PDET

Safeguarding / Child Protection Policy

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

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

- Abuse and Neglect
- Specific Safeguarding issues (including Child-on-Child Sexual Harassment and Sexual Violence and Harmful Sexual Behaviour (HSB))
- Roles and Responsibilities:
  - DSL
  - Directors
  - Headteacher
- Additional Advice and Support (resources and guidance)

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

Date	Revision & Amendment Details	By Whom
July 2025	Updated in line with KCSIE 2024 and approved	Board of Directors
September 2026	Updated in line with KCSIE 2025 and approved	Board of Directors

Quick Guide as to Where to Find Information

Information on the Following	Paragraph / Page Number / Policy etc.
What to do if you have concerns about a child	4.4: *Page 24 onwards*
What to do if you have safeguarding concerns about the behaviour of an adult (staff or volunteers) including 'low-level' concerns	4.12: *Page 32 / 33* Also see: • Allegations / Concerns Policy in relation to adults • Adult Code of Conduct
What to do if a child makes a disclosure	4.5: *Page 24 onwards*
Multi Agency Safeguarding Hub (MASH) contact details for referrals	*Page 27* **Appendix C** – Other Useful Links: *Page 58*
Local Authority Designated Officer (LADO) contact details (concerns about adult behaviour)	*Page 27* **Appendix C** – Other Useful Links: *Page 58*
Child-on-child sexual harassment and child-on-child sexual violence	*Page 21 -24* **Appendix A2**: *Pages 9 - 27*
Abuse, neglect and exploitation and other specific safeguarding issues	4.3.2 – 4.3.3: *Pages 21 - 24* **Appendix A1** and **A2**
Information on Prevent (radicalisation and extremism)	3.6: *Page 17* **Appendix A2**: *Pages 43 - 45* Also see: • British Values and the Prevention of Radicalisation and Extremism Policy
Information on safer recruitment and checks required etc.	3.5: *Page 16 - 17* Also see: • Part three of KCSIE • Safer Recruitment Single Central Record (SCR) Guidance (including pre-appointment checks)
Information on the role of the DSL	**Appendix B1**: *Pages 49 - 53*
Information on the role of the Directors	**Appendix B2**: *Pages 54 - 56*
Who needs to read KCSIE, which parts & other documents?	2: *Page 8*
Information specific to a school	***School Specific Details***: *Pages 40 – 43*

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

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1. Policy Statement

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

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

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

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

The Trust's directors acknowledge that they have a strategic leadership responsibility for their schools' safeguarding arrangements, and they ensure that the schools comply with their duties under legislation. Directors will have regard to the statutory guidance – ***Keeping Children Safe in Education 2026 (KCSIE)***, ensuring policies, procedures and training in their schools are effective and comply with the law at all times. For further information in relation to the role of the directors – ***see Appendix B2.***

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

Any reference in this policy to 'Headteacher' includes Principal.

Any reference in this policy to '**data protection laws**' refers collectively to the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR), and the Data (Use and Access) Act 2025.

For the purposes of this policy, the term '**making or sharing nudes and semi-nudes**' refers to the creation, sending or posting of nude or semi-nude images by young people under the age of 18.

The term '**images**' includes all visual content, such as photographs, videos and livestreams.

Images may be taken by the child themselves (sometimes referred to as 'self-generated imagery') or taken or created by another person. They may also be digitally altered or wholly generated using artificial intelligence, including what are sometimes described as '**deepfakes**' or '**deep nudes**'.

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

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

2. Introduction

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

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

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

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

Staff in our Trust:

- Are made aware that Safeguarding issues "COULD and DO HAPPEN HERE"
- Are trained to understand what possible indicators for abuse neglect and exploitation may look like
- Will always act in the best interests of the child and will have a conversation with the Designated Safeguarding Lead (DSL) or a Deputy Designated Safeguarding Lead (DDSL) when a concern arises
- In line with statutory requirements, understand the difference between a safeguarding concern and one involving "immediate danger" or "at risk of significant harm"
- Know their responsibility is always to record concerns (*details of the school's process for this can be found in* ***School Specific Details***)
- Are clear on their responsibility to contact the Multi Agency Safeguarding Hub (the MASH) (*see page 27 for more details re: the MASH*) directly should the need ever arise.

Requirements for reading *KCSIE* and Section 3 of the Early Years Foundation Stage (EYFS) Statutory Framework are:

- **All staff** must read at least **part one of *KCSIE*** and **Section 3 of the Early Years Foundation Stage (EYFS) statutory framework** alongside *KCSIE* where children aged 0 to 5 attend school-based nurseries or reception classes
- Those **staff who work directly with children** should read at least ***Part one*** *and* ***Annex A of KCSIE*** and **Section 3 of the Early Years Foundation Stage (EYFS) statutory framework** alongside *KCSIE* where children aged 0 to 5 attend school-based nurseries or reception classes
- School leaders *(Senior Leadership Team and above, including directors)* must read the whole of ***KCSIE*** and **Section 3 of the Early Years Foundation Stage (EYFS) statutory framework**
- All volunteers (including School Forum Representatives) must read at least ***Part one of KCSIE*** and **Section 3 of the Early Years Foundation Stage (EYFS) statutory framework**

Safeguarding Management:

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

2.1 Roles and Responsibilities

General

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

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

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

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

The broad areas of responsibility and activities related to the role of the DSL are found in *KCSIE Annex B* and are also set out in ***Appendix B1.***

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

Directors

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

Headteacher

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

2.2 Policy Application

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

2.3 Victims and Alleged Perpetrator(s)

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

This policy, in places, uses the term 'alleged perpetrator(s)' and where appropriate 'perpetrator(s)' as these are widely used and recognised terms. However, schools must think very carefully about terminology, especially when

speaking in front of children, not least because in some cases the abusive behaviour will have been harmful to the perpetrator as well. Use of appropriate terminology will be for schools to determine, as appropriate, on a case-by-case basis.

2.4 Legislation

This policy is consistent with:

- The legal duty on schools to safeguard and promote the welfare of children, as described in *Section 175 of the Education Act 2002* (as amended), and *the Education (Independent School Standards) Regulations 2014*
- The legal requirements of the *Children and Social Work Act 2017*
- The statutory guidance *Keeping children safe in education - GOV.UK*
- Section 3 of the *Early Years Foundation Stage (EYFS) statutory framework*
- The government's *Working Together To Safeguard Children 2026* which sets out statutory guidance for agencies
- The government's non-statutory guidance "What to do if you're worried a child is being abused" *Advice for Practitioners*, to identify child abuse and neglect and take appropriate action in response
- The non-statutory government advice *Information Sharing: Advice for Practitioners Providing Safeguarding Services for Children, Young People, Parents and Carers* – *May 2024*
- The duties of the *Counter Terrorism and Security Act 2015* and the *Counter Terrorism and Border Security Act 2019*
- The government's *The Prevent duty: safeguarding learners vulnerable to radicalisation*
- The government's *Child sexual exploitation: definition and guide for practitioners - GOV.UK* – February 2017
- *The Female Genital Mutilation Act 2003*
- *The Serious Crime Act 2015*
- The *Northamptonshire Safeguarding Children Partnership* (NSCP) *Inter-agency Procedures*, which contain procedures and guidance for safeguarding children.

Human Rights, Equalities and Public Sector Equality Duty

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

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

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

Sport and Equalities

As children get older, some sports are typically taught and played in single-sex groups. The Equality Act 2010 contains an exception in relation to single-sex sport. It applies to participation in any sport or game, or activity of a competitive nature, where the physical strength, stamina or physique of the average girl would put her at a disadvantage in competition with the average boy (or vice versa). This means that schools can separate children according to their biological sex in these circumstances without discriminating unlawfully against them on the basis of their sex.

Some sports may need to be played in single-sex groups from a certain age to ensure children's safety, and where this is the case there must be no exceptions. In other cases, schools may have adopted a policy of single-sex sports for reasons related to fairness. Where there are no safety concerns and a child makes a request relating to how they participate, schools will need to consider the request in light of the advice on "considering requests for support with social transition". This means that the school would need to take into account all the relevant factors, including whether supporting social transition is overall in the best interests of the child, as well as considering the impact on other children and the aim of creating safe and fair environments for children to participate in PE.

- The **Public Sector Equality Duty** (PSED) is found in the Equality Act. Compliance with the PSED is a **legal requirement** for state-funded schools.
  - The PSED places a general duty on schools to have, in the exercise of their functions, due regard to the need to eliminate unlawful discrimination, harassment and victimisation (and any other conduct prohibited under the Equality Act), to advance equality of opportunity and foster good relations between those who share a relevant protected characteristic and those who do not
  - The PSED helps schools to focus on key issues of concern and improve child outcomes. Some children may be more at risk of harm or bullying from specific issues such as sexual violence, homophobic, biphobic or transphobic bullying or faith or race-based discrimination. These concerns will vary between education settings, but it is important schools remain aware of disproportionate vulnerabilities and integrate this awareness into their safeguarding policies, procedures and guidance. For further information see *Technical guidance on the Public Sector Equality Duty: England | EHRC*.

Regulations and Safeguarding Requirements Relating to School Premises

Toilets

Schools must not allow children into toilets designated for the opposite biological sex. This includes where schools are responding to a request to support any degree of social transition for children who are questioning their gender.

Schools must provide separate toilets for boys and girls aged 8 and over (apart from where individual toilets are in a room that can be locked from the inside, intended for use by one child at a time). This is required by the School Premises (England) Regulations 2012 and the Education (Independent School Standards) Regulations 2014.

If a gender-questioning child does not want to use the toilet designated for their biological sex, schools should consider whether they can provide an alternative toilet facility, for example self-contained individual toilets, without compromising the provision of single-sex facilities. These alternative arrangements should not compromise the safety, comfort, privacy or dignity of the child, or of any other children.

It is important that schools keep a clear record of these situations, ensure they are communicated appropriately, and review them regularly.

Where a school provides mixed-sex toilets in addition to single-sex toilets, schools should assess safeguarding risks and plan accordingly, for example, mixed-sex toilets should be in individual, lockable rooms and open directly onto public areas (e.g. a corridor).

Changing Rooms and Showers
Schools must not allow a child, aged 11 years or older at the start of the school year, to undress in front of a child of the opposite biological sex. This is required by the School Premises (England) Regulations 2012 and the Education (Independent School Standards) Regulations 2014, which require schools to provide suitable changing accommodation and showers for children who are aged 11 years or over at the start of the school year. This means that the changing accommodation and showers must be suitable for the children they are provided for, having regard to their ages, numbers, and sex and any special requirements they may have and is informed by the school's safeguarding obligations. When responding to a request to support any degree of social transition, a school must not allow a child access to changing rooms designated for the opposite sex.

If a gender-questioning child does not want to use the changing rooms and showers designated for their sex, schools should consider whether they can provide an alternative changing or washing facility without compromising the provision of single-sex facilities. This could be a fully enclosed room – for use by one child at a time that can be secured from the inside – or by allowing access to facilities at an alternative time. These alternative arrangements should not compromise the safety, comfort, privacy or dignity of the child or of any other children.

Once again, it is important that schools keep a clear record of these situations, ensure they are communicated appropriately, and review them regularly.

3. Element 1: Prevention

3.1 Safeguarding Commitment

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

The school will therefore:

- Establish and maintain an ethos where all children feel secure, are encouraged to talk, are always listened to and reassured that they are being taken seriously and that they will be supported and kept safe
- Ensure that children know that there are adults in the school whom they can approach if they are worried or are in difficulty
- Include in the curriculum, activities, experiences and opportunities which equip children with the skills they need to stay safe from abuse, including online and to know to whom they can turn for help
- Provide opportunities to establish effective working relationships with parents, carers and colleagues from other agencies
- Contribute to multi-agency working in line with statutory guidance *"Working Together To Safeguard Children 2026"*
- Ensure they understand their role within the local safeguarding arrangements. **Safeguarding partners** *(the local authority; Integrated Care Boards (previously known as clinical commissioning group); and the chief officer of*

police) will make arrangements to work together with appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs

- Ensure that their senior leadership teams, especially their DSL and DDSL(S), make themselves aware of and follow their local arrangements
- Work with local authority children's social care, the police, health services and other services to promote the welfare of children and protect them from harm. This includes providing a coordinated offer of family help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans
- Allow access for local authority children's social care from the host local authority and, where appropriate, from a placing local authority, for that authority to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment, and
- Operate safer recruitment procedures and make sure that all appropriate checks are carried out on new staff and volunteers who will work with children, including: identity, references, online searches, right to work, further overseas checks, criminal record, prohibition from teaching, childcare disqualification (where appropriate) and Section 128 (where applicable) checks.

3.2 Opportunities to Teach Safeguarding

Safeguarding in the Curriculum

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

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

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

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

3.3 Online Safety

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

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

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

- **Content**: being exposed to illegal, inappropriate or harmful content; for example, pornography, racism, misogyny, self-harm, suicide, anti- Semitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories
- **Contact**: being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example, peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct**: online behaviour that increases the likelihood of, or causes harm; for example, making, sending and receiving explicit images including those generated using AI and online bullying, and
- **Commerce:** risks such as online gambling, inappropriate advertising, phishing and financial scams. If the school feels their children or staff are at risk, they should report it to the *Anti-Phishing Working Group*.

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

3.3.1 Remote Education

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

3.3.2 Policies

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

- Creating a safer online environment – including training requirements which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring
- Giving everyone the skills, knowledge and understanding to help children stay safe online
- Inspiring safe and responsible use and behaviour
- Safe use of smart technology and mobile phones both within the 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.

The Trust will consider the four areas of risk referred to above when reviewing the Trust's online safety policy.

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

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

3.3.3 Parents and Carers

Communications with parents and carers should:

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

3.3.4 Filtering and Monitoring

The Trust / school will ensure that:

- Appropriate filtering and monitoring systems are in place and that a review of their effectiveness is carried out at least once every academic year
- The leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.

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

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

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

The DfE has published *Generative AI: product safety expectations* to support schools to use generative artificial intelligence safely, and explains how filtering and monitoring requirements apply to the use of generative AI in education.

3.3.5 Reviewing Online Safety

Technology, and risks and harms related to it, evolve, and change rapidly. Schools will carry out an annual review of their approach to online safety, supported by an annual risk assessment that considers and reflects the risks their children face. A free online safety self-review tool for schools can be found via the *360 safe website* or *LGfL online safety audit*.

For additional information available to support schools to keep children safe online – ***See Appendix C*** – *'Additional Advice and Support' (Resources and Guidance) and Other Useful Links.*

3.3.6 Cybercrime

The Trust / schools will ensure they have appropriate cyber security systems in place. Guidance on e-security is available from the *National Education Network* and broader cyber security advice can be found at *National Cyber Security Centre – NCSC*.

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

3.4 Mobile Phones, Smart Watches and other Wearable Devices

It is Trust policy that either schools do not permit children to bring mobile phones, smart watches or other wearable devices to school or, if they do allow them, they must be immediately handed into the school office and there must be no use of such technology whilst on the school premises. The individual school's approach can be found in *School Specific Details*.

In specific circumstances where a child needs access to a mobile phone, smart watch, or other wearable device in order to monitor a medical condition, arrangements for bringing the device into school and use of the same must be agreed by the Headteacher in advance and in collaboration with parents / carers.

3.5 Recruitment and Selection of Staff

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

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

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

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

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

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

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

In line with requirements, all directors and School Forum representatives have DBS, identity, right to work and Section 128 checks, as appropriate. Additionally, all other leaders, managers and senior leaders have Section 128 checks.

3.6 The Prevent Duty

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

3.7 Extended School Activities

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

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

3.8 Hiring or Renting out School Facilities / Premises

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

3.9 Visitors

Schools will undertake any relevant checks on visitors to the school and / or escort or supervise visitors, as appropriate, in accordance with *KCSIE (paragraphs 375 – 380).*

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

3.10 Alternative Provision

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

Schools should obtain written confirmation from the alternative provision provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that the school would otherwise perform in respect of its own staff. This includes written confirmation that the alternative provider will inform the school of any arrangements that may put the child at risk (i.e. staff changes), so that the school can assure itself that appropriate safeguarding checks have been carried out on new staff.

The DfE has published voluntary *national standards for non-school alternative provision*, alongside guidance to support schools and local authority commissioners in quality assuring providers. Local authorities may use the standards to develop a register of approved settings for use by schools. However, the school remains ultimately responsible for the provision they commission. This means the school must continue to carry out safeguarding checks and conduct their own due diligence to ensure that the provision is appropriate for meeting each child's individual needs

Schools should always know where a child is based during school hours. This includes having records of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend. They should regularly review the alternative provision placements they make. Reviews should be frequent enough (at least half termly) to provide assurance that the child is regularly attending and the placement continues to be safe and meets the child's needs. Where safeguarding concerns arise, the placement should be immediately reviewed, and terminated, if necessary, unless or until those concerns have been satisfactorily addressed.

The DfE has issued two pieces of statutory guidance to which schools should have regard:

- *Alternative Provision* and
- *Education for children with health needs who cannot attend school*

Schools should use the relevant Trust documents to assist in checking potential Alternative Provision – *see Alternative Provider Details, Checklist and Letter Template.*

4. Element 2: Protection

4.1 Responsibilities - Staff

School staff are in a position to identify concerns early, provide help for children and prevent concerns from escalating.

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

All staff should be prepared to identify children who may benefit from Family Help. Family Help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

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

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

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and / or they may not recognise their experiences as harmful. For example, children may

feel embarrassed, humiliated, or are being threatened. This could be due to their vulnerability, disability and / or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children which facilitate communication.

4.2 Induction and Training

4.2.1 Induction

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

- *KCSIE*
- Section 3 of the Early Years Foundation Stage (EYFS) statutory framework
- Acceptable Use Policy (AUP)
- Adult Code of Conduct
- Allegations / Concerns in relation to Adults Policy
- Attendance Policy
- Behaviour Policy (which includes measures to prevent bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- British Values and Preventing Radicalisation and Extremism Policy
- Emergency Management & Business Continuity (including Lockdown, Invacuation and Cyber Response) Policy
- IT Controls Policy
- MyConcern
- Online Safety Policy
- Role of the DSL (including the identity of the DSL and DDSL)
- Safeguarding response to children who are absent from education, particularly on repeat occasions and / or prolonged periods (see – *West Northants Council, North Northants Council, Peterborough City Council* & *Rutland County Council*)
- Safeguarding / child protection Policy (which includes the policy and procedures to deal with child-on-child abuse)
- The school safeguarding leaflet / booklet
- The Prevent Duty
- Whistleblowing Policy.

4.2.2 Training

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

All staff will undergo safeguarding and child protection training (including online safety, which amongst other things, will include an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) at induction as stated above, and this will be **regularly updated**. Induction and training should be in line with any advice from local safeguarding partners *(see page 12 regarding Safeguarding Partners).*

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

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

All staff should be aware of the process for community-based Family Help assessments:

- The criteria, including the level of need, for when a case should be referred to Family Help support and services provided at:
  - Targeted early help level (under sections 10 and 11 of the Children Act 2004), and
  - Statutory services delivered under section 17 of the Children Act 1989 (children in need, including how this applies for disabled children).

- The criteria, including the level of need, for when a case should be referred to local authority children's social care for assessment and for statutory services under Section 47 of the Children Act 1989 (reasonable cause to suspect a child is suffering or likely to suffer significant harm)
  - Section 31 of the Children Act 1989 (care and supervision orders), and
  - Section 20 of the Children Act 1989 (duty to accommodate a child).

- Clear procedures and processes for cases relating to:
  - the abuse, neglect, and exploitation of children
  - children managed within the youth secure estate
  - disabled children.

Each school will keep a record of all training undertaken.

4.3 What to Look Out For

4.3.1 Support Before Statutory Intervention

Any child may benefit from support before statutory intervention, including from universal services and community-based Early Help, or the targeted early help level of Family Help. All staff should be particularly alert to the potential need for additional support for a child who:

- Is disabled or has certain health conditions and has specific additional needs
- Has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- Has a mental health need
- Is a young carer
- Has exhibited early signs of abusive, violent and/or harmful behaviours
- Is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Is frequently missing / goes missing from education, home or care
- Has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from school and in Alternative Provision or a Pupil Referral Unit
- Is at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation
- Is at risk of being radicalised into terrorism
- Has a parent or carer in custody, or is affected by parental offending
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing alcohol and other drugs themselves
- Is at risk of honour or faith- based abuse such as Female Genital Mutilation or Forced Marriage; and

- Is a privately fostered child.

4.3.2 Abuse, Neglect and Exploitation

All staff should be aware:

- Of the indicators of abuse, neglect, exploitation and modern slavery understanding that children can be at risk of harm inside and outside of the school, inside and outside of home and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection. For indicators of abuse and neglect - ***see Appendix A1***.
- That abuse, neglect, exploitation, and safeguarding issues are rarely stand-alone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap.
- **All** staff, but especially the DSL (and DDSL) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse – including physical, sexual, emotional abuse, and stalking), criminal exploitation (including financial exploitation), serious youth violence, county lines and radicalisation– for further information ***see Appendix A2***.
- That technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic / misandrist messages, the non-consensual making or sharing of nudes or semi-nudes, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.

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

4.3.3 Safeguarding Issues – Additional Awareness

All staff should have an awareness of safeguarding issues that often overlap and can put children at risk of harm (including but not limited to those listed below). The following behaviours and indicators can be signs that children are at risk:

- Drug taking and / or alcohol misuse
- Unexplainable and / or persistent absences from education
- Serious violence
- Criminal exploitation (including that linked to county lines)
- Radicalisation, and
- Consensual and non-consensual making or sharing of nude and semi-nudes.

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

Child-on-Child Abuse (including Harassment and Violence)

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

All staff should:

- Be aware that children can abuse other children (often referred to as child-on-child abuse) and it can take many forms. It can happen both inside and outside of school and online. For some (but not all) forms of child-on-

child abuse it is more likely that girls will be victims and boys' perpetrators, but all child-on-child abuse is unacceptable and will be taken seriously

- Be clear as to the school's policy and procedures with regard 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
- Understand that even if there are no reports in their school it does not mean it is not happening. It may be the case that abuse is not being reported. As such it is important that when staff have any concerns regarding child-on-child abuse (whether these concerns are thought to have taken place on or off site) they should speak to their DSL or DDSL. As part of this, schools should also try to be alert to when children might be at highest risk around the school day (for example immediately after school)
- Be aware that child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator
- As well as knowing how to respond to concerns, know that child-on-child abuse is preventable. As well as knowing how to recognise behaviours and indicators of risk early, staff should know that timely, evidence-based support can be key to preventing children from going on to commit abuse or violence.

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

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

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

Child-on-Child Sexual Harassment and Sexual Violence (including Harmful Sexual Behaviour (HSB))
Definitions and detailed information on harmful sexual beahviour (HSB), child-on-child sexual harassment and sexual violence and how the school **should respond to all signs, reports and concerns** of these things, including incidents occurring outside of the school premises and / or online is set out in ***Appendix A2***.

HSB can occur between two or more children of any age and sex. It can occur also through a group of children towards a single child or towards another group of children. HSB exists on a continuum and may escalate into sexual harassment or sexual violence, it can occur online or face to face (both physically and verbally) and is **never acceptable**.

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

Schools should be aware of the importance of:

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

- Recognising the escalatory nature of misogyny and the benefits of early identification to support their approach to minimising the risk of HSB, sexual harassment and sexual violence
- Challenging physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them, and
- Taking a safeguarding approach in response to all incidents involving the sharing of nude or semi-nude images, regardless of whether they are consensual or non-consensual. All such incidents require a safeguarding response, with a proportionate approach that considers the age, development, and circumstances of the children involved, as well as any elements of coercion, exploitation or vulnerability.

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

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

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

County Lines

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

Domestic Abuse

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

Female Genital Mutilation (FGM)

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

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

Mental Health

Definitions and detailed information on Mental Health and how it should be supported is set out in ***Appendix A2***. *Also see the section on 'Children requiring Mental Health Support' – pages 34.*

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

If staff have a concern about a child's mental health, that is also a safeguarding concern, they should follow this policy and speak to their DSL or DDSL. If staff feel that a child is in danger, they should call 999 or arrange for them to be taken to A&E immediately by a parent / carer or other suitable person. If a child needs help urgently for their mental health, but it's not an emergency, staff can get help from NHS 111 online or call 111 and select the mental health option.

Serious Violence

Serious violence is a continuing safeguarding concern.

Schools play a key role in protecting children from violence, safeguarding victims, as well as those who may be at risk of, or are involved in committing violence (who may also be victims themselves). Staff should be alert to signs that a child may be at risk of or involved in serious violence. These risks are higher for children with disrupted education (e.g. suspensions, permanent exclusions, time in alternative provision) or a history of offending. Schools

should also try to be alert to when children might be at highest risk around the school day (for example, immediately after school).

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

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

4.4 What to Do if Someone has Concerns about a Child

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

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

- Act on them **immediately**
- Speak to the DSL (or DDSL), and
- Follow the procedures set out on *pages 26 – 27*. Also see *page 29* for a flow chart setting out the process.

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

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

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

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

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

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

4.6 What to Do Next – Procedure to Follow in Cases of Possible, Alleged or Suspected Abuse, or Serious Cause for Concern about a Child

4.6.1 General

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

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

Any person may seek advice and guidance from the MASH particularly if there is doubt about how to proceed (*see contacts on page 27)*. Any adult, whatever their role, can take action in their own right to ensure that an allegation or concern is investigated and can report to the investigating agencies.

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

Staff should not assume a colleague, or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to local authority children's social care (such as a child in need or a child with a protection plan) – *see Information Sharing paragraph 4.9.*

Northamptonshire Safeguarding Children Partnership Procedures contain the inter-agency processes, protocols and expectations for safeguarding children (available on the *NSCP website*). The DSL is expected to be familiar with these, particularly the referral processes and with the content of "Right Help, Right Time – A continuum of need".

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

4.6.2 Main Procedural Steps

Individual Staff / Volunteers / Other Adults

- **When a child makes a disclosure, or when concerns are received from other sources**, **do not** investigate, interview, ask leading questions, examine children, or promise confidentiality. Children making disclosures should be reassured and, if possible, at this stage, should be informed what action will be taken next. As soon as possible, a note should be made of what has been disclosed following the school's specific procedure (for details of the procedure – ***see School Specific Details***) and a report made to the DSL.
- **If the concern involves the conduct of a member of staff** (including supply teachers, trainee teachers and contractors) or a volunteer, a visitor, a director, a School Forum representative, a trainee or another young person or child, the Headteacher must be informed. The Headteacher should contact the Local Authority Designated Officer (LADO) to seek advice – *see Trust 'Allegations / Concerns in relation to adults Policy'.*

- **If the allegation is about the Headteacher**, the information should be passed to the Trust's Central Executive Team or the LADO. (*See Trust 'Allegations / Concerns Policy in relation to adults'*).
- If this has not already been done, inform the child (or other party who has raised the concern) what action has been taken.

Designated Safeguarding Lead

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

Actions following Assessment of Concern: Referrals for Statutory Services

- **Where a child is suffering, or is likely to suffer from harm, it is important that a referral to local authority children's social care (MASH), and if appropriate the police, (see *when to call the police: guidance for schools and colleges*), is made IMMEDIATELY** and referrals should follow the local referral process. The MASH deals with referrals from professionals and members of the public who may have concerns about a child's welfare. The MASH makes the process of dealing with referrals quicker and more effective by improving the way that agencies share information.
- If the DSL decides to make a referral it is important that as much information as possible is provided to enable any assessment to consider all available evidence and enable a contextual approach to address such harm. The DSL should use the *Right help, Right time* document when making a referral.

- **Safeguarding Referrals must be made in the following way:**

  - **Urgent concern**
    Call the MASH immediately on 0300 126 7000 to speak to a professional who will listen to and record the concern. A written copy of the referral will need to be submitted following this conversation if level of need is met for a referral
  - **Concern where there is no immediate danger?**
    Establish the level of need and risk before taking action. *Right Help, Right Time guidance document* will help to do this. If it is considered that the concern meets the level of need for statutory intervention (L4), complete the online referral form or call MASH on 0300 126 7000 for a social work consultation if support is required with threshold application

    Online MASH Referral Form – *Make a children's referral to Northamptonshire's MASH – Online form*

  - **If a child is in immediate danger at any time, left alone or missing, the police should be contacted directly and / or an ambulance using 999.**
  - **Referrals regarding allegations against adults in education -** contact the local authority Designated Officers (**LADO**) – *see below*
  - All LADO referrals need to be completed via the online referral form. The online form can be found via this link *Referral Form* The online referral will be uploaded by MASH to a confidential database. Schools should be able to download a copy for their records and will receive an automated response, with date and time stamp, with reference number for audit trail purposes.
  - If LADO consultation is required in respect of threshold prior to submission of a referral, the consultation form on the NSCP website should be used and sent to LADOConsultations@NCTrust.co.uk – LADO will contact the sender with next steps.
  - If there is a need to speak to a LADO, an e-mail should be sent to LADOConsultations@NCTrust.co.uk in the first instance, using the consultation process set out above, and the sender will be contacted.
  - If a phone conversation is required, currently the Designated Officers for both North Northamptonshire and West Northamptonshire are:
    - Andy Smith: 07850 854309
    - Sian Edwards: 07738 636449
    - Francesca Hamilton: 07443 348415
- Within one working day of a referral being made, a local authority social worker should acknowledge its receipt to the referrer and make a decision about the next steps and the type of response that is required. This will include determining whether:
  - the child requires immediate protection and urgent action is required
  - any services are required by the child and family and what type of services
  - the child is in need and should be assessed under section 17 of the Children Act 1989 (see below)
  - there is reasonable cause to suspect the child is suffering or likely to suffer significant harm, and whether enquiries must be made, and the child assessed under section 47 of the Children Act 1989 (see below), and
  - further specialist assessments are required to help the local authority to decide what further action to take.
- The referrer should follow up if this information is not forthcoming.
- If social workers decide to carry out a statutory assessment, staff should do everything they can to support that assessment (supported by the DSL (or DDSL) as required).
- If, after a referral, the child's situation does not appear to be improving, the referrer should consider following local escalation procedures to ensure their concerns have been addressed and, most importantly, that the child's situation improves (see Section 4.7).

4.6.3 Outcomes of a Referral

MASH can advise on whether a family needs a Community - based Early Help assessment *(see below)* or whether they meet the threshold for statutory child protection.

Statutory Child Protection

- ***Children in Need:***
  - A child in need is defined under the *Children Act 1989* as "a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled". The local authority is required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the *Children Act 1989*.
  - Chapter 3 Section 2 of *Working Together To Safeguard Children 2026* provides details of the assessment process.

- ***Children Suffering or Likely to Suffer Significant Harm:***
  - Local authorities, with the help of other organisations as appropriate, have a duty to make enquiries under section 47 of the *Children Act 1989* if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment. This includes all forms of abuse neglect, and exploitation.
  - The DSL should refer all cases of suspected abuse or neglect to the MASH, police (cases where a crime may have been committed) and to the Channel programme where there is a radicalisation concern.
  - Chapter 3 Section 3 of *Working Together To Safeguard Children 2026* provides details of the assessment process.

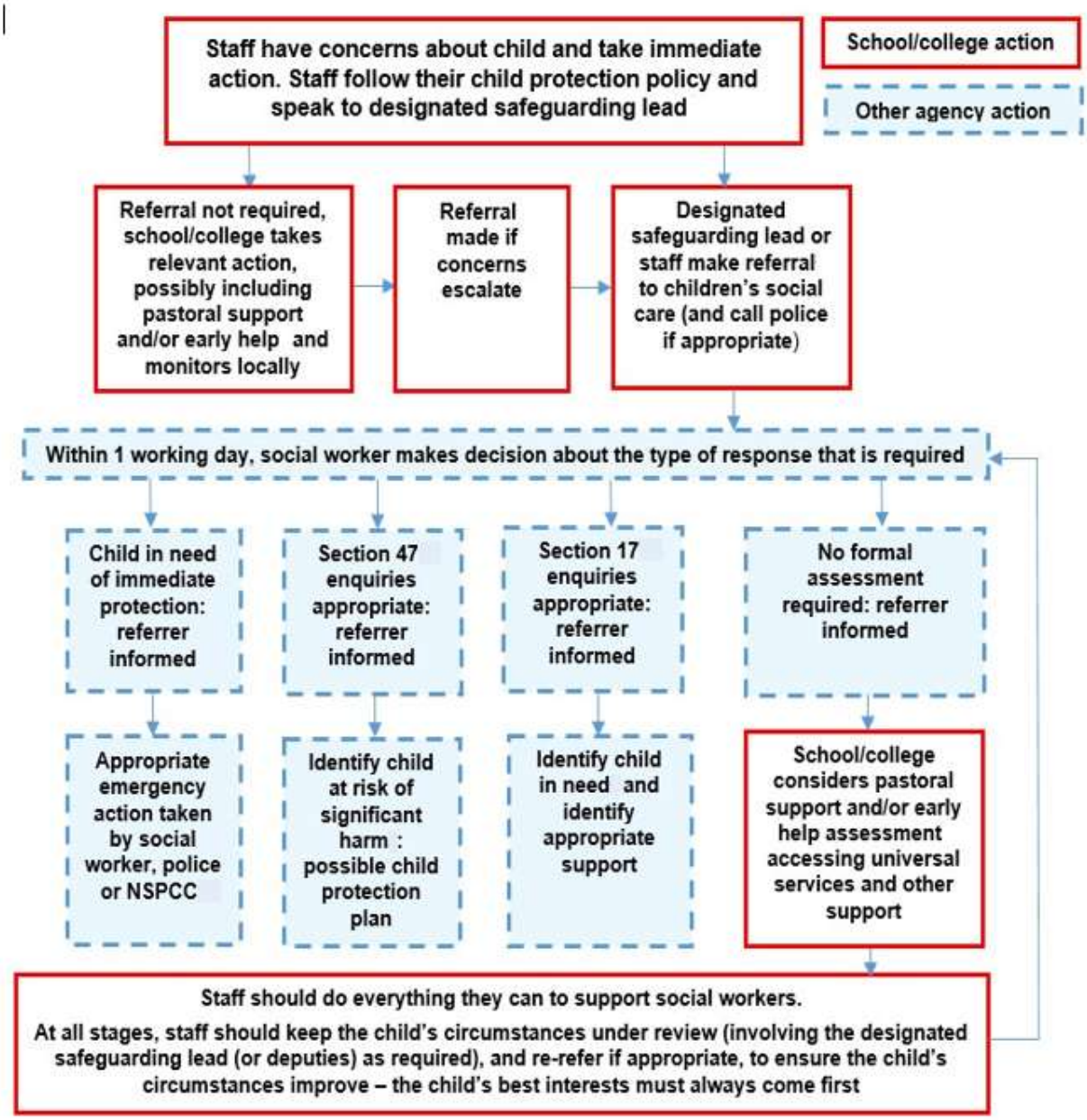
Community-based Early Help Assessment

- If children do not require the support of statutory children's services, the DSL (or DDSL) will generally lead the liaison with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in carrying out this assessment, in some cases acting as the lead practitioner. Further guidance on effective assessment of the need for Family Help[1] can be found in *Working Together To Safeguard Children 2026*. Any such cases should be kept under constant review and consideration given to a referral to local authority children's social care for assessment for statutory services if the child's situation does not appear to be improving or is getting worse. Alternatively, qualified lead practitioners (i.e. not a social worker) who may lead assessments before statutory intervention can continue to lead work with families up to and including section 17.
- Early Help / Family Help support is accessed through the Northamptonshire Children's Trust - Children and Family Support Service – email on CFSS@nctrust.co.uk or call 0300 126 7000

[1] Family Help is a community-based support service for families and children that combines early intervention and targeted social care. It gives households a single, named lead practitioner and a coordinated plan to address complex challenges before they require higher-level statutory protection.
Targeted early help services delivered through Family Help, are coordinated by a local authority and/or their partners to address specific concerns within a family. Targeted early help should be provided for children and families who have multiple and/or complex needs, or whose circumstances might make them more vulnerable

4.7 ACTIONS WHERE THERE ARE CONCERNS ABOUT A CHILD

(*from Keeping Children Safe in Education 2026*)



4.8 Professional Challenge and Disagreements

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

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

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

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

4.9 Information Sharing

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

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

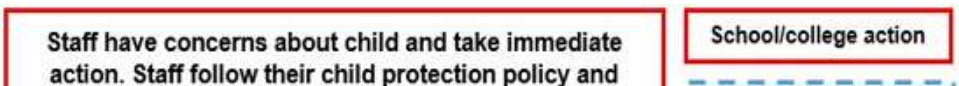
Staff should be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to local authority children's social care.

When deciding what information to share, schools should consider:

- The relevancy of the information, including to the current safeguarding risk
- What is necessary for the receiving setting to know, and
- Whether it is clearly presented and appropriately contextualised.

Professional judgement should be used to ensure that the information shared is focused and proportionate. This may include summarising or omitting information which is not necessary for safeguarding purposes. But care should be taken not to omit information where it may be relevant to understanding or managing safeguarding risk. This is further supported by the new information sharing duty, which is intended to give staff greater confidence to share information appropriately and in a timely way to safeguard children. Specific statutory guidance on the Information Sharing Duty will be provided in due course, following consultation.

The data protection laws place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.



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

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

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

The data protection laws do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information MUST NOT be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

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

Further details on information sharing can be found: in *Working Together to Safeguard Children*, which includes a myth-busting guide to information sharing, at *"Information Sharing - Advice for Practitioners providing safeguarding services to children, young people, parents and carers."*, the seven golden rules for sharing information will be especially useful and in the Information Commissioner's Office (ICO) *guide to sharing information to safeguard children and young people in the education sector in the UK* which is intended to help practitioners to feel confident to share personal information for safeguarding purposes

4.10 Records and Monitoring

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

Records are:

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

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

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

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

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

4.11 Child Transfer

When children leave the school, the DSL should ensure their child protection file is transferred, if possible, by hand, to the new school as soon as possible and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main child file, ensuring secure transit, and confirmation of receipt should be obtained (signed and dated record). Receiving schools should ensure key staff such as DSLs and SENCOs are aware as required. It will then be for the DSL to consider what other information should be shared with other relevant staff and when appropriate to do so.

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

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

In addition to the child protection file, the DSL should also consider if it would be appropriate to share any information with the new school in advance of a child leaving particularly where the information would support an assessment of risk to others in the school as well as the individual child. For example, information that would allow the new school to continue supporting children who have had a social worker and have been victims of abuse or those who are currently receiving support through the 'Channel' programme and can have that support in place for when the child arrives or incidents that may indicate concerns about serious violence or harmful behaviours.

Where information indicates a risk to others and / or the individual child, for example where a child has previously carried, threatened with, or used a knife or weapon, it is incumbent on the receiving school to assess risk, and accordingly, put in place a safety and support plan for when the child arrives. It would be good practice for a conversation to take place between the DSLs at both settings, where there are issues or concerns.

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

4.12 Safeguarding Concerns / Allegations regarding Another Staff Member including, Supply Staff, Trainee Teachers, Volunteers and Contractors

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

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

4.13 Staff / Children Relationships

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

4.14 Concerns about Safeguarding Practices within the School

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

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

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

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

5. Element 3: Support

5.1 Support for Children

5.1.1 A Child's Wishes

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

5.1.2 Children Who May be Vulnerable

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

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

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

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

Children Who Need a Social Worker (Child in Need and Child Protection Plans)

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

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

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

Children Requiring Mental Health Support

Schools have an important role to play in supporting the mental health and wellbeing of their children.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, still have an important role to play. Specifically, they can support the fulfilment of 4 key roles:

- Promoting good mental wellbeing and preventing the onset of mental illness

- Observing children and identifying early those who may be experiencing mental health problems or being at risk of developing one
- Ensuring early targeted support is provided, and
- Liaison with / referral to specialist services where needed.

For further information in relation to children requiring support with their mental health and mental health generally – ***see Appendix A2***.

Looked After Children and Previously Looked After Children

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

Appropriate staff have access to the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order) and the child's contact arrangements with birth parents or those with parental responsibility. They should also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after them. The DSL should have details of the child's social worker and the name of the virtual school head in the authority that looks after the child.

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

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

Young Carers

Schools should be alert to the needs of young carers, recognising that caring responsibilities can impact on their attendance, attainment, behaviour and wellbeing. Early identification is essential to ensure young carers receive support at the right time and by the appropriate services including additional support from external partners, or local authority and health services.

Children Absent From Education

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

All staff are aware that a child being absent from education for prolonged periods and / or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation – particularly county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, honour or faith-based abuse or risk of forced marriage.

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

The DfE's statutory guidance on school attendance *Working together to improve school attendance* sets out how schools must work with local authority children's services where school absence indicates safeguarding concerns - *see the Trust's Attendance Policy.*

Information regarding schools' duties for CME can be found in the DfE's statutory guidance *Children Missing Education*. This includes information schools **must** provide to the local authority when removing a child from the school roll at standard and non-standard transition points along with how schools should be supporting local authorities with joint reasonable enquiries to help identify and support children missing in education.

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

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

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

General information and advice for schools can be found in the Government's *Missing Children and Adults Strategy.*

Elective Home Education (EHE)

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

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

In accordance with the *School Attendance (Pupil Registration) (England) Regulations 2024* schools must make a return to the local authority when a child's name is deleted from the admission register.

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

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

Private Fostering

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

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

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

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

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

Children with Special Educational Needs, Disabilities or Health Issues

Our Trust recognises that children with **special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline**. Additional barriers can exist when recognising abuse, neglect and exploitation in this group of children. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- These children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- The potential for children with SEND or certain medical conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges risks that they do not understand that what is happening to them is abuse
- The need for intimate care or that these children are isolated from others
- That these children are more likely to be dependent on adults for care, and
- These children may have issues over cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content / behaviours in school or the consequences of doing so.

Any reports of abuse involving children with SEND will therefore require close liaison with the DSL (or DDSL) and the SENCO.

Schools should consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place.

Children with Medical Conditions

The fact that there has been an incident relating to the management of a child's medical condition (including allergies) would not in and of itself warrant a referral to local safeguarding partners. A safeguarding referral would only be needed where an incident highlighted concern that the child might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family unit because of their medical condition.

This might occur where relevant information about a child's medical condition is not provided to a school, or where they are repeatedly sent without essential medication, thereby putting the individual at risk. Further information is provided in the DfE statutory guidance on *supporting Pupils at School with Medical Conditions* and *Allergy safety in schools*.

Children Who are Lesbian, Gay or Bisexual

A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm; however, they can sometimes be vulnerable to discriminatory bullying. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are. Schools should consider how to address vulnerabilities such as the risk of bullying and take steps to prevent it, including putting appropriate sanctions in place.

Children Who are Questioning their Gender

There has been a significant increase in the number of children who are questioning the way they feel about being a boy or a girl, including the physical attributes of their sex and the related ways in which they fit into society. It is not for schools to initiate any action in this area; guidance in *KCSIE* is focused on circumstances where a child or their parent / carer has raised a request relating to social transition to which a school is responding.

Schools should keep in mind that it is common for children to engage in activities that are less typically associated with their sex.

Schools should take time to understand the thoughts and feelings of children who are questioning their gender and should be appropriately professionally curious about the full range of the child's experiences. Schools should remain aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs, for example relating to relationships with family, peers or their broader social environment, including discriminatory bullying.

Considering Requests for Support with Social Transition

Schools should **not** initiate any action regarding social transition; the guidance in *KCSIE* applies where a child or their parent / carer has requested that the school make changes or put support in place in order to facilitate the child presenting as the opposite biological sex ("social transition").

Staff should not adopt any changes relating to social transition unless a decision has been made by the school and a child's parents / carers have been involved as set out in *KCSIE*.

For details and information on how to deal with requests schools should follow *KCSIE (paragraphs - 258 – 282).*

5.1.3 Complaints

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

5.1.4 The Use of 'Reasonable Force'

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

5.2 Support for Staff

As part of their duty to safeguard and promote the welfare of children and young people staff may hear information, either from the child as part of a disclosure or from another adult that will be upsetting. Where a member of staff is distressed as a result of dealing with a Child Protection concern, they should in the first instance

speak to the DSL / DDSL about the support they require, or, if they are the DSL, the Trust Safeguarding Lead. The DSL / DDSL / Trust Safeguarding Lead should seek to arrange the necessary support.

6. Element 4: Working with Parents / Carers

The school should:

- Ensure that parents / carers have an understanding of the responsibility placed on the school and staff for safeguarding / child protection by setting out its obligations on the school website and in any School Prospectus
- Undertake appropriate discussion with parents / carers prior to involvement with another agency or with the MASH, unless to do so would place the child at risk of harm or compromise an investigation

School-specific information completed for Trinity CE Primary School for the September 2026 policy: names and local safeguarding procedures have been updated using the previous-year Trinity policy and the information confirmed by the school.

School Specific Details

Individual School Specific Details and Information	
Name of School:	Trinity CE Primary School
Headteacher	Name: Thomas Shipley
	Signature:
	Date: 01.09.26
Designated Safeguarding Lead (DSL) and Deputy/s (DDSL)	Name: Thomas Shipley (DSL)
	Signature:
	Date:
	Name: Emily Kruger (DDSL)
	Signature: 01.09.26
	Date:
Designated Teacher for Looked After and Previously Looked After Children	Name: Thomas Shipley
	Signature:
Mental Health Lead	Rosie Burrows McGill
	Date: 01.09.26
Early Help Coordinator	Name: Sam Harrold Email: Samantha.Harrold@NCTrust.co.uk

Disclosures *(4.5 & 4.6.2)*
Disclosures When a child makes a disclosure, the procedure we follow in our school is set out in paragraphs 4.5 and 4.6.2 of this policy. The adult to whom the disclosure is made must report the concern to the DSL by completing a "report a concern" form on MyConcern. If MyConcern is not available, the concern must be recorded on the bright orange safeguarding concern form available in the staff room and given to the DSL or DDSL. The adult should not investigate or ask leading questions and should record the child's words and relevant factual information as soon as possible.
Systems for Children to Report Abuse Children in our school can report abuse confidently by speaking to any member of staff. Children may also write or draw their concern or worry and place it in their class worry box. All concerns are taken seriously and passed to the DSL/DDSL for appropriate action.

Recording, Monitoring and Reviewing of Concerns *(4.10)*
Recording In our school we use MyConcern for recording safeguarding concerns. Every member of staff has access to the system and can log a concern directly. Staff complete the "record a concern" form with

as much accurate and specific factual information as possible. The concern is then sent to the DSLs for triage and appropriate action.

If a visitor or member of staff cannot access MyConcern, the bright orange safeguarding concern form in the staff room is used. The form should be completed as soon as possible, signed and dated, and handed to the DSL or DDSL; a body map is used where appropriate.

Monitoring and Reviewing

In our school we follow paragraph 4.10 of this policy. The DSL and DDSLs meet once a fortnight to review active safeguarding cases and concerns. This includes review of Level 3 and Level 4 files, Level 2 files at least every six months, and Level 1 files annually.

Online Safety *(3.3)*

Mechanisms to Identify, Intervene In, and Escalate Incidents

In our school we identify inappropriate internet use or online-safety concerns through staff observations, pupil disclosures, parent/carer reports, filtering/monitoring alerts and safeguarding reporting systems. Concerns are recorded on MyConcern and followed up by the DSL/DDSL in accordance with the safeguarding procedures in this policy.

Online Safety in the Curriculum

At our school we follow the Jigsaw scheme of work for PSHE, taught weekly, together with our collective worship programme and Protective Behaviours work. Each class receives dedicated online-safety teaching each year. Our ICT scheme provides sessions which are supplemented, where appropriate, by resources from Childnet and the UK Safer Internet Centre. Protective Behaviours is also used to support children who require additional work, including individual sessions where appropriate.

Information Provided to Parents / Carers in Relation to Online Safety

The school provides online-safety information to parents/carers through the school website and regular online-safety newsletters.

Filtering and Monitoring Systems to Monitor Staff and Children Internet Usage

In our school we use Securly filtering and Securly Aware for monitoring. Alerts are sent to the Headteacher/DSL, Thomas Shipley, for review and appropriate action. Filtering and monitoring arrangements are reviewed in accordance with Trust and DfE requirements.

Mobile Phones, Smart Watches or other Wearable Devices *(3.4)*

At Trinity CE Primary School, children are not permitted to use mobile phones, smart watches or other wearable devices during the school day or while on school premises. Where such a device is brought to school, it must be handed to the school office immediately and must not be used during the school day. Any agreed exception required for a medical, safeguarding or other exceptional reason will be managed by the school in line with the Trust policy and the child's individual needs.

Child-On-Child Abuse *(4.3.3 (page 21) and Appendix A2)*

Our System for Children to Report Child-on-Child Abuse

Children are encouraged to report any incident of child-on-child abuse or bullying to any member of staff, whether they are the recipient or a bystander. Children may also use their class worry box. All reports are taken seriously.

The procedures we use to record, investigate and deal with allegations of child-on-child abuse

Record: concerns are recorded on MyConcern by the member of staff receiving the concern or by another adult where necessary.
Investigate: the DSL/DDSL assesses the concern, gathers appropriate information without leading or investigative questioning, and follows the Trust safeguarding procedures and relevant risk-assessment processes.
Handle: the school takes proportionate safeguarding and behaviour action, involves parents/carers and external agencies where appropriate, and keeps the concern under review.

Supporting victims, perpetrators and any other children affected

We provide appropriate pastoral and safeguarding support to all children affected, taking account of individual needs and circumstances and involving parents/carers and external agencies where appropriate.

Minimising Child-on-Child Abuse

At our school we seek to minimise child-on-child abuse as set out in Appendix A2. We promote trusted relationships, Protective Behaviours, clear reporting routes, respectful behaviour, online safety and a culture in which children know they can speak to an adult and will be taken seriously.

Preventing Radicalisation and Extremism *(Appendix A2)*

Assessment of Risk

Our school currently assesses the risk of radicalisation and extremism to be low. This assessment is reviewed as part of the school's safeguarding arrangements and in accordance with the Trust's British Values and the Prevention of Radicalisation and Extremism Policy.

Further detail about this assessment can be found in the Trust's "British Values and the Prevention of Radicalisation and Extremism" Policy.

Mental Health *(page 23 and Appendix A2)*

The school:

Promotes good mental health by providing a supportive pastoral environment, trusted adults, opportunities for children to talk about worries and feelings, Protective Behaviours work and wider wellbeing activities.

Identifies children who may be experiencing mental health problems or be at risk of developing them through staff and parent/carer concerns, pupil conversations, pastoral monitoring and referrals to the Mental Health Lead and SEND/Inclusion lead.

Provides early targeted support through pastoral support, trusted-adult check-ins and other appropriate in-school interventions, with referrals to external services such as the school nurse, educational psychology and CAMHS where required. Rosie Burrows-McGill is the school's Mental Health Lead.
Other Relevant Policies
Health & Safety Policy (including visitors, trips, visits and risk assessments) First Aid Policy Adult Code of Conduct Allegations and Concerns Policy in Relation to Adults Looked After and Previously Looked After Children Policy Behaviour Policy (including anti-bullying and cyberbullying) Attendance Policy Equality / Equalities Policy and Objectives Physical Intervention Policy Supporting Pupils with Medical Conditions Policy Relationships and Sex Health Education Policy Whistleblowing Policy British Values and Prevention of Radicalisation and Extremism Policy Acceptable Use Policy (AUP) PDET IT Controls Policy Emergency Management and Business Continuity procedures (including lockdown, invacuation and cyber response) SEND Policy Accessibility Plan
Training *(4.2.2)*
Training – Staff and Volunteers Working with Children Staff and volunteers at our school undertake the following training, as appropriate: • General safeguarding awareness training • DSL / DDSL training • Safer Recruitment training • Prevent training • Online safety training • Designated Teacher for Looked After Children training • Allergy training • Any other relevant safeguarding, medical or contextual safeguarding training identified by the school or Trust A record of all training undertaken is maintained by the school. The record is kept up to date and accessible to the appropriate school leaders.