioners 2017.

Multi-Agency Guidelines: Female Genital Mutilation [July 2020](#)

Definition of Domestic Violence and Abuse: Guide for Local Areas [March 2013](#)

DfE and ACPO drug advice for schools [September 2012](#)

Searching, Screening and Confiscation [July 2022](#)

NHS Overview - Fabricating or Induced Illnesses Oct 2019 (page reviewed March 2023)

Preventing and Tackling Bullying [July 2017](#)

National action plan to tackle child abuse linked to faith or belief [August 2012](#)

The Children (private arrangements for fostering) Regulations 2005 [July 2005](#)

Use of reasonable force in Schools DfE [July 2013](#)

Guidance on Forced Marriage [March 2013 \(last updated March 2023\)](#)  
Preventing youth violence and gang involvement; practical advice for school's and college's August 2013.  
Sexting in Schools and Colleges – [UK Council for Child Internet Safety \(UKCIS\) 2016](#)  
Sharing nudes and semi-nudes: advice for education settings working with children and young people [December 2020](#)  
Criminal Exploitation of children and vulnerable adults: County-Lines guidance. [Home Office 2017 \(updated 2023\)](#)  
Tackling Violence Against Women and Girls 2021  
Disqualification under the Childcare Act 2006 – [2018 publication](#)  
Regulated Activity in Relation to Children: Scope. Factual Note by [HM Government 2012](#)

We recognise the need for use of both National and local guidance and all abuse and associated actions from the documents above will be used in conjunction with –

[Northamptonshire Children's Trust](#) works with both North and West Northamptonshire county councils. Northamptonshire Safeguarding Children Partnership have produced a Threshold 2022

The document identifies four levels and needs and provides the local actions to take once the threshold has been decided. These are –

**Level 1** – Needs are met through engagement with universal services

**Level 2** – Emerging needs require early help or intervention

**Level 3** – Needs causing a concern require a targeted support

**Level 4** – Needs require specialist or statutory services (complete the multi-agency referral form)

[MK together](#), works across the whole of Milton Keynes to safeguard all, they have produced a Levels of needs document [October 2023](#)

The document identifies four levels and needs and provides the local actions to take once the threshold has been decided. These are;

**Level 1** –Universal –Needs are met through engagement with universal services.

**Level 2** – Additional – Needs require extra support, provided by universal or targeted services – Early Help.

**Level 3** –Early Help targeted intervention – Needs are more complex and need multi-disciplinary response, lead professional and 'Team around the Family' approach

**Level 4** –Children's social care – Needs are more complex and enduring and are at risk of significant harm or impairment

Other sources are used as required, and the above documents will form the wider basis for any considerations and decisions that we may make. We reserve the right to make use of any new guidance, given that any findings will further strengthen our Safeguarding approach.



This policy draws together all the guidance in an accessible way for our school community to ensure that everyone understands Safeguarding. We strongly believe that simply providing guidance (as above) to staff is ineffectual alone; therefore, we ensure that the policy provides accessibility and makes the community more effective. It drives training in every Safeguarding training session. Members of the school community should also understand that they are able to access the listed guidance above on the DfE website. In making decisions, leadership will refer to the guidance in addition to this policy. All staff and volunteers are given this policy at induction.

We recognise the importance of key legislation when protecting children, especially;

UN Convention on the rights of the child 1992  
Children's Act 1989, 2004, Children and Families Act 2014  
Education Act 1996, 2023  
Sexual Offences Act 2003, 2024  
Protection of Children Act 1978, 2023  
Safeguarding Vulnerable Groups Act 2006  
Disqualification under the Childcare Act 2006, 2018  
Protection of Freedoms Act 2012

### **3. Safeguarding Information for all staff**

#### **3.1 What school staff should know and do**

Keeping Children Safe in Education. (KCSIE 2024)

“This is statutory guidance from the Department for Education (‘the Department’) issued under Section 175 of the Education Act 2002 (as amended), The Education Independent School Standards Regulations 2014, the Non-Maintained Special Schools (England) Regulations 2015 and the Apprenticeships, Skills, Children and Learning Act 2009 (as amended). Schools and colleges in England **must** have regard to it when carrying out their duties to safeguard and promote the welfare of children. For the purposes of this guidance children includes everyone under the age of 18.”

**The Teachers’ Standards 2021** state that teachers, including head teachers and Principals, should safeguard children’s wellbeing and maintain public trust in the teaching profession as part of their professional duties.

**KCSIE 2024** continues to place a greater emphasis upon ALL adults’ role in safeguarding their children, however, the guidance recognises that the Designated Safeguarding Lead and deputies are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns.

All school staff have a responsibility to provide a safe environment in which children can learn.

All school staff have a responsibility to identify children who may be in need of extra help – or who are suffering, or are likely to suffer, significant harm. All staff must be able to recognise the need for early help and discuss this with the DSLs. All staff then have a responsibility to take appropriate action, working with other services as needed, however the DSL/ DDSL is likely to be the lead staff member.

All school staff must know, understand and follow the requirements in this Safeguarding policy. In addition, they must understand the Behaviour and Fundamental Values Policy, the Staff Code of Conduct, the safeguarding response to children who go missing from education and those who are absent, the role of the DSL and their deputies, have read Part One of Keeping Children Safe in Education and Annex B (pg. 140 – 161) (as well as this policy) upon induction.

All school staff must know for children, there is no separation between 'real life' and the 'online world'.

“All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content (KCSIE 2024)

To keep children safe who attend our schools, we will -

- Establish and maintain an environment where children feel secure and are encouraged to talk and are listened to
- Ensure children have fair and honest feedback from staff as far as is possible
- Ensure children know that there are adults in the school whom they can approach if they are worried and have full respect for “the child’s voice.”
- Ensure that staff, all members of the school community and visitors are able to identify welfare concerns and understand how to report them swiftly
- Ensure that staff understand national and local trends
- Ensure that the child’s wishes and feelings are sought and considered when making decisions in the best interests of a child
- Ensure that the curriculum develops the children as confident individuals who recognise right and wrong, understand Modern British values, and the protected characteristics, value themselves and others and have the skills to share worries and concerns
- Recognise that each pupil’s welfare is of paramount importance and that some children may be especially vulnerable to abuse e.g. those with special educational needs and disabilities with increased vulnerabilities to abuse, those living in adverse circumstances or those who witness violence
- Ensure access to Safeguarding information for all staff (KCSIE 2024)

- Safeguarding and promoting the welfare of children is defined as protecting children from maltreatment; preventing impairment of children’s health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes
- Where a child is suffering significant harm, or is likely to do so, **immediate** action should be taken to protect that child
- Action should also be taken to promote the welfare of a child in need of additional support, even if they are not suffering harm or are at immediate risk. Statutory Guidance expects all staff (and upon staff induction– and in addition to this policy) – to read Part One of KCSIE and Annex B and to raise any questions about the guidance with the DSL/ DDSL promptly. The schools will also provide training to allow staff to develop and secure their understanding. The DSL/DDSLS will provide support for staff to allow them to discharge their role.

School staff are particularly important in keeping children safe as they are in a position to identify concerns early and provide help for children, to prevent concerns from escalating. Schools and their staff form part of the wider safeguarding system for children. School staff see the children more regularly than the vast majority of professionals and know their children well, therefore, they are vital in the wider workforce to protecting children effectively. Staff should also be aware that safeguarding incidents and or behaviours can be associated with factors outside school and or can occur between children outside of this environment. Staff should also consider whether children are at risk of abuse or exploitation in situations outside their families. For example: sexual exploitation, criminal exploitation and serious youth violence.

All school members **MUST** be aware of the signs of abuse and neglect so that they are able to identify cases of children who may be in need of help, protection or being at risk of exploitation. They must also be able to identify children who would benefit from Early Help with the support from the DSL/ DDSL. “Early help means providing support as soon as a problem emerges at any point in a child’s life, from the foundation years through to the teenage years.” (KCSIE 2024).

### **3.2 What school staff should look out for:**

Any child may benefit from support, but all school staff should be particularly alert to the potential need for Early Help for a child who:

- is in a family circumstance presenting challenges for the child
- is disabled and has specific additional needs
- has special educational needs (whether or not they have an EHCP)
- is a young carer

- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- is frequently missing/goes missing from care or from home
- is misusing drugs or alcohol
- suffers from poor mental health
- is at risk of modern slavery, trafficking or exploitation
  
- is under the care of an adult with mental health problems or suffering domestic abuse/violence
- is returning home to their family from care
- is showing early signs of abuse and/or neglect
- is at risk of being radicalised or exploited;
- is a privately fostered child
- is a looked after child

You should now also be alert to any child who (KCSIE 2024):

- Has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit
- Has a parent or carer in custody (previously it was 'family member in prison'), or is affected by parental offending
- Is frequently missing/goes missing from education, home or care (the word 'education' has been added)

It is an expectation of staff that we have an “it could happen here” attitude “Safeguarding and promoting the welfare of children is everyone’s responsibility. Everyone who comes into contact with children and their families has a role to play. 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. It is important all staff (including those who do not work directly with children) recognise the important role they play in protecting children” (KCSIE 2024).

“Staff should not assume a colleague, or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to local authority children’s social care (such as a child in need or a child with a protection plan). [Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers](#) supports staff who have to make decisions about sharing information. This advice includes the seven golden rules for sharing information and considerations with regard to the Data Protection Act 2018 (DPA) and UK General Data Protection Regulation (UK GDPR). DPA and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe and

promoting their welfare. If in any doubt about sharing information, staff should speak to the designated safeguarding lead or a deputy. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of children.” (KCSIE 2024)

Knowing what to look for is vital to the early identification of abuse and neglect. If staff members are unsure they should always speak to the Designated Safeguarding Lead or Deputy (listed in the appendix).

#### **4. Taking immediate action when it is required – all staff members**

In exceptional circumstances, such as in an emergency where a child could be at risk of harm or a genuine concern that appropriate action has not been taken, staff members can and should speak directly to MASH – they must not wait to see a DSL/DDSL in the unlikely event that one is unavailable. The staff member should seek advice from the wider leadership team where this is practical and possible. If there is a risk of immediate serious harm to a child, a referral should be made to MASH immediately or the Police if harm is imminent/ taking place, by the member of staff who has become aware.

Outside of these circumstances, it is preferred that the DSL/DDSLs are spoken with as they hold other information that could be important. However, we would prefer a referral is made – even if proved to be unfounded– to protect all children from harm if the DSL/DDSL is unavailable or a staff member is still concerned.

To make a referral, you should ensure that you have access to Arbor, for the pupil’s details to give name, DOB and address. However, you should not be deterred from calling MASH if you do not have access to this. You will need to call from a number where they are able to phone you back. Local authorities should make decisions on the referral in one working day and should be followed up upon through the local authority if the decision is not given to the referrer in this time. All staff are expected to challenge decisions by MASH if they feel children are still at risk of harm. They should press for re-consideration if they are still concerned or the child’s situation is not improving.

The Local Authority must let the person who has referred know whether:

- The child requires immediate protection and urgent action is required
- Whether the child is in need, and should be assessed under section 1
- There is reasonable cause to suspect the child is suffering, or likely to suffer, significant harm, and whether enquiries must be made and the child assessed under section 47
- Any services are required by the child and family and what type of services; and further specialist assessments are required in order to help the local authority to decide what further action to take

#### **4.1 The referrer should follow up if this information is not forthcoming**

Northampton MASH – 0300 126 7000  
Northants Out of hours – 01604 626938

Milton Keynes MASH 01908 253169  
Out of Hours Milton Keynes 01908 265545

“No single practitioner can have a full picture of a child’s needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.” (KCSIE 2024)

Each school should have details on how to contact MASH – as well as the policy – available on the website for parents and an explanation that they should report concerns directly rather than delaying to see what the school thinks.

#### **5. What you should do if you have concerns about a child**

All schools in the Trust must use MyConcern. It is the Principal’s duty to ensure everyone has had MyConcern training.

Without delay, all schools must report using MyConcern, it should contain the date and time of the issue/ disclosure and show the child’s full name and class. It should be factual and record what children say/ do/ display as accurately as possible. It is vital that you record the voice of the child where applicable.

If there is an internet malfunction or issue involving technology then this must be reported immediately to the DSL or DDSL in their absence.

No information is too small – you should pass any concerns swiftly to the DSL/DDSL. You should understand that your information could be used by outside agencies, including social care and the Court. However, you are duty bound to report and this forms part of the expectation of choosing to work with children. It is important for children to receive the right help at the right time to address risks and prevent issues escalating. Research and Child Safeguarding Practice Reviews (SPRs) have repeatedly shown the dangers of failing to take effective action. Poor practice includes: failing to act on and refer the early signs of abuse and neglect, poor record keeping, failing to listen to the views of the child, failing to re-assess concerns when situations do not improve, sharing information too slowly and a lack of challenge to those who appear not to be taking action. Staff must refer information every time to the DSL/DDSL and update on MyConcern. Staff must not keep individual

notes on a given child in their own records.

Appropriate confidentiality and sharing information promptly and accurately are an expectation.

## **6. Dealing with a disclosure at our schools**

If a child chooses to make a disclosure to you, this can be very distressing for yourself. It is important to remain calm and not to show the child this. It is a huge leap of trust that they are placing in you. Reassure the child that you have their best interests at heart and that whilst you cannot keep what they say secret, you will act with their best interests and you will need to talk to DSL/ DDSL. You should remember that your role is not to investigate, as this disclosure will be used by agencies in decision making and your responses should be open, for example “did you want to tell me about that?” It is important to record information accurately and exercise good judgement.

What to do if You're Worried a Child is Being Abused March 2015 provides more detailed information. The NSPCC website is also an additional resource to reference in identifying types of abuse and what signs to be vigilant to.

## **7. Training**

All our DSL/ DDSL have at least the minimum refresher training at the correct intervals as set out in the current KCSIE (every two years). To ensure their knowledge and skills are current and effective, they attend courses of specific areas; read documentation; meet other DSLs and keep up to date with e-bulletins (list not exhaustive).

All staff are expected to attend staff training, including safeguarding and child protection, online safety and Prevent (from the DSL/ DDSL and/or external professionals) each academic year with additional updates and key areas as required nationally or locally or by school need as outlined in KCSIE 2024. Whilst we recognise that this is above the requirement, we value keeping our children safe and believe that this is vital. Any staff who feel they need further training or support should see a DSL/ DDSL to ask for this. All staff are expected to attend as part of their employment within our Trust, all training must be recorded in a training log. These must be kept updated and available at all times.

All Trustees and specifically the ARC Committee are responsible for ensuring that this happens and required to attend yearly safeguarding training themselves.

## **8. Looked After Children (KCSIE 2024)**

The most common reason for children becoming looked after is as a result of abuse and/or neglect. The Executive Team should ensure that staff have the skills, knowledge and understanding necessary to keep looked after children safe.

“Governing bodies of maintained schools and proprietors of academies must appoint a designated teacher and should work with local authorities to promote the educational achievement of registered pupils who are looked after. With the commencement of sections 4 to 6 of the Children and Social Work Act 2017, designated teachers will also have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales. The designated teacher must have appropriate training and the relevant qualifications and experience. In other schools and colleges, an appropriately trained teacher should take the lead.” KCSIE 2024

The individual schools must name the Designated Teacher on their policy. (See Paragraph 191 KCSIE 2024 for further information on the Designated teacher’s role).

Local authorities have on-going responsibilities to the young people who cease to be looked after and become care leavers and the Designated Teacher must be aware of the associated guidance.

The school needs to ensure that appropriate staff have the information they need in relation to a child’s looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. They should also have information about the child’s care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The designated safeguarding lead should have details of the child’s social worker and the name of the Virtual School Lead in the authority that looks after the child.

## **9. SEND Pupils and those with Disabilities or Physical Health issues (KCSIE 2024)**

Children with Special Educational Needs or Disabilities (SEND) or certain physical health conditions can face additional safeguarding challenges both online and offline. Governing bodies and proprietors should ensure their child protection policy reflects the fact that additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury



- relate to the child's condition without further exploration
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in managing or reporting these challenges
- cognitive understanding – being able to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools of colleges or the consequences of doing so

## **9.1 LGBTQ+ Pupils**

LGBTQ+ pupils can also face additional safeguarding challenges both online and offline. As with children with Special Educational Needs or Disabilities (SEND) or certain physical health conditions, additional barriers can exist when recognising abuse and neglect in this group of children.

These can include:

- being more prone to bullying (including homophobic bullying) than other children
- potential discrimination from peers

Difficulty finding a trusted adult or safe space to share their concerns may be increased.

## **9.2 Gender Questioning**

KCSIE 2024 says your school should take a cautious approach to supporting a gender questioning child and:

- Consider the broad range of the individual's needs
- Do this in partnership with their parents/carers (except in rare circumstances where involving parents/carers would bring a significant risk of harm to the child)
- Include any clinical advice that is available
- Consider how to address wider vulnerabilities, such as the risk of bullying

It is also important for staff to 'create a culture' where pupils can speak out or share any concerns with staff (previously it was to 'provide a safe space' for pupils to do this).

## **10. Types of abuse and neglect (KCSIE 2024)**

Understanding the definitions of abuse and neglect enables you to be able more confidently pass concerns to the DSL/ DDSL. These concerns may be of a serious nature or you may feel that a child is presenting in a way that they would benefit from Early Help. However, big or small something seems, it should always be passed on to the DSL/ DDSL.

It is important for staff to be aware that children may not feel ready or know how to tell someone they are being abused.

### **10.1 Abuse:**

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear, or experience its effects. Children may be abused in a family or in an institutional or extra-familial contexts by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children (Working Together to Safeguard Children, 2023).

### **10.2 Physical Abuse:**

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

### **10.3 Emotional Abuse:**

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from

participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

#### **10.4 Sexual Abuse**

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and **all** staff should be aware of it and of their school or college's policy and procedures for dealing with it.

#### **10.5 Neglect:**

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

- provide adequate food, clothing, and shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate caregivers)
- ensure access to appropriate medical care or treatment
- provide suitable education
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs

## **11. Children's Mental Health**

KCSIE 2024 makes explicit links with children's mental health and safeguarding. As a result, all staff should be aware that mental health problems can be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

We recognise that staff cannot make a diagnosis, this should only be left to trained professionals; however our school staff are well placed to observe children and identify behaviour which suggests they may be experiencing a mental health problem or that they are at risk of developing one.

Annual staff training ensures that staff are aware of how abuse, neglect and other traumatic adverse childhood experiences can have a lasting impact and effect on child's mental health, behaviour and education. If a member of staff has any concerns relating to mental health that is also a safeguarding concern, immediate action must be taken. Staff must follow the Safeguarding Policy, recording concerns on MyConcern to notify the DSL/DDSL.

Specific safeguarding issues – Further support and links to key documentation can be found in KCSIE 2024.

## **12. Child Missing Education and Attendance**

Principals/ DSL/ DDSL must have a good understanding of the full guidance for Children Missing in Education.

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of their school's unauthorised absence and children missing education procedures as noted below.

All children, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude and any special educational needs they may have.

Staff MUST report to the DSL/ DDSL, a child who is missing/ has unexplained absence swiftly and the office team are most well placed to do this if they become concerned around specific circumstances. Additionally, poor attendance, patterns of absence or persistent lateness should be discussed with the Principal to ensure that the issue is/ can

be investigated.

In the event a child is missing, and further investigations do not satisfy the DSL/DDSL, we will follow the procedures in place for Northamptonshire or Milton Keynes as appropriate.

On the morning of absence, the office staff must contact the family. If there is no response, all other held contact details should be used to establish that the child is off (and safe). If no other channels of communication are effective by midday, the school must conduct a home visit the same day.

Reasonable steps may include asking neighbours if they know where a family is, (you must show your identity badge and always attend with another member of school staff). If these steps are unsuccessful, DSL/DDSL will contact the Police to request a welfare check. The Trust has this policy, in part, due to tragic events seen in the news where something has happened to the parent and then, as a consequence, the child.

The Trust expects all schools to go beyond the legal minimum and take every step to hold more than one emergency contact number. KCSIE 2024 states that this is good practice as it allows a school to make contact with a responsible adult when a child is missing from education or if there is a welfare and/ or safeguarding concern. In addition, the school will follow the prolonged absence process (see appendix 2).

The school follows the guidance for the removal of pupils from our registers. Additionally, we inform the local authority of any pupil who fails to attend school regularly, or at intervals as are agreed between the school and the local authority (or in default of such agreement, at intervals determined by the Secretary of State).

### **13. Elective Home Education**

If a parent/carer expresses an intention to home educate their children, the school will ensure the local authority is made aware. The school follows the guidance for the removal of pupils from our registers.

Although we recognise that the parent/carer may have already removed the child from school, the school will continue to work with appropriate agencies to safeguard the child, including informing the Local Authority. Where Safeguarding concerns exist around the child who is educated at home, our schools will ensure the appropriate agencies are informed immediately of our concerns.

## **14. Female Genital Mutilation (FGM)**

FGM is illegal.

All staff must personally report to the Police a disclosure that FGM has been carried out in addition to talking to the school DSL/DDSL through school referral procedures.

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs for non-medical reasons. It has no health benefits and harms girls and women in many ways. It involves removing and damaging healthy and normal female genital tissue, and hence interferes with the natural function of girls' and women's bodies. The practice causes severe pain and has several immediate and long-term health consequences, including difficulties in childbirth also causing dangers to the child.

### **14.1 Recognising FGM (Multi-Agency Guidelines: Female Genital Mutilation)**

The age at which girls undergo FGM varies enormously according to their community. The procedure may be carried out when the girl is new born, during childhood or adolescence, at marriage or during the first pregnancy. However, the majority of cases of FGM are thought to take place between the ages of 5 and 8 and therefore girls within that age bracket are at a higher risk.

In identifying prevention of this abuse, our school recognises the importance of not signing for permission of leave in exceptional circumstances without checking attendance, and identifying levels of risk for individual pupils. Multi-Agency Statutory Guidance on Female Genital Mutilation (July 2020)

### **14.2 Specific factors that may heighten a girl's risk**

There are a number of factors in addition to a girl's or woman's community or country of origin that could increase the risk that she will be subjected to FGM:

- The position of the family and the level of integration within UK society – it is believed that communities less integrated into British society are more likely to carry out FGM
- Any girl born to a woman who has been subjected to FGM must be considered to be at risk of FGM, as must other female children in the extended family
- Any girl who has a sister who has already undergone FGM must be considered to be at risk of FGM, as must other female children in the extended family

- Any girl withdrawn from Personal, Social and Health Education or Personal and Social Education may be at risk as a result of her parents wishing to keep her uninformed about her body and rights

### **14.3 Specific factors that could suggest that FGM is imminent**

It may be possible that families will practice FGM in the UK when a female family elder is around, particularly when she is visiting from a country of origin.

- A professional may hear reference to FGM in conversation, for example a girl may tell other children about it
- A girl may confide that she is to have a 'special procedure' or to attend a special occasion/receive a special gift to 'become a woman'
- A girl may request help from a teacher or another adult if she is aware or suspects that she is at immediate risk
- Parents state that they or a relative will take the child out of the country for a prolonged period
- A girl may talk about a long holiday to her country of origin or another country where the practice is prevalent (see Figure 1 in section 2.3 of Multi-Agency Statutory Guidance on Female Genital Mutilation 2020 for the nationalities that traditionally practice FGM)
- Parents seeking to withdraw their children from learning about FGM

There are a number of indications that a girl has already been subjected to FGM:

- A girl may have difficulty walking, sitting or standing and may even look uncomfortable
- A girl may spend longer than normal in the bathroom or toilet due to difficulties urinating
- A girl may spend long periods of time away from a classroom during the day with bladder or menstrual problems
- A girl may have frequent urinary, menstrual or stomach problems
- There may be prolonged or repeated absences from school
- A prolonged absence from school with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return could be an indication that a girl has recently undergone FGM
- A girl may be particularly reluctant to undergo normal medical examinations
- A girl may confide in a professional
- A girl may ask for help, but may not be explicit due to embarrassment or fear
- A girl may talk about pain or discomfort between her legs

In the event of concern of FGM, we will refer to Multi-Agency Statutory Guidance on Female Genital Mutilation 2020 and report to the police.

## **15. Preventing Radicalisation KCSIE 2024**

Section 26 of the Counter-Terrorism and Security Act 2015 places a duty on certain bodies (“specified authorities” listed in schedule 6 to the Act), ‘in the exercise of their functions, to have “due regard to the need to prevent people from becoming terrorists or supporting terrorism”.

Children are susceptible to radicalisation into terrorism and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools or colleges safeguarding approach.

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

**Radicalisation** is defined as 'the process of a person legitimising support for, or use of, terrorist violence' (KCSIE 2024)

Terrorism is an action that endangers or causes serious violence to a person/people, causes serious damage to property, or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or intimidate the public and is made for the purpose of advancing a political, religious or ideological cause. Although there is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism, there are possible indicators that should be taken into consideration, such as: isolating themselves from old friends and family, converting to a new religion, sympathetic to extremist ideologies, increased secretiveness and refusing to listen to different points of view. Background factors combined with specific influences such as family and friends may contribute to a child's susceptibility.

Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home). However, it is possible to protect susceptible people to radicalisation into terrorism and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and use the 'Notice, Check, Share' process;

Notice – initial concerns are identified and recorded on MyConcern

Check – open discussion with the child and DSL

Share – with a DSL/DDSL, then if needed complete a Police Prevent Team referral and MASH.



In our schools, we are aware of the risks posed by the internet and have appropriate online safety procedures in place. Additionally, we ensure the promotion of Modern British Values, protected characteristics and have Citizenship and PSHE themes within the curriculum, which would give the opportunity to recognise extreme views and teach children in a way to allow them not to be radicalised as easily.

Our internet has appropriate filters and monitoring, (see Online-safety Policy), to further reduce the risk of radicalisation. Staff referrals should be recorded on MyConcern as well as handed to the DSL/ DDSL and our school will make use of the DfE's guidance on [managing risk of radicalisation in your education setting](#)

## **16. Domestic Abuse**

[The Domestic Abuse Act 2021](#) introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Under the statutory definition, both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be “personally connected” (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing 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.

Young people can also experience domestic abuse within their own intimate relationships. This form of child on child abuse is sometimes referred to as ‘teenage relationship abuse’. Depending on the age of the young people, this may not be recognised in law under the statutory definition of ‘domestic abuse’ (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child

safeguarding procedures should be followed and both young victims and young perpetrators should be offered support. KCSIE 2024

Staff must report any concerns immediately of domestic abuse, whether the child has disclosed or not.

When school are notified of an incident of domestic abuse outside of school, the DSL/DDSL will be contacted by appropriate person within the County Council. The email will be sent via Egress/EnCompass and DSLs which then has to be responded to by the DSL. All information must be uploaded to MyConcern immediately.

### **17. Drugs Use & Searching, Screening & Confiscation**

At our schools, we promote pupil's well-being and provide a curriculum that enables them to understand how to look after themselves, what is healthy and how to be assertive and resilient. If any of our schools were to suspect a child is in possession of drugs, we would follow the DfE and ACPO drug advice for schools September 2012. Staff must report the concern immediately, bringing the child to a member of the Senior Leadership Team (SLT), providing appropriate supervisory steps for keeping all the children safe and applying the assumption that a drug found could be a controlled drug. The incident must be reported to the Senior DSL who will seek advice from the Trust as soon as possible, as well as informing the Police.

The SLT will then follow guidance in Searching, Screening and Confiscation July 2022 and the DfE and ACPO drug advice for schools September 2012. The pupil needs to agree to the search, however Principals and DSLs have a statutory power to search pupils or their possessions, without their consent, where they have reasonable grounds for suspecting that the pupil may have a prohibited item(s). The DSL/ DDSL will also look at the Thresholds and Pathways document to implement appropriate action.

### **18. Additional Banned items that pupils must not have:**

- illegal drugs or medicine not kept in the school office, including syringes, other than authorised medicine required to be near the pupil
- knives or weapons
- alcohol
- stolen items
- tobacco and cigarette papers
- matches and lighters
- chemicals

- fireworks
- pornographic images
- any article that the member of staff reasonably suspects has been, or is likely to be, used to commit an offence, or to cause personal injury to, or damage to the property of, any person (including the pupil)
- any material relating to radicalised views

Children who disclose that there is drug use in their home will be supported under the Child Protection and Safeguarding Policy and use of appropriate Thresholds and Pathways document. All staff must report such disclosures in the same way as other safeguarding concerns. Additionally, staff must use reporting procedures as well as our duty of care if they believe an adult responsible for children is under the influence of drugs.

If drugs of any nature were to be found on site, two people must collect the item together to protect themselves and the school community. This then must be safely stored until given further guidance by the Police and/or other agencies.

## **19. Fabricated Illness**

This type of abuse is rare, but our schools are always vigilant. If this type of abuse is suspected, we will follow NHS Overview - Fabricating or Induced Illnesses 2019 and the appropriate Thresholds and Pathways.

A parent/ carer may:

- fabricate signs and symptoms. This may include the fabrication of past medical history. It may also include falsification of letters and documents
- induction of illness by a variety of means

## **20. Faith Abuse**

This is abuse linked to faith or belief and the following list is not exhaustive. It includes: belief in concepts of witchcraft and spirit possession, demons or the devil acting through children or leading them astray (traditionally seen in some Christian beliefs), the evil eye or djinns (traditionally known in some Islamic faith contexts) and dakini (in the Hindu context); ritual or muti murders where the killing of children is believed to bring supernatural benefits or the use of their body parts is believed to produce potent magical remedies; and use of belief in magic or witchcraft to create fear in children to make them more compliant when they are being trafficked for domestic slavery or sexual exploitation.

If this is identified, we will follow appropriate Thresholds and Pathways as well as accessing the National action plan to tackle child abuse linked to faith or belief to support judgements August 2012.

## **21. Private Fostering**

A private fostering arrangement is essentially one that is made privately (that is to say without the involvement of a local authority) for the care of a child under the age of 16 (under 18, if disabled) by someone other than a parent or close relative with the intention that it should last for 28 days or more. Private foster carers may be from the extended family, such as a cousin or great aunt. However, a person who is a relative under the Children Act 1989 i.e. a grandparent, brother, sister, uncle or aunt (whether of the full or half blood or by marriage) or step-parent is not a private foster carer.

A private foster carer may be a friend of the family, the parent of a friend of the child, or someone previously unknown to the child's family who is willing to privately foster a child. The period for which the child is cared for and accommodated by the private foster carer should be continuous, but that continuity is not broken by the occasional short break.

If staff become aware of a private fostering arrangement, they must refer under normal safeguarding procedures.

To ensure that we have a full understanding of private fostering arrangements if they arise, a full birth certificate will be requested on entry to our school as well as completion of the school entry form.

## **22. 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 and 12-17 year olds.  
(See links in KCSIE 2024)

## **23. Bullying including cyber-bullying**

Our school has both anti-bullying and online safety policies which address this. We expect all school staff to recognise the signs of bullying, respond appropriately to disclosures about bullying and report all concerns swiftly. We recognise that child on child abuse can take place and will make appropriate responses in line with this policy and the anti-bullying policy.

## **24. (Sexting) Youth Produced Imagery**

There is no clear definition of 'sexting'. Creating and sharing sexual photos and videos of under- 18s is illegal and therefore causes the greatest complexity for schools and other agencies when responding. It also presents a range of risks, which need careful management.

*'Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive - but children still need to know it is illegal - whilst non-consensual is illegal and abusive. UKCIS provides detailed advice about sharing of nudes and semi-nude images and videos.'* **KCSIE 2024**

(UKCIS) Any new advice introduces the phrase 'youth produced sexual imagery' and uses this instead of 'sexting.' This is for clarity in guidance. (UKCIS – UK council for child internet safety).

Making, possessing and distributing any imagery of someone under 18 which is 'indecent' is illegal. This includes imagery of yourself if you are under 18. The relevant legislation is contained in the Protection of Children Act 1978 (England and Wales) as amended in the Sexual Offences Act 2003 (England and Wales).

Specifically:

- It is an offence to possess, distribute, show and make indecent images of children
- The Sexual Offences Act 2003 (England and Wales) defines a child, for the purposes of indecent images, as anyone under the age of 18. (UKCCIS)

All leadership staff **MUST** refer to guidance promptly to avoid incorrect responses to the issue. Any device considered evidence for the Police must be confiscated immediately.

Adults should not view youth produced sexual imagery unless there is good and clear reason to do so. Wherever possible, responses to incidents should be based on what DSL/ DDSL have been told about the content of the imagery and the details logged onto MyConcern.

Guidance from UKCCIS will be followed.

## **25. Mobile Phones and Smart Watches**

To ensure school is a safe place for our children and to enable them to be fully engaged with their learning, mobile phone use is prohibited throughout the school day, which includes break and lunchtimes.

This approach allows our schools to provide children with access to their mobile phone before and after school, while ensuring use is prevented during the school day. Pupils hand their phone in to a member of staff upon arrival and collect it at the end of the day.

Smart watches which have the same kind of capabilities, technology and communication access as mobile phones, will be treated in the same way as phones and are required to be handed in on arrival at school.

Our schools will always consider reasonable adjustments to a ban on mobile phones. This may be required in line with the Equality Act 2010. For instance, where a pupil with SEND may need access to a mobile phone or similar device due to the nature of their disability, or where a child uses it to support a medical condition. These adjustments are also applied to staff.

Staff should not use their own mobile phone and smart watch for personal reasons in areas pupils may be throughout the school day.

## **26. Child-on-child abuse including upskirting**

Children can abuse other children. This is generally referred to as child-on-child 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; sexting and initiating/hazing type violence and rituals.

Staff should be aware of KCSIE 2024 referencing “upskirting,” which typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. This is a criminal offence.

We recognise that child-on-child abuse can happen and we would deal with issues in line with child protection actions if a child came to harm (additionally, use associated guidance and policies including the anti-bullying policy and behaviour policy). Child-on-child abuse can also be sex specific issues – for example, girls being sexually touched or boys being subject to an initiation/ violence. As such, any adult with any concern around child-on-

child abuse must refer the concern to the DSL/ DDSL as well as the Principal. Any allegations of sexual harassment must be reported to the Principal and recorded on the sexual harassment log.

We believe that abuse is abuse and should never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up.” We operate a zero-tolerance policy and once the issue is deemed to be child-on-child abuse, we will ensure that a DSL/DDSL is present during investigations that are made by the Principal. Where the Principal is a DSL, another member of the safeguarding team or member of the SLT must be present. The victim will be treated with respect and dignity with due consideration to their wishes. We will ensure that immediate provisions are put in place to protect the individual and will work with partner agencies and the pupil’s parents to ensure that the correct actions are taken for the specific circumstances. We recognise the following from KCSIE 2024:

- recognition of the sex of the child of child-on-child abuse (i.e. that it is more likely that girls will be victims and boys perpetrators), but that all child-on-child abuse is unacceptable and will be taken seriously;
- the different forms child-on-child abuse can take, such as:
- sexual violence and sexual harassment
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexting (also known as youth produced sexual imagery):

The UK Council for Child Internet Safety (UKCCIS) Education Group has published guidance [on sharing nudes and semi nudes; advice for education settings working with children and young people \(2020\)](#).

The many forms that child-on-child abuse might take, can be found in KCSIE 2024 page 105 – 107.

Our school insists on high standards of behaviour, including appropriateness, and all staff are consistent and vigilant.

The school have a duty to provide adequate support for both victims and perpetrators of child-on-child abuse, and any other children that may have been affected. This will include age appropriate discussions around the behaviours, partnership work with parents (including sharing information to help support their child such as Pantasaurus) and external agencies if needed.

## 27. What is sexual violence and sexual harassment?

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. (Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault)
- **Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party)
- **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. Further information about consent can be found here: [Rape Crisis England & Wales - Sexual consent](#)
  - a child under the age of 13 can never consent to any sexual activity;
  - the age of consent is 16;
  - sexual intercourse without consent is rape

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school/college. 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:
  - consensual and non-consensual sharing of nude and semi-nude images and videos. As set out in [UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) (which provides detailed advice for schools and colleges) taking and sharing nude photographs of U18s is a criminal offence;
  - sharing of unwanted explicit content;
  - upskirting (is a criminal offence);
  - sexualised online bullying;
  - unwanted sexual comments and messages, including, on social media; sexual exploitation; coercion and threats.

Sexual violence and sexual harassment should be taken seriously. Paragraph 18 of the Sexual violence and sexual harassment between children in schools and colleges 2021 document, says, “All staff should be able to reassure victims 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 abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.” Sexual violence and sexual harassment can occur between two children of any age and sex, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. All staff working with children are advised to maintain an attitude of ‘it could happen here’

Children who are victims of sexual violence and sexual harassment wherever it happens, will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Schools should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college, including intimate personal relationships.

Staff should be aware of the importance of:

- making clear that there is a zero-tolerance approach to sexual violence and sexual harassment and it is never acceptable, and it will not be tolerated and it should never be passed off as “banter”, “just having a laugh”, “part of growing up” or “boys being boys”. Challenging physical behaviour (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts
- not recognising, acknowledging or understanding the scale of harassment and abuse and/or downplaying some behaviours related to abuse as it can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it; and;
- understanding that all of the above can be driven by wider societal factors beyond the school and college, such as everyday sexist stereotypes and everyday sexist language

### **27.1 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, it is important school staff understand consent. This will be especially important if a child is reporting they have been raped.

If staff have a concern about a child or a child makes a report to them, they should record this on MyConcern, inform the Principal and be recorded on the sexual harassment log.

When responding to incidents of harmful sexual behaviour, the following should be adhered to by the DSL:

- Consider the severity of the sexual behaviour (see table below) and refer as necessary to outside agencies, including MASH and or Police
- Talk to the children and their parents / carer(s) soon as possible after the incident
- Be ready to manage communications about the incident, including outside the school community
- Consider the ongoing risks for all the children involved, including how contact between the children can be managed
- Review possible actions and arrangements to suit each child
- Where necessary, but especially when it meets the abusive threshold on the table, hold a safety planning meeting for each child who has been involved (both perpetrator and victim) and their parent(s) /carer(s) to draft an individualised risk assessment, checking that both child and parent(s)/carer(s) understand what has

been drawn up and why

- Implement risk assessment
- Review the risk assessment until safety measures can be removed.

Normal	Consensual, mutual, reciprocal and developmentally expected, with shared decision-making
Inappropriate	Displayed in isolated incidents; generally consensual, reciprocal and acceptable within a peer group, but may be in an inappropriate context
Problematic	May be socially unexpected, developmentally unusual, and compulsive, but with no element of victimisation; may lack reciprocity or equal power
Abusive	Intrusive, with a victimising intent or outcome; often involves manipulation, coercion, or lack of consent
Violent	Very intrusive and may have an element of sadism

### **Hackett 2010 – NSPCC Understanding sexualized behaviour in children June 2024**

### **27.2 Discipline for Perpetrators of Sexual Abuse or Harassment**

Anyone found to be a perpetrator of sexual abuse or harassment will be dealt with in line with this policy, our disciplinary or behaviour policies and as appropriate, referred to the police and MASH.

### **28. Forced Marriage**

A forced marriage is where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. This practice is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights as well as a criminal offence.

The pressure put on people to marry against their will can be physical (including threats, actual physical violence and sexual violence) or emotional and psychological (for example, when someone is made to feel like they're bringing shame on their family) and financial abuse (taking your wages or not giving you any money) can also be a factor.

The schools will make use of The Forced Marriage Guidance April 2023 and consult with the Forced Marriage Unit, contactable on 02070 080151.

## **29. Honour-based violence**

So-called 'honour-based' violence 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 honour-based violence 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 honour-based violence, or already having suffered honour-based violence. KCSIE 2024.

If staff have a concern regarding a child that might be at risk of honour-based violence or who has suffered from honour-based violence, they should record this on MyConcern and then speak immediately to the DSL / DDSL.

## **30. Child Sexual Exploitation (CSE) & Child Criminal Exploitation (CCE)**

Each school must have a named DSL who is responsible for CSE.

CSE and CCE are defined as forms of abuse when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual or criminal activity. The imbalance can be due to age, as well as other factors like the sex of the child, gender identity, sexual identity, cognitive ability, physical strength and access to economic or other resources. In some cases, the abuse will be exchanged for something the victim may need or want and or will be to the financial benefit or other advantage e.g. increased status of the perpetrator or facilitator.

CSE and CCE can be:

- Perpetrated by individuals or groups
- Males or females and children or adults
- A one-off occurrence or be a series of incidents over time
- Range from opportunistic to complex organised abuse
- Involve force and or enticement-based methods of compliance and can involve violence or threats of violence.
- Where victims are exploited even when activity appears to be consensual
- Online as well as in person

Sexual exploitation can take many forms ranging from the seemingly 'consensual'

relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

Indicators can include -

- going missing for periods of time or regularly coming home late
- regularly missing school or education or not taking part in education
- appearing with unexplained gifts or new possessions
- associating with other young people involved in exploitation
- having older boyfriends or girlfriends
- suffering from sexually transmitted infections
- mood swings or changes in emotional wellbeing
- drug and alcohol misuse
- displaying inappropriate sexualised behaviour.

We are also aware that many children and young people who are victims of sexual exploitation do not recognise themselves as such.

We will use the following guidance if we suspect this abuse -  
Child sexual exploitation; definition and guide for practitioners 2017.

### **31. Preventing Youth Violence and Gang Involvement**

Primary schools are recognised often as the first place to see early warning signs for youth violence and gang culture beginning. Staff should be aware and vigilant to this and report any concerns on MyConcern. It is important to understand that it is not only the risk to the individual and others' safety, but the liability a gang member has if another member of the gang commits a crime.

### **32. Child Criminal Exploitation; County -Lines**

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas.

Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to MASH completed. In addition, a referral to the National Referral Mechanism should be considered. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18
- can affect any vulnerable adult over the age of 18 years;
- 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;

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 sex, cognitive ability, physical strength, status and access to economic or other resources.

KCSIE 2024 states that schools should be aware of children who:

- Go missing **from school or home** and are subsequently found in areas away from their home
- Have been the perpetrator or **alleged** perpetrator of serious violence (e.g. knife crime), as well as the victim

### **33. Serious Violence**

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries.

Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

All staff should be aware of the associated risks and understand the measures in place to manage these. Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang involvement; practical advice for schools and colleges 2013.

### **34. Violence Against Women and Girls**

Violence against women and girls (VAWG) are serious crimes. These crimes have a huge impact on the economy, health services, and the criminal justice system. Protecting

women and girls from violence, and supporting victims and survivors of sexual violence, remains a priority of the government. In 2021, the Government published Tackling Violence Against Women and Girls (Home Office 2021).

### **35. Children with family members in prison**

Approximately, according to Crest's data simulation 312,000 children are affected by parental imprisonment each year in England and Wales (National Information Centre on Children of Offenders -NICCO) These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

Often when a child has a parent that is in prison, schools are often not made aware by other family members. When this is confirmed, schools can work with local agencies to ensure that the child is well supported. Our teams will also ensure that the child has additional well-being support to provide them with time to talk and discuss their feelings.

### **36. Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL/DDSL should be aware of contact details and referral routes in to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include: household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and should not, replace a referral into MASH where a child has been harmed or is at risk of harm. KCSIE 2024.

### **37. Record keeping and pupils joining/ leaving our schools**

Our Child Protection records are kept securely via MyConcern and follow data protection requirements – classed as sensitive, personal data. Staff, governors and trustees should use the DfE's data protection guidance for schools. Only the DSL/ DDSL can access the files and manage the contents of the use. The Principal needs to be kept up to date and understand how to access all aspects of safeguarding in the absence of the DSL/DDSL.

The school office is vital in protecting children new to and leaving our school. They are responsible for ensuring that the DSL/ DDSL know pupils are being removed off roll so that any safeguarding records can be transferred and archived. Equally, they are responsible for informing the DSL/ DDSL of new pupils arriving, so that they are prepared for any new safeguarding records to arrive and ensure they have been imported to MyConcern.

If records are held for any child in the school including those leaving at the end of Key Stage Two, then the school will transfer all safeguarding files via MyConcern or hand delivered where possible or sent recorded delivery if the new school does not use MyConcern or is not local. These files will be transferred within a five-day window from the child being off-rolled. We require a signature for receipt of the records and the receipt must be kept securely on school site.

The DSL/ DDSL should also consider whether a receiving school requires information via a phone call in advance to allow for smooth transition for the pupil. The school must ensure that the child is definitely due to attend the establishment before sharing information.

Upon receiving a child, our office staff will make contact with the previous school to confirm whether records of this nature are held by the school, though the legal liability lies with the previous school.

### **38. Our Duty of Care**

By the nature of working in schools, all staff have a duty of care towards all pupils at our schools. Therefore, if there is any foreseeable risk, then staff should seek advice from the DSL/ DDSL/Principal immediately. Whilst every scenario cannot be described, and staff need to exercise their professional understanding, some examples can support decision making. For example, it is foreseeable that if a four-year-old child is asked to meet a parent at the gate, not the door, there is a foreseeable risk of something happening. If a parent arrives smelling of alcohol and they have their car keys, there is a foreseeable risk. If a child is asked to leave an after-school club in the dark and walk home on their own to an empty house consideration needs to be given to what safety provisions have been put in place. In specific cases of foreseeable risk, contact the DSL/ DDSL or a senior member of staff before releasing the child.

In cases where there is no foreseeable risk, but parental arrangements are less than ideal, the DSL/ DDSL should follow this up with parents or ask the class teacher/ phase leader to do so. It could form part of a concern that leads to Early Help or may be a contributing factor to other concerns. School can access the local Neglect Tool Kit to support with decision making.



In addition, where a parent or adult coming into school or onto the site is subject to a conviction or investigation which may make them a risk to our pupils or school community, they will not be allowed on site. Such action will always be considered alongside appropriate legal advice and approved by the Chief Executive Officer.

### **39. Disguised Compliance**

It is important to recognise disguised compliance.

The NSPCC provides good information about this on their website. The website states;

“Disguised compliance involves parents and carers appearing to co-operating with professionals in order to allay concerns and stop professional engagement. This can mean that social workers and other practitioners may be unaware of what is happening in a child’s life and the risks they face may be unknown to local authorities.”

Schools will work with partner agencies, as required, to help to identify and address this issue. Examples of this could be deflecting attention from themselves by blaming other agencies, working well with one agency or agreeing to work with an agency and then not doing so. Staff should also be aware of disguised compliance in the event that something concerns them or that there are outside agency involvements for a child they see regularly and adopt the “what if I’m right approach.”

### **40. Working with Other Agencies**

We fully uphold guidance in KCSIE 2024 and all associated national and local guidance.

Our school follows the guidance in Working Together to Safeguard Children. We have a high commitment to working with all agencies to protect children in our care.

Of specific note, we would expect social workers to liaise with parents and ensure that they had given permission for access for routine work in school. However, where there is a level of risk suspected in a given situation, we would certainly give permission for the social worker to see the child at school to support the child’s safety being assessed without parental permission.

## **41. Alternative Provision**

- If a child is attending an alternative provision during school hours, it is the school's responsibility to ensure that the adults working directly with the child have been subject to appropriate checks such as a DBS. This can be done by the DSL/Principal requesting to see the organisation's single central record. If this is refused, email communication must be sought and recorded to evidence the request and confirmation from the organisation that the checks have been carried out. KCSIE 2024 states that where a school places a pupil in an alternative provision provider, the school continues to be responsible for the safeguarding of that pupil. You should be satisfied that the placement meets the pupil's needs (paragraph 171).

## **42. DPA/ GDPR (KCSIE 2024)**

Information sharing is vital in identifying and tackling all forms of abuse and neglect. As part of meeting a child's needs, all leaders must recognise the importance of information sharing between practitioners and local agencies. This includes ensuring arrangements are in place for sharing information within the school and with the three safeguarding partners, other organisations, agencies and practitioners as required.

School staff 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 the local authority children's social care.

The Data Protection Act 2018 and the GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. 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.

School Principals ensure relevant staff have due regard to the data protection principles, which allow them to share personal information, as provided for in the Data Protection Act 2018 and the GDPR. Relevant staff should be confident of the processing conditions under the Data Protection Act 2018 and the GDPR which allow them to store and share information for safeguarding purposes, including information which is sensitive and personal, and should be treated as 'special category personal data'.

The Principal must ensure that staff who need to share ‘special category personal data’ are aware that the Data Protection Act 2018 contains ‘safeguarding of children and individuals at risk’ as a processing condition that allows practitioners to share information. This includes allowing 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.

### **43. Opportunities to teach Safeguarding**

Each Principal should ensure that children are taught about safeguarding, including online safety. Schools should consider this as part of providing a broad and balanced curriculum. This may include covering relevant issues through Relationships and Sex Education (formerly known as Sex and Relationship Education), and through Personal, Social, Health and Economic (PSHE) education. The Trust has a bespoke Relationships and Sex Education Curriculum.

The curriculum expects that both real life and the online world are addressed in each theme as far as is possible.

Whilst it is essential that the ARC Committee and Executive team ensure that appropriate filters and monitoring systems are in place, they should be careful that “over blocking” does not lead to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding.

### **44. Responsibilities**

The Trust has strategic leadership responsibility for their school’s safeguarding arrangements and must ensure that they comply with their duties under legislation. They must have regard to this guidance, ensuring policies, procedures and training in their schools is effective and comply with the law at all times.

Principals should ensure that the policies and procedures adopted by the Trust (particularly those concerning referrals of cases of suspected abuse and neglect), are understood, and followed by all staff.

The ARC Committee are responsible for ratification of the Safeguarding and Child protection Policy understanding the filtering, monitoring systems and processes in place. All schools must adhere to both Trust requirements and legislation.

The DSL and Principal are responsible for the effective implementation of this policy. See Appendix for individual school structures.

The Trust Safeguarding Team will communicate all aspects of their work to the CEO and where noncompliance is present, the CEO will address this alongside members of the Trust and by way of the ARC Committee.

The Trust Safeguarding Team are a network of support for all schools and provide a cohesive approach to safeguarding, including regular advice to schools in protecting children in specific instances.

The Trust requires copies of any audits completed and reports of progress to address actions. The Trust Safeguarding Team appraises and responds to the audit content to ensure compliance in each school.

The Trust ensures that this policy is updated at least annually by the Senior DSLs in the Trust for Safeguarding.

The Trust will ensure that all trustees receive appropriate safeguarding and child protection (including online) training at induction.

This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated (KCSIE 2024).”

#### **44.1 DSL Responsibilities:**

The DSL will take lead responsibility for safeguarding and child protection across the school. They will take part in strategy discussions and inter-agency meetings and contribute to the assessment of children.

They will advise and support other members of staff on child welfare, safeguarding and child protection matters, and liaise with relevant agencies such as the local authority and police.

Some safeguarding activities may be delegated to deputies, but the lead DSL will retain ultimate lead responsibility for safeguarding and child protection. See DSL job description for further detail.

## **45. Supervision**

Supervision and professional discussion are the best way of preventing an error in decision making made by the DSL/ DDSL in the case of child protection/ welfare. We expect a culture of positive challenge to each other regardless of seniority to ensure that we make the right judgements in all cases and do not miss a vital aspect in a case of concern.

We use both formal and informal supervision. There is an expectation of regular supervision discussions as the need arises at all levels. This is to ensure that careful thinking and planning is regularly taking place in decision making and to make all colleagues feel supported in what can be distressing scenarios. Managing risk carries a level of stress and supervision must ensure that all colleagues are supported in protecting children resulting in safe outcomes for our pupils.

The Trust expects formal supervision at times of heightened caseload or in cases carrying serious risk, harm or causing stress to the member of staff actioning the case. This could be in the form of partnership working and challenge.

Supervision should follow the structures of the safeguarding teams, with the DSL accessing the Principal for further support or in the case of the DSL being the Principal, to link with another DSL Principal or the Trust Safeguarding Lead. Supervision of all staff members supporting a child with safeguarding concerns will be carried out informally and by the DSL with responsibility for the case. We expect formal and regular supervision if the DSL delegate work to a non-qualified teacher such as a Support Worker whilst recognising the considerable skill that these staff members may have.

## **46. Concerns about an adult working with children**

Concerns with Safeguarding regarding a professional's behaviour/ conduct raised via the whistle blowing process will potentially involve the use of the Designated Officer (formally LADO) by the DSL/ Principal. All Trust schools must inform the CEO as soon as possible that there are concerns. See the Whistle Blowing Policy for further information.

### **46.1 What staff should do if they have concerns about safeguarding practices or a staff member within the School?**

All staff and volunteers should feel able to raise concerns about poor or unsafe practice/potential failures in the Trust safeguarding regime/concerns around a staff member and know that such concerns will be taken seriously by the senior leadership team. Even if the concern is deemed 'low-level' all adults have a responsibility to report

these concerns and the leaders/trust must create opportunities for these low-level concerns to be recorded on Confide.

*'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 of harm. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the school or college may have acted in a way that:*

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

*Paragraph 426 (KCSIE 2024) gives examples of such 'low-level' concerns which 'could include, but are not limited to:*

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

Concerns should initially be raised to the Principal both verbally and written recorded on Confide. In the event that staff remain concerned or the concern is regarding the Principal, then they must contact the CEO or Chair of Trust. If the staff member is still not satisfied they can report to the Designated Officer (formally LADO) or Ofsted.

Those taking such actions in good faith will not suffer a detriment for taking this action.

KCSIE 2024 “Where a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, other whistleblowing channels are be open to them”:

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 0250285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

## **46.2 Designated Officer Contact (formally LADO):**

### Northamptonshire:

Email - LADOConsultations@NCTrust.co.uk

Or by phone:

Andy Smith - 07850 854 309

Sheila Kempster - 07831 123 193

Sian Edwards (interim) - 07738 636 449

### Milton Keynes:

LADO Milton Keynes – 01908 254307

lado@milton-keynes.gov.uk

The Trust fully upholds all guidance in terms of referring to the DBS/ Secretary of State and this statement is to ensure recognition by all leaders of this requirement. DBS for all members of staff across our schools are updated every three years as good practice. Office managers check DBS for any visitors working regularly with children, including supply staff. New members of staff cannot start their role in the Trust without a new DBS.

## **47. Safer Recruitment – Recruitment, Selection and Vetting**

We follow all guidance from Keeping Children Safe in Education 2024, including: that schools will carry out online searches as part of their due diligence checks on shortlisted candidates, with candidates being made aware of this.

Principals must ensure that procedures are followed and are safer recruitment trained.

We recognise we meet the criteria for a Section 128 check. All new appointments will follow the “pre-appointment checks” as detailed on KCSIE 2024 part 3.

Applicants that have lived or worked outside of the UK, are subject to the same pre-appointment checks. We will make any further checks considered appropriate so that relevant events that occurred outside the UK can be considered, including obtaining an enhanced DBS certificate with barred list information and certificate of good character (even if the applicant has never been to the UK).

Applicants may be able to provide proof of their past conduct, issued by the professional regulating authority in the country in which they worked. Where available, such evidence can be considered alongside other information obtained through other pre-appointment checks to help assess their suitability.

## **47.1 Recruitment of an ex-offender**

- as an organisation assessing applicants' suitability for positions which are included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order using criminal record checks processed through the Disclosure and Barring Service (DBS), the Trust complies fully with the [code of practice](#) and undertakes to treat all applicants for positions fairly
- The Trust undertakes not to discriminate unfairly against any subject of a criminal record check on the basis of a conviction or other information revealed
- The Trust can only ask an individual to provide details of convictions and cautions that the Trust are legally entitled to know about. Where a DBS certificate at either standard or enhanced level can legally be requested (where the position is one that is included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 as amended, and where appropriate Police Act Regulations as amended)
- The Trust can only ask an individual about convictions and cautions that are not protected
- The Trust is committed to the fair treatment of its staff, potential staff or users of its services, regardless of race, gender, religion, sexual orientation, responsibilities for dependants, age, physical/mental disability or offending background
- The Trust has a written policy on the recruitment of ex-offenders, which is made available to all DBS applicants at the start of the recruitment process
- The Trust actively promotes equality of opportunity for all with the right mix of talent, skills and potential and welcome applications from a wide range of candidates, including those with criminal records
- The Trust select all candidates for interview based on their skills, qualifications and experience
- An application for a criminal record check is only submitted to DBS after a thorough risk assessment has indicated that one is both proportionate and relevant to the position concerned. For those positions where a criminal record check is identified as necessary, all application forms, job adverts and recruitment briefs will contain a statement that an application for a DBS certificate will be submitted in the event of the individual being offered the position
- The Trust ensures that all those in the Trust who are involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences
- The Trust also ensures that they have received appropriate guidance and training in the relevant legislation relating to the employment of ex-offenders, e.g. the Rehabilitation of Offenders Act 1974
- Candidates will complete a criminal convictions disclosure form, to be handed in at interview
- At interview, The Trust ensures that an open and measured discussion takes place on the subject of any offences or other matter that might be relevant to the



position. Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of an offer of employment

- The Trust makes every subject of a criminal record check submitted to DBS aware of the existence of the [code of practice](#) and makes a copy available on request
- The Trust undertakes a discussion on any matter revealed on a DBS certificate with the individual seeking the position before withdrawing a conditional offer of employment

#### **47.2 Recruit by becoming a visa sponsor**

##### **Skilled Worker visa**

Overseas teachers can apply for a Skilled Worker visa up to 3 months before they start work in the UK under the following conditions:

- we, as the employer, are a licensed Home Office employer sponsor and have offered the overseas teacher a teaching job
- the overseas teacher can speak, read, write and understand English
- the role pays at least £20,940 or the relevant minimum rate for teachers in England, whichever is higher (minimum rates for teachers are on the Get into Teaching website) - if the role is part time, pro-rata rates will apply as long as the salary is at least £31,600 a year

#### **47.3 Recruit without becoming a sponsor**

##### **Graduate visa**

The Graduate visa has been available from summer 2021 to international students who have successfully completed their degree in the UK and been sponsored by a Home Office licensed student sponsor. This includes certain postgraduate courses such as initial teacher training at universities.

Those on a Graduate visa will be able to study, work or look for work in the UK at any skill level without a sponsor for up to 2 years after completing their studies (3 years for PhD students). This includes working as a teacher.

Teachers on a Graduate visa will be able to apply to switch to another visa route such as the Skilled Worker visa without having to leave the UK if they meet the requirements for the other visa route.

#### **47.4 Other visas**

Teachers on other types of visas may also be permitted to work in the UK.

Documents that can be accepted when checking a job applicant's right to work.

## **48. Regulated Activity in Relation to Children: Scope**

**This document must be referred to in order to apply the correct checks.**

All schools must refer to the above guidance as well as KCSIE to ensure that they fully assess each role to consider whether it is regulated or not.

### **48.1 Adults not employed by the school**

Adults invited into school by school staff are expected to be discussed with the Principal/DSL first so that they are both appropriate and the school does not suffer from an excessive numbers of adults. It will be important to risk assess whether or not they are appropriate adults to be in school.

Whilst we operate a comprehensive check (in line with KCSIE 2024) on adults entering our school, we are also vigilant to behaviour causing concerns. (Please refer to sections above about concerns about an adult in relation to safeguarding children).

### **48.2 Supply teachers**

Full checks are carried out on all agency workers (including supply teachers) and it is the responsibility of each school to ensure that this is done. Concerns or allegations about supply staff must be referred to the Principal and the relevant procedures followed. It is not acceptable to simply stop using the services of the individual (s).

### **48.3 Volunteers**

Regulated activity and volunteer guidance is followed. Due to the open plan nature/ break out areas in many of our schools, the appropriate level of checks are made including volunteers holding a current DBS.

## **49. Induction Arrangements**

### **Volunteers**

All volunteer helpers are required to have a discussion with a DSL/ DDSL so that they understand what constitutes something of concern, who to report to, as well as confidentiality. They are given an introductory safeguarding leaflet which details this policy.

Students are inducted by the teacher in charge of students who also ensures that they meet the DSL/ DDSL as part of the process.

## **50. Visitors**

All visitors to school, including student teachers, enter through the front office and are required to sign in and out on the electronic system. A photographic badge must be worn at all times. None of the above mentioned are allowed to enter school without the appropriate level of checks (this will be variable depending on the nature of the visit. Eg a guided tour is supervised and there is no right to ask for safeguarding checks but they would be expected to sign in) whilst pupils are in school.

The Principal does not have the right to ask for checks in respect of family members or visitors for sports day, for example, and must decide upon the most appropriate level of supervision.

All adults not employed by our school are required to meet for a fire register count in the event the alarm sounds.

Visiting professionals and contractors must show photographic ID and have the appropriate DBS check. This must be a physical copy. If a contractor does not have a current DBS, supervision must be put in place by the Principal, otherwise they will not be permitted onto school site when children are present.

## **51. Keeping children safe when out-of-school-setting providers use our school premises for non-school activities**

Organisations renting a space should ensure they follow the policies in place for safeguarding and renting school premises in accordance with KCSIE 2024.

When services or activities are provided by the Trust Board or proprietor, under the direct supervision or management of their school staff, their arrangements for child protection will apply (such as breakfast and after school club).

“However, where services or activities are provided separately by another body (such as Brownies/baby groups) this is not necessarily the case. The Trust or proprietor should therefore seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with the school or college on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll or attend the

college. The Trust Board or proprietor should also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement” (KCSIE 2024).

If the school receives an allegation relating to an incident where an individual or organisation was using your school premises for running an activity for children, the school will follow their safeguarding policies and procedures and inform the local authority designated officer (LADO), as they would with any safeguarding allegation. paragraph 377).

## **52. Useful Contacts**

Northamptonshire Safeguarding Hub (MASH) - **0300 126 7000**

Milton Keynes Safeguarding Hub - **01908 253169/70**

Northamptonshire: [mash@nctrust.co.uk](mailto:mash@nctrust.co.uk)

Milton Keynes: [children@milton-keynes.gov.uk](mailto:children@milton-keynes.gov.uk)

Out of hours contact Northampton: **01604 626938**

Out of hours contact Milton Keynes: **01908 265545**

Thames Valley Police (Milton Keynes) and Northamptonshire Police – non-emergency 101  
Police - emergency – 999

NSPCC

<https://www.nspcc.org.uk/keeping-children-safe/>

## Appendix 1:

The School's Designated People are:

### **Buckton Fields Primary School**

Hannah Rogers	Principal Senior DSL Overall responsibility for Policy and Practice Senior Attendance Champion Behaviour and values lead Safer Recruitment Trained Single Central Record Holder Prevent Lead Child Sexual Exploitation Lead
Chris Brennan	DDSL Safer Recruitment Trained Designated Teacher (LAC Lead) Early Help Assessment Lead
Josh Pender	DDSL SENCO Mental Health Lead Well-being Lead Online Safety Lead
Lisa Deane	DDSL Safer Recruitment Trained SCR Holder

## Holne Chase Primary School

David Killick	Principal Senior DSL SCR Holder Mental Health Lead Safer Recruitment Trained Attendance Lead Looked after Children Lead Child Sexual Exploitation Lead Prevent Lead Prevent Lead
Emily Harrison	SENCO DDSL Safer Recruitment Trained
Sarah McConnell	DDSL Family Support Worker Early Help Coordinator Attendance Champion
Kirsty Miller	SCR Holder Safer Recruitment Trained
Amy Latham	DDSL EVC Trained
Filomena Havill	DDSL EVC Trained
Tracey Schembre	DDSL (Wrap Around Provision)

## Parklands Primary School

Carmilla Cassidy	Principal Safer Recruitment Trained SCR Holder Attendance lead, behaviour and values lead DDSL Trained EVC trained Prevent Lead Data Protection Lead
Vanessa Tear	SENCO
Leanna Govan	DDDSL Senior Welfare Officer Early Help Coordinator
Ella Wesbdale	DDSL FGM Lead
Michael Hayes	DDSL Prevent Lead
Georgie Robinson	Senior DSL Designated Teacher (LAC Lead) Safer Recruitment Trained Child Sexual Exploitation Lead
Lindsey Henderson	DDSL (Studio Club manager)
Chloe Rollins	DDSL Trained (Studio Club)
Kate Clark	SCR Holder Safer Recruitment Trained DDSL Trained
Sam Mallard	Online Safety Lead DDSL Trained

## Pineham Barns Primary School

Caroline Stewart	Principal Senior DSL SCR Holder Attendance & Behaviour and values Lead Safer Recruitment Trained EVC Trained Child Sexual Exploitation Lead Prevent Lead
Emily Dell	DDSL Designated Teacher (LAC Lead) SENCO
Aaron McDonald	Well-Being Lead Deputy DSL
Lucy Randal	Deputy DSL EHA Lead
Linda French-Eaton	DDSL Mental Health Lead Family Support Worker
Kelly Denton	SCR Holder Safer Recruitment Trained
Nara Mackenzie	DDSL Online Safety Lead
Rosie Godfrey	DDSL and EVC Trained
Diane Wellington	Wrap Around Care Manger – DDSL
Ian Sinnamon	EVC Trained Attendance Champion
Trafford Ayres	DDSL Online Safety Lead



## Preston Hedge's Primary School

Tracey Coles	Principal, Behaviour and values lead Safer Recruitment Trained Online Safety Lead SCR Holder Prevent Lead
Rachel Winstanley	Attendance lead
Vanessa Tear	Trust Safeguarding Lead Senior DSL Child Sexual Exploitation Lead  SENCO Designated Teacher (LAC Lead)
Liz Pearce	DDSL
Sarah Straiton	DDSL
Jess Chapman	DDSL
Claire Clayson	SCR Holder Trust SCR Holder Safer Recruitment Trained
Helen Kendall	DDSL Mental Health Lead Early Help Lead Pastoral Lead ELSA trained

## Appendix 2 – Prolonged absence process

If the office has had no contact with a parent regarding absence that day – see Safeguarding Policy for immediate actions – missing child protocol.

### **Prolonged absence process**

When a child is absent from school, the office will log on Arbor the reasons for the absence as per policy, when a parent/guardian informs the school.

If a child is absent from school for **5 consecutive school days**, the office team will raise this with the DSL team. From **day 6**, daily the DSL's will then follow the process overleaf:

