Child Protection and Safeguarding Requirements and Procedures within IFtL*

September 2025 – September 2026

Policy name:	Child Protection and Safeguarding Requirements and Procedures in IFtL
Version:	V11
Date relevant from:	September 2025
Date to be reviewed:	September 2026 *This policy will be reviewed every year unless legislation dictates otherwise. Recent changes in Legislation will need to be read and used to review this Policy.*
Role of reviewer:	IFtL Head of Safeguarding, Health, Children & Families, IFtL Deputy Designated Safeguarding Lead.
Statutory (Y/N):	Y
Published on website*:	1A

Policy level:**	1
Relevant to:	All employees through all IFtL schools and departments
Bodies consulted:	Employees Trade unions School / department governance bodies
Approved by:	IFtL Board of Trustees
Approval date:	28 August 2025

Key:

**** Publication on website:***

IFtL website		**School website**	
1	Statutory publication	A	Statutory publication
2	Good practice	B	Good practice
3	Not required	C	Not required

***** Policy level:***

1. Trust wide:
   - This one policy is relevant to everyone and be consistently applied across all schools and Trust departments with no variations.
     - *Approved by the IFtL Board of Trustees.*
2. Trust core values:
   - This policy defines the values to be incorporated fully in all other policies on this subject across all schools and Trust departments. This policy should therefore from the basis of a localised school / department policy that in addition contains relevant information, procedures and / or processes contextualised to that school / department.
     - *Approved by the IFtL Board of Trustees as a Trust Core Values policy.*
     - *Approved by school / department governance bodies as a relevantly contextualised school / department policy.*

3. School / department policies
   - These are defined independently by schools / departments as appropriate

- *Approved by school / department governance bodies.*

Contents

Important contacts: IFtL Trust Wide 4
Important contacts: Milton Keynes schools 5
Important contacts: Corby schools 6
IFtL School Designated Safeguarding Leads 8
1. Aims 10
1.1 Safeguarding Statement 11
2. Legislation and statutory guidance 11
3. Definitions 13
4. Equality statement 15
5. Roles and responsibilities 16
6. Confidentiality 20
7. Recognising abuse and taking action 21
8. Online safety and the use of mobile technology 35
9. Notifying parents or carers 37
10. Pupils with special educational needs, disabilities or health issues 37
11. Pupils with a social worker 38
12. Looked-after and previously looked-after children 38
13. Complaints and concerns about school safeguarding policies 39
14. Record keeping 39
15. Training 40
16. Contextual and additional safeguarding information for XXXX school. 42
17. Monitoring arrangements 43
18. Links with other policies (school based and trust wide) 43
Appendix 1: types of abuse 45
Appendix 2: safer recruitment and DBS checks – policy and procedures 47
Appendix 3: allegations of abuse made against staff 54
Appendix 4: specific safeguarding issues 62

Important contacts: IFtL Trust Wide

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Chief Executive Officer of the IFtL School Trust	Sarah Bennett	sbennett@IFtL.co.uk 07837 111178
IFtL Designated Safeguarding Lead	Victoria Blackmore	vblackmore@IFtL.co.uk 07909257778
IFtL Deputy Designated Safeguarding Lead	Victoria Gidman	vgidman@IFtL.co.uk 07350 364514
IFtL Deputy Designated Safeguarding Lead	Jamie Ainscow	Jainscow@IFtL.co.uk
IFtL Designated Safeguarding Lead for TMA ITT	Michelle Gardner	Mgardner@IFtL.co.uk
IFtL Designated Safeguarding Officers	Michelle Gardner Maddie Boothroyd Emily Castle Jacqueline White	Mgardner@IFtL.co.uk Mboothroyd@rickleypark.co.uk ecastle@fairfieldsprimary.co.uk jwhite@priorshallalc.com
IFtL Prevent Specific Point of Contact; Designated Child Sexual Exploitation Lead (CSE); Designated Looked After Children Lead	Victoria Blackmore	vblackmore@IFtL.co.uk 07909257778
Board of Trustees Chair	Marilyn Hubbard	Mhubbard@IFtL.co.uk
Designated Trustee for Safeguarding and Safer Recruitment	Marilyn Hubbard	Mhubbard@IFtL.co.uk
IFtL Human Resources contact	Amelia Perrin Chelsea Angelos	Aperrin@IFtL.co.uk cangelos@IFtL.co.uk

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Whistleblowing Contacts	CEO, Sarah Bennett IFtL DSL, Victoria Blackmore IFtL DDSL, Victoria Gidman IFtL DDSL, Jamie Ainscow Trustee,	sbennett@IFtL.co.uk vblackmore@IFtL.co.uk 07909257778 vgidman@IFtL.co.uk 07350364514 Jainscow@IFtL.co.uk
	Whistleblowing Hotline Advice Line Public Concern at Work	01908 794051 0800 028 0285 help@nspcc.org 0207 404 6609 help@pcaw.co.uk
GDPR	If there are any concerns with regards to data breaches (for example, where data is lost, accidentally deleted our stolen), the Data Protection Officer – Jason Smith within IFtL – must be informed immediately. Jsmith@IFtL.co.uk 07741 292 555 Rsmith@IFtL.co.uk 07909 257776	
Police	Thames Valley Police 101 Emergency 999	101 999

Important contacts: Milton Keynes schools

Multi Agency Safeguarding Hub (MASH team)	Civic 1 Saxon Gate East Central Milton Keynes MK9 3EJ	Safeguarding Children 01908 253169 / 253170 (Mon – Thu 09:00-17:00; Fri 09:00 – 16:00) Emergency Social Work Team 01908 265545 Children@milton-keynes.gov.uk

Adults at risk – Safeguarding adults	If you are worried about a vulnerable adult Civic 1 Saxon Gate East Central Milton Keynes MK9 3EJ	Mon – Thu 08:30 – 17:00 Fri – 09:00 – 16:30 01908 252835 Out of hours 17:00 – 21:00 01908 725005 Access: safeguardingadults@milton-keynes.gov.uk Emergency social work team: 01908 265545
Local Authority Designated Officer (Formerly known as Designated Officer)	Kay Newman Debbie Young	01908 254307 Email: lado@Milton-keynes.gov.uk
MK Together Partnership Boards	MK Together Management Board, Health and Wellbeing Board and the Community Safety Partnership Board	01908 254373 Mktogether@milton-keynes.gov.uk
Joint Police and Children's Social Care Protocol for Dealing with Children Missing from Care	(Children absent from Education) Children Missing Education, People Directorate (CMET) Cme@milton-Keynes.gov.uk 01908 253338	

Important contacts: Corby schools

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Multi Agency Safeguarding Hub (MASH team) Joint Children's Trust	Children, Families and Education Criminal Justice Centre 700 Pavilion Drive Northampton NN47YL	0300 126 7000 (OPTION 1) (Mon/Thu 09:00-17:00) (Fri 09:00-16:30) Emergency Social Work Team **01604 626 938.** (Out of hours)

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Adults at risk – Safeguarding adults	North Northamptonshire Council covers the following areas: • Kettering • Corby • East Northants • Wellingborough North Northants 0300 126 3000 West Northamptonshire Council covers the following areas: • Daventry • Northampton • South Northants West Northants 0300 126 7000	
Designated officer (formerly LADO)	Northamptonshire Children's Trust Designated Officer One Angel Square, Angel Street Northampton, NN1 1ED	Business Support: Beth Panter 07836 687844 Adebola Attah 07836 690052 DO, Andy Smith 07850 854309 DO, Sian Edwards 07738 636449 DO, Francesca Hamilton 07443 348415 LADOConsultations@NCTrust.co.uk 01604 362993 Designated Officer (formerly LADO) - Northamptonshire Safeguarding Children Board
Joint Police and Children's Social Care Protocol for Dealing with Children Missing from Care	(Children absent from Education) Children Missing Education, People Directorate Cmetracking@northamptonshire.gov.uk	
Northamptonshire Safeguarding Children Partnership	Email: nscp@northnorthants.gov.uk Northampton Safeguarding Children Partnership c/o Northampton County Council One Angel Square, Northampton, NN1 1ED	

IFtL School Designated Safeguarding Leads

ROLE/ORGANISATION	NAME OF DSL	CONTACT DETAILS
Ashbrook School	Toni Cole	tcole@IFtL.co.uk
Chestnuts Primary School	Lauren Seagrave	Lseagrave@chestnutsprimary.co.uk
Exeter – A Learning Community	Jennifer Doherty	JDoherty@exeterschool.co.uk
Fairfields Primary School	Debbie Walker	dwalker@fairfieldsprimary.co.uk
Glebe Farm School	Penny Meehan	PMeehan@glebefarmschool.co.uk
Heronsgate School	Sarah Cox	SCox@heronsgateschool.co.uk
Heronshaw School	Bridget Nicholls	BNicholls@heronshawschool.co.uk
Holmwood School	Toni Cole	tcole@IFtL.co.uk
Heronshill School and Nursery	Juliet Griffin	JGriffin@heronshillschool.co.uk
Lavendon School	Amy Archer	Aarcher@iftl.co.uk
New Chapter Primary School	Alice Hedges	AHedges2@newchapterprimary.co.uk
Olney Infant Academy	Amy Archer	Aarcher@iftl.co.uk
Olney Middle School	Edith Collins	Ecollins@iftl.co.uk
Priors Hall – A Learning Community	Jacqueline White	JaWhite@priorshallschool.co.uk
Rickley Park Primary School	Maddie Boothroyd	Mboothroyd@rickleypark.co.uk
St. Mary & St. Giles (SMSG) Church of England School	Cath Hoskin	choskin@iftl.co.uk
St Mary's Wavendon C of E Primary School	Emma Francis	Efrancis@stmaryswavendoncofe.co.uk
Two Mile Ash School	Holli Isherwood	Hisherwood@tmaschool.com
TMA ITT	Michelle Gardner	mgardner@iftl.co.uk
Whitehouse Primary School	Jackie Puddephatt	JPuddephatt@whitehouseprimary.co.uk
Woodnewton A Learning Community	Jezamin Lindsay	JLindsay@woodnewtonschool.co.uk

Important contacts: New Chapter Primary School

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Headteacher	John Billing	Jbilling@newchapterprimary.co.uk 01908 679809
Designated Safeguarding Lead	Alice Hedges John Billing (covering maternity leave from October 2025)	Ahedges2@newchapterprimary.co.uk 01908 679809 Jbilling@newchapterprimary.co.uk
Deputy Designated Safeguarding Lead	John Billing Alison Hedges Jill Dunkley Rachael Trigg	Jbilling@newchapterprimary.co.uk Ahedges@newchapterprimary.co.uk Jdunkley@newchapterprimary.co.uk Rtrigg@newchapterprimary.co.uk
Designated Safeguarding Officers	NA	
Designated Teacher for Children looked after/ Kinship Care/ SGO.	Rachael Trigg	Rtrigg@newchapterprimary.co.uk
Designated Teacher for children with a social worker.	Alice Hedges John Billing (covering maternity leave from October 2025)	Ahedges2@newchapterprimary.co.uk 01908 679809 Jbilling@newchapterprimary.co.uk
Prevent Specific Point of Contact; Designated Child Sexual Exploitation Lead (CSE);	Alice Hedges John Billing (covering maternity leave from October 2025)	Ahedges2@newchapterprimary.co.uk 01908 679809 Jbilling@newchapterprimary.co.uk
Designated Governor for PREVENT	David Hopkins	David.Hopkins@Milton-keynes.gov.uk

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated Governor for Safeguarding and Safer Recruitment	David Hopkins	David.Hopkins@Milton-keynes.gov.uk
Human Resources contact	Alison Hedges	ahedges@newchapterprimary.co.uk

1. Aims

Safeguarding is everybody's business. Inspiring Futures through Learning trust schools have an unwavering commitment to safeguarding to ensure that all our children and young people are safe and feel safe; that children, parents, carers and staff are able to talk about any safeguarding concerns and feel assured that they will be listened to; and that all staff and volunteers are aware of and implement safeguarding procedures and guidance, including what to do if they suspect a child or young person may be experiencing, or be at risk of harm. In essence, we instil a culture of vigilance. This culture of safeguarding underpins everything that The Trust and associated schools have in place.

We aim to create a culture within our schools, where all staff and volunteers are committed to safeguarding children and where students and their families feel supported and safe.

To facilitate this, we

- Fully implement safer recruitment procedures
- Create a network around vulnerable children, ensuring that staff are sensitive to any changes in behaviour
- Listen carefully to what children say, take what they say seriously and always respond to their concerns, passing on concerns to MASH where necessary.
- Work in partnership with our parents to protect children
- Pick up, record and respond to concerns in an appropriate, timely way
- Take an interest in children's' lives (including online life), responding to any issues identified and support parents to care for their own children
- Create a culture of learning, ensuring that safeguarding training is drip fed to all members of staff and volunteers and is reviewed frequently.
- Develop policies, procedures and training to support a safe culture and ensure that these are fully implemented and followed

The school aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding

- Staff are professionally trained in recognising and reporting safeguarding issues
- Staff are confident in questioning and challenging safeguarding practice, if they believe that appropriate action is not being taken
- Act as an advocate for children, creating a safe space, with trusted professionals who fully support them
- Will advocate for children's safety, whilst working with other agencies. Keeping the welfare of the child as the foremost concern.

1.1 Safeguarding Statement

This safeguarding statement will be included within all IFtL policies and core documentation:

Safeguarding is everybody's business. IFtL MAT is committed to ensuring that all our children and young people are safe and feel safe. The right to be safe and feel safe for any member of the IFtL community is non-negotiable and paramount. Safeguarding and child protection is crucial, and we are fully committed to ensuring the welfare and safety of all our children and staff. IFtL and all the schools within the Trust must fully adhere to all safeguarding and child protection legislation, policy and procedures at all times and under any circumstances. Any concerns at a Trust level will be referred to IFtL safeguarding Lead, Victoria Blackmore, the DDSL's Victoria Gidman and Jamie Ainscow and to the relevant designated safeguarding leads/officers within each school for concerns pertinent to children within the school. IFtL fully adheres to all Safeguarding and child protection legislation and MK Together Partnership/Northamptonshire Safeguarding requirements, including the Milton Keynes/Northamptonshire Whistleblowing Policy and procedures and all requirements within KCSIE 2025, Working Together 2023, Information Sharing Guidance 2024 and other relevant legislation and guidance.

Our Governors and Trustees are fully engaged with the development and implementation of policies and procedures within individual schools. They are clear about their legal responsibilities and the need to question, challenge and audit school processes and procedures. They have responsibility for monitoring and ensuring that policies and procedures are fully implemented and effective within schools. There are regular reports to governors and trustees from headteachers and DSL's that monitor the number of concerns raised, the referrals made and the outcomes. Governors are also aware of cases involving police and any safeguarding allegation made against a staff member. Governors are encouraged and supported through training to question and challenge data.

Governors receive safeguarding training at induction, exploring how to scrutinise and challenge information and data. This training is regularly updated.

Regular audits are undertaken to ensure that policies, procedures and practice are in line with policies and fit for purpose.

2. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education (2025) and Working Together to Safeguard Children (2023), and the Governance Handbook. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners (Police, Health and Social Care).

This policy is also based on the following legislation:

- Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques
- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- Information Sharing guidance 2024 https://assets.publishing.service.gov.uk/media/66320b06c084007696fca731/Info_sharing_advice_content_May_2024.pdf
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Safer Recruitment Guidance, which sets standards around recruitment, details the checks that must be undertaken and also the documents that must be produced and checked. It also gives details on criminal disclosure and which offences are protected and not considered in any decision making.
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- Statutory guidance on the Prevent duty guidance (2023) which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children
- This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage (2024).

IFtL schools are committed to remaining compliant with all current and forthcoming safeguarding legislation. We are actively monitoring the progress of the proposed *Children's Wellbeing and Schools Bill* (subject to final parliamentary approval), which is expected to introduce new statutory duties around pupil wellbeing, attendance, and local authority oversight of children not in school.

Anticipated areas of impact may include:

- **Enhanced responsibilities for schools** to monitor and report on pupil wellbeing

- **New expectations around the sharing of attendance and welfare data** with local authorities and integrated care systems
- **A formal register of children not in school**, with clearer roles for schools, trusts, and LAs to support these children
- **Closer links between education and health systems**, including strengthened Multi-Agency Safeguarding Arrangements.

IFtL's preparatory steps:

- We will update this policy and all linked procedures once the legislation and accompanying statutory guidance are finalised
- Our DSLs and senior leaders will receive training on any new duties that arise
- Any new safeguarding, attendance or data-sharing processes will be shared with staff during regular CPD and briefing cycles

3. Definitions

Safeguarding and promoting the welfare of children is defined in Working Together (2023) as:

• providing help and support to meet the needs of children as soon as problems emerge.

• protecting children from maltreatment, whether that is within or outside the home, including online.

• preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care.

• promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, wherever possible and where this is in the best interests of the children; and

• taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.

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

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

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Working Together (2023) states that Neglect may involve a parent of carer failing to:

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

• Protect a child from physical and emotional harm or danger.

• Ensure adequate supervision (including the use of inadequate caregivers).

• Ensure access to inappropriate medical care or treatment.

• Provide suitable education.

Exploitation (Child criminal exploitation CCE and Child Sexual Exploitation CSE): Both CCE and CSE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CCE and CSE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation

Child on child abuse refers to the abuse of a child or children perpetrated by another child or children.

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

• bullying (including online bullying, prejudice-based and discriminatory bullying).

• abuse in intimate personal relationships between children.

• physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse).

• sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence).

• sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse.

• causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

• consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as sexting or youth produced sexual imagery).

• upskirting/shorting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and

• initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Sharing of nudes and semi-nudes (also known as sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.

Children includes everyone under the age of 18.

Within this policy:

• **Parent'** refers to birth parents and other adults in a parenting role, for example adoptive parents, stepparents and foster carers.

• '**Staff' or 'members of staff'** refers to all teaching, non-teaching, support, supply, peripatetic, contract staff, governors, volunteers and trustees working in or on behalf of the school.

Keeping Children Safe in Education (September 2025) may be abbreviated to 'KCSIE'.

Child abuse is covered by the term "**significant harm**" and is defined in the Adoption and Children Act 2002 in the following way:

• "harm" means ill-treatment or the impairment of health or development

• "development" means physical, intellectual, emotional, social or behavioural development

• "health" means physical or mental health

• "ill-treatment" includes sexual abuse and forms of ill-treatment which are not physical

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

- The local authority (LA)
- A clinical commissioning group for an area within the LA
- The chief officer of police for a police area in the LA area

The safeguarding partners have a responsibility for setting local procedures and auditing organisations to ensure they are meeting the local procedures.

4. Equality statement

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

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities or health conditions (see section 10)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language

- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Military service families
- Private fostering Arrangements
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 12)
- Are absent/missing from education
- Are seen as different due to their sexuality, LGBTQ+ status or self-identified gender
- Whose parent/carer has expressed an intention to remove them from school to be home educated

Any other issue which the school identifies a making a child more vulnerable and at increased risk of abuse. This is not an exhaustive list, and staff are reminded that any child may be vulnerable at certain times in their lives. Staff should be constantly vigilant for changes in behaviour and families acting in a different way. Students may not always identify that they are being harmed or may not openly disclose it, a student may feel humiliated, scared or even enjoy the experience, so it is down to staff to be constantly vigilant and to raise awareness with the DSL when they see changes.

We must be aware and be vigilant to any form of bullying, discrimination or harassment of any nature. However, we need to be particularly aware of the Human Rights Act 1998 and the Equality Act 2010 (including the Public Sector Equality Duty) and any form of behaviour occurring against these rights will not be tolerated under any circumstances. As highlighted within KCSIE September 2025, being subjected to harassment, violence and or abuse, may breach children's rights as stated within the Human Rights Act.
Provisions within the Equality Act allow IFtL to take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting our pupils with certain protected characteristics in order to meet their specific need. IFtL, could, for example, consider taking positive action to support girls if there was evidence they were being disproportionately subjected to sexual violence or sexual harassment. There is also a duty to make reasonable adjustments for disabled children and young people.

Children who are LGBTQ+; lesbian, gay, bisexual, transgender, queer or questioning or any other identity (e.g. intersex, asexual, non-binary, pansexual), identify as LGBTQ+ or those who are perceived as being LGBTQ+ may be particularly vulnerable to be bullying and we need to be extra vigilant for signs of this.

At IFtL, we will not tolerate any form of bullying, discrimination or harassment and will ensure they are swifty and fully investigated. We also believe in educating and supporting our school communities to help prevent the occurrence in the first place.

5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers, supply staff, peripatetic, governors, trustees and anybody providing services to our schools within IFtL and is consistent with the procedures of its safeguarding partners. Our policy

and procedures also apply to extended school and off-site activities. We adhere to and follow the guidance 'Keeping children safe in out of school settings 2022'.

Where rooms are rented out to organisations who work with children or vulnerable adults, we have a written agreement that confirms that they have the relevant safeguarding checks in place. We also have sight of all relevant documentation and record this. Any concerns that are raised in these groups must be shared with the school DSL.

5.1 All staff

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

All staff will sign a declaration at the beginning of each academic year to say that they have read, understood and will adhere to the guidance. This declaration is referred to as the IFtL signing agreement.

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role of the designated safeguarding lead (DSL) and deputy and other designated officers, the behaviour policy, the online safety policy, and the safeguarding response to children who are absent/missing from education
- The internal reporting and recording process for all concerns including low level concerns.
- The early help process (including Early Help Assessments) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM and Prevent, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse, exploitation and neglect, as well as specific safeguarding issues, such as child-on-child abuse (previously known as peer-on-peer abuse), child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, gang activity, FGM and radicalisation
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe whilst the issue is investigated.
- That every safeguarding issue raised is taken seriously and that pupils are supported. A culture of openness and transparency, should support students to disclose concerns, knowing that they will be addressed and followed up on

Section 15 and appendix 4 of this policy outline in more detail how staff are supported to do this.

5.2 The designated safeguarding lead (DSL) at New Chapter Primary School.

The DSL is a member of the senior leadership team. Our DSL is Alice Hedges (DSL/ Pastoral Lead). The DSL takes lead responsibility for child protection and wider safeguarding in the school. Additional deputies designated safeguarding officers will be appointed to support the DSL and ensure there is sufficient cover at all times.

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

Out of school hours, the DSL will be contactable by email on ahedges2@newchapterprimary.co.uk or on dsl@newchapterprimary.co.uk

The DSL will lead the Safeguarding Core Team consisting of a DSL, Deputy DSL and additional designated safeguarding officers (DSOs).

When the DSL is absent, the DDSLs – John Billing (Headteacher), Jill Dunkley (Deputy Headteacher), Rachael Trigg (Assistant Headteacher and SENCO) and Alison Hedges (School Business Manager)– will act as cover.

The Governing body will ensure that the DSL is given the time, funding, training, resources and support to:

- Enable them to fulfil their role and support other members of staff
- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children for early help and child protection.
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, and/or police), and support staff who make such referrals directly
- Support Governors or their delegated person to report relevant cases to the Disclosure and Barring Service (DBS), Criminal Justice system (CJS) and the Teaching Regulation Agency (TRA).

The DSL's first responsibility is to the safety of the child, in the event of any external agencies coming into question or examine the child (such as police or children's social care), then the DSL must put the welfare of the child first.

In the event of a child being questioned or examined, the DSL must ensure that they are familiar with PACE 1984 guidance around appropriate adults; PACE Code C 2019 (accessible) - GOV.UK. If they believe that other professionals are not following guidance and behaving in an inappropriate way, then the DSL is required to challenge their behaviour.

The DSL can take on the appropriate adult role or ensure that a family member is contacted to take on that role. They must ensure that no child is questioned or examined without an appropriate adult being present.

The DSL will also keep the headteacher and governors informed of any issues and liaise with local authority case managers and designated officers for child protection concerns as appropriate.

The DSL will take lead responsibility for understanding the filtering and monitoring systems and processes in place.

The full responsibilities of the DSL and deputy and designated safeguarding officers are set out in their job description.

5.3 The governing board

The governing board will:

- Ensure that the school has a Designated Safeguarding Lead and that that lead carries out the duties listed above

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development
- Develop or delegate the writing of this policy, evaluate its effectiveness and sign off this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation.
- Ensuring that the child protection policy is available to the public and published on the school website.
- Appoint a safeguarding link governor to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL and cannot be a school employee.

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

All governors will read Keeping Children Safe in Education in its entirety and undertake safeguarding induction training and update training on a regular basis. Support is also available to governors through the Trust staff.

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

Note: Governors must not be given details relating to individual child protection cases or situations, in order to ensure confidentiality is not breached.

Governors and proprietors must ensure filtering and monitoring systems are effective, in line with the DfE's filtering and monitoring standards for schools. The filtering and monitoring data will be shared with the governors in FGB.

Governors should receive information about number of cases, number of referrals, number of child protection and child in need cases. They should also be aware of any challenges made about referrals and all cases that are reported to the police, must be notified to the Governing body.

Data should be broken down to vulnerabilities and categories of harm. Governors are expected to question and scrutinise data, the Headteacher should be prepared to respond to those questions.

5.4 The Headteacher/Head of School

The headteacher/head of school is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers:
- Are informed of our systems which support safeguarding, including this policy, as part of their induction
- Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse, exploitation and neglect
- Communicating this policy to parents/carers when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources (as directed by the Governors), and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training, and updating the content of the training (with the DSL) regularly

- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
- Ensuring the relevant staffing ratios are met, where applicable
- Making sure each child in the Early Years Foundation Stage is assigned a key person
- Ensuring that all staff, volunteers and visitors adhere to the child protection policy.
- Overall, the headteacher must ensure that all safeguarding decisions, policies and procedures directed by the Governors are implemented within school and working effectively. The DSL's support the headteacher to ensure that all staff have knowledge and understanding of safeguarding.

5.5 The trust

The Multi-School Trust (MAT) core safeguarding team will provide support and guidance as appropriate to enable the DSL and Headteacher to carry out their roles effectively. This includes a range of quality assurance activities outlined in the IFtL Safeguarding Strategy.

The Trustees delegate responsibility to the Local Governing Body to ensure that safeguarding processes and procedures are enacted.

The Head of Safeguarding will set the strategic safeguarding direction for the Trust, working in an advisory capacity to provide support and guidance to Headteachers and DSLs on all safeguarding related matters. The main areas of responsibility include:

• Strategic oversight of developing safeguarding and child protection ensuring statutory compliance and development of this area

• Developing, implementing, and evaluating the impact of an annual safeguarding action plan

• Representing the Trust within strategic multi-agency partnerships

• Implementing of the Safeguarding strategic plan to promote effective quality assurance and practice improvement

• Providing or facilitating the provision of advice, guidance and coaching support to DSLs on complex safeguarding cases

• Chairing Trust DSL Network Meetings

Schools should contact **Victoria Blackmore or Victoria Gidman** for further support and guidance.

The Trust team must have access to the Single Central Record (SCR) of all schools signed up to the Trust.

6. Confidentiality

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Information can be shared within the school and externally when it is to protect the welfare of a child. Any incidents where a decision

is made to share information or not share information should be recorded, in the event of a practice review or investigation this information must be available.

- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy). The DSL may consult MASH and discuss a hypothetical case.
- Parents should be informed of any concerns, unless it places the child at increased risk or the DSL believes there is a flight risk. If there is any doubt, then MASH will be consulted.
- Confidentiality is also addressed in this policy with respect to record-keeping in section 14, and allegations of abuse against staff in appendix 3
- The DSL can also decide if information should be shared with a parent with parental rights, in some cases the DSL may choose not to share information as it puts the child at increased risk. For example, if there is domestic abuse within the family and parents are no longer residing in the same household, then the DSL will need to decide on whether to share address details with that parent.
- If the DSL considers that the risk is too high, they can withhold this information. This must be recorded in the child protection file. The DSL's priority is always the child.

7. Recognising abuse and taking action

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

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

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

Make a referral to children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm or is in immediate danger. **Anyone can make a referral.**

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

- A DSL must be informed in person **within 10 minutes (if possible but as soon as feasible where this is not and must be well before the child is due to go home)**

Worried about a Child?

7.2 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions

- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Immediately notify the DSL, if the child wants to go with you when you notify them then let them.
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- Records should be made using the online safeguarding program, CPOMS. This record should be completed by the end of the working day at the very latest. If appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process
- Never ask the child to write down what has happened or take photographs of any injuries unless explicitly directed to by MASH Health or Police staff. It is important to note that you must NEVER take a picture of a child's intimate areas.
- Children Social Care may ask staff to ask additional questions, if this begins to feel like investigation, staff must stop and remind MASH that this is a social workers responsibility not the schools.
- Seek support for yourself, you should be able to debrief with the DSL or an appointed member of staff.

Reporting and Recording a Concern

All staff and volunteers receive guidance on the procedures to report safeguarding concerns upon induction and receive regular updates. All concerns should be reported in writing, using CPOMS unless a child is at significant risk of harm whereby the DSL should be informed in person immediately this should also be written on CPOMS as soon as possible. Actions logged on CPOMS entries should be created as soon as possible, on the same day and during working hours. Staff should never wait until the next day to report a safeguarding concern. All staff and volunteers will:

- make a written record (see Record Keeping), informing the child that you are doing so.
- pass the information to the DSL and DDSL without delay, either in person (for immediate, priority cases) or using CPOMS (lower-level concerns) depending on the nature of the concern.

All reports to the DSL must be followed up in writing through CPOMS. The DSL/DDSL will then:

- keep a confidential record of all comments, actions and observations. These records will be filed, kept securely and access will be restricted to only staff authorised by the DSL, Headteacher or Trust Head of Safeguarding.
- seek to discuss any concerns about a student with their parents. This must be handled sensitively and the DSL or the DDSL will contact the parent in the event of a concern, suspicion or disclosure. However, if the DSL or the DDSL believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's social care/Multi Agency Safeguarding Hub (MASH).

• If the DSL or the DDSL believes that "a child is experiencing or may have already experienced abuse or neglect" or "is at risk of suffering significant harm" either now or in the future, then the school will comply with the procedures of the Local Safeguarding Partnership.

Concerns About Significant Harm or Imminent Danger

Any member of staff that suspects or has evidence of child abuse or is concerned that a child may be at risk of imminent danger, they must notify the DSL or a DDSL immediately and in person. A referral must be made if a child may be suffering or at risk of suffering harm. Whilst the DSL or a DDSL should make the referral, anyone can make a referral to children's social care. If anyone other than the DSL makes a referral to Children's social care or to the police, they should inform the DSL as soon as possible.

Concerns Below the Threshold for Significant Harm and No Imminent Danger

Staff should log concerns on CPOMS, at the earliest opportunity, providing sufficient information and context for the DSL/DDSL to assess the information. The DSL will decide on the most appropriate course of action and whether the concerns should be referred to children's social care, using the thresholds guidance published by the local safeguarding partnership. If it is decided to make a referral to children's social care the parent will be informed, unless to do so would place the child at further risk or undermine the collection of evidence. All concerns, discussions and decisions will be recorded in writing. The DSL will provide guidance on the appropriate action. Options will include:

• managing any support for the child internally via the school's own pastoral support processes.

• an Early Help Assessment; or

• a referral for statutory services where the child is or might be in need or suffering or likely to suffer significant harm.

The below provides an overview of how academies will respond to specific safeguarding issues. The list is not exhaustive and is designed to complement the contents of Keeping Children Safe in Education (2025). Staff should follow the procedures outlined above when responding to, recording and reporting the specific safeguarding issues detailed below. The response of DSLs and DDSLs will always be guided by Keeping Children Safe in Education (2025) and multi-agency policies and procedures implemented by the safeguarding partnership

7.3 If you discover that FGM has taken place or a pupil is at risk of FGM

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

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

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

Any teacher who either:

- Is informed by a girl under eighteen that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under eighteen and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

Under FGM duty to refer guidance, teachers are required to report this immediately to the Police, they also have a duty to report to the DSL, who will be involved in the follow up process for the child.

A joint referral involving the teacher and the DSL is preferable, ensuring that guidance in KCSIE and the FGM duty are implemented. CSC will also be involved.

Milton Keynes – a call to MASH to safeguard the child and then Police 101 will be required to report under the mandatory reporting duty.

Northants – the lead for FGM, sits within the MASH team, so a call to MASH is required, ensure that you are clear that it is a report under the FGM mandatory reporting duty.

In both cases you will be asked for details of the child, any other siblings, make-up of the family, addresses and contact details. Details of the DSL, the school and what action has been taken to safeguard the child.

Consideration must be made on whether there is a flight risk. The school nurse may also be helpful, as they are trained to discuss this issue with parents.

A number will be given that needs to be recorded on the front of the child's child protection file.

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

The DSL will also complete the FGM screening tool which gives further advice and guidance.

- See further information and a risk assessment tool here.

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

Figure 1 below, before section 7.7, illustrates the procedure to follow if you have any concerns about a child's welfare.

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

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from:

Milton Keynes MASH on 01908 253169

Northamptonshire MASH on 0300 126 7000

You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

Milton Keynes schools: Make a referral to the Milton Keynes Multi Agency Referral Hub (MASH) directly on 01908 253169, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

Corby schools: Make a referral to the Milton Keynes Multi Agency Referral Hub (MASH) directly on 0300 126 7000; email MASH@northamptonshire.gov.uk , if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

MASH may also be consulted for advice and guidance.

Early help

Early help and Vulnerable Children

All staff should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life. If early help is appropriate, the DSL or DDSL will generally lead on involving the child and family and liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required

to support, in some cases acting as the lead practitioner. Any such cases should be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services if the child's situation does not appear to be improving or is getting worse. Timelines of interventions will be monitored and reviewed.

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

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

• is disabled or has certain health conditions and has specific additional needs.

• has special educational needs (whether or not they have a statutory Education, Health and Care Plan (EHCP)).

• has a mental health need.

• is a young carer.

• is bereaved.

• is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.

• is frequently missing/goes missing from care or from home.

• is at risk of modern slavery, trafficking, sexual or criminal exploitation.

• is at risk of being radicalised.

• is viewing problematic and/or inappropriate online content or developing inappropriate relationships online.

• has a parent or carer in custody; family member in prison or is affected by parental offending.

• is in a family circumstance presenting challenges for the child, such as drug and alcohol, adult mental health issues and domestic abuse.

• is misusing drugs or alcohol themselves.

• is suffering from mental ill health.

• has returned home to their family from care.

• is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage.

• is a privately fostered child, Under Kinship Care, or an Special Guardianship Order; and

• is missing education, or persistently absent from school, or not in receipt of full-time education. This also includes unexplainable persistent absences from education.

•has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit.

The DSL will maintain a list of students who the school has identified to be at potential risk, including those with a social worker, and ensure that relevant staff are aware and that these

students are monitored closely and supported to achieve the best possible outcomes. Many of these children will be looked after children, or previously looked after children, or have special educational needs or disabilities.

- Early Help is available through Milton Keynes and Northamptonshire. The MASH team can support with additional support alongside the Targeted Early Intervention team in Milton Keynes.
- An Early Help toolkit is available, and the safeguarding team will liaise with MASH.
- Milton Keynes Multi Agency Safeguarding Hub (MASH) - Milton Keynes Council (milton-keynes.gov.uk)
- Report a concern or request support | Northampton Children's Trust
- All schools in IFtL are committed to supporting and safeguarding all pupils. Early Help may also take the form of School Based Provision where staff support specific areas of need.
- Early Help will often decrease the need for formal statutory intervention later on; it is better to provide support at an early stage than get to the point where there must be statutory intervention by CSC.

Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so. If you make a referral directly you must tell the DSL as soon as possible. Children's social care assessments should consider where children are being harmed in contexts outside the home, so the school will provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm. The school will be guided by MASH as to the appropriate outcome e.g., complete an Early Help Assessment (EHA) or refer to a relevant specialist agency.

All Child Protection records, including referrals, will be logged on CPOMS. The protocols as outlined in the Data Protection Policy must be followed. The local authority will decide within 1 working day of a referral about what course of action to take and will inform the referrer of the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded. If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves. All escalations must be recorded on CPOMS. The DSL should refer all cases of suspected abuse or neglect to the Multi Agency Safeguarding Hub (MASH), police (cases where a crime may have been committed) and to the Channel programme where there is a radicalisation concern. Consent will be required before support can be delivered to any individual through the Channel programme. Contact details for the MASH can be found in Section 1 of this policy.

7.5 If you have concerns about extremism/radicalisation

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

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if

appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team. It is important to note that consent will be required before support can be delivered through Channel panel.
The DSL will make a joint referral, with the person who spotted the concern.

Milton Keynes- Phone the MASH team to consider the immediate safety of the child. The DSL will then contact police, using the 101 number and ask to report under the PREVENT Duty. They will be asked for further details around the concern.

Northamptonshire- Phone MASH team to consider the immediate safety of the child. The Prevent Lead sits within the MASH team, so you will be transferred to talk directly with them. You will be asked for further details around the concern.

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

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related
- Further information is also available within the PREVENT duty guidance (https://www.gov.uk/government/publications/prevent-duty-guidance) and on the Act Early website (ACT Early | Prevent radicalisation), this gives advice and guidance for professionals and parents.

7.6 If you have a mental health concern

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

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

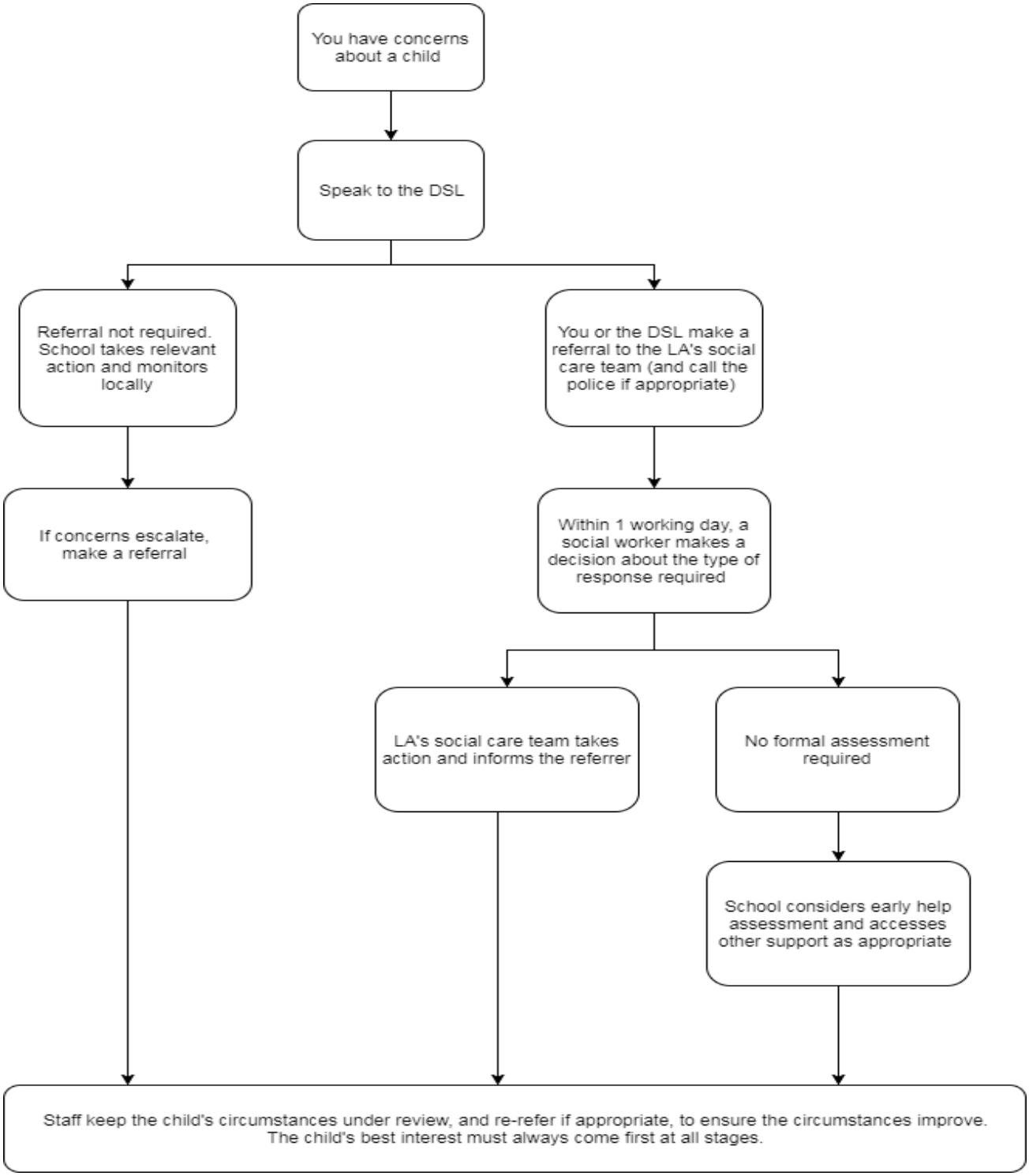
If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.

All schools work with other schools within the Inspiring Futures through Learning trust to bring experts in positive mental health together.

More information is available via the Department for Education guidance on mental health and behaviour in schools.

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

(Note – if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.)



7.7 Concerns about a staff member, supply teacher, volunteer or contractor

At IFtL we pride ourselves on staff having a clear concise understanding of what amounts to 'good staff conduct' (as detailed in the staff code of conduct). This enables us to create an environment in which children feel safe and understand the behaviour expectations of both themselves and of staff.

Concerns about staff member now come under two strands

Strand one- includes concerns which meets the harm threshold and requires a referral through to the LADO or DO in the Local Authority.

The categories are:

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

Strand two - includes concerns that do not meet the harm criteria and are considered low level concerns. This includes showing favouritism towards a child, shouting at a child or not following the code of conduct.

In both strands, if you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) or a professional in another agency, is posing a risk of harm to children, speak to the headteacher as soon as possible.

If the concerns/allegations are about the headteacher, then speak to the chair of governors and the Trust DSL.

The headteacher/chair of governors will then follow the procedures set out in appendix 3, if appropriate.

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the headteacher as soon as possible. The headteacher will then follow the procedures set out in appendix 3, if appropriate.

Schools and colleges may receive an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children (for example community groups, sports associations or service providers that run extra-curricular activities). As with any safeguarding allegation, schools and colleges should follow their safeguarding policies and procedures, including informing the LADO.

If the concerns/allegations are about the headteacher, speak to the Chair of Governors or the local authority designated officer /Designated Officer (LADO/DO),

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the headteacher, report it directly to the local authority designated officer/Designated Officer (LADO/DO).

The LADO/DO will advise, the school if they need to inform Ofsted/ TRA or DBS of the allegation and actions taken, within the necessary timescale (see appendix 3 for more detail).

The LADO/DO will also advise on whether the person can continue working with children, should be moved to other work or must be suspended during the investigation.

If a concern is for an adult within the IFtL core team, TMA ITT then the concern should be shared with Victoria Blackmore and Michelle Gardner (for MK ITT). The IFtL reporting form should be completed in this instance.

The IFtL DSL should be informed that a concern has been raised by contacting them immediately. *[See contact information at the beginning of this policy].*

If there are any concerns about any of the people named above, including the CEO, then these concerns are to be shared with the safeguarding trustee, XXXX (XXX) or the chair of Trustees, Marilyn Hubbard (mhubbard@IFtL.co.uk).

It is essential that these reports must be made immediately,

Low level concerns will also be shared with the LADO/DO as part of the investigation, they will also be informed of any other work or volunteering that the person completes which involves contact with children. There will also be consideration of the safety of their own children made.

Investigation will be undertaken quickly and resolved as soon as possible. Criminal referrals may take much longer as they are dependent on the Crown Prosecution Service.

7.8 Allegations of abuse made against other pupils (Child on Child Abuse)

We recognise that children can abuse their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

We also recognise the gendered nature of child-on-child abuse. There are more allegations of abuse against females than males reported. However, all child-on-child abuse is unacceptable and will be taken seriously.

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

- Bullying
- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harm and sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)
- Involves hazing or initiation ceremonies

See appendix 4 for more information about child-on-child abuse.

Procedures for dealing with allegations of child-on-child abuse

There is a legal requirement that the school must log any concerns, complete risk assessments for victim, perpetrator, other children and staff. All actions must be recorded, any actions to ensure safety, any changes made to policies and procedures and any resolution.

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

- The priority is to ensure the safety of all children involved.
- You must record (log) the allegation and tell the DSL, but do not investigate it
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence (as defined in when-to-call-the-police--guidance-for-schools-and-colleges.pdf)

- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected including staff) with a named person they can talk to if needed
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate
- The DSL will also consider if referrals are required for contraceptive advice, STI testing, healthy relationship advice and counselling.
- The Governing body will consider if policies and procedures need to be adapted to minimise the risk of reoccurrence.

Creating a supportive environment in school where children are encouraged to report and minimising the risk of child-on-child abuse

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour, healthy relationships and consent
- Ensure pupils can easily and confidently report abuse using our reporting systems (as described in section 7.10 below)
- Ensure staff reassure victims that they are being taken seriously and keep them informed about what is happening
- Recognition that it is more likely that girls will be victims and boys' perpetrators although it is important to remember boys can be victims and girls perpetrators, but that all child-on-child abuse is unacceptable and will be taken seriously

- Ensure staff are trained to understand:
- How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
- That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of "it will happen here"
- That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
- Children can show signs or act in ways they hope adults will notice and react to
- A friend may make a report
- A member of staff may overhear a conversation
- A child's behaviour might indicate that something is wrong
- Children may not recognise the abuse

- Children may try to protect the abuser and see them as a real girlfriend/boyfriend
- Children may be frightened, feel humiliated and ashamed or may have been threatened.
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- That a pupil harming another child could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns

7.9 Sharing of nudes and semi-nudes

Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (previously known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

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

You should explain that you need to report the incident and reassure the pupil(s) that they will receive support and help from the DSL.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services (Report Remove: Remove a nude image shared online | Childline)

- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved unless it places the child at increased risk))

The DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)
- The DSL has reason to believe that other young people are at risk, making it in the public interest.

If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL

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

They will hold interviews with the pupils involved (if appropriate).

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

Informing parents/carers

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

Referring to the police

If it is necessary to refer an incident to the police, this will be done through local neighbourhood police or by dialing 101. Reference should also be made to the guidance NPCC 'When to call the Police' (when-to-call-the-police--guidance-for-schools-and-colleges.pdf))

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded on CPOMS. The record-keeping arrangements set out in section 14 of this policy also apply to recording these incidents. Records of this will also be made on the online safeguarding system. The DSL is required to review these records regularly, checking for common themes, escalation of cases or links between individual events.

Curriculum coverage

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our relationships and sex and health education (RSHE) and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
- Issues of legality
- The risk of damage to people's feelings and reputation

Pupils also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

This policy on the sharing of nudes and semi-nudes is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

Pupils will also be taught how to remove these images and how to report concerns directly.

In line with KCSIE 2025, we understand and value the importance of the role all our schools can play in **preventative education** and the importance of an age-appropriate planned programme of relationships, sex and health education (paragraph 130) and that we need to ensure we education our children and families about harmful online challenges and online hoaxes (paragraph 132). Moreover, as highlighted in the paragraph 139, we will ensure we communicate with parents/ carers about children's access to online sites when away from school as well as when in school.

7.10 Reporting systems for our pupils

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- Ensure pupils understand that this is not their fault. Staff will be reminded of the need to be non-judgemental
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback
- Pupils will be able to report concerns and speak to any member of staff across the school
- Give alternative reporting mechanisms i.e. NCA's CEOP safety centre.
- Younger pupils will be taught to identify trusted adults on 'helping hands'
- Pupils will be able to speak to staff directly and use 'worry monsters' to write concerns down
- Pupils in KS2 and KS3 may wish to speak with form tutors as well as the wider staff

- Pupils will be made aware of the reporting systems and processes through discussion the relationship/sex education curriculum
- All disclosures and concerns will be dealt with respectfully and pupils will be taken seriously, creating a culture of trust
- School should create a safe space within school and develop trusted staff, to support children to feel confident in raising concerns.

8. Online safety and the use of mobile technology

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which may include mobile phones or smart watches)
- Set clear guidelines for the use of mobile phones and other mobile devices for the whole school community (when using devices within school or at home)
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate
- Have effective filtering and monitoring systems in place which also feature an alert mechanism.

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

- **Content** – being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.
- **Contact** – being subjected to harmful online interaction with other users, such as child-to-child pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

To meet our aims and address the risks above we will:

- Educate pupils about online safety as part of our curriculum. For example:
- The safe use of social media, the internet and technology
- Keeping personal information private
- How to recognise unacceptable behaviour online including harmful online challenges

- How to report any incidents of online-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
- Train staff, as part of their induction, on safe internet use, filtering and monitoring processes and online safeguarding issues including online-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year
- Staff must ensure that staff are aware of the risks of harmful online challenges i.e. TikTok Choking challenge, skull cracking challenge. And how to respond to them.
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them, so they know how to raise concerns about online safety and alert them to any emerging concerns around online harmful challenges, content, apps, games and platforms.
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
- Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
- Staff will not share personal numbers or email addresses with parents of children.
- Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Staff should not use personal phones to contact parents or pupils, only school phones should be used. In the event of an emergency when a personal phone has to be used, staff will ensure they withhold the number.
- Staff cannot have on their personnel smart watches which feature cameras as well as other devices which feature a camera or record mechanism.
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Ensure pupils and staff are aware of rules around appropriate dress and only using open spaces (such as kitchen or living room)
- Any video or photographic recording session should only be undertaken with agreement of the SLT, any unauthorised recording should lead to the session being terminated immediately. The retention period will be documented by the school and SLT will monitor these records and delete videos as they are no longer required.
- Usage of zoom/ teams and personal spaces will always be professional and appropriate in content including backgrounds and specific effects used.
- All online sessions should be authorised beforehand, and the DSL should have the ability to check on any session without warning.
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation
- Governors are responsible for ensuring that a robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems is in place.

- The filtering system should be monitored; it should not stop genuine research around topics for pupils but must block potentially harmful information.
- We ensure that all school devices offer appropriate filtering and monitoring of online content and that any harmful content is logged and responded to appropriately and proportionately in line with the DfE's 2023 filtering and monitoring standards for schools (please refer to the online safety policy)
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community

This section summarises our approach to online safety and mobile phone use. For comprehensive details about our school's policy on online safety and the use of mobile phones, please refer to our online safety policy and mobile phone policy, which you can find on our website.

At IFtL Trust we use 1:1 devices and as such our Online safety policy and procedures reflect the additional safeguarding considerations that have been made inclusive of awareness of the risks posed by Artificial intelligence.

For comprehensive details about our policy on online safety, please refer to our online safety policy, which you can find on our website.

9. Notifying parents or carers

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

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

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

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

Parents will be notified of how the issue is being addressed, they must not contact any children involved or parent of that child.

10. Pupils with special educational needs, disabilities or health issues

We recognise that pupils with special educational needs (SEN) or disabilities or certain health conditions can face additional safeguarding challenges. Any child may be vulnerable at some point in their lives, so it is essential that staff can identify vulnerabilities and be aware of the potential risk it can create for children. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs

- Communication barriers and difficulties in managing or reporting these challenges
- The Child may have a lack of understanding about what abuse is.
- The child may believe it is normal behaviour as they have grown up with the abuse.

11. Pupils with a social worker

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

The DSL and all members of staff will work with and support social workers to help protect vulnerable children. Children Social Care are required to inform and involve the DSL, where a social worker needs to be involved, this should be routine practice. The DSL should be involved in any discussion or decision made for the child.

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

- Responding to unauthorised absence or missing from education where there are known safeguarding risks
- The provision of pastoral and/or academic support
- The need to carry out home visits or contact via zoom
- The DSL and their team are aware that it is essential that they have sight of the child and have an opportunity to talk to them without a parent or carer being present (whilst ensuring that the child and staff member is in sight of others.

12. Looked-after Children, Previously Looked-after Children, and Children in Kinship Care

We are committed to ensuring that all staff have the skills, knowledge and understanding necessary to safeguard children who may be particularly vulnerable due to their care arrangements, including:

- Children who are looked after by a local authority (LAC)
- Children who were previously looked after but are now adopted, subject to special guardianship or child arrangements orders (PLAC)
- Children being raised in kinship care – whether formally arranged through a local authority or informally through family or friends
- Our approach includes ensuring:
- Relevant staff are aware of the legal status of a child's care arrangement, including contact with birth parents or others with parental responsibility, and how this may impact safeguarding
- The DSL maintains accurate and up-to-date records of the child's social worker, Virtual School Head (VSH), and any other professionals involved
- The DSL or a deputy maintains regular contact with the VSH, family members and carers to ensure joined-up support

Designated Teacher

We have appointed a Designated Teacher (see contact details at the start of this policy), in line with statutory guidance, who is responsible for promoting the educational achievement of looked-after and previously looked-after children.

The Designated Teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their duties, the Designated Teacher will:

- Work closely with the DSL to ensure that any safeguarding concerns are quickly and effectively responded to
- Collaborate with Virtual School Heads to identify how Pupil Premium Plus and other funding can be used to support progress
- Monitor progress, attainment, attendance and wellbeing, and ensure that personal education plans (PEPs) are in place and reviewed
- Identify and respond to additional vulnerabilities for children in kinship care, ensuring that staff understand the complexities and potential safeguarding implications of informal care arrangements
- Seek guidance from the local authority where care arrangements are unclear or if concerns arise that informal kinship care may mask safeguarding risks

Note: Staff should be aware that some kinship care arrangements may not involve formal local authority oversight. These informal arrangements may lack professional monitoring, increasing the potential for hidden harm. Any uncertainty about a child's living arrangements or primary caregiver should be raised with the DSL.

13. Complaints and concerns about school safeguarding policies

13.1 Complaints against staff

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

All allegations are taken seriously and will always be followed up and investigated by the relevant person within school or the LADO/DO)

13.2 Whistleblowing

All schools in the IFtL trust follow the trust-wide whistle-blowing policy that covers concerns regarding the way the school safeguards pupils – including poor or unsafe practice, or potential failures. The full whistleblowing policy can be read here.

There is the facility for external reporting, if staff do not feel confident to report internally. All staff are made aware of this as part of their induction and reminded on a regular basis.

14. Record keeping

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

All safeguarding concerns (including low level concerns), discussions, decisions made and the reasons for those decisions, must be recorded on the school's digital system, CPOMS. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

- A clear and comprehensive summary of the concern
- Any actions that need to be taken and by who
- Any information shared with other agencies.
- Details of how the concern was followed up and resolved
- Details of support and plan that is in place.
- A note of any action taken, decisions reached, challenge required and the outcome
- Cases being closed and any challenge to that closure.
- Discussions and decisions made including the rationale for those decisions.
- Instances where referrals were or were not made to other agencies.

Concerns and referrals will be kept in an electronic file for each child. This includes a chronology of events, which is regularly reviewed by the DSL. Written records, notes, body maps will be scanned and added to the file

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

Safeguarding records relating to individual children will be retained within the education system until they reach the age of 25 years. Copies by the schools will be kept for 12 months to assist with any queries from the new school, but copies of records will be destroyed after this 12-month period.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded within 5 days securely, and separately from the main pupil file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

Any transfers due to sexual harm or sexual harassment or PREVENT, the receiving school or college should be made aware of the concerns, prior to starting, to allow the school or college time to prepare and safeguard other children in their care.

Signed transfer receipts will be kept for all on boarders and leavers. *For schools that also have CPOMS, the digital records will be transferred digitally through CPOMS, and a digital receipt will be saved within the system. CPOMS will then archive the file, which allows the school to access their information if requested by statutory authorities.

In addition:

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks
- Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff

15. Training

15.1 All staff

All staff members will undertake safeguarding and child protection training as part of their induction, including internal and external whistle-blowing procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect.

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole trust safeguarding approach and wider staff training, and curriculum planning
- Focus on the contextual needs of the school and recent trends
- Include an extra familial harm focus on children they are working with.
- Have regard to the Teachers' Standards to support the expectation that all teachers:
- Manage behaviour effectively to ensure a good and safe environment
- Have a clear understanding of the needs of all pupils
- Understand what to do in the event of a disclosure
- Understand how to report safeguarding allegations against staff

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

All staff will have an awareness around Female Genital Mutilation and the duty to report, identifying signs that it has happened or that a child is at risk of it happening.

All staff working with children must be aware of the risks through child criminal exploitation, specifically the risks of child sexual exploitation. This must cover identifying the signs and knowing how to report through effectively.

Staff will also receive regular safeguarding and child protection updates, including on online safety which amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring. Training is delivered as required but at least annually (for example, through emails, e-bulletins and staff safeguarding briefings).

All staff will receive training to ensure they understand expectations, roles and responsibilities around school setting's filtering and monitoring systems. This will also be included in staff induction training.

The ethos within our schools is that safeguarding is a strand that runs through all activities, lessons and extra-curricular activities, we have a culture of safeguarding ensuring that all staff are aware and signed up to this ethos and remind staff frequently of their responsibilities to identify, respond and report

Volunteers will receive appropriate training through a safeguarding induction, ensuring that they know what to look for and how to report a concern Volunteers do not work on their own so will be supported by other staff.

15.2 The DSL and deputy and additional designated safeguarding officers

In addition, the DSL, Deputy DSL and additional DSOs will undertake child protection and safeguarding training at least every 2 years.

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

They will also undertake SEN, Internet safety, Prevent awareness training, FGM training and attend multi agency training every three years.

They will also be encouraged to identify any other training needs or gaps in knowledge that they may have, helping them to respond to emerging concerns and issues.

15.3 Governors/Trustees

All governors and trustees must receive induction training, which covers the need to challenge and scrutinise.

They will also receive annual training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities. The chair of governors and safeguarding governor should receive additional training looking at their safeguarding responsibilities specifically.

As the chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, they receive training in managing allegations for this purpose.

In the event of them having to take the case manager role, additional support would be provided via the Trust.

15.4 Recruitment – interview panels

At least one person conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures. This must be updated every three years in line with MK Together recommendations.

IFtL schools are fully compliant with Safer Recruitment requirements and ensure that all required checks are undertaken. Risk assessment will be undertaken where necessary and kept on personnel files. All checks are recorded on the Single Central Record (SCR)

See appendix 2 of this policy for more information about our safer recruitment procedures.

15.5 Staff who have contact with pupils and families

All members of the safeguarding team and other identified relevant staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues. This allows them to discuss cases, raise issues and to ensure that their own welfare is monitored and supported.

16. Contextual and additional safeguarding information for New Chapter Primary school.

16.1 Visitors

The processes for visitors to New Chapter Primary School are as follows:

The Office should be made aware of planned visitors before hand.

Visitors must use the electronic buzzer to request access to the school site- whether this is the pedestrian or the car park gate.

All visitors are required to sign in on arrival using the electronic Inventory system. This requires visitors to input their name, where they are from and who they are visiting. The system will take a photograph of the individual and they are required to wear the visitor sticker for the duration of their visit.

Visitors must read and sign a copy of the visitors safeguarding leaflet to indicate they are aware of and understand our safeguarding procedures. The leaflet outlines our safeguarding statement, use of mobile phones, emergency procedures, New Chapter Primary safeguarding team and how to respond to a safeguarding concern. A copy of the school Child Protection Policy will be available, and the attention of the visitor will be drawn to what they need to do if they have a concern, the names of the DSL and safeguarding team and how to make a report.

All visitors are required to wear a lanyard, which indicates the level of checks that have been undertaken on the individual and checks if they are able to work in regulated activity, supervised or unsupervised. Green lanyards are given to visitors where their DBS has been verified or where we have received letters of assurance from their employer. Red lanyards are given to visitors where no DBS has been verified or letter of assurance received. Visitors wearing a red lanyard are not left unsupervised and remain with the member of staff they are visiting.

Visitors must be collected by the relevant member of staff and should be escorted to the area where they will be working or seeing children. All staff are aware that anyone not wearing a lanyard must be challenged (if safe to do so) and escorted back to the Office. They are aware of what the different lanyards mean and the requirement to never leave someone unsupervised unless they have the relevant DBS check in place.

Children are also aware of the meaning of the lanyards.

All visitors must sign out on leaving the building.

16.2 Collection arrangements

Where there are specific collection arrangements in place for children, notes are added to their file to detail the arrangements and staff are made aware. Staff are aware they need to inform a DSL if changes are made to collection arrangements for monitored children.

17. Monitoring arrangements

This policy will be reviewed **annually** by Victoria Blackmore (IFtL DSL) and Victoria Gidman (IFtL Deputy DSL). **Each school Headteacher is responsible for ensuring that the processes and procedures reflect the current needs of the school but link to the Trust IFtL.**

The Board of Trustees is responsible for reviewing this policy annually and ensuring that is it compliant with current legislation, best practice and oversight of key documentation ensuring that each school maintains an up-to-date list of key contacts and related policy and procedures are kept up to date. The Local Governing Bodies of each school are responsible to ensure this policy is adhered to within their school and are compliant with legislation and requirements.

Regular audits will also take place to ensure that the school is working to the policies.

They will also be subject to an annual section 175 audit, which is shared with safeguarding partnerships to check compliance to local policies and procedures.

18. Links with other policies (school based and trust wide)

Child protection and safeguarding is a thread that runs through and links all our policies. In particular it links to the following policies and procedures:

- Behaviour
- Staff code of conduct
- Complaints
- Health and safety

- Attendance
- Equality
- Relationships and sex education (RSE)
- First aid
- Curriculum
- Designated teacher for looked-after and previously looked-after children
- Privacy notices (GDPR)

This policy is also to be read in conjunction with the Inspiring Futures through Learning policies.

- Whistleblowing
- Anti-bullying
- Responsible Use and Online Safety Policy (technology)

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

Appendix 1: types of abuse

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

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

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

Emotional abuse may involve:

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

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

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

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

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

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

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

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

Exploitation (Child criminal exploitation CCE and Child Sexual Exploitation CSE): Both CCE and CSE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CCE and CSE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation

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

Recruitment and selection process

To make sure we recruit suitable people and deter unsuitable people from applying, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

Advertising

When advertising roles through *My New Term*, we will make clear:

- Our schools and trust's commitment to safeguarding and promoting the welfare of children
- Details of safeguarding checks that will be undertaken
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children (regulated or unregulated activity)
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account
- The requirements for original documents to be produced including a birth certificate and any documents that relate to name changes.
- That an online check may be undertaken on them and that any issues identified will be raised during interview.

Online Applications via *My New Term*

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders
- Include a statement that we will be seeking criminal disclosure declarations for all shortlisted candidates.
- Include a statement that we may do online checks on any shortlisted candidates, applicants will be asked about any issues identified at interview.

Shortlisting

Our shortlisting process will involve at least 2 people and will:

- Consider any inconsistencies in information and look for gaps in employment and reasons given for them
- Explore all potential concerns
- Consider the information gained from online searches which may be done as part of due diligence checks.

Once we have shortlisted candidates, we will ask shortlisted candidates to:

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
- If they have a criminal history
- Whether they are included on the barred list
- Whether they are prohibited from teaching
- Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
- Details of all names that they have used from birth and any name changes that have taken place.
- Any relevant overseas information
- Anything that may affect their suitability to work with children.
- Any paid or voluntary work they are undertaking that may impact on their suitability to work with children.

They will be asked to sign a declaration confirming the information they have provided is true and the need to notify the Headteacher if there are any change in circumstances that may impact on their suitability.

Seeking references and checking employment history

For teaching staff, we will obtain references before interview (If possible). Any concerns raised will be explored further with referees and taken up with the candidate at interview.

For non-teaching staff, they can indicate if they are willing for references to be sought before interview or to be left until a conditional offer of employment is made.

When seeking references, we will:

- Not accept open references
- Check the validity of any electronic references.
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/Headteacher as accurate in respect to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed

- If they have never worked or volunteered with children, then a personal reference will be sought, but must be followed up with a risk assessment

Interview and selection

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Check the candidate's motivation to work with children
- Record all information considered and decisions made (including scoring)

Pre-appointment vetting checks

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

All checks must be completed, before a new staff member can commence employment.

New staff

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- Verify their identity (using birth certificate and other documentation. Copies of documents used to verify the successful candidate's identity, right to work and required qualifications will be kept in their personnel file)
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed, we will keep a record of the fact that vetting took place, the result of the check, any risk assessment made and recruitment decision taken
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate. This may involve contacting the awarding body.
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. Where available, these will include:
- For all staff, including teaching positions: criminal records checks for overseas applicants
- For teaching positions: obtaining a letter of professional standing from the professional regulating authority in the country where the applicant has worked

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

* Management positions are most likely to include, but are not limited to, headteachers, Headteachers, deputy/assistant headteachers and those managing financial or confidential records.

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

Regulated activity means a person who will be:

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

Existing staff

We will check annually (via an annual declaration) with staff

- if they have committed or been investigated for any action that may deem them unsuitable to work with children,
- if there is any work or volunteering, they are undertaking with children or vulnerable adults.
- We will also ask them to disclose any previous names that they have used or been known by, that have not already been disclosed.

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more
- Or they have applied and been offered a post, with a significant increase in responsibility.

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

- We believe the individual has engaged in relevant conduct; or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and

- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left
- The member of staff has behaved in a way that makes them unsuitable to work with children
- There has been an incident or issue in their personal life that effects their suitability to work with children. (i.e. Domestic abuse incident, where they have failed to protect their children.

Agency and third-party staff

We will obtain written signed notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made. We will also ask if they have received safeguarding training and will ensure that we carry out an induction that explains our procedures and where to report concerns to.

Contractors

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

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

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

We will not keep copies of such checks for longer than 6 months.

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

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

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

Trainee/student teachers

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

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

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

Volunteers

We will:

- Always seek an enhanced DBS check for all volunteers and a barred list check for any engaged in regulated activity.
- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

Governors

All trustees, local governors and members will have an enhanced DBS check without barred list information.

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

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

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

- A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008).
- Identity check (to include birth certificate and any name changes)
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK (i.e. overseas checks)

Staff working in alternative provision settings

The responsibility for the child rests with the school, where we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

We also require regular updates from the alternative provision in terms of progress and behaviour and any issues that may arise.

Children should only remain in alternative education for the minimum amount of time and then supported to transition back into mainstream education as soon as it is possible to do so.

Adults who supervise pupils on work experience

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

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

Over 18's should have a DBS check in place

Under 18's should have a statement of good conduct from their training provider

They must be supervised and supported at all times

Pupils staying with host families

Where the school makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people. A risk assessment should be undertaken for anyone living in the household. If a concern is identified, this must be checked out with the Head and a risk assessment undertaken or refusal for a work placement made.

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

Appendix 3: allegations of abuse made against staff

Section 1: allegations that may meet the harms threshold

The first category for safeguarding allegations against staff/volunteers, means that anyone spotting a concern about staff behaviour must report it to the Headteacher, or if it's about the headteacher to the chair of Governors

If it meets one of the four categories of harm (see below), then it must be reported to the LADO/DO, who will decide whether an internal or external investigation is required

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

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school

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

A 'case manager' will lead any investigation. This will be the headteacher, or the chair of governors where the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

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

Suspension of the accused until the case is resolved

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

Based on an assessment of risk and advise from the LADO and the IFtL DSL, we will consider alternatives such as:

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

If in doubt, the case manager will seek views from the school's personnel adviser and the Local Authority Designated Officer at the local authority, as well as the police and children's social care where they have been involved.

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded**: to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

In the event of an allegation that meets the Harm criteria, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the Local Authority Designated Officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the LADO/DO (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the LADO/DO, police and/or children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's own family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the LADO/DO. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details

- **If it is decided that no further action is to be taken** regarding the subject of the allegation or concern, record this decision and the justification for it and agree with the LADO/DO what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the LADO/DO to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. Advice is accessible through the 24/7 helpline.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

The LADO/DO will act as a source of advice and guidance all through the process. Governors legally have a duty to inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

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

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

Consideration will be given and a decision made about whether a report needs to go to DBS, the LADO/DO will advise on this.

Additional considerations for supply teachers and all contracted staff

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

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO/DO to determine a suitable outcome.
- The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation

- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

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

Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days
- Cases involving criminal investigations, are more complicated and reliant on decisions being made by the Crown Prosecution Service

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will also refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Substantiated and unsubstantiated allegations will remain on the individuals personnel file until retirement age or plus 10 years, whichever is later.

Individuals returning to work after suspension

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

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

Unsubstantiated, unfounded, false or malicious reports

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it
- Unfounded, false or malicious allegations will be removed from their personnel file at the conclusion of the investigation.

Confidentiality and information sharing

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

The case manager will take advice from the LADO/DO, police and children's social care services, as appropriate, to agree:

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

Record-keeping

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

The records of any allegation that, following an investigation, is found to be unfounded, malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations, they will be kept on the personnel file.

The following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, the school will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

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

References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- Include any substantiated allegations, provided that the information is factual and does not include opinions

Learning lessons

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

This will include consideration of (as applicable):

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

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Historic allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO/DO in line with our local authority's procedures for dealing with historic allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: concerns that do not meet the harm threshold (known as low level concerns)

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns

The term 'low-level' concern is any concern refers to actions where there is no direct harm to a child, but they have behaved in a way that is considered inappropriate– no matter how small. An adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

Examples of such behaviour could include, but are not limited to:

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Working whilst affected by taking a significant number of drugs or alcohol the night before.
- Using inappropriate sexualised, intimidating or offensive language

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per section 7.7 of this policy
- Empowering staff to self-refer. Failure to self-refer is a disciplinary offence and will be followed up.
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system
- All staff agree to being open and honest and not bringing the school into disrepute.

Responding to low-level concerns

If the concern is raised via a third party, the headteacher will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's staff code of conduct.

Keeping Children Safe in Education also links to this report for more information Developing and implementing a low-level concerns policy: A guide for organisations which work with children]

All low-level concerns are taken seriously and followed up on, as this may be an early sign of behaviour that could be harmful to children or the reputation of the school and the Trust.

The IFtL Low level concern policy should be adhered to at all times.

Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school, when retention is considered on a case-by-case basis.

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the LADO/DO at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance
- Substantiated

Appendix 4: specific safeguarding issues

Children who are absent from education

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

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

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

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

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage. Where pupils are absent from school for prolonged periods we will follow our attendance policy to ensure that pupils are seen regularly by a member of the School staff and that pupil is supported to return to school as soon as they are able to.

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

Referrals to the local authority CME team must be made for children who are deemed as 'Missing' from education and whom have not been seen in school for 10 school days.

Children in Alternative Provision

Where a school places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and will ascertain appropriate assurances to satisfy that the placement meets the pupil's needs.

The DSL alongside the SENco and Headteacher should ensure that the appropriate Quality assurance has been completed prior to the child starting at the Alternative provision. This must include obtaining the appropriate Safer recruitment checks, letter of assurance inclusive of staff DBS information and the setting's safeguarding policy. The school should also ensure they receive regular attendance, engagement and attainment information from the Alternative provision.

The cohort of pupils in Alternative Provision often have complex needs, it is important that the setting is made aware of any risk assessments, safety plans, or external services that are supporting the pupil/ family.

Child criminal exploitation

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

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

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

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

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

The CCE toolkit should be completed by the DSL.

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased

status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

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

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

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

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

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

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

The CSE toolkit should be completed by the DSL.

Domestic abuse

Domestic Abuse Act 2021 states that children can be direct victims of domestic abuse as well as witnessing and being adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home.

Older children may also experience domestic abuse and/or violence in their own personal relationships.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. This is the procedure where police forces are part of Operation Encompass.

The DSL will provide support according to the child's needs and update records about their circumstances. The school may also reach out to a parent subject to domestic abuse, giving details of local domestic abuse services and support available.

Homelessness

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

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

The lack of a stable home is always a child protection issue.

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

So-called 'honour-based' abuse (including FGM and forced marriage)

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

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

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

Staff must never discuss HBA directly with family if they believe it puts the child at increased risk or may create a flight risk.

FGM

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

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues

A girl:

- Having difficulty walking, sitting or standing, or looking uncomfortable
- Finding it hard to sit still for long periods of time (where this was not a problem previously)
- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Having frequent urinary, menstrual or stomach problems
- Avoiding physical exercise or missing PE
- Being repeatedly absent from school, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

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

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

A girl:

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

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

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them. From 2022, the legal minimum age for marriage has increased to 18 years. In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form or coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer

- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

Preventing radicalisation

- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups
- **Extremism** is the promotion or advancement of an ideology based on violence, hatred or intolerance, that's aims to:

- Negate or destroy the fundamental rights and freedoms of others; or
- Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
- Intentionally create a permissive environment for others to achieve the results in (1) or (2).

- **Terrorism** is an action that:

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

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

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

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

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

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

Staff will be alert to changes in pupils' behaviour.

The government website Educate Against Hate, Actearly and charity NSPCC say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech

- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation often do not fit in and may be searching for a sense of identity or belonging, they may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

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

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

Child-on-Child abuse (previously referred to as Peer-on-peer abuse)

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school and online.

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

- Bullying (including online-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between peers
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nudes and semi-nudes images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk. Schools should create a safe place for children to report concerns and encourage trusted adults to support children who are also mindful of the need to work within professional boundaries.

Children who have been sexually harmed may need additional support through other agencies such as contraceptive advice, STI testing, counselling, guidance on healthy relationships and consent.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (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

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

We are aware and must be ultra-vigilant for signs of sexual violence and harassment as we know that it is highly prevalent and children often do not talk out about this and even accept it as the 'norm'. We must ensure this is not the case in any of our schools.

Serious violence

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above)

Risk factors which increase the likelihood of involvement in serious violence include:

- Being male
- Having been frequently absent or permanently excluded from school
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

Children who are LGBTQ+

Children who are, or are perceived to be, LGBTQ+ can be targeted by other children. Risks can be compounded when children who are LGBTQ+ lack a trusted adult with whom they can be open. Staff will be mindful of the additional barriers that may face children who are LGBTQ+ and will seek to build trusted relationships with students and provide a safe space for them to speak out or share their concerns. LGBTQ+ inclusion is embedded within PSHE and Relationship and Sex Education.

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

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

Visitors are expected to sign the visitors' book and wear a visitor's badge at all times.

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

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

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

carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

Staff have been taught to challenge anyone not wearing a lanyard or wearing one that indicates they should be accompanied at all times.

Non-collection of children

If a child is not collected at the end of the session/day, we will:

- Wait with the pupil in a safe space, younger children will be with a familiar adult
- Two people must remain with the child
- Attempt to make contact with each emergency contact
- Send a text message to the priority contacts
- Escalate to MK MASH should school be unable to make contact with someone on the priority list
- The incident will then be recorded on the electronic system for safeguarding

Missing pupils

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

- Contact the parent(s) by telephone
- If school is unable to make contact, then a text message and/or email will be sent to the parents/carers asking for them to make contact within an hour timeframe
- If no contact is made, then a home welfare check will be scheduled to take place. DSLs will make a decision depending on previous levels of need and decide whether immediate escalation to MASH is necessary.
- A home welfare check may be carried out and details of this will be logged on the school's electronic safeguarding system. Two members of staff will attend.
- If there is no answer at the property, then a note will be posted through the door asking for contact to be made immediately with school. A call to MK MASH will be made to explain the concerns.
- If no contact is made with school within 2 hours, then MK MASH will be contacted to further escalate the issue. A welfare check may be requested from Thames Valley Police.
- All information will be logged on the electronic system.

Home Visits

Any home visits must be undertaken with a very clear purpose for the visit. Staff must be aware of the value of a home visit but also the limitations.

Objectives must be set beforehand and reviewed on return.

Staff should not enter a home without parents' permission or without parents being present unless in the event of an emergency. In the event of an emergency, they must consider involving police to protect themselves and the child.

Home visits should only be undertaken in a place which is open and visible. They should not see children in bedrooms, but in living room, kitchen or in the garden, in sight of parents.

Children should be given the opportunity to rise concerns without the presence of their parent; staff must consider how this can be managed safely.

On return to school, a full report should be completed detailing what they have seen, how the child has reacted, and the responses given.