PDET

Safeguarding / Child Protection Policy

This is a Trust Policy – details specific to individual academies and their procedures are added by the Academy in the section at the end of this policy 'Academy Specific Details'. (*For a copy of the policy for a specific academy which includes this information – see individual academy websites)*

N.B. - the appendices to this policy form part of the policy and **MUST BE READ WITH IT**; the separation of documents is for ease of reference. The appendices contain:

- Abuse and Neglect
- Safeguarding issues
- Roles and Responsibilities:
    - DSL
    - AGCs
    - Headteacher
- Additional Advice and Support (resources and guidance)

See also: **'Allegations / Concerns Policy in relation to adults'**

Date	Revision & Amendment Details	By Whom
July 2023	Updated and approved	Board of Directors
November 2023	Quick Guide added	Central Executive Team
January 2024	Amendment to references to Working Together	Central Executive Team
July 2024	Updated in line with KCSIE 2024 and approved	Board of Directors

Quick Guide as to Where to Find Information

Information on the Following	Paragraph / Page Number / Policy etc.
What to do if you have concerns about a child	4.4: *Page 22 onwards*
What to do if you have safeguarding concerns about the behaviour of an adult (staff or volunteers) including 'low-level' concerns	4.12: *Pages 30 - 31* Also see: • Allegations / Concerns Policy in relation to adults • Staff Code of Conduct
What to do if a child makes a disclosure	4.5: *Page 22 onwards*
Multi Agency Safeguarding Hub (MASH) contact details for referrals	*Page 24 / 25 or* Appendix C – Other Useful Links: *Page 57*
Local Authority Designated Officer (LADO) contact details (concerns about adult behaviour)	*Page 25 or* Appendix C – Other Useful Links: *Page 57*
Child-on-child sexual violence and child-on-child sexual harassment - *procedures to follow*	*Page 20* and Appendix A2: *Pages 9 - 27*
Abuse, neglect and exploitation and other specific safeguarding issues	4.3.1 – 4.3.2: *Pages 18 & 19* and Appendix A1 and A2
Information on Prevent (radicalisation and extremism)	3.5: *Page 16* and Appendix A2: *Pages 40 - 42* Also see: British Values and the Prevention of Radicalisation and Extremism Policy
Information on safer recruitment and checks required etc	3.4: *Page 15* Also see: • Part three of KCSIE • Safer Recruitment Single Central Record (SCR) Guidance (including pre-appointment checks)
Information on the role of the DSL	Appendix B1: *Pages 48 - 52*
Information on the role of the AGC	Appendix B1: *Pages 48 - 52*
Who needs to read KCSIE and which parts?	2: *Page 8*
Information specific to an Academy	Academy Specific Details: *Pages 37 – 40*

Named Leads and Initial Contacts	
Nominated Director for Safeguarding:	Andrew Scarborough
Trust Safeguarding Lead:	Helen Buckley
Designated Safeguarding Leads and Deputies:	*See section on Academy Specific Details at the end of the policy for information in relation to an individual academy*
Safeguarding Governors:	*See section on Academy Specific Details at the end of the policy for information in relation to an individual academy*

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1. Policy Statement

Peterborough Diocese Education Trust (PDET) (the / our Trust) is **committed to safeguarding and promoting the welfare of all children within the Trust**. This policy sets out how we, including each of the individual academies (the / our Academy) will fulfil this commitment. Academy specific details can be found in the section at the end of this policy entitled *'Academy Specific Details'.*

Our Trust has a **child centred and co-ordinated whole Trust approach to safeguarding**. Consequently:

- Safeguarding and child protection will be at the forefront and underpin all relevant aspects of process and policy development
- All systems, processes and policies will operate with the best interests of the child at heart
- Where there is a safeguarding concern, all involved will ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide and
- Systems will be in place that are well promoted, easily understood and easily accessible for children to confidently report any form of abuse or neglect, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

Details of the Trust's overall approach can be found in the document entitled *'PDET's approach to Safeguarding'.*

The Trust fully recognises the contribution it can make to protect and support children in the Trust. The children's welfare and safety are of paramount importance. The aim of the policy is to safeguard and promote our children's welfare, safety and health by fostering an honest, open, caring and supportive climate.

The Trust's directors acknowledge that they have a strategic leadership responsibility for their academies' safeguarding arrangements, and they ensure that the academies comply with their duties under legislation. Directors will have regard to the statutory guidance – ***Keeping Children Safe in Education September 2024 (KCSIE)***, ensuring policies, procedures and training in their academies are effective and comply with the law at all times.

This Policy is subject to the published Equality Information, in line with the Equality Duty 2011 and is underpinned by the Christian beliefs and values of the Trust.

Any reference in this policy to 'Headteacher' includes Principal, Head of School and / or Executive Head as appropriate.

The Trust's statutory responsibility for safeguarding the welfare of children goes beyond simply child protection. The duty is to ensure that safeguarding permeates all activity and functions. This policy therefore complements and supports a range of other documents and policies. For details – see *Academy Specific Details.*

The list of policies in *Academy Specific Details* is not exhaustive but, when undertaking development or planning of any kind, the Trust and the Academy will consider the implications for safeguarding (including online safety) and promoting the welfare of children.

2. Introduction

Safeguarding and promoting the welfare of children is (as defined in *KCSIE*):

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

There are four main elements to our Safeguarding / Child Protection Policy:

Element 1: Prevention (e.g. positive, supportive academy atmosphere, teaching and pastoral support to children, safer recruitment procedures)
Element 2: Protection (by following agreed procedures, ensuring all staff are trained and supported to respond appropriately and sensitively to Safeguarding / Child Protection concerns)
Element 3: Support (to children and academy staff who may have been abused, witnessed violence and / or are vulnerable)
Element 4: Working with parents and carers (to ensure appropriate communications and actions are undertaken).

Staff in our Trust:

- Are made aware that Safeguarding issues "COULD and DO HAPPEN HERE"
- Are trained to understand what possible indicators for abuse neglect and exploitation may look like
- Will always act in the best interests of the child and will have a conversation with the Designated Safeguarding Lead (DSL) or a Deputy Designated Safeguarding Lead (DDSL) when a concern arises
- In line with statutory requirements, understand the difference between a safeguarding concern and one involving "immediate danger" or "at risk of significant harm"
- Know their responsibility is always to record concerns (*details of the Academy's process for this can be found in Academy Specific Details*)
- Are clear on their responsibility to contact the Multi Agency Safeguarding Hub (the MASH) (*see pages 24 / 25 for more details re: the MASH*) directly should the need ever arise.

Requirements for reading KCSIE are:

- All staff must read at least **part one of *KCSIE***
- Those staff who work directly with children should read at least ***Part one* and *Annex B of KCSIE***
- Academy leaders *(Senior Leadership Team and above, including directors)* must read the whole of ***KCSIE***
- All volunteers (including governors) must read at least ***Part one of KCSIE***.

In terms of Safeguarding management:

- the Trust has procured MyConcern, an electronic system for recording and managing safeguarding, for use across the Trust as part of its commitment to safeguarding its children.

2.1 Roles and Responsibilities

General

Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners need to make sure their approach is child centred. This means that at all times they consider what is in the **best interests** of the child. This includes a responsibility to be alert to possible abuse and to record and report concerns without delay to staff identified with child protection responsibilities within the Academy.

Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Lead (DDSL)

The Headteacher appoints a DSL who is an appropriate senior member of staff from the Academy leadership team and appropriate senior members of staff to deputise for the DSL in their absence.

The DSL takes **lead responsibility** for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place), will provide support to staff to carry out their safeguarding duties and will liaise closely with other services such as local authority children's social care.

The responsibilities of the DSL are found in full in ***KCSIE Annex C*** and are also set out in *Appendix B1.*

The names of the DSL and Deputy DSL(s) for the current year are listed in *Academy Specific Details*.

Academy Governance Committee (AGC)

For details of the role of the AGC – *see Appendix B2.*

Headteacher

For details of the role of the Headteacher – *see Appendix B3*.

2.2 Policy Application

This policy applies to all staff, volunteers, directors, governors and visitors to any of our academies. We recognise that child protection is **everyone's** responsibility. We ensure that all parents, carers and other working partners are aware of our Safeguarding / Child Protection Policy by highlighting it on academy websites and in any academy prospectus (if appropriate), displaying appropriate information in reception areas / entrances and by raising awareness at meetings with parents and carers.

2.3 Victims and alleged perpetrator(s)

This policy, in places, uses the term 'victim' as it is a widely recognised and understood term. However, it is recognised that not everyone who has been subjected to abuse considers themselves a victim or would want to be described in this way. Therefore, academies will be conscious of this when managing any incident and be prepared to use any term with which the child is most comfortable.

This policy, in places, uses the term 'alleged perpetrator(s)' and where appropriate 'perpetrator(s)' as these are widely used and recognised terms. However, academies must think very carefully about terminology, especially when speaking in front of children, not least because in some cases the abusive behaviour will have been harmful to the perpetrator as well. Use of appropriate terminology will be for academies to determine, as appropriate, on a case-by-case basis.

2.4 Legislation

This policy is consistent with:

- The legal duty on academies to safeguard and promote the welfare of children, as described in Section 175 of the Education Act 2002 (as amended), and the Education (Independent School Standards) Regulations 2014
- The legal requirements of The *Children and Social Work Act 2017*
- The statutory guidance *Keeping children safe in education – Statutory guidance for schools and colleges" – September 2024*
- The government's *Working Together To Safeguard Children 2023* which sets out statutory guidance for agencies
- The government's non-statutory guidance "What to do if you're worried a child is being abused" *Advice for Practitioners,* to identify child abuse and neglect and take appropriate action in response
- The non-statutory government advice *Information Sharing: Advice for Practitioners Providing Safeguarding Services for Children, Young People, Parents and Carers – May 2024*
- The duties of the *Counter Terrorism and Security Act 2015* and the *Counter Terrorism and Border Security Act 2019*
- The government's *The Prevent duty: safeguarding learners vulnerable to radicalisation*
- The government's *Child sexual exploitation - Definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation* – February 2017
- *The Female Genital Mutilation Act 2003*
- *The Serious Crime Act 2015*
- The *Northamptonshire Safeguarding Children Partnership* (NSCP) *Inter-agency Procedures*, which contain procedures and guidance for safeguarding children.

Human Rights, Equalities and Public Sector Equality Duty

- The Trust will have regard to the Human Rights Act 1998 (HRA), the Equality Act 2010 and the Public Sector Equality Duty (PSED) in relation to safeguarding.
- The **HRA** sets out the fundamental rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (the Convention) that are deemed to apply in the UK, which compels public organisations to respect and protect an individual's human rights when they make individual decisions about them. Under the HRA, it is unlawful for academies to act in a way that is incompatible with the Convention. The specific convention rights applying to academies are:
  - Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)
  - Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity
  - Article 14: all of the rights and freedoms set out in the Act must be protected and applied without discrimination, and
  - Protocol 1, Article 2: protects the right to education.

  Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances. For further information (including on absolute and qualified rights) see: Equality and Human Rights Commission.
- The **Equality Act** provides that academies **must not** unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics). Whilst all of these protections are important, in the context of safeguarding, this policy, and the **legal duties** placed on academies in relation to safeguarding and promoting the welfare of children, directors and all staff should carefully consider how they are

supporting their pupils with regard to particular protected characteristics - including disability, sex, sexual orientation, gender reassignment and race.

Guidance to help academies understand how the Equality Act affects them and how to fulfil their duties under the Act can be found at Equality Act 2010: advice for schools. For further information see Equality Act 2010 | EHRC (equalityhumanrights.com).

- The **Public Sector Equality Duty** (PSED) is found in the Equality Act. Compliance with the PSED is a **legal requirement** for state-funded academies. Advice on this, including on specific duties, is set out in the advice in the link in the paragraph above.
- The PSED places a general duty on academies to have, in the exercise of their functions, due regard to the need to eliminate unlawful discrimination, harassment and victimisation (and any other conduct prohibited under the Equality Act), to advance equality of opportunity and foster good relations between those who share a relevant protected characteristic and those who do not.
- The PSED helps academies to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from specific issues such as sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination. Such concerns will differ between education settings, but it is important academies are conscious of disproportionate vulnerabilities and integrate this into their policies and procedures. For further information see Technical Guidance on the Public Sector Equality Duty: England Equality and Human Rights Commission (equalityhumanrights.com).

3. Element 1: Prevention

3.1 Safeguarding Commitment

The Trust adopts an open and accepting attitude towards children as part of its responsibility for pastoral care. All staff encourage children and parents / carers to feel free to talk about any concerns and to see the Academy as a safe place when there are difficulties. Children's fears and concerns will be taken seriously, and all children are encouraged to seek help from members of staff.

The Academy will therefore:

- Establish and maintain an ethos where all children feel secure, are encouraged to talk, are always listened to and reassured that they are being taken seriously and that they will be supported and kept safe
- Ensure that children know that there are adults in the Academy whom they can approach if they are worried or are in difficulty
- Include in the curriculum, activities, experiences and opportunities which equip children with the skills they need to stay safe from abuse, including online and to know to whom they can turn for help
- Provide opportunities to establish effective working relationships with parents, carers and colleagues from other agencies
- Contribute to multi-agency working in line with statutory guidance *"Working Together To Safeguard Children 2023"*.
- Ensure they understand their role within the local safeguarding arrangements. **Safeguarding partners** *(the local authority; Integrated Care Boards (previously known as clinical commissioning group); and the chief officer of police)* will make arrangements to work together with appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs

- Ensure that their Academy Governance Committee (AGC), their senior leadership teams, especially their DSL and DDSL(S), make themselves aware of and follow their local arrangements
- Work with local authority children's social care, the police, health services and other services to promote the welfare of children and protect them from harm. This includes providing a coordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans
- Allow access for local authority children's social care from the host local authority and, where appropriate, from a placing local authority, for that authority to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment
- Promote the Early Help agenda in the child's local authority, incorporating the "Signs of Safety" approach, enabling families to share with the Academy any challenges that they may be facing which may benefit from early help engagement or assessment, and
- Operate safer recruitment procedures and make sure that all appropriate checks are carried out on new staff and volunteers who will work with children, including identity, references, online searches, right to work, further overseas checks, criminal record, prohibition from teaching, childcare disqualification (where appropriate) and Section 128 (where applicable) checks.

3.2 Opportunities to Teach Safeguarding

Safeguarding in the Curriculum

It is recognised that a one size fits all approach may not be appropriate for all children and a more personalised or contextualised approach tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse and some children with SEND, might be needed. Teaching will therefore be adapted accordingly, where necessary.

As part of providing a broad and balanced curriculum, children will be taught about how to keep themselves and others safe, including online, and the following areas are addressed (adapted to the age of the child) through the opportunities and experiences provided in the Academy:

- Body Boundaries and Safe Touch
- Bullying / Cyberbullying / Prejudice based bullying / Discriminatory bullying
- Child Criminal Exploitation (including County Lines)
- Child on Child Abuse
- Child on Child Sexual Harassment and Sexual Violence
- Child Sexual Exploitation
- Culture, Diversity, Race, Faith and Discrimination issues
- Domestic Abuse
- Drug, Alcohol and Substance Misuse
- Fire and Water Safety
- Healthy Living
- 'Honour Based Abuse' such as Forced Marriage, Female Genital Mutilation
- Keeping Safe at Home
- Online safety including Safe Use of Technology; Sharing of nude and semi-nude images and or videos (also known as sexting or youth produced sexual imagery)
- Preparation for life in modern Britain
- Prevention from Extremism / Radicalisation
- Protective Behaviours
- Relationships Sex and Health Education
- Road Safety

- Serious Violence
- Sexual Harassment and Sexual Violence
- Stranger Awareness; and
- Other safeguarding issues as appropriate.

Online safety is included in the Academy's curriculum at all levels and forms part of teacher training (for Academy specific details *see Academy Specific Details*).

3.3 Online Safety

It is essential that children are safeguarded from potentially harmful and inappropriate online material.

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; child criminal exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm. It is recognised that an effective whole academy approach to online safety empowers an academy to protect and educate the whole academy community in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into **four areas of risk** as set out in ***KCSIE*:**

- **Content**: being exposed to illegal, inappropriate or harmful content; for example, pornography, fake news, racism, misogyny, self-harm, suicide, anti- Semitism, radicalisation and extremism
- **Contact**: being subjected to harmful online interaction with other users; for example, peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct**: online behaviour that increases the likelihood of, or causes harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nude and semi-nude and/or pornography, sharing other explicit images and online bullying), and
- **Commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If the Academy feels their children or staff are at risk, they should report it to the Anti-Phishing Working Group.

Academies will ensure that they have effective mechanisms to identify, intervene in, and escalate any concerns where appropriate.

3.3.1 Remote Education

Guidance to support academies understand how to help keep pupils and staff safe whilst learning remotely can be found at Safeguarding and Remote Education and Providing Remote Education: Guidance for Schools.

3.3.2 Policies

The Academy will consider the four areas of risk referred to above when developing their online safety policy.

The Academy will have a clear policy on the use of mobile and smart technology. Amongst other things this will reflect the fact many children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G).

All staff are made aware of Trust policies covering online safety (including the Relationships, Sex and Health Education Policy) which set our expectations relating to:

- Creating a safer online environment – including training requirements which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring
- Giving everyone the skills, knowledge and understanding to help children stay safe online
- Inspiring safe and responsible use and behaviour
- Safe use of smart technology and mobile phones both within the Academy and on Academy trips / outings
- Safe use of camera equipment, including camera phones, and
- What steps to take if you have concerns and where to go for further help.

Staff also have to read, and sign to acknowledge that they have read and understood, the following Trust policies:

- The Acceptable Use Policy (AUP)
- PDET IT Controls Policy
- Staff Code of Conduct (which includes personal online behaviour).

3.3.3 Parents and Carers

Communications with parents and carers should:

- Be used to reinforce the importance of children being safe online
- Inform them that the Academy uses appropriate systems to filter and monitor online use
- Inform them of what their children are being asked to do online and be clear who from the Academy (if anyone) their child is going to be interacting with online.

3.3.4 Filtering and Monitoring

The Academy will ensure that:

- Appropriate filtering and monitoring systems are in place and regularly review their effectiveness
- The leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.

In all of this, consideration will be given to the number of and age range of their children, those who are potentially at greater risk of harm, and how often they access the IT system along with the proportionality of costs versus safeguarding risks.

The DfE's filtering and monitoring standards set out that academies should:

- Identify and assign roles and responsibilities to manage filtering and monitoring systems
- Review filtering and monitoring provision at least annually
- Block harmful and inappropriate content without unreasonably impacting teaching and learning, and
- Have effective monitoring strategies in place that meet their safeguarding needs.

3.3.5 Reviewing online safety

Technology, and risks and harms related to it, evolve, and change rapidly. Academies will carry out an annual review of their approach to online safety, supported by an annual risk assessment that considers

and reflects the risks their children face. *See Appendix C – 'Additional Advice and Support' (Resources and Guidance) and Other Useful Links.*

3.3.6 Cybercrime

Academies will ensure they have the appropriate level of security protection procedures in place in order to safeguard their systems, staff and learners and will review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies. Academies should also consider meeting the Cyber Security Standards for Schools and Colleges.

Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime – for further information and details of what to do if there are concerns in this respect – *see Appendix A2.*

3.4 Recruitment and Selection of Staff

The Trust's safer recruitment processes are based on the statutory guidance: ***KCSIE (in particular Part three)*** and are designed to deter and prevent people who are unsuitable to work with children from applying for or securing employment, or volunteering opportunities in the Trust.

When recruiting staff, decisions are made about the suitability of the prospective employee based on checks and evidence including:

- Identity checks
- Criminal record checks (enhanced DBS checks)
- Barred list checks
- Right to work checks
- Overseas checks
- Prohibition checks
- Childcare disqualification (where appropriate)
- References
- Online searches
- Section 128 checks (*see* below), and
- Interview information.

Those involved with the recruitment and employment of staff to work with children will have received appropriate safer recruitment training, the substance of which will at a minimum cover the content of ***Part three of KCSIE.***

On every interview panel for academy / Trust staff, at least one member will have undertaken Safer Recruitment training, and this will be refreshed at least every five years (even though this is not now statutory), either online or by attending an appropriate local or national accredited training course.

When asked to provide references, academies should ensure the information confirms whether they are satisfied with the applicant's suitability to work with children and provide the facts (not opinions) of any substantiated safeguarding concerns / allegations that meet the harm threshold. They should not include information about concerns / allegations which are unsubstantiated, unfounded, false, or malicious. Any repeated concerns or allegations which do not meet the harm threshold which have all been found to be false, unfounded, unsubstantiated or malicious should not be included in any reference.

Academies have an open safeguarding ethos regularly addressing safeguarding responsibilities during staff meetings and fostering an ongoing culture of vigilance. All new staff and volunteers receive a safeguarding induction - *see paragraph 4.2.1*

In line with requirements, all directors and governors have DBS, identity, right to work and Section 128 checks. Additionally, all other leaders, managers and senior leaders have Section 128 checks.

3.5 The Prevent Duty

All academies are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from becoming terrorists or supporting terrorism". This duty is known as the Prevent duty. For further information on Prevent and what academies need to do – *see Appendix A2 and see the Trust's British Values and the Prevention of Radicalisation and Extremism Policy.*

3.6 Extended Academy Activities

Where an Academy provides services or activities under the **direct supervision or management of Academy staff**, the Academy's arrangements for safeguarding and child protection will apply.

Where services or activities are provided **separately by another provider**, the Academy seeks assurance in writing that the body concerned has appropriate policies, procedures and training in place to safeguard and protect children (and inspects these as needed) and ensures that there are arrangements to liaise with the Academy on these matters where appropriate. This applies regardless of whether or not the children who attend are children on the Academy roll.

3.7 Hiring or Renting out Academy Facilities / Premises

Where an Academy hires or rents out their facilities / premises to organisations or individuals, they will use the PDET template Hire Agreement and ensure that appropriate arrangements are in place to keep children safe. The guidance on Using After School Clubs, Tuition and Community Activities details the safeguarding arrangements that academies should expect providers to have in place.

3.8 Visitors

Academies will undertake any relevant checks on visitors to the Academy and / or escort or supervise visitors, as appropriate, in accordance with ***KCSIE*** (paragraphs – 305 – 308).

Whilst external organisations can provide a varied and useful range of information, resources and speakers that can help academies enrich children's education, careful consideration should be given to the suitability of any external organisations. Academies will therefore in relation to such organisations undertake an assessment of the education value, the age appropriateness of what is going to be delivered and whether relevant checks will be required.

3.9 Alternative Provision

Where an academy places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and should be satisfied that the placement meets the pupil's need.

Academies should obtain written confirmation from the alternative provision provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that the Academy would otherwise perform in respect of its own staff.

4. Element 2: Protection

4.1 Responsibilities - Staff

Academy 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.

All staff have a responsibility to provide a safe environment in which children can learn. The expectation is that staff will manage behaviour effectively for a safe environment – *see Behaviour Policy*.

All staff should be prepared to identify children who may benefit from early help. 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.

Any staff member who has **any** concerns about a child's welfare should follow the processes set out in paragraph 4.4 in accordance with any necessary timescales given. Staff should expect to support social workers and other agencies following any referral.

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 any form of abuse and/or neglect nor should a victim ever be made to feel ashamed for making a report.

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and / or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or are being threatened. This could be due to their vulnerability, disability and / or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children which facilitate communication.

4.2 Induction and Training

4.2.1 Induction

All staff will be made aware of systems within the Academy and policies, procedures and key documents which support safeguarding, and these will be explained to them as part of staff induction and access to documents provided as appropriate. This will include the following:

- ***KCSIE***
- Acceptable Use Policy (AUP)
- Allegations / Concerns Policy
- Approach to Safeguarding
- Attendance Policy
- Behaviour policy (which includes measures to prevent bullying (including cyberbullying, prejudice-based and discriminatory bullying)

- British Values and Preventing Radicalisation and Extremism Policy
- IT Controls Policy
- MyConcern
- Role of the DSL (including the identity of the DSL and DDSL)
- Safeguarding arrangements to respond to children who are absent from education, particularly on repeat occasions and / or for prolonged periods (see – *West Northants Council, North Northants Council, Peterborough City Council & Rutland County Council*).
- Safeguarding / child protection policy (which includes the policy and procedures to deal with child-on-child abuse and child-on-child sexual violence and sexual harassment)
- Staff Code of Conduct
- The Academy safeguarding leaflet / booklet
- The Prevent Duty
- Whistleblowing Policy

4.2.2 Training

Safeguarding training for staff, including online safety training, will be integrated, aligned and considered as part of the whole Academy safeguarding approach and wider staff training and curriculum planning – *see Academy Specific Details* for Academy specific information.

All staff will undergo safeguarding and child protection training (including online safety, which amongst other things, will include an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) at induction as stated above, and this will be **regularly updated**. Induction and training should be in line with any advice from local safeguarding partners *(see page 11 regarding Safeguarding Partners).*

In addition, all staff will receive safeguarding and child protection updates, including online safety (for example, via email, e-bulletins and staff meetings), as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively.

Staff should also be made aware of learning from local and national Serious Incidents (Child Safeguarding Practice Reviews (SPRs) (previously known as Serious Case Reviews)) and other issues that may arise that are seen to be relevant for learning with regard to safeguarding the children and staff of the Academy.

Each Academy will keep a record of training undertaken.

4.3 What to look out for

4.3.1 Early Help

Any child may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child who:

- Is disabled or has certain health conditions and has specific additional needs
- Has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- Has a mental health need
- Is a young carer
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines

- Is frequently missing / goes missing from education, home or care
- Has experienced multiple suspensions, is at risk of being permanently excluded from school
- Is at risk of modern slavery, trafficking, sexual and / or criminal exploitation
- Is at risk of being radicalised or exploited
- Has a parent or carer in custody, or is affected by parental offending
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing alcohol and other drugs themselves
- Is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- Is a privately fostered child.

4.3.2 Abuse, neglect and exploitation

All staff should be aware:

- Of the indicators of abuse, neglect and exploitation understanding that children can be at risk of harm inside and outside of the Academy, inside and outside of home and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection. For indicators of abuse and neglect - *see Appendix A1*.
- That abuse, neglect, exploitation, and safeguarding issues are rarely stand-alone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap, therefore staff should always be vigilant and always raise any concerns with their DSL or DDSL.
- That safeguarding incidents and / or behaviours can be associated with factors outside the Academy and / or can occur between children outside of this environment. **All** staff, but especially the DSL (and DDSL) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence and county lines and radicalisation– for further information *see Appendix A2*.
- 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.

In all cases, if staff are unsure, they should always speak to the DSL or DDSL.

4.3.3 Safeguarding Issues – Additional Awareness

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and / or alcohol misuse, unexplainable and / or persistent absences from education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and / or videos can be signs that children are at risk.

Below is reference to some safeguarding issues **all** staff should be aware of but **full information on these safeguarding issues and information on other safeguarding issues, and what to do is set out in *Appendix A2.***

Child-on-Child Abuse

Definitions and detailed information on child-on-child abuse and how it should be dealt with is set out in *Appendix A2*.

Children can abuse other children (often referred to as child-on-child abuse) and it can take many forms. It can happen both inside and outside of the Academy and online.

All staff should understand that even if there are no reports in their academy it does not mean it is not happening. It may be the case that abuse is not being reported. As such it is important that when staff have any concerns regarding child-on-child abuse they should speak to their DSL or DDSL.

It is essential that ALL staff understand the importance of challenging inappropriate behaviours between children that are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Child-on-child abuse will **not be tolerated** in our Trust and individuals (victims, perpetrators etc.) will be supported.

Information as to the systems in place in the Academy for children to report child-on-child abuse, the procedures to record, investigate and deal with allegations of child-on-child abuse, how victims, perpetrators and any other children affected by it will be supported and what the Academy is doing to minimise child-on-child abuse is set out in *Academy Specific Details*.

Child-on-Child Sexual Violence and Sexual Harassment

Definitions and detailed information on child-on-child sexual violence and sexual harassment and how the Academy **should respond to all signs, reports and concerns** of it, including those that have happened outside of the Academy premises and / or online is set out in *Appendix A2*.

Sexual violence and sexual harassment can occur between two or more children of any age and sex, online and also 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 occur online and face to face (both physically and verbally) and are **never acceptable**.

All staff working with children should maintain an attitude of **'it could happen here'** and this is especially important when considering child-on-child abuse.

Academies should be aware of the importance of:

- Making clear that there is a **zero-tolerance** approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated. As stated above, it should **never** be passed off as "banter", "just having a laugh", "a part of growing up" or "boys being boys"
- Recognising, acknowledging, and understanding the scale of harassment and abuse and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported, and

- Challenging physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

The Academy has systems in place which are well promoted, easily understood and easily accessible, for children to confidently report abuse, knowing their concerns will be treated seriously – see *Academy Specific Details.*

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Definitions and detailed information on CSE and CCE and how it should be dealt with is set out in *Appendix A2.*

County Lines

Definitions and detailed information on County Lines and how it should be dealt with is set out in *Appendix A2.*

Domestic Abuse

Definitions and detailed information on Domestic Abuse and how it should be dealt with is set out in *Appendix A2.*

Female Genital Mutilation (FGM)

Definitions and detailed information on FGM and how it should be dealt with is set out in *Appendix A2.*

Whilst all staff should speak to the DSL (or DDSL) with regard to any concerns about FGM, there is a specific **legal duty on teachers**. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher **must** report this to the police.

Mental Health

Definitions and detailed information on Mental Health and how it should be dealt with is set out in *Appendix A2.*

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

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Academies can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this policy, and speaking to the DSL or DDSL.

Serious Violence

Definitions and detailed information on Serious Violence and how it should be dealt with is set out in *Appendix A2.*

All staff should be aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include:

- Increased absence from the Academy
- A change in friendships or relationships with older individuals or groups
- A significant decline in educational performance
- Signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries.

For details and information on all safeguarding issues see *Appendix A*.

4.4 What to do if Someone has Concerns about a Child

Staff are advised to maintain an attitude of **'it could happen here'** where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the **best interests of the child**.

If staff have **any concerns** about a child's welfare they should:

- Act on them **immediately**
- Speak to the DSL (or DDSL), and
- Follow the procedures set out on pages 23 - 25 and *see page [27]….for a flow chart setting out the process.*

4.5 What to do if a Child Makes a Disclosure e.g. tells that they are being abused, exploited, or neglected

All staff and volunteers should know what to do if a child makes a disclosure. They should:

- Listen, only asking questions when necessary to clarify. (Using the **'tell, 'explain' and 'describe' ("TED")** approach "Anything else you want to tell me?", "Can you explain/describe what you mean?")
- Listen to what is being said without displaying shock or disbelief
- Accept what is being said
- Allow the child to talk freely
- Reassure the child that they are being taken seriously and that they will be supported and kept safe but not make promises which it might not be possible to keep
- Never promise a child that they will not tell anyone - as this may ultimately not be in the best interests of the child
- Make sure the child is not given the impression that they are creating a problem by reporting any form of abuse and / or neglect and reassure them that what has happened is not their fault and not to feel ashamed for making a report
- Stress that it was the right thing to tell
- Not criticise the alleged perpetrator
- Explain what has to be done next and who has to be told
- Make a record (*see paragraph 4.10*). For details of the Academy's procedures – *see Academy Specific Details*
- Pass the information to the DSL (or DDSL) **immediately**.

Staff should also know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the DSL (or DDSL) and local authority children's social care. Staff should never promise a child that they will not tell anyone about a report of any form of abuse, as this may ultimately not be in the best interests of the child.

Disclosures about potential harm caused by another staff member (including supply staff, volunteers, and contractors).

If a staff member or volunteer receives such a disclosure, they should follow procedures as outlined in *the Trust's 'Allegations / Concerns Policy in relation to adults'* and in ***Part four of KCSIE***.

4.6 What to do next – Procedure to follow in cases of Possible, Alleged or Suspected Abuse, or Serious Cause for Concern about a Child

4.6.1 General

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

If in exceptional circumstances, the DSL (or DDSL) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and / or take advice from local authority children's social care. In these circumstances, any action taken should be shared with the DSL (or DDSL) as soon as is practically possible.

Any person may seek advice and guidance from the MASH particularly if there is doubt about how to proceed (*see contacts on page 24 / 25*). Any adult, whatever their role, can take action in their own right to ensure that an allegation or concern is investigated and can report to the investigating agencies.

All staff should be aware of the process for making **referrals** to local authority children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments – *see below.*

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) – *see Information Sharing paragraph 4.9.*

Northamptonshire Safeguarding Children Partnership Procedures contain the inter-agency processes, protocols and expectations for safeguarding children (available on the NSCP website www.northamptonshirescb.org.uk). The DSL is expected to be familiar with these, particularly the referral processes and with the "Thresholds and Pathways".

Details must be recorded on MyConcern (or a written dated and signed record made, which must be subsequently uploaded onto MyConcern) as to what has been alleged, noticed and reported.

4.6.2 Main procedural steps

Individual Staff / Volunteers / Other Adults

- When a child makes a disclosure, or when concerns are received from other sources, **do not** investigate, interview, ask leading questions, examine children, or promise confidentiality. Children making disclosures should be reassured and, if possible, at this stage, should be informed what action will be taken next. As soon as possible, a note should be made of what has been disclosed following the Academy's specific procedure (for details of the procedure – *see Academy Specific Details*) and a report made to the DSL.

- If the concern involves the conduct of a member of staff (including supply staff and contractors) or volunteer, a visitor, a director, a governor, a trainee or another young person or child, the Headteacher must be informed. The Headteacher should contact the Local Authority Designated Officer (LADO) to seek advice – *see Trust 'Allegations / Concerns in relation to adults Policy'.*
- If the allegation is about the Headteacher, the information should normally be passed to the Chair of Governors or the LADO. (*See Trust 'Allegations / Concerns Policy in relation to adults'*).
- If this has not already been done, inform the child (or other party who has raised the concern) what action has been taken.

Designated Safeguarding Lead

- **Following reported concerns**, the DSL should decide on the most appropriate course of action and whether the concerns should be referred to local authority children's social care-*refer to Northamptonshire Thresholds Guidance*.
  If it is decided to make a referral to local authority children's social care the parent / carer should be informed, unless to do so would place the child at further risk or undermine the collection of evidence e.g. obtaining forensic evidence. It is important to remember that informing parents / carers does not require seeking their consent to share the information with professionals who need to know.
- Information should be shared confidentially with those who need to know observing the guidelines as laid out in "Information Sharing" 2024 (*also see Paragraph 4.9*). Information on a child can be 'logged' with the MASH. This does not require submission of a referral form unless instructed to complete one by the MASH. Any information logged with the MASH needs to be recorded on MyConcern.
- Where there is a child protection concern requiring immediate, same day, intervention the MASH should be contacted immediately by phone and their advice should be followed. Written confirmation should follow within 24 hours on the NSCP Interagency Online Referral Form. All other referrals should be made firstly through a telephone conversation with the MASH and then by following up with the online form, where requested to do so.
- If it appears that urgent medical attention is required, arrangements should be made for the child to be taken to hospital (normally this means calling an ambulance) accompanied by a member of staff who should inform medical staff that non-accidental injury is suspected. Parents / carers should be informed that the child has been taken to hospital.
- Exceptional circumstances: if it is feared that the child might be at immediate risk on leaving the Academy, advice should be taken from the MASH (for instance about difficulties if the Academy day has ended, or on whether to contact the police). A member of the senior leadership team should remain with the child until the social worker, or Police take responsibility. If in these circumstances an adult with Parental Responsibility for the child arrives to collect the child, the member of staff has no right to withhold the child, unless there are current legal restrictions in force (e.g. A Restraining Order). If there are clear signs of physical risk or threat, the MASH should be updated, and the Police should be contacted immediately. (NPCC-when to call the police should help DSLs understand when they should consider calling the police and what to expect when they do).
- Where initial enquiries do not justify a referral to the investigating agencies the initiating adult should be informed, early help actions considered (see below) and the situation monitored. If in doubt, advice should be sought from the MASH: 0300 126 3000 – North Northamptonshire or 0300 126 7000 – West Northamptonshire.
- The concern must either be directly logged on MyConcern or, if the concern is made on a separate form, subsequently logged on MyConcern – see *Academy Specific Details* for an individual Academy's process.

Actions following Assessment of Concern: Referrals for Statutory Services

- **Where a child is suffering, or is likely to suffer from harm, it is important that a referral to local authority children's social care (MASH), and if appropriate the police, (see when to call the police: guidance for schools and colleges) , is made IMMEDIATELY** and referrals should follow the local referral process. The MASH deals with referrals from professionals and members of the public who may have concerns about a child's welfare. The MASH makes the process of dealing with referrals quicker and more effective by improving the way that agencies share information.
- If the DSL decides to make a referral it is important that as much information as possible is provided to enable any assessment to consider all available evidence and enable a contextual approach to address such harm. The DSL should use the Thresholds and Pathways document when making a referral.
- **Safeguarding Referrals must be made in the following way:**
  - By telephone contact to the **MASH**: **0300 126 3000 – North Northamptonshire or 0300 126 7000 West Northamptonshire** followed up by completion of the online referral form (if requested by the MASH)
  - In an emergency outside office hours, by contacting the Emergency Duty Team on: **01604 626938** or the Police on 999.
  - **If a child is in immediate danger at any time, left alone or missing, the police should be contacted directly and/or an ambulance using 999.**
  - **For referrals regarding allegations against adults in education contact the local authority Designated Officers (LADO) – *see below***
- All LADO referrals need to be completed via the online referral form. The online form can be found via this link Referral Form The online referral will be uploaded by MASH to a confidential database. Academies should be able to download a copy for their records and will receive an automated response, with date and time stamp, with reference number for audit trail purposes.
- If LADO consultation is required in respect of threshold prior to submission of a referral, the consultation form on the NSCP website should be used and sent to LADOConsultations@NCTrust.co.uk – LADO will contact the sender with next steps.
- If there is a need to speak to a LADO, an e-mail should be sent to LADOConsultations@NCTrust.co.uk in the first instance, using the consultation process set out above, and the sender will be contacted.
- If a phone conversation is required, currently the Designated Officer for North Northamptonshire is Sheila Kempster and she can be contacted on 07831 123193 and the Designated Officer for West Northamptonshire, is Andy Smith and he can be contacted on 07850 854309.
- If phoning, the LADO service requests that they are contacted on Monday – Friday between 14:00 – 17:00. If unable to get through, a message should be left and they will get back to the caller as soon as they can.
- Within one working day of a referral being made, a local authority social worker should acknowledge its receipt to the referrer and make a decision about the next steps and the type of response that is required. This will include determining whether:
  - the child requires immediate protection and urgent action is required
  - any services are required by the child and family and what type of services
  - the child is in need and should be assessed under section 17 of the Children Act 1989 (see below)
  - 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 of the Children Act 1989 (see below), and
  - further specialist assessments are required to help the local authority to decide what further action to take.
- The referrer should follow up if this information is not forthcoming.
- If social workers decide to carry out a statutory assessment, staff should do everything they can to support that assessment (supported by the DSL (or DDSL) as required).

- If, after a referral, the child's situation does not appear to be improving, the referrer should consider following local escalation procedures to ensure their concerns have been addressed and, most importantly, that the child's situation improves (see Section 4.8).

4.6.3 Outcomes of a Referral

MASH can advise on whether a family needs an early help assessment or whether they meet the threshold for statutory child protection.

Statutory Child Protection

- ***Children in Need:***
  - A child in need is defined under the *Children Act 1989* as "a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled". The local authority is required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the *Children Act 1989*.
  - Chapter 3 Section 2 of *Working Together To Safeguard Children 2023* provides details of the assessment process.
- ***Children suffering or likely to suffer significant harm:***
  - Local authorities, with the help of other organisations as appropriate, have a duty to make enquiries under section 47 of the *Children Act 1989* if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment. This includes all forms of abuse neglect, and exploitation.
  - The DSL should refer all cases of suspected abuse or neglect to the Multi Agency Safeguarding Hub (MASH), police (cases where a crime may have been committed) and to the Channel programme where there is a radicalisation concern.
  - Chapter 3 Section 3 of *Working Together To Safeguard Children 2023* provides details of the assessment process.

Co-ordinated Early Help – carrying out an Early Help Assessment

- If early help has been advised, the DSL (or DDSL) will generally lead on liaising with other agencies and setting up an inter-agency early help assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Further guidance on effective assessment of the need for early help can be found in *Working Together To Safeguard Children 2023*. Any such cases should be kept under constant review and consideration given to a referral to local authority children's social care for assessment for statutory services or a complex case review (*see* below) if the child's situation does not appear to be improving or is getting worse.
- Early help support is accessed online at: Early Help – Professionals | Northampton Children's Trust (nctrust.co.uk)
- For details of who an individual Academy's Early Help Co-ordinator is – *see Academy Specific Details.*

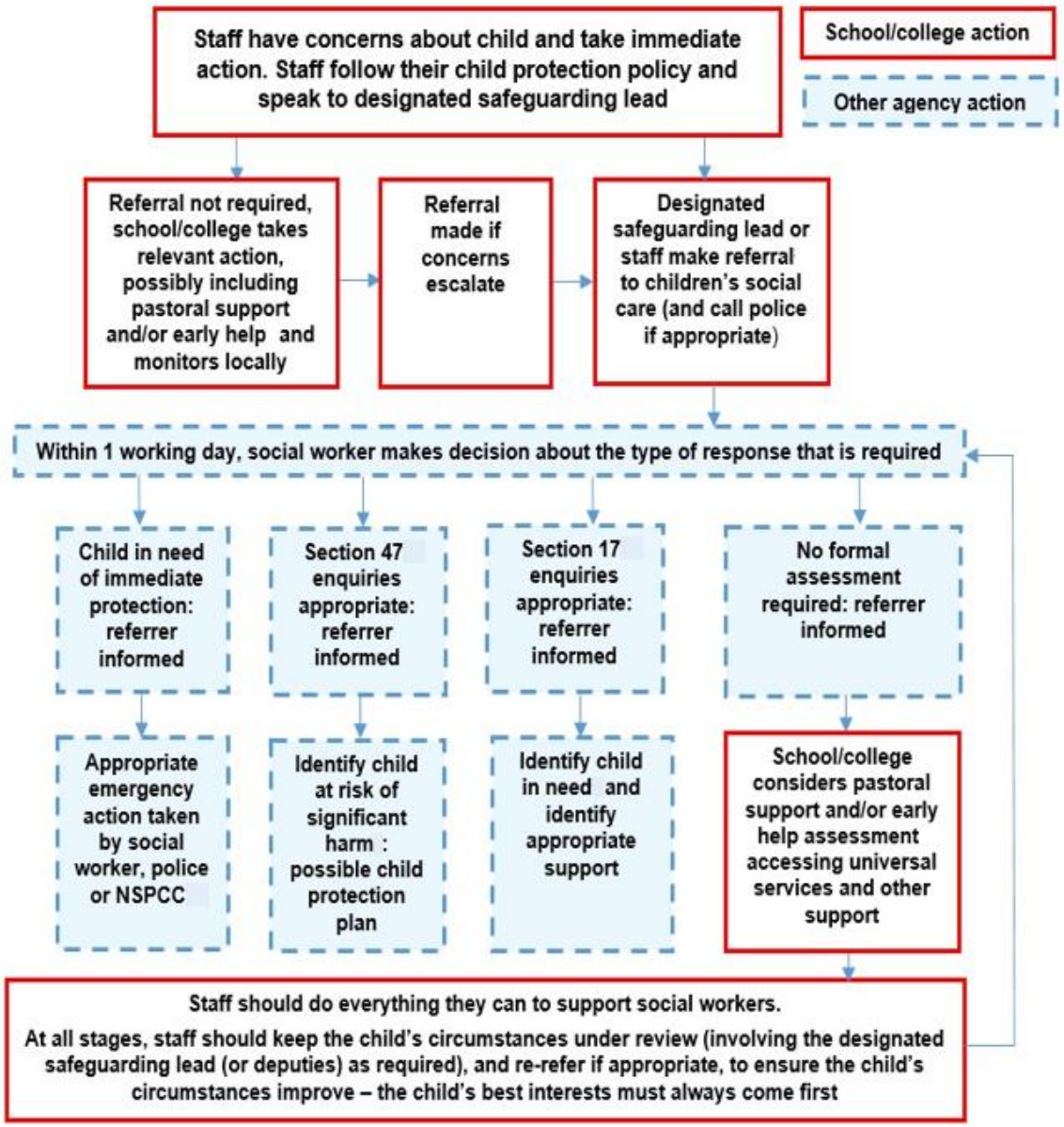
4.7 Early Help – Non-Referral

Early help is, "support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. It is not an individual service, but a system of support delivered by local authorities and their partners working together and taking collective responsibility to provide the right provision in their area" (*Working Together To Safeguard Children 2023*).

Staff should identify support for those children and families, managing any support for the child internally via the Academy's own pastoral support processes. This may be Academy-based support or may involve intervention from other agencies – Co-ordinated Early Help (see below).

ACTIONS WHERE THERE ARE CONCERNS ABOUT A CHILD

(*from Keeping Children Safe in Education 2024*)



4.8 Professional Challenge and Disagreements

Working with children and families, and in particular safeguarding and child protection work, is stressful and complex and will involve uncertainty and emotion. To ensure that the best decisions are made it may be necessary to challenge one another's practice.

The culture within the Academy enables all staff members to raise, without fear of repercussions, any concerns that they may have about the management of safeguarding and child protection within the Academy. This may include raising concerns about decisions, actions or inaction by colleagues about individual children. If necessary, staff members should speak to the DSL, DDSL, Headteacher, Chair of Governors or LADO.

Co-operation across all agencies is vital to provide the best outcomes for children and families. Professionals need to work together, using their skills and experience, to make a robust contribution to safeguarding children and promoting their welfare within the framework of discussions, meetings, conferences and case management.

If there are any professional disagreements with practitioners from other agencies the DSL (or the Headteacher) should initially raise concerns with the relevant agency manager and then follow the agreed conflict resolution or appeal procedures as laid out in Section 4 of the NSCP Procedures Manual.

Requests for Complex Case Discussion

The aim of these meetings is to provide a responsive service to families and professionals throughout Northamptonshire where a case is considered to be of a complex nature and various support has already been in place without noticeable success.

Should this situation arise, the DSL should complete an online request form detailing the risks and issues and intended outcomes from a case discussion. The family's consent for case discussion should be sought. Decisions on a way forward will be suggested by an Early Help Co-ordinator who will contact the Academy to offer advice and to agree actions.

https://northamptonshire-self.achieveservice.com/service/Request_a_complex_case_discussion

4.9 Information Sharing

Information sharing is vital in identifying and tackling all forms of abuse, neglect and exploitation, and in promoting children's welfare, including in relation to their educational outcomes. Academies have clear powers to share, hold and use information for these purposes.

The Academy recognises the importance of sharing information between practitioners and local agencies and follows statutory guidance as set out in "Information Sharing - Advice for Practitioners providing safeguarding services to children, young people, parents and carers."

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 local authority children's social care.

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

Staff should have due regard to the relevant data protection principles, which allow them to share and withhold personal information, as provided for in the Data Protection Act 2018 and the UK GDPR. This includes:

- Being confident of the processing conditions 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';
- Understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner. It would be legitimate to share information without consent where: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; and, if to gain consent would place a child at risk; and
- For academies, not providing children's personal data where the serious harm test under the legislation is met.

Where in doubt the Academy should seek legal advice from the Central Team.

The Data Protection Act 2018 and UK 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 safeguard and promote the welfare and protect the safety of children.

For details about information sharing when children leave the Academy – *see paragraph 4.11*.

4.10 Records and Monitoring

Well-kept records are essential to good child protection practice. All concerns, discussions and decisions made, and the reasons for those decisions, must be recorded on MyConcern.

Records are:

- Reviewed regularly, by the DSL and DDSLs, to check whether any action or updating is required and to monitor the impact of actions. This includes monitoring patterns of complaints or concerns about any individuals and ensuring that these are acted upon
- Kept fully up to date with all incidents, contact with the parents / carers and other professionals recorded, as well as clear evidence of regular and robust reviews having taken place between the DSL and DDSLs
- Kept securely on MyConcern, with access confined to specific staff, i.e. the DSL, the Headteacher and DDSLs**.**

Records should include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome.

If in doubt about recording requirements, staff should discuss with the DSL (or DDSL).

The DSL is responsible for receiving, actioning, maintaining and reviewing these records and for deciding at what point they should be shared with, or copied and passed over to, other agencies.

Records relating to actual or alleged abuse or neglect are stored separately and securely (in the case of children, on MyConcern) from normal pupil and staff records. Normal records have markers to show that there is sensitive material stored elsewhere. This is to protect individuals from accidental access to sensitive material by those who do not need to know.

For specific details of an individual Academy's process for recording, reviewing and monitoring – *see Academy Specific Details*.

4.11 Pupil Transfer

When children leave the Academy the DSL should ensure their child protection file is transferred, if possible, by hand, to the new school / academy as soon as possible and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained (signed and dated record). Receiving schools / academies should ensure key staff such as DSLs and SENCOs are aware as required.

A copy of the Chronology from the file must be made and securely archived on MyConcern together with the receipt of transfer.

In the event of a child moving out of area / county and a physical handover not being possible, then the confidential records are sent to the named DSL by registered post and a receipt is included for return. This receipt is always chased up and kept with the copy of the chronology. (*Northamptonshire County Council advice is to copy and retain the Child Protection record before it is transferred to the new setting*.)

Files requested by other agencies, e.g. police, are copied and shared as appropriate.

In addition to the child protection file, the DSL should also consider if it would be appropriate to share any information with the new school / academy in advance of a child leaving (e.g., information that would allow the new school / academy to continue supporting children who have had a social worker and have been victims of abuse or those who are currently receiving support through the 'Channel' programme) so they can have that support in place for when the child arrives.

(NB: In relation to academies in Northamptonshire - no archived files can currently be destroyed until county issues further information.)

4.12 Safeguarding Concerns / Allegations regarding Another Staff Member, Supply Teacher, Volunteer or Contractor

If staff have safeguarding concerns or an allegation is made about another member of staff (including supply teachers, volunteers, and contractors):

- **Harming or posing a risk of harm** to children they should follow the processes and procedures set out in the Trust's ***'Allegations / Concerns Policy in Relation to Adults'***.
- That **does not** meet the harm threshold, then this should be shared in accordance with processes and procedures set out in the Trust's ***'Allegations / Concerns Policy in Relation to Adults'***.

4.13 Staff / Pupil Relationships

All staff and volunteers should be made aware of their position of power and trust and should adhere to regulations relating to the Sexual Offences Act 2003 and to the *Staff Code of Conduct*. This also extends to the use of social media - *see Acceptable Use Policy and Staff Code of Conduct.*

4.14 Concerns about Safeguarding Practices within the Academy

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the Academy's safeguarding provision and know that such concerns will be taken seriously by the senior leadership team – also *see Trust's Whistleblowing Policy*.

Appropriate whistleblowing procedures are in place for such concerns to be raised with the Academy's senior leadership team.

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

- General advice on whistleblowing can be found at whistleblowing for employees
- The NSPCC Whistleblowing Advice Line is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by the Academy. Staff can call 0800 028 0285 – and the line is available from 08:00 to 20:00 Monday to Friday, and 09:00 to 18:00 at weekends. The email address is help@nspcc.org.uk.

5. Element 3: Support

5.1 Support for Pupils

5.1.1 A child's wishes

Where there is a safeguarding concern, the Headteacher and Academy staff should ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide to protect individual children. This will happen through ensuring there are systems in place that are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously and knowing they can safely express their views and give feedback. All systems and processes should operate with the best interests of the child at heart – *see Academy Specific Details for information in relation to individual academies systems and processes.*

5.1.2 Children who may be vulnerable

Our Trust recognises that **children who are abused** or **who witness violence** may find it difficult to develop a sense of self-worth and view the world in a positive way. For such children the Academy may be one of the few stable, secure and predictable aspects of their lives. Whilst all children should be protected, it is important to recognise that some groups of children, are potentially at greater risk of harm than others (both online and offline). We will actively seek to provide such children with the necessary support and to build their self-esteem and confidence. Support will be given within the Academy and / or help from external services should be sought.

Children under five are considered to be **extra vulnerable** because of their age.

Other children may be **vulnerable** because, for instance they:

- Have English as an additional language
- Are of a cultural heritage that may pose risk, such as from FGM, Breast Flattening or Forced Marriage
- Are refugees
- Are homeless (or at risk of becoming homeless)
- Are Looked After or Previously Looked After
- Have a disability and specific additional needs
- Have special educational needs (whether or not they have an EHCP)
- Are a young carer
- Are showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- Are frequently missing from care or from the home
- Are misusing drugs or alcohol themselves
- Are at risk of modern slavery, trafficking or exploitation
- Are in a family circumstance presenting challenges for the child such as, substance abuse, adult mental health problems or domestic abuse
- Have returned to their family from care
- Are showing early signs of abuse and / or neglect
- Are at risk of being radicalised or exploited
- Have to appear in court
- Have family members in prison
- Are being privately fostered.

Children who need a social worker (Child in Need and Child Protection Plans)

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse and / or neglect and / or exploitation and / or complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

Local authorities should share the fact a child has a social worker, and the DSL should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and academies to safeguard and promote the welfare of children.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and / or academic support, alongside action by statutory services).

Children requiring mental health support

Academies have an important role to play in supporting the mental health and wellbeing of their children. For further information on Mental Health and what to do – *see Appendix A2*.

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

Academies have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems – *see Academy Specific Details.*

A mental health lead role is not mandatory, however, it is good practice for academies to identify a staff member for the role. A mental health lead should be a member of, or supported by the senior leadership team, and could be the pastoral lead, SENCO, or DSL. Details of the Academy's mental health lead can be found in *Academy Specific Details.*

Looked after children and previously looked after children

The most common reason for children becoming looked after is as a result of abuse and / or neglect.

Appropriate staff have access to 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 the child's 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 them. The DSL should have details of the child's social worker and the name of the virtual school head in the authority that looks after the child.

A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children.

All academies must appoint a designated teacher for Looked After and Previously Looked After children and the DSL should work closely with them. For details of the Academy's designated teacher and the training they have attended – *see Academy Specific Details.*

Children absent from Education

The Trust recognises the importance of the fact that all children are entitled to full time education which is suitable to their age, ability, aptitude and any special educational needs they may have.

All staff are aware that a child being absent from education for prolonged periods and /or on repeat occasions can act as a vital warning sign to a range of safeguarding issues. This may include neglect, sexual abuse and child sexual and child criminal exploitation – particularly county lines. 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.

It is important the Academy's response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child); being absent from education may increase known safeguarding risks within the family or in the community.

Guidance on academy attendance, including information on how academies should work with local authority children's services where academy absence indicates safeguarding concerns can be found in Working together to improve school attendance.

For information regarding academies' duties regarding children missing education, including information academies **must** provide to the local authority when removing a child from the academy roll at standard and non-standard transition points – see DfE's statutory guidance: Children Missing Education.

Where a child is missing education, the DSL should follow the relevant county's procedures. Cases should be closely monitored and information reported to the Educational Inclusion Partnership Team (EIPT) and the MASH, as appropriate.

All staff are aware of the Trust's unauthorised absence and children missing from education procedures.

Where reasonably possible, the Academy should hold more than one emergency contact number for each child. This goes beyond the legal minimum and is good practice to give the Academy additional options to make contact with a responsible adult when a child missing education is also identified as a welfare and / or safeguarding concern.

Further information for academies can be found in the DfE's Working together to improve school attendance and the Trust's Attendance Policy.

Elective Home Education (EHE)

Many home educated children have a positive learning experience. It is expected that parents' decision to home educate is made with their child's best education at the heart of the decision.

However, this is not the case for all. Elective home education can mean that some children are not in receipt of suitable education and are less visible to the services that are there to keep them safe and supported in line with their needs.

Academies must inform their local authority of all deletions from their admission register when a child is taken off roll.

Where a parent / carer has expressed their intention to remove a child from the Academy with a view to educating at home, it is recommended that local authorities, the Academy, and other key professionals work together to coordinate a meeting with parents / carers where possible. This is particularly important where a child has SEND, and / or has a social worker, and / or is otherwise vulnerable.

Whilst primarily aimed at local authorities, academies should also be familiar with the DfE guidance – Elective home education.

Private Fostering

The nationally accepted definition of Private Fostering is when a child under the age of 16 (under 18 if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them, or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer.

Many Private Fostering arrangements remain unknown to the local authority. This is a cause for concern as privately fostered children and young people, without the safeguards provided by law, are a particularly vulnerable group.

There are many reasons why children and young people are privately fostered, for example:

- Parental ill health
- Children sent to this country for health care or education by parents living overseas
- Children living with a friend's family as a result of separation, divorce or arguments at home
- Children at boarding schools who do not return to their parents during holidays
- Teenagers living with the family of a boyfriend or girlfriend
- Children on holiday exchanges or living with host families for a variety of reasons
- Children brought from abroad with a view to adopt
- Children whose parents work unsocial hours
- Children whose parents are in prison
- Children whose parents are serving in the forces.

Such arrangements may come to the attention of Academy staff through the normal course of their interaction, and promotion of learning activities, with children. If so, the Academy should notify the local authority to allow the local authority to check the arrangement is suitable and safe for the child, or encourage the parent / carer to inform the MASH of the arrangement, or contact MASH themselves if they think parents / carers may not have done so already.

Children with Special Educational Needs, Disabilities (SEND) or Health Issues

Our Trust recognises that children with **special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline**. Additional barriers can exist when recognising abuse, neglect and exploitation 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 disproportionally impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content / behaviours in the Academy or the consequences of doing so.

In order to address these additional challenges, extra pastoral support and attention is considered for these children along with ensuring any appropriate support for communication is in place.

Children who are lesbian, gay, bisexual, or gender questioning

A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm. However, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are.

When supporting a gender questioning child, academies should take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents / carers (other than in the exceptionally rare circumstances where involving parents / carers would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. Academies should refer to the DfE Guidance for Schools and Colleges in relation to Gender Questioning Children, when deciding how to proceed.

Risks can be compounded where children lack trusted adults with whom they can be open. It is therefore **vital** that staff endeavour to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff.

5.1.3 Complaints

Complaints or concerns raised by children will be taken seriously and followed up in accordance with the Academy's process.

5.1.4 The use of 'reasonable force'

There are circumstances when it is appropriate for staff in academies to use reasonable force to safeguard children. For details of the Trust's policy in this respect – *see Physical Intervention Policy.*

5.2 Support for Staff

As part of their duty to safeguard and promote the welfare of children and young people staff may hear information, either from the child as part of a disclosure or from another adult that will be upsetting. Where a member of staff is distressed as a result of dealing with a Child Protection concern, they should in the first instance speak to the DSL / DDSL about the support they require, or, if they are the DSL, the Trust Safeguarding Lead. The DSL / DDSL / Trust Safeguarding Lead should seek to arrange the necessary support.

6. Element 4: Working with parents / carers

The Academy should:

- Ensure that parents / carers have an understanding of the responsibility placed on the Academy and staff for safeguarding / child protection by setting out its obligations on the Academy website and in any Academy Prospectus
- Undertake appropriate discussion with parents / carers prior to involvement with another agency or with the MASH, unless to do so would place the child at risk of harm or compromise an investigation
- Engage parents / carers in the early help agenda for the relevant local authority for the child's / parental address applying the Vulnerability Matrix and using the Signs of Safety approach, where early need is identified, and signpost families appropriately or make referrals to outside agencies using the Early Help Assessment tool.