



Safeguarding and Child Protection

Approved by:	Last reviewed on:	Next review due by:
	September 2023	September 2024 or sooner if necessary

At the CE Academy the named personnel with designated responsibility for safeguarding are:

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The named personnel with designated responsibility regarding allegations against staff are:

James Thomas	Headteacher	01604 239734 jthomas@ce-academy.org
Chair of Governors (in the event of an allegation made against the headteacher)	Julie Swales	01604 239734

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1. Aim of Policy

The CE Academy recognises our statutory responsibility to safeguard and promote the welfare of all pupils. We will endeavour to provide a safe and welcoming environment where children are respected and valued. We will be alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice.

Safeguarding is everyone's responsibility. We recognise that our school is part of a wider safeguarding system and work closely with the Northamptonshire Safeguarding Children Partnership and other agencies to promote the welfare of children. We maintain an attitude of 'it could happen here' and will consider the wishes of, and at all times, what is in the best interests of each child.

We understand that children can be abused by adults or by other children. We are committed to creating a culture of safety, that minimises the opportunity for any form of abuse (including all forms of child on child abuse) through training, education and robust response procedures.¹

The aim of this policy is to:

- promote safeguarding and child protection and to provide information about how we work to keep children safe;
- ensure that all staff are aware of and clearly understand their statutory safeguarding responsibilities;
- provide all members of staff with the information required to meet their safeguarding duty and protect children from harm;
- provide stakeholders with clear information relating to the school's safeguarding and child protection procedures; and to
- ensure that we are protecting children from maltreatment or harm.

2. Scope

This policy applies to all staff, including governors, volunteers and trustees working in or on behalf of the CE Academy. All references in this document to 'staff' or 'members of staff' should be interpreted as relating to the aforementioned unless otherwise stated.

3. Definitions

Safeguarding and promoting the welfare of children is defined in Keeping Children Safe in Education (KCSIE) 2023 as:

- protecting children from maltreatment;
- preventing impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

¹ For full details about how we work to prevent and respond to child on child abuse, please see Appendix B.

For the purposes of this policy, the term ‘safeguarding’ refers to everything that the school does to keep children safe and promote their welfare, including (but not limited to):

- Supporting pupils’ health, safety and well-being, including their mental health.
- Meeting the needs of children with special educational needs and/or disabilities.
- Meeting the needs of children with medical conditions.
- Providing first aid.
- Educational visits.
- Emotional wellbeing.
- Online safety and associated issues.
- Appropriate arrangements to ensure school security, taking into account the local context.
- Keeping children safe from risks, harm and exploitation.
- Child protection.

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

Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. It can be perpetrated by an adult or adults known or unknown to a child, or a child or children known or unknown to the child. It can happen in person or online. Where abuse is perpetrated by another child, it is known as ‘child on child’ abuse.

Neglect is a form of abuse and is the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development².

Child on child abuse refers to the abuse of a child or children perpetrated by another child or children. Abuse in intimate relationships between children is sometimes known as ‘teenage relationship abuse’. Child on child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as sexting or youth produced sexual imagery);

² See Appendix C for more information about abuse and neglect.

- upskirting, which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Children includes everyone under the age of 18.

Within this policy:

- ‘Parent’ refers to birth parents and other adults in a parenting role for example adoptive parents, stepparents and foster carers.
- ‘Staff’ or ‘members of staff’ refers to all staff working in or on behalf of the CE Academy.
- Keeping Children Safe in Education (2023) may be abbreviated to ‘KCSIE’.

4. Legislation and statutory guidance

The school adheres to all relevant safeguarding legislation, statutory guidance and guidance from the Northamptonshire Safeguarding Children Partnership. This includes:

Statutory Guidance

- Keeping Children Safe in Education (2023)
- Working Together to Safeguard Children (2018)
- Multi-agency statutory guidance on female genital mutilation (July 2020)
- Filtering and Monitoring Standards (DfE March 2023)

Legislation

- The Children Act 1989 and The Children Act 2004
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015
- The Rehabilitation of Offenders Act 1974
- Safeguarding Vulnerable Groups Act 2006
- Counter-Terrorism and Security Act 2015 (and the Prevent Duty guidance)
- The Education Act 2002
- The School Staffing (England) Regulations 2009
- The Equality Act (2010)

Guidance from the Northamptonshire Safeguarding Children Partnership (NSCP) can be found here: <http://www.northamptonshirescb.org.uk/>.

The school also has regard to non-statutory guidance relating to safeguarding, including:

- What to do if you are worried a child is being abused (2015)
- Guidance for safer working practice for those working with children and young people in education settings (Feb 2022)
- Sexual violence and sexual harassment between children in schools and colleges (2021)

This policy links with other school policies and procedures, including:

- Behaviour management policy
- Code of conduct for staff
- Concern/complaints procedure
- Health and safety policy
- Attendance policy
- Digital and online safety policy
- Equal opportunities policy
- Health and Safety
- First aid and accident/incident procedure
- Whistle blowing policy
- Off-site activities and visits
- Anti-bullying policy
- Dealing with allegations of abuse against staff
- Preventing extremism and radicalisation policy

Our public health emergency (COVID-19) procedures can be found at Appendix A.

5. Equality Statement

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

Please see Section 11 for further details about how we work to support children with special educational needs and disabilities (SEND).

6. Confidentiality and Information Sharing

Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. Schools and colleges have clear powers to share, hold and use information for these purposes. The General Data Protection Regulation (GDPR) does not prevent, or limit, the sharing of information for the purposes of keeping children safe. Lawful and secure information sharing between schools, Children's Social Care, and other local agencies, is essential for keeping children safe and ensuring they get the support they need.

The school adheres to the Data Protection Act (2018) and the General Data Protection Regulation (2018). Please see the Data Protection Policy for more information.

6.1 Sharing information with parents

The CE Academy will ensure the Safeguarding and Child Protection Policy is available publicly via the academy website <https://www.ce-academy.org/> under 'Safeguarding'.

Where appropriate, we will discuss any concerns about a child with the child's parents.

If we believe that notifying the parents would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so (see Section 6.2 for more details).

6.2 Consent

The Data Protection Act 2018 introduced 'safeguarding' as a reason to be able to process sensitive, personal information, even without consent (DPA, Part 2, 18; Schedule 8, 4). All relevant information can be shared without consent if to gain consent would place a child at risk. Fears about sharing information must not be allowed to stand in the way of promoting the welfare and protecting the safety of children. All professionals responsible for children should not assume that someone else will pass on information that they think may be critical to keeping a child safe.

As with all data sharing, appropriate organisational and technical safeguards are in place and will be adhered to when processing safeguarding and child protection information.

All staff in school will be made aware of their duties in relation to Data Protection and safeguarding, particularly in respect of confidentiality. This includes the following:

- Staff should never promise a child that they will not tell anyone about an allegation, as this may not be in the child's best interests.
- Staff who receive information about children and their families in the course of their work should share that information only within appropriate professional contexts.
- Timely information sharing is essential to effective safeguarding.
- Information must only be shared on a 'need-to-know' basis, but consent is not required to share information if a child is suffering, or at risk of, serious harm.³

7. Roles and responsibilities

7.1 Governing body

The Governing body has a strategic leadership responsibility for safeguarding arrangements at The CE Academy. The governing body will appoint a Governor Safeguarding Lead to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the Designated Safeguarding Lead (DSL).

The Governor Safeguarding Lead for The CE Academy is Claire Smith.

Governors will ensure that there are mechanisms in place to assist staff in understanding and discharging their statutory safeguarding roles and responsibilities. Governors will ensure that the school is working with local safeguarding partners and that the school contributes to multi-agency working, adhering to Working Together to Safeguard Children (2018). All governors will read KCSIE (2023) and a record will be kept of this.

³ See Working Together to Safeguard Children (2018), pages 18-22 for more information.

Part 2 of KCSIE (2023) sets out the responsibilities of governing bodies and the governors at the CE Academy will adhere to this guidance at all times. As part of these responsibilities the governors will;

- ensure that they comply with their duties under statutory guidance and legislation;
- work to facilitate a whole school approach to safeguarding, by ensuring that safeguarding and child protection underpin all relevant aspects of policy and process;
- ensure that policies, procedure and training at The CE Academy are effective and comply with the law at all times and that they allow concerns to be responded to in a timely manner;
- ensure that safeguarding training for staff, including online safety training, is integrated, aligned and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning;
- ensure that the academy takes into account local criteria for action and protocol for assessment and supply information as requested by the three safeguarding partners, (these are a team of key professionals from three sectors: the local authority; the integrated care board and the chief officer of police for any area that falls under the local authority);
- ensure that the CE Academy has an effective child protection policy, which is published on the school website and will review this annually;
- ensure that the academy has systems in place to allow children to raise concerns, which are well-promoted, well-understood and easily accessible;
- ensure that the academy takes safeguarding concerns seriously and takes the wishes and feelings of children into account;
- ensure that there are systems in place for young people to safely express their views and give feedback on safeguarding practice;
- ensure that the CE Academy has a suitable behaviour policy for pupils and a Code of Conduct for staff;
- ensure that all staff undergo safeguarding and child protection training on induction;
- consider a whole-school approach to online safety, including the use of mobile technology in school;
- ensure that there are clear systems and processes in place for identifying when children may be experiencing mental health problems;
- ensure that children are taught about safeguarding, including online safety. See section 10.6 and Appendix F of this policy for further information;
- ensure that an appropriate safeguarding response for children who go missing from education is in place;
- appoint an appropriate member of staff from the senior leadership team to the role of Designated Safeguarding Lead;
- ensure that appropriate filters and monitoring systems are in place and regularly reviewed to keep children safe online. This includes:
 - *making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training;*
 - *reviewing the DFE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards.*

- ensure that there are appropriate procedures in place to manage safeguarding concerns, or allegations against staff; and
- respond to allegations of abuse against the Headteacher. The Chair of Governors will act as the 'case manager' in the event that an allegation of abuse is made against the head teacher, where appropriate (see Appendix E).

7.2 The Headteacher

The Headteacher is responsible for the implementation of this policy. The Headteacher will:

- ensure that this policy is reviewed annually and ratified by the governing body;
- ensure that this policy and associated procedures are adhered to by all staff and take action as necessary if not;
- ensure that staff (including temporary staff) and volunteers are informed of the systems that support safeguarding, including this policy, as part of their induction.
- ensure that all staff are made aware of the named governor for safeguarding and the Designated Safeguarding Lead;
- ensure that the role of 'Designated Safeguarding Lead' is explicit in the role-holder's job description, that they have appropriate time, funding, training and resources and that there is always adequate cover if the DSL is absent;
- decide whether to have one or more deputy safeguarding leads and ensure they are trained to the same standard as the Designated Safeguarding Lead;
- organise appropriate cover for the role of Designated Safeguarding Lead for any out of hours/out of term activities;
- appoint a 'Designated Teacher for Looked After and Previously Looked After Children' to promote the educational achievement of children looked after and previously looked after;
- appoint a lead for online safety including responsibility for filtering and monitoring systems;
- make sure that online safety training is included in staff safeguarding and child protection training;
- oversee the safe use of technology, mobile phones and cameras in the setting;
- ensure that all recruitment follows the safer recruitment guidance (see Part 3 of KCSIE) and a single, central record is maintained with details of all members of staff who are in contact with children;
- respond to allegations of abuse against all other members of staff and act as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate;
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required;
- ensure that the CE Academy works with social care, the police, health services and other services to; promote the welfare of children; provide a co-ordinated offer of early help when need is identified; contribute to inter-agency plans for children subject to children protection plans and to protect children from harm;

- safeguard children’s wellbeing and maintain public trust in the teaching profession as part of their professional duties (Teaching Standards, 2012);
- ensure that children’s social care (from the host local authority or placing authority) have access to the CE Academy to conduct, or to consider whether to conduct a section 47 or section 17 assessment, as per Keeping Children Safe in Education (September 2023).

7.3 The Designated Safeguarding Lead (DSL)

The full responsibilities of the DSL are set out in Annex C, KCSIE (2023).

The DSL is a member of the Senior Leadership Team. Our DSL is Lou Bridger, Deputy Head. The DSL takes lead responsibility for child protection and wider safeguarding, including online safety and filtering and monitoring systems and will work closely with the ICT Manager to maintain effective technical systems.

Our safeguarding team also includes five deputy Designated Safeguarding Leads:

- Claire Smith – Safeguarding Manager
- Ellie Matthews - Safeguarding Officer
- James Thomas – Headteacher
- Adrian Davy – Deputy Headteacher
- Hayley Singlehurst-Mooney – Senior Mental Health Lead

The DSL and/or deputy DSLs are always available during term time. The CE Academy ensure appropriate cover arrangements for contact are made for out of hours/out of term.

Any deputies will be trained to the same standard as the Designated Safeguarding Lead.

Whilst the activities of the Designated Safeguarding Lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the Designated Safeguarding Lead; this lead responsibility should not be delegated.

The Designated Safeguarding Lead and deputies will;

- act as a source of support and expertise on matters relating to safeguarding and child protection to ensure that other members of staff can carry out their safeguarding duty;
- advise on the response to safeguarding concerns;
- liaise with the Local Authority and work with other agencies in line with ‘Working Together to Safeguard Children (2018);
- identify if children may benefit from early help;
- refer suspected cases, as appropriate, to the relevant body (local authority children’s social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly;
- make referrals to the Channel programme where there is a radicalisation concern and/or support staff that make a referral to Channel;
- support the school with regards to their responsibilities under the Prevent duty, make sure that staff have appropriate Prevent training and induction, and provide advice and support on protecting children from radicalisation;
- refer cases to the police where a crime may have been committed;
- be available during school hours for staff to discuss any safeguarding concerns.

- undertake training to equip them with the skills to carry out the role and update this every two years;
- ensure all staff have read and understood Part 1 and Annex B of Keeping Children Safe in Education (September 2023);
- update their knowledge and skills regularly and keep up with any developments relevant to their role;
- provide staff in school with the knowledge, skills and support required to safeguard children;
- ensure safeguarding and child protection concerns are recorded accurately and in a timely manner;
- ensure safeguarding files are transferred to the receiving establishment when a child leaves the CE Academy;
- attend or ensure an appropriate representative attends multi-agency safeguarding or child protection meetings;
- work closely with other relevant education professionals (e.g. SENCO, Virtual School Head) to ensure children with additional vulnerabilities are safeguarded;
- help to promote educational outcomes of children who have experienced or are experiencing safeguarding or child protection issues by sharing relevant information with staff;
- promote a 'culture of safeguarding', in which every member of the academy community acts in the best interests of the child;
- regularly meet with the safeguarding link governor to review safeguarding at the academy; and
- liaise with the Headteacher regarding safeguarding cases, issues and police investigations and be aware of the requirement for children to have an Appropriate Adult.

Contact details for the DSL and deputies can be found at the beginning of this policy.

7.4 All staff

Staff play a particularly important role because they are in a position to identify concerns in order to provide help for children. 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 nor recognise their experiences as harmful. They may feel embarrassed, humiliated or are being threatened. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. All staff:

- have a responsibility to provide a safe environment, where children can learn;
- will endeavour to build trusted relationships with children which facilitate effective communication;
- will recognise that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way;
- will be trained so that they know what to do if a child tells them that he/she is being abused or neglected, including specific issues such as Female Genital Mutilation, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals;

- will be able to identify indicators of abuse and neglect;
- will be made aware of systems in the academy that support safeguarding and child protection;
- will be made aware of reporting mechanisms for safeguarding and technical concerns;
- will be made aware of safeguarding issues that put children at risk of harm and behaviours associated with these risks;
- should ensure that they know what to do if a child makes a disclosure of abuse and never promise confidentiality when a child makes a disclosure;
- will be made aware of and should be clear on the academy's policy and procedures with regards to child on child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it;
- will be made aware of the early help process and understand their role in it;
- should be prepared to identify children who may benefit from early help and will discuss early help requirements with the DSL and/or deputies;
- may be required to support social workers and other agencies following a referral;
- will be made aware of the process for making referrals to Children's Social Care through the Multi Agency Safeguarding Hub (MASH), understand statutory assessments and the role that they may be expected to play in such assessments;
- should be prepared to make referrals to MASH if they have concerns about a child's welfare and understand the role that they may be expected to play in such assessments;
- will receive regularly updated safeguarding and child protection training to cover all of the above, as well as online safety;
- will receive safeguarding updates throughout the year as part of continuous professional development;
- will be encouraged to contribute to the development of safeguarding policy and practice;
- should always seek advice from the DSL or deputies if they are unsure; and
- should safeguard children's wellbeing and maintain public trust as part of their professional duties.

All staff will be made aware of our systems and documents that support safeguarding, including this policy, the staff code of conduct, the role and identity of the Designated Safeguarding Lead (DSL) and any deputies, the behaviour policy and the safeguarding response to children who go missing from education.

All staff who work at the CE Academy will be provided with a copy of, and must sign to say they have read, understood and will follow Part 1 and Annex B of Keeping Children Safe in Education annually and will receive training on their safeguarding roles and responsibilities and any updates on an annual basis.

Although there are extensive mechanisms in place to support staff understanding in relation to safeguarding and child protection, there is an expectation that if staff are unclear on any aspects of our safeguarding policy or practice, they speak to the Designated Safeguarding Lead without delay, so that additional training can be put in place.

8. Recognising Abuse: Training

The school is committed to continuous professional development and all staff undergo rigorous and ongoing safeguarding training. We strive to ensure that staff fully understand their safeguarding responsibilities, that training promotes a culture of safeguarding and equips staff with the skills to identify any signs of abuse, neglect or harm.

8.1 All staff

All staff:

- will undertake safeguarding and child protection training at induction (including online safety and whistle-blowing procedures) to ensure they understand the school's safeguarding systems, their responsibilities and can identify signs of possible abuse or neglect. This will include how to report and record concerns. This training will be regularly updated and will be in line with advice from the three safeguarding partners. Volunteers will receive appropriate training, as applicable;
- will have training on the government's anti-radicalisation strategy Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas;
- will also receive regular safeguarding and child protection updates (for example, through emails, e-bulletins and staff meetings) as required, but at least annually;
- will receive training to ensure that they can manage behaviour effectively to ensure a good and safe educational environment and they should have a clear understanding of the needs of all pupils.

8.2 The DSL and Deputy DSLs

- The DSL and Deputy DSLs will undertake child protection and safeguarding training at least every 2 years.
- In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).
- They will also undertake Prevent awareness training and online safety training.

8.3 Governors

- All governors will receive safeguarding training, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.
- As the chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Headteacher, they should receive training in managing allegations for this purpose.

8.4 Recruitment – interview panels

At least one person conducting any interview for a post at the CE Academy will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, KCSIE (2023), and will be in line with local safeguarding procedures.

8.5 Specific safeguarding issues

Staff will also receive specific training on the following issues and action will be taken if the school suspects that a child is at risk of or is the victim of:

- physical abuse;
- sexual abuse;
- child sexual exploitation;
- emotional abuse;
- neglect;
- child criminal exploitation (including involvement in county lines);
- domestic abuse;
- fabricated or induced illness;
- faith-based abuse;
- female genital mutilation;
- forced marriage;
- gangs or youth violence;
- gender-based violence;
- hate;
- online safety;
- child on child abuse;
- radicalisation;
- relationship abuse;
- serious violence;
- sexual violence or sexual harassment (including child on child abuse);
- sexting or sharing of youth produced sexual imagery;
- so-called 'honour-based' abuse;
- trafficking and modern slavery.

All staff will be made aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff will be expected to consider whether children are at risk of abuse or exploitation in situations outside their families (extra-familial harm). Extra familiar harms can include sexual harassment and domestic abuse in their own intimate relationships (teenage relationships).

Staff will also be made aware of the additional safeguarding vulnerabilities of children:

- in the court system;
- Missing or absent from education;
- with family members in prison;
- who are homeless;
- who have or have had a social worker;
- who are young carers;
- looked after or previously looked after; and
- with mental health problems.

9. Recognising and responding to abuse: How to take action

If a member of staff, parent or member of the public is concerned about a pupil's welfare, they should report it to the DSL or a deputy DSL as soon as possible. In the unlikely event that either the DSL or any of the deputy DSL's are unavailable, individuals with any concerns should consider taking advice from children's social care through MASH. The MASH team can be contacted on 0300 1267000.

Although any member of staff can make a referral to children's social care, where possible there should be a conversation with the DSL or a deputy DSL. All staff must follow the procedures set out below in the event of a safeguarding issue.

All staff will be alert to indicators of abuse (including child on child abuse) and will report any of the following to the DSL and/or a deputy DSL immediately:

- any concern or suspicion that a child has sustained an injury outside what is reasonably attributable to normal play;
- any concerning behaviours exhibited by children that may indicate that they have been harmed or are at risk of harm, including unusual changes in mood or behaviour, concerning use of language and/or concerning drawings or stories;
- any significant changes in attendance or punctuality;
- any significant changes in a child's presentation;
- any indicators that a child may be experiencing child on child abuse;
- any concerns relating to people who may pose a risk of harm to a child; and/or
- any disclosures of abuse that children have made.

More information about our approach to child on child abuse (including sexual violence and sexual harassment) can be found at Appendix B.

The following procedures are in line with statutory guidance (see Section 4) and the Northamptonshire Safeguarding Children Partnership's Threshold Guidance (2022)⁴. Referral procedures can be found in section 9.5.

9.1 If a child discloses that they are suffering or at risk of suffering abuse

If a child discloses that he or she has been abused in some way, the member of staff/ volunteer will:

- 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, but do 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;
- reassure him or her that what has happened is not his or her fault;
- stress that it was the right thing to tell;
- listen, only asking questions when necessary to clarify;
- not criticise the alleged perpetrator;

⁴ <https://www.nctrust.co.uk/help-and-protection-for-children/Documents/NSCB%20Thresholds%20Guidance.pdf>

- explain what has to be done next and who has to be told;
- make a written record (see Record Keeping); and
- pass the information verbally to the DSL and/or deputy DSL without delay who will inform them of the next course of action including who will submit a referral to children’s social care and/or who will contact the police.
- record referrals, actions and outcomes on the CE digital safeguarding system, Edaware. See 9.6 Figure 2.

All staff will reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment, nor should a victim ever be made to feel ashamed for making a report.

The term ‘victim’ is a widely and recognized term but not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. Staff should be conscious of this when managing any incident and be prepared to use any term with which the individual child is most comfortable.

Staff should also be mindful when using the term ‘perpetrator’ as in some cases abusive behaviour will have been harmful to the perpetrator as well. The use of appropriate terminology will be managed on a case-by-case basis.

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

If you think that a child is suffering or at risk of suffering significant harm, you must report this to the DSL and/or deputy DSL immediately.

Where possible, there should be a conversation with the DSL and/or deputy DSL but a referral must be made if a child may be suffering or at risk of suffering harm. **Anyone can make a referral to children’s social care.** If anyone other than the DSL or deputy DSL makes a referral to children’s social care or to the police, they should inform the DSL as soon as possible and record on Edaware.

9.3 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

Figure 1 on page 20 illustrates the procedure to follow if you have any concerns about a child’s welfare. All concerns must be verbally communicated to a member of the Senior Leadership Team (SLT). All members of the Senior Leadership Team have received Designated Safeguarding Training and are either the DSL or a deputy DSL.

The member of SLT will decide on the most appropriate course of action and whether the concerns should be referred to children’s social care, using the [Northamptonshire Thresholds Guidance](#). If it is decided to make a referral to children’s social care the parent will be informed, unless to do so would place the child at further risk or undermine the collection of evidence. See Section 6.1 for more details.

All concerns, discussions and decisions will be recorded in writing on Edaware.

Guidance will be provided on the appropriate action. Options can include:

- managing any support for the child internally;
- seeking advice from the local early help co-ordinator;
- an Early Help Assessment;
- a referral for statutory services where the child is or might be in need or suffering or likely to suffer significant harm;

- a referral to a specialised external agency;
- a referral to the CE occupational therapist; and/or
- a shared approach with parents.

9.4 Early help

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.⁵ If early help is appropriate, the DSL and/or the Safeguarding Manager, who is also a deputy DSL, will advise about liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

All staff will be made aware of the early help process, and understand their role in identifying emerging problems, sharing information with other professionals to support early identification and assessment of a child's needs. It is important for children to receive the right help at the right time to address risks and prevent issues escalating. This also includes staff monitoring and reviewing the situation and feeding back to the DSL and/or deputy DSL any ongoing/escalating concerns so that consideration can be given to a referral to children's social care if the child's situation does not appear to be improving.

Timelines of interventions will be monitored and reviewed.

We recognise that any child can be the victim of abuse and may benefit from early help. However, we will be particularly vigilant to potential need for early help if a child:

- is disabled or has certain health conditions and has specific additional needs;
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- has a mental health need;
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from care or from home;
- is at risk of modern slavery, trafficking, sexual or criminal exploitation;
- is at risk of being radicalised or exploited;
- has a family member in prison, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves;
- has returned home to their family from care;
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
- is a privately fostered child; and
- is persistently absent from education, including persistent absences for part of the school day.

⁵ For more information about Early Help, please see: <https://www.nctrust.co.uk/help-and-protection-for-children/protecting-children-information-for-professionals/Pages/early-help.aspx>

9.5 Referrals

If it is appropriate to refer the case to local authority children's social care through MASH or the police, the DSL and/or deputy DSL will make the referral or support staff to do so. If a member of staff makes a referral directly (see Section 9), they must tell the DSL and/or deputy DSL as soon as possible. Children's social care assessments should consider where children are being harmed in contexts outside the home, so The CE Academy will provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm.

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

If the child's situation does not seem to be improving after the referral, the DSL, deputy DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.⁶

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

- By contacting the Multi-Agency Safeguarding Hub (MASH) by telephone on: **0300 126 7000 (Option 1)**.
- Follow up any telephone referrals in writing by using the online referral form found at: **[MASH ONLINE REFERRAL](#)**⁷
- **In an emergency outside office hours**, contact children's social care out of hours team on 01604 626938 or the Police⁸
- If a child is in **immediate danger** at any time, left alone or missing, you should contact the police directly and/or an ambulance using **999**.

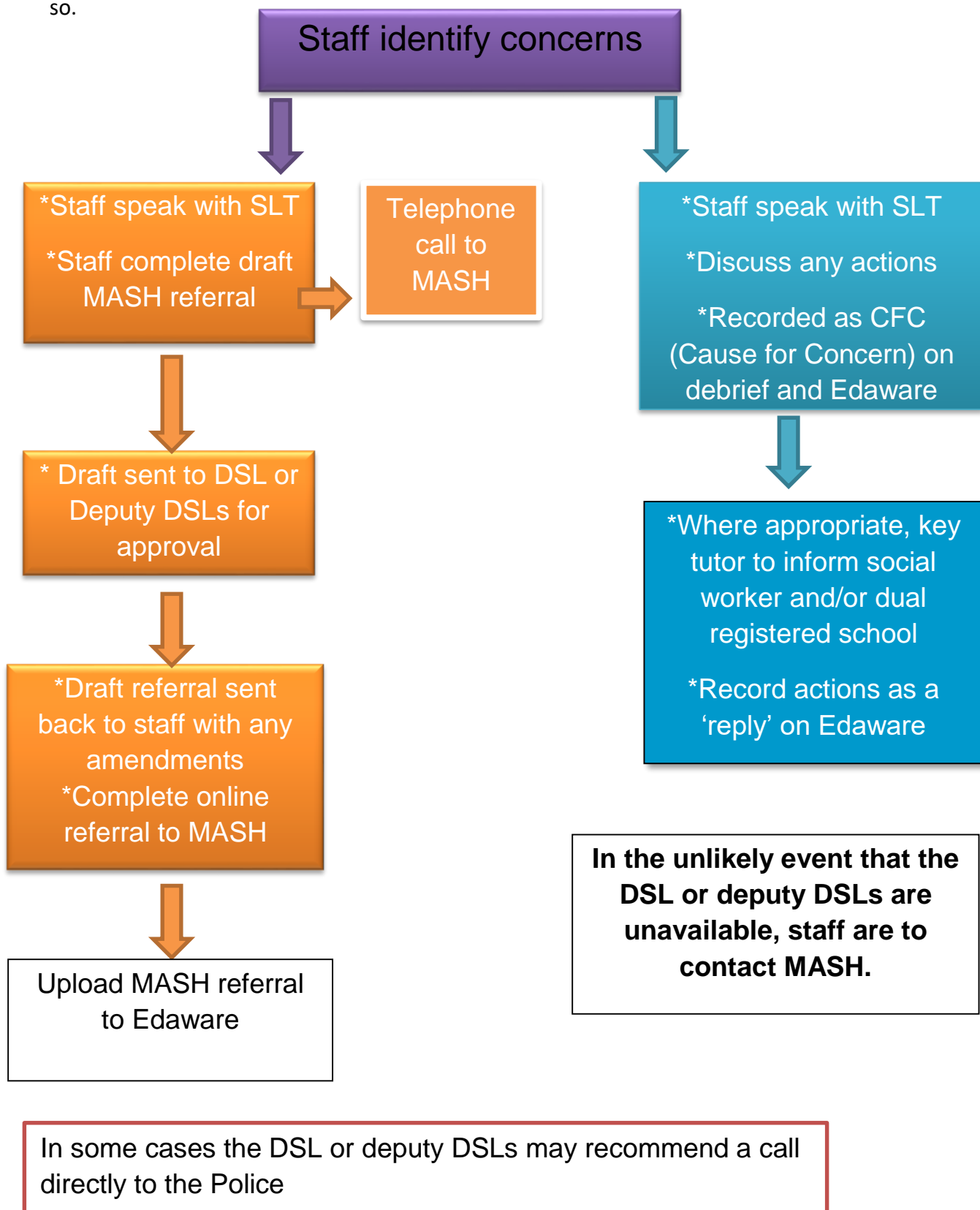
⁶ The NSCP Case and Conflict Resolution Protocol can be found here: <http://www.northamptonshirescb.org.uk/schools/case-conflict-resolution-protocol/>

⁷ <https://www.nctrust.co.uk/Pages/home.aspx>

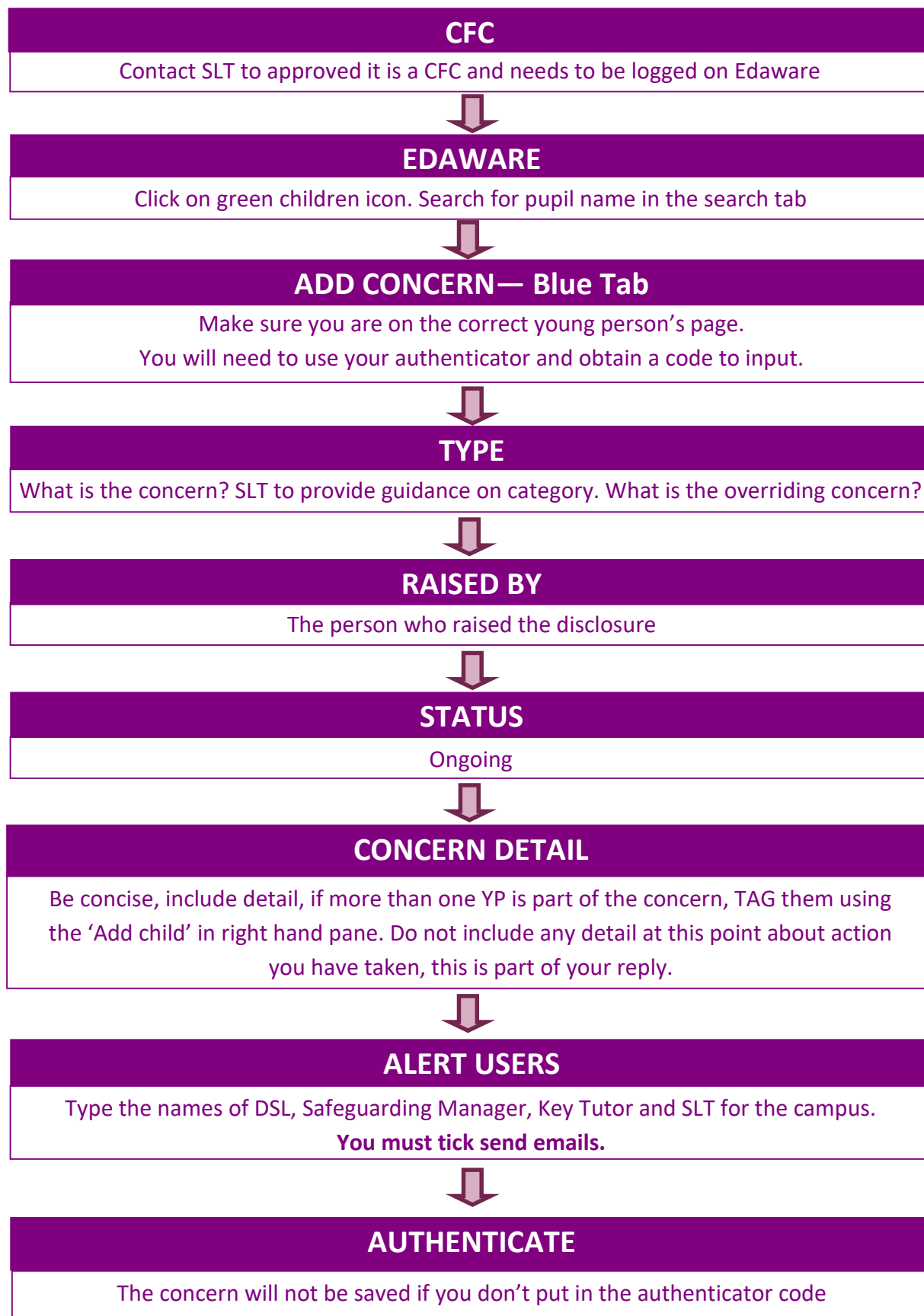
⁸ The Designated Safeguarding Lead may make use of the NPCC guidance '[When to call the police](#)'.

9.6 Figure 1: Reporting and responding to concerns guidance

If a child is suffering or likely to suffer from harm, or in immediate danger inform the DSL or deputy DSLs immediately. If it is appropriate to refer the case to the Multi-Agency Safeguarding Hub (MASH) or the police, the DSL will make the referral or support you in doing so.



9.6 Figure 2 How to log concerns on Edaware



10. Specific safeguarding issues

For more information relating to specific safeguarding issues, please see Appendix C. For more information about child on child abuse, please see Appendix B.

10.1 Female Genital Mutilation (FGM)

Any teacher who discovers that an act of FGM appears to have been carried out on a pupil under 18 must immediately report this to the police, personally. This is a mandatory duty, and teachers will face disciplinary sanctions for failing to meet it. Unless they have good reason not to, they should also discuss the case with the DSL and/or deputy DSL and involve children's social care as appropriate. Any other member of staff who discovers that an act of FGM appears to have been carried out on a pupil under 18 must speak to the DSL and/or deputy DSL and follow local safeguarding procedures.

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

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

10.2 Radicalisation and extremism

All schools are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 in the exercise of their functions to have "due regard" to the need to prevent people from being drawn into terrorism. In the event that concerns are raised relating to radicalisation and extremism, the DSL and/or deputy DSL should be informed immediately.

10.3 Children potentially at greater risk of harm

The academy recognises that some children need a social worker due to abuse, neglect or family circumstances and that abuse and trauma can leave children vulnerable to further harm, as well as educational disadvantage.

The CE Academy will hold information relating to social workers working with CE pupils. This information will inform decisions about safeguarding and promoting welfare (including the provision of pastoral and/or academic support).

We will also take action to promote the educational outcomes of and to protect;

- children missing education or who have been absent from education for prolonged periods;
- children missing from home or care.

There are other familial issues that can have a detrimental impact on children. We work with other agencies in line with Keeping Children Safe in Education (2023) to support children and families in the following circumstances:

- children facing the court procedures and/or children in the court system;
- children with family members in prison;
- children who are homeless;
- children who need a social worker.

10.4 Mental health

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.

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child they must discuss this with the DSL and the Senior Mental Health Lead to agree the next course of action. We will respond to the concern, inform and discuss our concerns with parents/carers and seek ways to support the child in and out of school.

The Senior Mental Health Lead for the CE Academy is:

Hayley Singlehurst-Mooney hsinglehurst-mooney@ce-academy.org

If staff have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in Section 9.

If staff have a mental health concern that is not also a safeguarding concern, speak to the DSL and/or deputy DSL to agree a course of action.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health concern. However, the CE Academy will provide information and signposting services to children and parents. This may include support in contacting a GP, a referral to CAMHS or other external mental health organisations. The CE Academy is also committed to the teaching of emotional health and wellbeing to children in our curriculum.

Further information can be found in the Department for Education guidance on [mental health and behaviour in schools](#)⁹.

10.5 Child on child abuse

The CE Academy takes all reports and concerns about child on child abuse, including child on child sexual violence and harassment, very seriously. This includes any reports or concerns that have occurred outside of the academy, or online.

In order to ensure that our policy on child on child abuse is well-promoted, easily understood and accessible, we have included information about our approach to minimising and responding to child on child abuse as an appendix. Full details of how the school prevents, responds to and supports victims of child on child abuse can be found at Appendix B.

10.6 Online safety

Our Digital and Online Safety Policy is set out in a separate document and more information can be found in Appendix F of this policy. We ensure that we have effective mechanisms to identify, intervene in, and escalate any incident where appropriate. We ensure we have effective filtering and monitoring systems in place to safeguard both pupils and staff from potentially harmful and inappropriate online material. Online safety is included in our curriculum at all levels and information is also provided to parents/carers.

⁹ <https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2>

All staff are made aware of the school policy on digital and online safety which sets our expectations relating to:

- creating a safer online environment – including training requirements, filters and monitoring;
- giving everyone the skills, knowledge and understanding to help children and young people stay safe on-line;
- inspiring safe and responsible use and behaviour;
- safe use of mobile phones both within school and on school 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 must read the Digital and Online Safety Policy in conjunction with our Code of Conduct in relation to personal online behaviour.

Pupil mobile phones

- Pupils are not permitted to use their mobile phones during the school day.
- At KS4 campuses, on arrival 'phones should be put in the 'phone locker and will not be taken out until the end of their school day. At KS3, pupils should hand in their 'phones to staff.
- Recharging 'phone lockers are available for young people at KS4.
- Young people can be contacted during the day through the campus secretary. This is for urgent/emergency messages only.
- If needed for medical reasons mobile phones can be kept in the secretary's office for ease of access.

Our mobile phone policies can be found in Appendix G.

11. Pupils with special educational needs and disabilities (SEND)

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

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- these children being more prone to peer group isolation or bullying than other children;
- the potential for pupils with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs;
- communication barriers and difficulties in overcoming these barriers; and/or
- cognitive understanding – being unable to understand the difference between fact and fiction in online consent and then repeating the content/behaviours in school or the consequences of doing so.

12. Pupils with a social worker and those that have previously needed a social worker

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health. We work with the local authority to ensure that we are providing effective support for this group of children.

All members of staff at the academy will work with and support social workers to help protect vulnerable children.

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

- responding to unauthorised absence or missing education where there are known safeguarding risks; and
- the provision of pastoral and/or academic support.

13. Looked after and previously looked after children

We will ensure that staff have the skills, knowledge and understanding to keep looked after children and previously looked after children safe. In particular, we will ensure that:

- The CE Academy has an appointed designated teacher who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).¹⁰

Our designated teacher is Gary Morton.

- The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.
- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements. The designated teacher has details of children's social workers and relevant virtual school heads.

As part of their role, the designated teacher will:

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

¹⁰ <https://www.gov.uk/government/publications/designated-teacher-for-looked-after-children>

14. Record keeping

All safeguarding concerns, discussions and decisions made and the reasons for those decisions must be recorded in writing on the digital safeguarding system, Edaware. All staff at the CE Academy have access to Edaware and are trained in the use of this recording system. If in doubt about recording requirements staff should discuss this with the DSL and/or deputy DSL.

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

- record in writing, as soon as possible after the conversation;
- not destroy the original notes in case they are needed by a court;
- record the date, time, place and any noticeable non-verbal behaviour and the words used by the child;
- indicate the position of any injuries if relevant on the body map found on Edaware; and
- record statements and observations rather than interpretations or assumptions.

All records need to be digitally recorded and uploaded onto Edaware. No copies should be retained by the member of staff or volunteer.

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

Records will include:

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

Confidential information and records will be held securely on Edaware and only available to those who have a right or professional need to see them. We will hold records in line with our records retention schedule.

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

Appendix D sets out our policy on recruitment and checks.

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

15. Relationships, sex and health education (RSHE)

Promoting safeguarding and welfare in the curriculum

The CE Academy is committed to equipping pupils with the skills and knowledge needed to enable them to make informed decisions about their wellbeing, health and relationships in order to keep themselves safe. The CE Academy offers a curriculum that provides pupils with knowledge, skills and understanding to prepare them to play a full and active part in society in modern Britain. We take a whole school approach to RSHE which complements and is supported by our ethos, pastoral support, other curriculum subjects and policies (including online safety) and our approach to developing pupils socially, morally, spiritually and culturally. At the CE Academy we give specific thought to the particular needs and vulnerabilities of our pupils.

Our RSHE planned programme tackles issues such as:

- Healthy and respectful relationships
- Boundaries and consent
- Stereotyping, prejudice and equality
- Body confidence and self esteem
- How to recognize an abusive relationship
- Sexual harassment and sexual violence
- Laws relating to sexual consent, abuse, grooming, coercion among others.

The Relationships, Sex and Health Education Policy and the Acceptable Use of the Internet and Online Safety Policy can be found on the CE website under 'Policies and Procedures'.

16. Safer working practice

We work to create and embed a culture of openness, trust and transparency, in which the academy's values and expected behaviour (as set out in the staff code of conduct) are constantly lived, monitored and reinforced by all staff.

We expect all staff to act with professionalism at all times. To reduce the risk of unsafe or harmful practice, all staff should receive training on safer working practice and should be familiar with the guidance contained in the staff handbook and the code of conduct for staff and Safer Recruitment Consortium document [Guidance for safer working practice for those working with children and young people in education settings \(Feb 2022\)](#).¹¹

Governors and senior leaders will ensure that this policy is adhered to by:

- ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others through effective training;
- empowering staff to share any low-level safeguarding concerns;
- addressing unprofessional behaviour and supporting the individual to correct it at an early stage; and
- providing a responsive, sensitive and proportionate handling of such concerns when they are raised.

Governors will help to identify any weakness in the academy's safeguarding system.

Staff are expected to adhere to the staff Code of Conduct at all times. In the event of any concerns or allegations, the school will deal with them promptly, in line with local guidance and KCSIE (2022).

¹¹ <https://www.saferrecruitmentconsortium.org/>

16.1 Staff use of mobile phones

Staff should not see or hear pupil mobile phones, so it is difficult to expect pupils to put their phones away if staff do not. Staff are allowed to bring their personal phones to school, but should keep them in the office, workroom or lockers. There is no problem checking them at lunchtimes. Smart watches should be put in flight mode during the school day.

Staff should not use personal mobiles to contact young people or use their phones or cameras to take pictures or make recordings of pupils.

All campuses have mobile phones for staff use. The secretaries at campus sites keep the school mobile phones charged so they are ready to use when anyone goes off site.

Staff must not have their work emails downloaded to their personal email accounts on personal devices, eg mobile phones.

17. Safeguarding concerns and allegations made about members of staff, including volunteers and contractors

17.1 Concerns or allegations that may meet the harms threshold

In the event that there is an allegation of abuse or concerns raised against a member of staff, working in or on behalf of The CE Academy we will adhere to Part 4, Section 1 of KCSIE (2023) and Northamptonshire Safeguarding Children Partnership guidance. See Appendix E for more details.

Concerns or allegations that may indicate that a person would pose a risk of harm if they continue to work in their present position or in any capacity with children in a school or college include:

- staff having behaved in a way that has harmed a child, or may have harmed a child;
- staff possibly committing a criminal offence against or related to a child;
- staff behaving towards a child or children in a way that indicates they may not be suitable to work with children; and/or
- staff behaving or possibly behaving in a way that indicates they may not be suitable to work with children.

This includes behaviour or incidents that have occurred both in and outside of the academy.

Allegations against the Headteacher

If an allegation is made against the Headteacher, it must be reported to, the Chair of Governors. Contact details can be found at the front of this policy.

Allegations against staff

If a concern or allegation of abuse arises against any member of staff or volunteer other than the Headteacher, it must be reported to the Headteacher without delay. This includes volunteers and anyone working in or on behalf of the school, whether paid or unpaid. Allegations of abuse against staff must be reported to the Headteacher or Chair of Governors as appropriate and not discussed directly with the person involved.

The Headteacher or Chair of Governors should consider if the concern or allegation meets the threshold for Designated Officer (formally known as the LADO) intervention.

Information about the Designated Officer and contact details can be found on:

www.northamptonshirescb.org.uk/schools/referrals-eha/designatedofficer

Allegations against staff relating to a position of trust issue will be referred to the Designated Officer at the local authority within 24 hours. If a child has suffered or may have suffered abuse or harm, a MASH referral will also be made and the police will be contacted if necessary.

If you receive an allegation relating to an incident where an individual or organization was using the school premises for running an activity for children, follow our school safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

A referral to the Disclosure and Barring Service will be made if a member of staff is dismissed or removed from their post as a result of safeguarding concerns, or would have been removed if they had not have resigned.

In all concluded cases, whether an allegation is substantiated or unfounded, false, malicious or unsubstantiated, the Headteacher and the Designated Officer (if they have been involved) will review the case and determine whether any lessons can be learned or if improvements can be made.

17.2 Safeguarding concerns that do not meet the harm threshold (low level concerns)

In the event that there is a safeguarding concern about a member of staff, we will adhere to guidance outlined in Part 4, Section 2 of KCSIE (2023) and Northamptonshire Safeguarding Children Partnership guidance.

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

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the Designated Officer

Low level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the academy; or as a result of vetting checks undertaken.

It is essential that low level concerns are reported. Such behaviours can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse. We will act quickly, proportionately and appropriately in the event of a low level concern, to prevent abuse or harm of a child and to promote a culture of safeguarding. Dealing with low level concerns also protects those working in or on behalf of the academy from potential false allegations or misunderstandings.

Staff will receive training about what may constitute a low-level concern. More information can be found in Part 4 of KCSIE (2022).

Reporting low level concerns

Low level concerns should be reported to the Headteacher.

All low-level concerns should be recorded in writing. Please see Appendix J. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible. These records will be kept securely.

The Headteacher may:

- Speak directly to the person who raised the concern (unless it has been raised anonymously).
- Speak to the individual involved and/or witnesses.
- Consult with the designated officer if there is any doubt as to whether a low-level concern meets the harm threshold.

The Headteacher will decide on an appropriate course of action, although in some cases, depending on the nature of the low-level concern, the headteacher may consult with the DSL and take a more collaborative decision making approach. All decisions will be recorded.

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. In the event that patterns and/or wider cultural issues within the academy are identified, the senior leadership team will either:

We will retain low level concerns information for at least as long as the person is employed by the CE Academy.

18. Complaints and concerns about school safeguarding policies

18.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with low level concerns or allegations of abuse made against staff (see Section 17).

18.2 Whistleblowing

The CE Academy endeavours to foster an environment where all staff feel they are able to raise concerns about poor or unsafe practise and potential failures in the academy's safeguarding regime. Any concern should be raised with a member of the senior leadership team or the chair of governors. All concerns will be taken seriously and investigated.

Please refer to The Whistleblowing Policy found on the academy website which illustrates the framework used to allow such concerns to be raised.

19. How we safeguard pupils attending work experience placements and external provisions

Pupils at the CE Academy may have the opportunity to participate in work experience and/or external provisions as part of their individualised timetables. We will ensure that the placement provider has policies and procedures in place to protect children from harm.

Work Experience

The following will assist in keeping pupils safe while on work experience placements:

- The vocational coordinator (VC) at The CE Academy will conduct physical checks of the workplace including toilets and washing facilities, fire precautions and protective equipment before a young person starts the placement.
- The VC has attended training and is experienced in dealing with child protection and safeguarding issues.

- The VC along with other key staff is responsible for assessing and ensuring the:
 - suitability of a work experience placement for an individual student
 - suitability of an individual student for a particular placement.
- The VC will ensure there are systems in place for students and employers to report any concerns. Clear advice will be given to employers about who to contact in relation to any child protection issues that arise during a work experience placement.
- The VC and key tutor will actively monitor the student's welfare during the work experience placement.
- The VC on behalf of the academy will ensure that the employer has appropriate insurance arrangements in place.

External Provisions

The CE Academy work with a number of external agencies, who provide our young people with additional vocational and personal development opportunities.

We have a vocational coordinator (VC) in place that is responsible for the operational systems.

The following will assist in keeping pupils safe while on external provisions:

- A member of the senior leadership team will oversee vocational/external provisions and will approve such activities.
- The DSL will check that all safeguarding and child protection policies and procedures are in place at the external provision.
- The VC will ensure that all providers have up to date documentation in place, such as risk assessments, insurance etc.
- The VC will conduct visits to providers and maintain regular contact.
- The VC will ensure that all providers are aware of the systems in place to report any safeguarding concerns.
- The VC will inform the DSL and/or deputy DSL and key tutor of any such concerns and will record onto Edaware.
- The VC will ensure key tutors provide relevant up to date information about the pupil to include individual risk assessments, background information and parental consent and will pass on to providers.
- The VC will liaise with secretaries regarding attendance.

20. Policy implementation, monitoring and review

The policy will be reviewed annually by the governing body. It will be implemented through the academy's induction and training programme, and as part of day to day practice. Compliance with the policy will be monitored by the DSL and through staff performance measures.

Appendix A: Public health emergency (COVID-19) arrangements

Context

Attending face to face education or childcare is hugely important for children and young people's health and their future. As we learn to live safely with coronavirus (COVID-19), the imperative remains to reduce disruption to children and young people's education.

In England, all children and young people should now be in full-time face-to-face learning.

It is not recommended that children and young people are tested for COVID-19 unless directed to by a health professional.

If a child or young person has a positive COVID-19 test result they should try to stay at home and avoid contact with other people for 3 days after the day they took the test, if they can. After 3 days, if they feel well and do not have a high temperature, the risk of passing the infection on to others is much lower. This is because children and young people tend to be infectious to other people for less time than adults.

Children and young people who usually go to school, college or childcare and who live with someone who has a positive COVID-19 test result should continue to attend as normal.

Control measures

At the CE Academy we will continue to:

1. encourage and promote good hand hygiene for everyone;
2. encourage and promote good respiratory and cough hygiene;
3. maintain appropriate cleaning regimes and provide PPE and cleaning equipment;
4. keep occupied spaces well ventilated;
5. follow public health advice;
6. review and update risk assessments and outbreak management plan;
7. encourage staff and pupils to take up the offer of a vaccine.

Key Safeguarding Contacts

These remain the same as stated at the beginning of the Safeguarding and Child Protection Policy.

Attendance

Parents and carers are expected to contact school on the first day of illness and inform us of the reason for absence, in the usual way. If contact has not been made the CE Academy will contact the parent/carer to establish the reason for absence.

We will work collaboratively with any families who are anxious about sending their child to school to support and reassure them.

Reporting a concern

Where staff are concerned about a child who is remote learning, they should continue to follow the process outlined in the Safeguarding and Child Protection Policy. Staff are reminded of the need to report any concern to the DSL and/or deputy DSL in a timely manner and record onto Edaware.

Vulnerable Children

If any pupil at CE Academy is absent due to clinical or public health advice we will continue to keep in contact with them. Where appropriate we will:

- inform their social worker;
- inform Virtual School if they are a Looked After Child;
- inform the mainstream school if a pupil is dual registered;
- refer to any other services if additional support is required.

Online learning

Where appropriate we will support those that have tested positive for Covid 19 to work or learn from home if they are well enough to do so.

Staff at the CE Academy will:

- check if a vulnerable pupil is able to access remote education;
- support them to access it (as far as possible);
- regularly check if they are accessing remote education;
- keep in contact with them to check their wellbeing and refer onto other services if additional support is needed;
- follow up if a pupil is absent from online lessons and make contact with parents/carers.

All remote learning and any other online communication will take place in line with current CE Academy processes and procedures as outlined in the Digital and Online Safety Policy.

Please also see Appendix F for more information.

Consideration

Due to the potential changing circumstances surrounding Covid 19, this addendum will be monitored and reviewed on a regular basis, whilst being shared with all stakeholders.

Appendix B: Child on child sexual violence and sexual harassment

Child on child abuse is any abuse of a child or children that is perpetrated by another child or children. This includes all forms of sexual harassment, sexual violence and abuse. We strive to create a culture of safety at The CE Academy, where children are free from harassment or abuse of any kind.

We know that even if we do not receive any reports relating to child on child abuse, it does not mean that it is not happening. We support and encourage anyone – especially our pupils – to come forward to share any concerns about child on child abuse so that we can take action to keep all children safe.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between children, sometimes known as ‘teenage relationship abuse’;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as sexting or youth produced sexual imagery);
- upskirting, which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).¹²

All children are capable of abusing their peers and we recognise that girls are more likely to be the victims of child on child abuse and boys’ perpetrators. All child on child abuse is unacceptable and will be taken seriously.

Harmful Sexual Behaviour

Children’s sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent which may cause developmental damage. An umbrella term used in child protection is “harmful sexual behaviour” (HSB). HSB can occur online and/or face-to-face and can also occur simultaneously between the two. Both the ages and stages of development of the children are critical factors.

¹² Keeping Children Safe in Education (2023)

Staff training

All staff are made aware that children can abuse other children, that this can happen online or in person, at school or outside of school. All staff will receive training so that they can confidently recognise the indicators and signs of child on child abuse in order to identify it and respond appropriately to reports. All staff will be made aware of the academy's policy and procedures with regards to child on child abuse and the crucial role that they play in preventing it and responding to it as necessary. It will be made clear that addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

Procedures for minimising opportunities for child on child abuse

We recognise that a crucial part of our safeguarding responsibility is to minimise the opportunity for child on child abuse to occur. In order to do this, and to establish a safe environment for all children, we:

- ensure staff understand what is meant by child on child abuse;
- train staff thoroughly so that they challenge inappropriate behaviour (even if it appears to be relatively innocuous);
- train staff thoroughly so that they are confident to challenge inappropriate behaviours between children, that are actually abusive in nature;
- never downplay certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys", as this 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; and
- recognise that sexual harassment and sexual violence, as well as other forms of child on child abuse, may be happening even if they are not reported.
- ensure the DSL and deputies have a good understanding of HSB and are aware of local specialist support.

How we address child on child abuse within the curriculum and across the school

The CE Academy fulfils its statutory requirement to provide Relationships, Sex and Health Education and covers a range of topics enabling young people to learn about;

- healthy and respectful relationships;
- what respectful behaviour looks like; consent;
- stereotyping, equality;
- body confidence and self-esteem;
- prejudiced behaviour;
- how sexual violence and sexual harassment is always wrong;
- addressing cultures of sexual harassment;
- the negative impact of pornography; and
- harmful online behaviour.

We seek to incorporate topics designed to meet and reflect the specific needs of our pupils which in turn informs our planning.

An aim of this aspect of our curriculum is to prepare our young people for life beyond school in a manner that cannot be achieved within the constraints of an accredited course with GCSE objectives. As well as within the classroom the delivery of many of these topics is supported and reinforced on an informal basis throughout the school day. Many opportunities arise within lessons and unstructured times to continue discussions as a way of imparting knowledge and information sharing.

We ensure that there are a variety of ways that are easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously. At the CE Academy we:

- promote open discussions between staff and young people during social times;
- are with the young people throughout the school day including social times;
- operate a high staff/pupil ratio;
- ensure every young person has a key tutor;
- believe in the importance of forming positive relationships with pupils;
- ensure support staff are in campuses every day where possible to provide consistency; and
- adopt an open door ethos for pupils to speak with staff.

Additional Vulnerabilities

We recognise that some children may be more vulnerable to child on child abuse than others. For example, children who have already experienced abuse, those that have special educational needs or disabilities (SEND), children living in care and children who are LGBTQ+, may be more likely to face child on child abuse than other children. We recognise that girls are more likely to be the victims of child on child abuse than boys. Some children may face additional barriers to telling anyone about abuse because of their vulnerability, disability, sex, ethnicity and/or sexual orientation. We ensure all children have the same protection, regardless of any barriers they may face.

How to report concerns

If a young person witnesses or experiences any form of child on child abuse, we strongly encourage them to speak to a trusted member of staff, parent or trusted adult about it.

All victims will be taken seriously, regardless of how long it has taken them to come forward and they will be supported and kept safe. Abuse that occurs online or outside of the school will be treated equally seriously. A victim will never be given the impression that they are creating a problem by reporting child on child abuse, including sexual violence or sexual harassment. A victim will never be made to feel ashamed for making a report or have their experience minimised. Staff will not promise confidentiality as it may be in the victim's best interest to seek advice or guidance.

In the event that a pupil reports or discloses child on child abuse, we will take their report seriously, take prompt action to respond and to safeguard the child or children involved and we will ensure that we are listening to the voice of the child when deciding on the best course of action to take. We will always act in the best interests of children. Following any disclosures or reports of child on child abuse, we will review our school systems, training and policies to determine if any learning can be derived from the situation to further strengthen our approach to this issue. We will always encourage our pupils to safely express their views and give feedback on how they have been supported following a safeguarding concern.

Any member of staff that has concerns about child on child abuse should follow the procedure set out in Section 9 and must report concerns immediately.

If a child discloses to an adult outside of school, the adult should contact the Designated Safeguarding Lead without delay to report the issue.

What happens when an allegation of child on child abuse is made?

We will adhere to [Keeping Children Safe in Education \(2023\)](#) when responding to incidents of child on child abuse. The school takes child on child abuse seriously and will respond to all concerns or disclosures of child on child abuse, including those that have occurred outside of school and online, immediately.

Upon receiving a concern, report or disclosure of abuse, the Designated Safeguarding Lead and/or Deputy DSL will decide what further action is necessary.

Our starting point regarding any report of child on child sexual harassment or violence should always be that there is a zero tolerance approach, of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. It is never acceptable and it will not be tolerated. It is especially important not to pass off any sexual violence or sexual harassment as “banter”, “just having a laugh”, “part of growing up” or “boys being boys” as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

The subsequent action taken will vary depending on the type of child on child abuse and the severity of the incident/s disclosed. The Designated Safeguarding Lead and/or Deputy DSL will take contextual factors into account when managing the report.

The Designated Safeguarding Lead and/or deputies will always consider the following:

- the wishes of the victim in terms of how they want to proceed. The victims will be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered;
- the nature of the alleged incident(s), including: the level of coercion or threat, whether a crime may have been committed and consideration of harmful sexual behaviour;
- both the chronological ages and developmental stages of the children involved;
- any power imbalance between the children, including consideration of the age of children and whether children have special educational needs or disabilities;
- the impact on the victim;
- that sexual violence and sexual harassment can take place in intimate personal relationships between peers (teenage relationship abuse);
- if the alleged incident is a one-off or a sustained pattern of abuse;
- if there are ongoing risks to the victim, other children, or staff; and
- other related issues and wider context, such as links to child criminal or child sexual exploitation.

Depending on the nature of the incident/s, the Designated Safeguarding Lead and/or deputies may:

- seek further information from those involved and witnesses;
- undertake a risk assessment and needs assessment to ascertain steps necessary to safeguard the victim, alleged perpetrator, adults and other children.;
- decide to manage the concern internally;

- organise a meeting with relevant staff and agencies to assess risk and agree a safety plan;
- refer the victim and/or the perpetrator to local services for Early Help;
- refer the case to Children's Services via a MASH referral;
- liaise with social workers working with children involved (if applicable);
- make a report to the police;
- liaise with specialist services.

In the event of a disclosure of child on child sexual violence, we will make an immediate risk and needs assessment. The risk and needs assessment will consider:

- the victim, especially their protection and support;
- whether there may have been other victims;
- the alleged perpetrator(s);
- support for any potential witnesses and
- all the other children, (and, if appropriate staff) at the academy, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

More information about these options in relation to sexual violence and sexual harassment can be found in Part 5 of KCSIE (2023).

Recording procedures

Incidents of child on child abuse will be recorded on Edaware along with the actions taken and the outcome. Any referrals to other agencies in relation to the incident will also be uploaded. Such incidents will also be shared in writing with Governors through regular safeguarding updates provided by the DSL.

Pupil risk assessments will be generated or updated, whichever is applicable and held on Google Drive and shared with all staff. Please see Appendix H - pupil risk assessment process.

Members of staff will follow the procedures for recording a disclosure as outlined in Section 9 of this policy.

How we support victims of child on child abuse

The academy recognises that child on child abuse has a significant impact on young people and victims are likely to need ongoing support. Children who are victims of sexual violence and sexual harassment wherever it happens, will likely find the experience stressful and distressing. Appropriate support will be put in place for victims of child on child abuse whilst investigation is taking place and following the initial response. This may include involving external specialist agencies. Support will continue for as long as it is needed and will be reviewed regularly to ensure the victim is receiving appropriate care. The academy will do everything we can to maintain the victim's normal routine but changes to timetables may be appropriate and in the best interest of the victim. Any changes will be done in discussion with the pupil and parents/carers. We will do everything we can to protect the victim from further bullying, harassment or abuse as a result of their disclosure.

Staff will do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment.

How we will support alleged perpetrators and perpetrators of child on child abuse

We have a responsibility to safeguard and support all children. We will adhere to KCSIE (2022) when managing reports of child on child abuse and decide on action and support on a case by case basis.

The school has a responsibility to ensure that an alleged perpetrator continues to receive a suitable education.

We recognise that children who perpetrate child on child abuse may be being abused themselves. The school will continue to safeguard the alleged perpetrator and provide them with support.

A plan to reduce the risk posed by the alleged perpetrator will be put in place as part of the risk assessment made following the alleged abuse. This may involve timetabling changes. The Designated Safeguarding Lead will take advice from children's social care, specialist services and the police as necessary.

If the alleged perpetrator moves to another setting, the Designated Safeguarding Lead will share information as necessary to safeguard the individual and other children at the new setting.

Parents/Carers

Parents will be informed of incidents unless sharing information puts a child at greater risk of harm. Children will always be encouraged to speak to parents about child on child abuse unless it puts them at greater risk of harm.

Whole school response

Incidents of child on child abuse will be recorded and reviewed in order to look for potential patterns of concerning, problematic or inappropriate behaviour. Where a pattern is identified, we will take appropriate action. Consideration will be given to whether there are wider cultural issues that enabled the inappropriate behaviour to occur and in order to minimise it happening again, we may:

- dedicate more teaching time to a particular issue or topic;
- deliver additional staff training;
- review and update relevant policies if appropriate.

Appendix C: Types of abuse

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment on others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by adults or by another child or children. Abuse, including neglect, and other safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

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

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

Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

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

The activities may involve:

- physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing;
- non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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

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

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment

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

Children missing or absent from education

A child going missing from education or absent for prolonged periods, particularly repeatedly, can be a vital warning sign of a range of safeguarding issues. These might include neglect, child sexual and child criminal exploitation, particularly county lines or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

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

- are at risk of harm or neglect;
- are at risk of forced marriage or FGM;
- come from Gypsy, Roma, or Traveller families;
- come from the families of service personnel;
- go missing or run away from home or care;
- are supervised by the youth justice system;
- cease to attend a school;
- come from new migrant families.

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

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

If a pupil is absent from school, we will contact the parent or carer on the first day of absence and continue to make every effort to locate the pupil. This will involve further telephone calls and home visits. We will also liaise with any external agencies (social care, health etc) who are involved with the child/family.

If all attempts have been made to locate a child and they have not been seen in 10 days we will complete an online Child missing from education form, notifying the local authority.

[See link to NNC/WNC procedures for Children Missing Education¹³](#)

Please see Appendix I for our attendance monitoring procedure and refer to our Attendance Policy which can be found on the CE website.

¹³ <https://www.northamptonshire.gov.uk/councilservices/children-families-education/schools-and-education/information-for-school-staff/pupil-support-and-inclusion/attendance-and-behaviour/Pages/children.aspx>

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

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

Child criminal exploitation

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

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines (see below), working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same; however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Indicators of CCE can include a child:

- appearing with unexplained gifts or new possessions;
- associating with other young people involved in exploitation;
- suffering from changes in emotional wellbeing;
- misusing drugs and alcohol;
- going missing for periods of time or regularly coming home late;
- regularly missing school or education;
- not taking part in education.

If a member of staff suspects CCE, they will discuss this with the DSL and/or deputy DSL who will advise the next course of action. This will likely involve a referral to the Multi-Agency Safeguarding Hub (MASH) and the police, if appropriate.

County Lines

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

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Serious violence

Signs that a child is at risk from, or involved with serious violent crime include:

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

There are a range of risk factors which increase the likelihood of involvement in serious violence, such as

- being male;
- having been frequently absent or permanently excluded from school; and/or
- having experienced child maltreatment and having been involved in offending, such as theft or robbery.

If a member of staff suspects a child is involved in or at risk of serious violent crime, they will discuss this with the DSL and/or deputy DSL. The DSL will trigger the local safeguarding procedures, including a referral to MASH and the police, if appropriate.

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited, eg they believe they are in a genuine romantic relationship.

Children and young people often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL and/or deputy DSL. The DSL will trigger the local safeguarding procedures, including a referral to MASH and the police, if appropriate.

Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

In the event that anyone has concerns about child abduction or community safety incidents, they should speak to the DSL or deputy DSL immediately.

Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer).

Cyber-dependent crimes include;

- unauthorised access to computers (illegal 'hacking');
- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If we have concerns about a child and possible risk of being drawn into cybercrime, the DSL (or a deputy) will consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. We may also refer to MASH if we think a child is suffering or is at risk of suffering harm.

Domestic abuse

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

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

Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.

Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour resistance and escape and regulating their everyday behaviour.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Children who witness domestic abuse are also victims.

Older children may also experience domestic abuse and/or violence in their own personal relationships and can be victims and perpetrators. See Appendix B: Child on child abuse for more details.

At the CE Academy we are working in partnership with North Northamptonshire Council and West Northamptonshire Council and Northamptonshire Police to identify and provide appropriate support to pupils who have experienced domestic abuse in their household; nationally this scheme is called Operation Encompass. In order to achieve this, North Northamptonshire Council and West Northamptonshire Council will share police information with the DSL of all domestic incidents where one of our pupils has been affected. On receipt of any information, the DSL will decide on the appropriate support the child requires, this could be silent or overt.

All information sharing and resulting actions will be undertaken in accordance with the '[NSCP Protocol for Domestic Abuse – Notifications to Schools](#)'. We will record this information on Edaware.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL and deputies will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL and/or deputies will also make a referral to children's social care.

So-called ‘honour-based’ or ‘faith/belief based’ abuse (including female genital mutilation and forced marriage)

So-called ‘honour-based’ abuse (HBA) or ‘faith/belief based’ abuse encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL and/or deputy DSL, who will activate local safeguarding procedures.

We are aware of the ‘one chance’ rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

Female Genital Mutilation (FGM)

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 10 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

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

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

- the girl’s family having a history of practicing FGM (this is the biggest risk factor to consider);
- FGM being known to be practiced in the girl’s community or country of origin;
- a parent or family member expressing concern that FGM may be carried out;
- a family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues;

- a girl:
 - Having a mother, older sibling or cousin who has undergone FGM
 - Having limited level of integration within UK society
 - Confiding to a professional that she is to have a “special procedure” or to attend a special occasion to “become a woman”
 - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period
 - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
 - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
 - Being unexpectedly absent from school
 - Attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

Staff will receive training around forced marriage and the presenting symptoms. If a member of staff suspects that a pupil is being forced into marriage, they must discuss concerns with the DSL and/or deputy DSL.

Possible next course of action include:

- speak to the young person;
- refer the case to MASH;
- report to the Police;
- seek advice from the Forced Marriage Unit on 020 7008 0151 or fm@fco.gov.uk;
- refer the pupil to external support agencies.

Private Fostering

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

A close family relative is defined as a ‘grandparent, brother, sister, uncle or aunt’ and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

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

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

Staff should notify the DSL and/or deputy DSL when they become aware of private fostering arrangements. A member of staff will speak to the family of the child involved to check that they are aware of their duty to inform the local authority. The school itself has a duty to inform the local authority of the private fostering arrangements.

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

Preventing radicalisation

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

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

Terrorism is an action that:

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

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

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

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

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

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

Staff will be alert to changes in pupils' behaviour. The government website [Educate Against Hate](#)¹⁴ and charity [NSPCC](#)¹⁵ say that signs that a pupil is being radicalised can include:

- refusal to engage with, or becoming abusive to, peers who are different from themselves;
- becoming susceptible to conspiracy theories and feelings of persecution;
- changes in friendship groups and appearance;
- rejecting activities they used to enjoy;
- converting to a new religion;
- isolating themselves from family and friends;
- talking as if from a scripted speech;
- an unwillingness or inability to discuss their views;
- a sudden disrespectful attitude towards others;
- increased levels of anger;
- increased secretiveness, especially around internet use;
- expressions of sympathy for extremist ideologies and groups, or justification of their actions;
- accessing extremist material online, including on Facebook, Tik Tok and X (formerly Twitter);
- possessing extremist literature;
- being in contact with extremist recruiters and joining, or seeking to join, extremist organisations.

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

If staff are concerned about a pupil, they will follow our procedures set out in Section 9 of this policy, including discussing their concerns with the DSL and/or deputy DSL. Staff should always take action if they are worried.

Further information on the school's measures to prevent radicalisation are set out in our Preventing Extremism and Radicalisation policy.

Fabricated or Induced Illness (FII)

The following are indicators that will alert any professional to concerns that a child is suffering, or at risk of suffering significant harm as a result of having an illness fabricated or induced by their parent/carer:

- A parent/carer reporting symptoms and observed signs that are not explained by any known medical condition;
- A parent/carer reporting to professionals that a diagnosis has been made by another professional when this is not true, and giving conflicting information to different professionals;

¹⁴ <https://educateagainsthate.com/signs-of-radicalisation/>

¹⁵ <https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/protecting-children-from-radicalisation/>

- Missed appointments especially if the appointments are not leading in the desired direction for the parent/carer;
- Physical examination and results of investigations that do not explain symptoms or signs reported by the parent/carer;
- The child having an inexplicably poor response to prescribed medication or other treatment, or intolerance of treatment;
- Acute symptoms that are exclusively observed by/in the presence of the parent/carer;
- On resolution of the child's presenting problems, the parent/carer reporting new symptoms or reporting symptoms in different children in sequence;
- The child's daily life and activities being limited beyond what is expected due to any disorder from which the child is known to suffer, for example, partial or no school attendance and the use of seemingly unnecessary special aids;
- Objective evidence of fabrication - for example, the history of events given by different observers appearing to be in conflict or being biologically implausible (such as small infants with a history of very large blood losses who do not become anaemic, or infants with large negative fluid balance who do not lose weight); test results such as toxicology studies or blood typing; evidence of fabrication or induction from covert video surveillance (CVS);
- The parent/carer expressing concern that they are under suspicion of FII, or relatives raising concerns about FII;
- The parent/carer seeking multiple opinions inappropriately.

There may be a number of explanations for these circumstances and each requires thorough and thoughtful review.

A characteristic of FII in the child is a discrepancy between the findings of the professional and signs and symptoms reported and/or observed. In diagnosed organic illness the professional may observe a lack of usual response to proven effective treatment (ie a child who suffers from asthma). It is this puzzling disparity that alerts the professional to the potential for harm to the child particularly where over time the child is repeatedly presented with a range of signs and symptoms or reported symptoms and found signs are not seen to begin in the absence of the parent/carer.

FII may manifest in a child in a number of ways. Fabrication of signs of illness may include false reporting of current symptoms or a fabrication of previous medical history. In addition to false reporting; falsification of letters, documentation and hospital charts and physical interference with specimens such as urine or stool samples may also be seen.

Induction of illness can be achieved by a variety of means including, but not limited to;

- administration of household substances to induce vomiting;
- salt poisoning;
- withholding or over administration of medications;
- withholding of nutrition or intentional suffocation.

FII is relatively common in children who have an existing medical diagnosis including children with disabilities and developmental difficulties. This may be in the form of exaggeration of symptoms or unexpected responses to medications or treatment. Statistics show that disabled children are at increased risk of abuse. FII can easily remain unappreciated in children who already have existing health care needs.

The needs of the child and the potential for significant harm must always be the first priority; however it is important to consider what secondary benefit the parent/carer may receive by presenting their child to services in this way. This can take many forms. It is important to note that the exaggeration or falsification of conditions, existing or otherwise, may be perpetrated in an attempt to retain or qualify for financial aid in the form of disability living allowance.

The presenting signs and symptoms need careful evaluation for a range of possible causes. Professionals must remain open minded to all possible explanations. Concerns that a child's illness may be fabricated or induced are most likely to come from health professionals. However, any professional in contact with a child may become concerned including education staff. If any member of staff suspect a case of FII they must speak with the DSL and/or deputy. It is essential that a paediatrician is involved in the assessment of FII and staff at the academy will support in gathering and sharing information with all agencies involved.

Appendix D: Safer recruitment

We adhere to Part 3 of KCSIE at all times. We consider safeguarding throughout the recruitment process, including when defining and advertising roles.

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

Pre-appointment safer recruitment

We will include the following in all job advertisements:

- our commitment to safeguarding and promoting the welfare of children;
- clear confirmation that safeguarding checks will be undertaken;
- the safeguarding responsibilities of the post as per the job description and personal specification; and
- whether the post is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020.

Where a role involves engaging in regulated activity relevant to children, we will include a statement in the application form or elsewhere in the information provided to applicants that it is an offence to apply for the role if the applicant is barred from engaging in regulated activity relevant to children.

All applicants will be provided with a link on the CE website to the academy's child protection policy and practices on employment of ex-offenders.

Applicants

We require applicants to provide:

- personal details, current and former names, current address and their national insurance number;
- details of their present (or last) employment and reason for leaving;
- full employment history, (since leaving school, including education, employment and voluntary work) including reasons for any gaps in employment;
- qualifications, the awarding body and date of award;
- details of referees/references; and
- a statement of the personal qualities and experience that the applicant believes are relevant to their suitability for the post advertised and how they meet the person specification.

We will only accept copies of curriculum vitae alongside an application form.

Shortlisting and selection

Shortlisted candidates will be asked to complete a self-declaration of their criminal record or information that would make them unsuitable to work with children. For more details of what this will contain, please see Part 3 of Keeping Children Safe in Education (2023).

At least two people will carry out shortlisting and they will explore any potential concerns, including inconsistencies and/or gaps in unemployment. This may involve an online search where any issues/incidents found on a public forum can be explored at interview. Shortlisted

candidates will be informed if an online search will be conducted as part of due diligence checks and in accordance with legislation and the law.

At least one member of the interview panel will have undertaken safer recruitment training. We will seek references on all shortlisted candidates before interview. We will scrutinise these and resolve any concerns before confirming appointments. The references requested will ask specific questions about the suitability of the applicant to work with children.

When asked to provide references, we will ensure the information confirms whether we are satisfied with the applicant's suitability to work with children and provide the facts (not opinions) of any substantiated safeguarding allegations.

New staff

When appointing new staff, we will:

- verify a candidate's identity. This includes demonstrating an awareness for the potential for individuals changing their name.
- obtain (via the applicant) an enhanced DBS check (including children's barred list information, for those who will be engaging in regulated activity with children);
- obtain a separate children's barred list check if an individual will start work in regulated activity with children before the DBS certificate is available;
- verify the candidate's mental and physical fitness to carry out their work responsibilities;
- verify the person's right to work in the UK, including EU nationals;
- If the person has lived or worked outside the UK, make any further checks the school or college consider appropriate;
- verify professional qualifications, as appropriate; and
- ensure that an applicant to be employed to carry out teaching work is not subject to a prohibition order.
- Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the Secretary of State.

Regulated activity means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

Existing staff

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

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

- We believe the individual has engaged in **relevant conduct**; or
- the individual has received a caution or conviction for a relevant offence, or

- there is reason to believe the individual has committed a listed relevant offence, under the **Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009**; or
- the 'harm test' is satisfied in respect of the individual (ie they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left.

Agency and third-party staff

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

Contractors

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

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children
- Keeping a record of their DBS number and date of the check on the Central record
- Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.
- We will check the identity of all contractors and their staff on arrival at the school.

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity.
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity.
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment.

Governors

All Governors will have the following checks:

- an enhanced DBS check without barred list information;
- an enhanced DBS check with barred list information if working in regulated activity;
- identity;
- right to work in the UK;
- other checks deemed necessary if they have lived or worked outside the UK.

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors unknown to the academy should be ready to produce identification.

Visitors are expected to sign the visitors' book and are given a visitors lanyard to wear with a visitors pass.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and the organisation sending the professional, such as the LA or educational psychology service, will provide annually written confirmation that an enhanced DBS check with barred list information has been carried out.

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views.

Appendix E: How the school responds to allegations that may meet the harms threshold

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

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

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

We will deal with any allegation of abuse against a member of staff or volunteer quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation. Our procedures for dealing with allegations will be applied with common sense and judgement.

For more information about how the school responds to low-level concerns (concerns do not meet the harms threshold) please see Section 17 of this policy.

Suspension of the accused until the case is resolved

Suspension will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative. We will seek views from the local authority designated officer/s, the police and/or Children's Social Care (as appropriate).

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

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned.
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children.
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted.
- Temporarily redeploying the individual to another role in a different location.

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation.
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive.
- **False:** there is sufficient evidence to disprove the allegation.

- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence).
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the Headteacher (or chair of governors where the Headteacher is the subject of the allegation), will be referred to as the 'case manager' and will take the following steps:

- Immediately discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police before consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police).
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies.
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate.
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details.
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation.
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or Children's Social Care services as appropriate.
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.

- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children’s social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child
- If the school is made aware that the Secretary of State has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.
- Where the police are involved, wherever possible the academy will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school’s disciplinary process, should this be required at a later point.

Timescales

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

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

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

If the individual concerned is a member of teaching staff, the case manager will discuss with the designated officer whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

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

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

Unsubstantiated or malicious allegations

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

Confidentiality

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

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

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

Record-keeping

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

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

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

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

References

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

Learning lessons

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

This will include consideration of (as applicable):

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

For referrals regarding adults in education and other information on the role of the Designated Officer (formally known as LADO) please visit:

<http://www.northamptonshirescb.org.uk/schools/referrals-eha/designated-officer/>

If it is decided that the allegation does not meet the threshold for safeguarding, it will be handed back to the Headteacher or chair of Governors for consideration via the academy's internal procedures.

Appendix F: Online Safety

Teaching pupils to stay safe online and keeping children safe online in school is a crucial part of safeguarding. It is essential that children are safeguarded from potentially harmful and inappropriate online material. We take a whole school approach to online safety to protect and educate pupils and staff in their use of technology and have mechanisms in place to identify, intervene in, and escalate any concerns where appropriate.

Our approach to online safety runs through every aspect of our work with children, including (but not limited to):

- curriculum planning and RSHE;
- teacher training;
- the role and responsibilities of the Designated Safeguarding Lead; and
- parental engagement.

This appendix complements and should be read alongside our Digital and Online Safety policy. Staff must read this policy in conjunction with our Code of Conduct in relation to personal online behaviour. All staff receive online safety training at induction which includes how to report, record and act on any concerns of a technical nature and will receive regular updates and formal training thereafter, where appropriate.

The Designated Safeguarding Lead (DSL) takes lead responsibility for online safety and will work alongside the ICT manager to maintain effective filtering and monitoring systems. The DSL attends training regularly to ensure that they understand the unique risks associated with online safety and to ensure that they are confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at the academy.

Risks to children

The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- **content:** being exposed to illegal, inappropriate or harmful 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:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (eg consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams.

We refer to these four areas of risk when planning our approach to online safety and ensuring that we are safeguarding children against a broad spectrum of potential online harms.

Filtering and monitoring

In order to keep children safe when using school IT equipment, classroom internet access is only available via an internet user account controlled by staff.

The service provider EXA Networks supplies internet access through routers and filtering services (Impero and Surf Protect designed for pupil access) in all campus sites. This will be reviewed annually.

The DSL and ICT Manager will work together to ensure we meet the needs of staff and pupils whilst keeping them safe. The ICT manager will ensure such safety mechanisms are updated regularly by conducting and recording a full security check and frequent monitoring of the academy's ICT systems. The ICT manager is aware how to identify risk and the process of escalating any concerns. Any safeguarding and child protection matters that are picked up through monitoring checks will be dealt with by the DSL. The leadership team are aware of and understand the filters and monitoring systems in place.

CE staff laptops will be subject to random checks to ensure they are being used appropriately.

Filtering and monitoring systems will be checked they are working correctly on new devices before releasing to staff and pupils.

We are mindful that "over-blocking" can lead to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding and mitigate against this by ensuring:

- Staff and pupils read, understand and sign the 'Acceptable Internet Use' Statement before being allowed access.
- Staff will select websites and online resources which will support the learning outcomes planned for pupil's age and maturity.
- Pupils will not be allowed to access public or unregulated chat rooms.

Pupil mobile phones

Many children have unlimited and unrestricted access to the internet via mobile phone networks (ie 3G, 4G and 5G). This access means some children, whilst at school sexually harass their peers via their mobile and smart technology, share indecent images: consensually and non-consensually (often via large chat groups), and view and share pornography and other harmful content. At the CE Academy pupils are not allowed to use their mobile phones during the school day. Lockable charging lockers are available for staff and pupils.

See Appendix G which illustrates the process for staff if they see or hear a pupil's mobile phone.

See Section 16 of this policy for more details about staff use of mobile phones.

Remote learning

Remote learning will only take place using the Google Suite Platform. All remote learning and any other online communication will take place in line with current CE Academy processes and procedures as outlined in the Digital and Online Safety policy and in line with confidentiality expectations outlined in the Data Protection Policy.

Any safeguarding concerns will be reported in accordance with this policy and the usual CE Academy processes and procedures will be followed. Any safeguarding concerns will be reported to the DSL and/or deputy DSL on the day.

If inappropriate language or behaviour takes place, participants involved may be removed by staff, the session may be terminated, and concerns will be reported to SLT and/or the DSL. Inappropriate online behaviour will be responded to in line with existing policies such as Digital and Online Safety, Safeguarding and Child Protection, Allegations against Staff, Anti-Bullying and Behaviour.

Sanctions for deliberate misuse may include:

- Restricting/removing use, and/or
- contacting the police if a criminal offence has been committed

How to report online safety concerns

If pupils, parents or staff have any concerns about online safety, or need to make a disclosure, they should speak to the Designated Safeguarding Lead or a deputy DSL without delay. The contact details for these members of staff can be found on the front of this policy.

Regular review of our approach to online safety

We recognise that technology, and risks and harms related to it evolve and changes rapidly.

We carry out an annual review of our approach to online safety. This is informed by local and national training and regular updates.

More information

For more information about online safety, please see Part 2 of Keeping Children Safe in Education (2023).

Artificial Intelligence (AI)

Generative Artificial Intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Bard.

CE Academy recognizes that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (eg bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

CE Academy will treat any use of AI to access harmful content or bully pupils in line with this policy and our (anti-bullying/behavior) policy.

Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being used by the school.

Appendix G: Mobile Phone Policies

Key Stage 3

- Mobile phones must not be seen or heard on site throughout the day.
- If a young person arrives at school wearing headphones it is obvious they have a phone. They will need to give in both the phone and headphones/ airpods.
- On arrival phones should be handed in and will not be returned to pupils until the end of their school day.
- Young people can be contacted during the day through the campus secretary. This is for urgent/emergency messages only.
- If a young person is seen/heard to have phones or wear headphones they will be asked to hand them in to staff. If they refuse parents/carers will be called and asked to speak to the young person.
- If the young person continues to refuse; following debrief parents/carers will be called again to update them and to request their intervention.
- If the young person refuses to put the phone away again, parents/carers and the young person will be asked to attend a meeting.
- Mobile phones without SIM cards are not acceptable on site.

Key Stage 4

- Mobile 'phones must not be seen or heard on site throughout the day.
- If a young person arrives at school wearing headphones it is obvious they have a phone. They will need to give in both their phone and headphones unless the headphone/airpods are attached to an MP3 player.
- Recharging 'phone lockers are available for young people.
- On arrival 'phones should be put in the 'phone locker and will not be taken out until the end of their school day.
- Young people can be contacted during the day through the campus secretary. This is for urgent/emergency messages only.
- If a young person is seen/heard to have 'phones or wear headphones they will be asked to put them in a locker. If they refuse parents/carers will be called and asked to talk to them.
- If the young person continues to refuse; following debrief parents/carers will be called again to update them and to request their intervention.
- If the young person refuses to put the phone away again, parents/carers and the young person will be asked to attend a meeting.
- The only headphones allowed will be attached to an MP3 player, available on eBay £6-£10. You will need to show staff the MP3 player is attached to the headphones.
- Mobile 'phones without SIM cards are not acceptable on site.

Staff guide on implementing mobile phone policy

- Mobile phones should not be seen or heard by staff throughout the day. If needed for medical reasons mobile phones can be kept in the secretary's office for ease of access.
- If you see pupils arrive with headphones/airpods they will be expected to hand in their phones and headphones/airpods unless they are attached to an MP3 player.
- There are recharging phone lockers available for young people and staff to use.
- On arrival young people will be asked to hand in/place any phones in a locker.
- If staff see or hear mobile phones on pupils they should ask politely for the phone to be put in a locker.
- If the young person refuses to give up their mobile phone, parents/ carers should be called. A phone call must be made to update parents/carers at the end of the day. If the young person refuses to put the phone away a meeting will be arranged with parents/carers and the young person to discuss.
- This policy **MUST** be applied **CONSISTENTLY** by **ALL** staff.

Appendix H: Pupil Risk Assessment Process

Individual Pupil Risk Assessments to be put in place if behaviours require **additional** support measures to keep themselves or others safe

Pupil Risk Assessments agreed in consultation with SLT at:

- Referral stage
- Debrief
- Reviews
- Campus meetings

• Completed by key tutor and **discussed and agreed with young person.**

- Uploaded to Google Drive in the shared drive – ‘CE Pupil Folders’. Each pupil has their own folder. Risk assessments to be placed under ‘Vocational’.
- Key tutor to circulate to all staff
- Office administrator to put copy in campus office file

Pupil Risk Assessments can be reviewed at:

- Debrief
- Reviews
- Campus Meetings

CHANGES

NO CHANGES

- Note review date on risk assessment on Google Drive
- State ‘no changes’

- Amend risk assessment on Google Drive
- Discuss changes with young person
- Add at the bottom - date, brief note of changes and name
- Email new risk assessment to campus staff, office administrator and vocational coordinator

- Alert office administrator that risk assessment has been reviewed
- Office administrator to print and replace in pupil file and campus office file

- Office administrator to print a copy and put in pupil file and campus office file

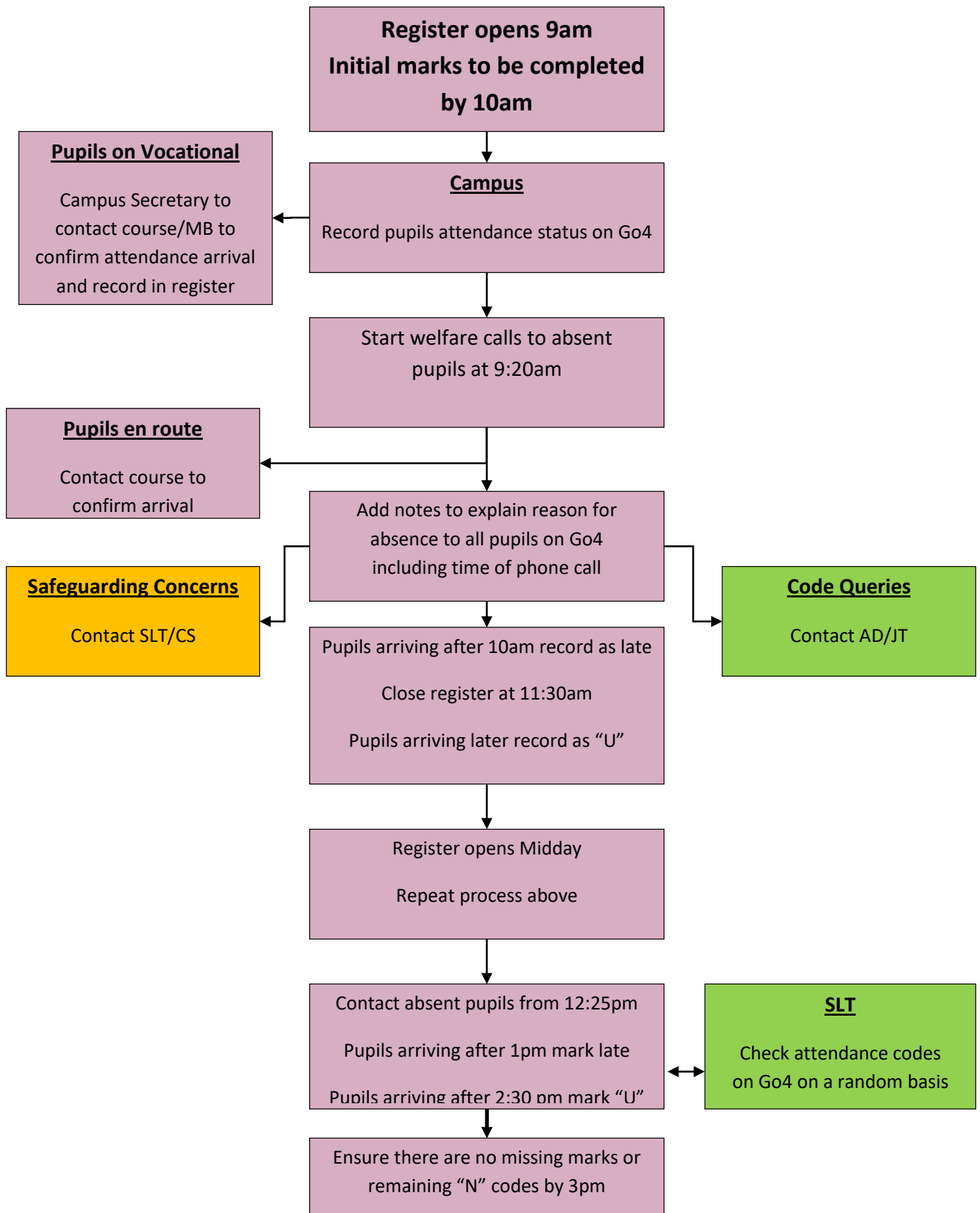
- Vocational coordinator to alert internal/ external provision of amended risk assessment

Monitored via:

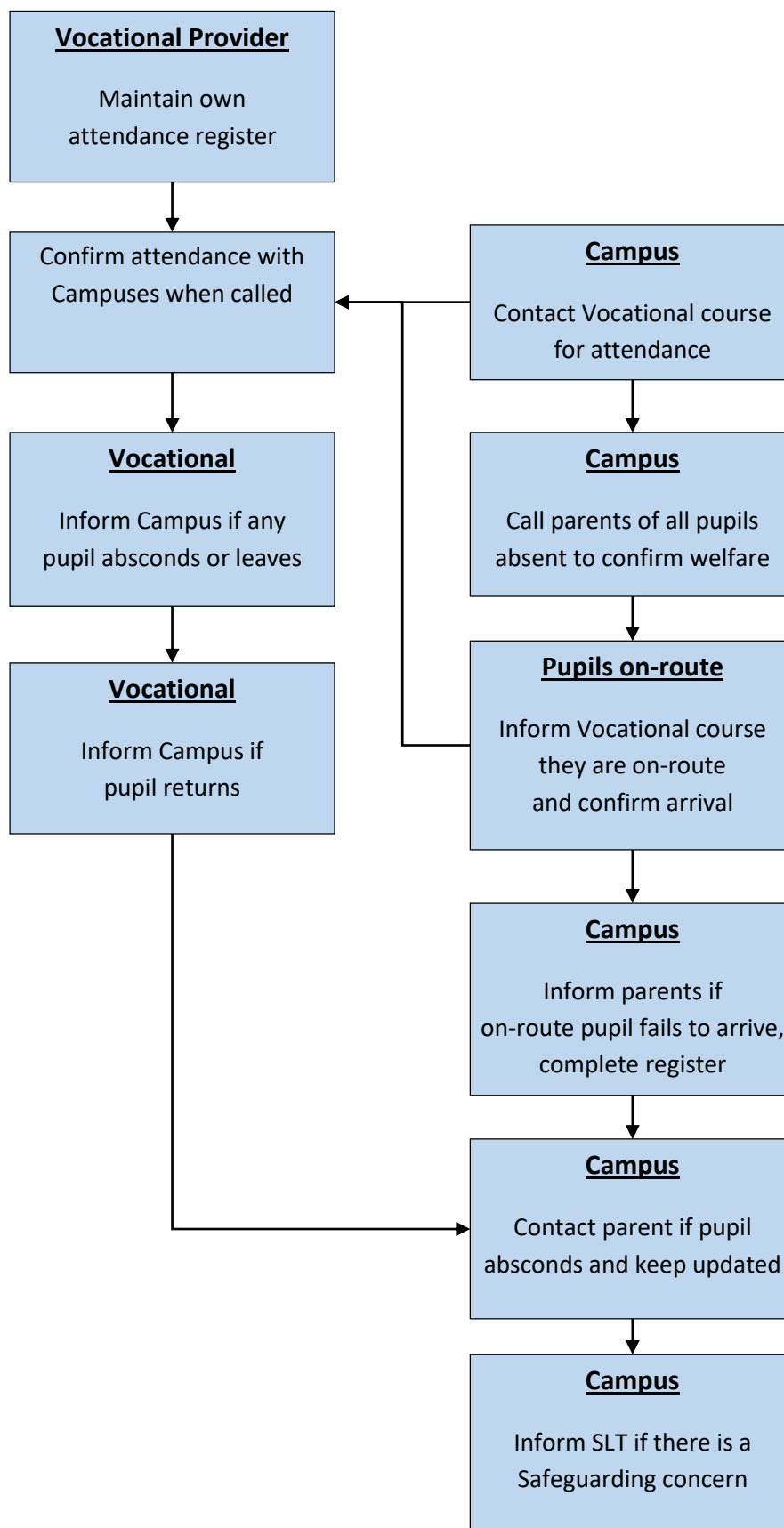
- Campus Co File Checks
- SLT at Campus meetings
- Google Drive
- A risk assessment will be discontinued, in consultation with SLT, if there is no reason to suspect there is a continuing risk.

Appendix I: Attendance Process

CE Academy Registration Process



CE Academy Vocational Registration Process



Received by <i>(print name)</i> :	
Date:	
ACTION TAKEN:	
Signed:	Date:

This record form will be held securely, either digitally or in paper form.

Low Level Concern reporting will be treated as confidential as far as possible, however in certain circumstances it may be necessary to share and or disclose the information with third parties for relevant and necessary reasons. This includes where a reporter has indicated they wish to remain anonymous.

Policy Control Sheet

Version:	03
Approved by:	
Date approved:	
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Policy Owner:	Lou Bridger/SLT

Document History			
Version	Date of review	Author	Note of revisions
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