

SAFEGUARDING AND CHILD PROTECTION POLICY



Northampton International Academy



PERSON RESPONSIBLE FOR POLICY:	DR JO TREVENNA – HEADTEACHER
APPROVED:	
SIGNED:	CHAIR OF GOVERNORS – BEN SHIRLEY
TO BE REVIEWED:	SEPTEMBER 2021 NOTE ADDED 1 ST SEPT 2021 – THIS POLICY IS CURRENTLY BEING REVIEWED AND WILL BE RATIFIED BY THE LOCAL ADVISORY BOARD ON THE 20 TH SEPTEMBER 2021.

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

Designated Safeguarding Lead	Deputy Designated Safeguarding Lead(s)	Safeguarding Governor
Emma Ruffles	Eno Hall (Senior DDSL) Julie Fenlon (EYFS & Years 1-4) Beth Sidwell (Years 5, 6 & 7) Sarah Lightbody (Years 8 & 9) Candice Hart (Years 10 & 11) Debbie Burgess (Years 12 & 13) Amanda Carroll (Mental Health Lead)	Interim Safeguarding Lead Ben Shirley c/o info@nia.emat.uk

The named personnel with Designated Responsibility regarding allegations against staff are:

Designated Senior Manager	Deputy Designated Senior Manager	Chair of Governors	East Midland Academy Trust (EMAT) Head of Safeguarding and Inclusion
Dr Jo Trevenna Headteacher	Emma Ruffles DSL and Deputy Headteacher	Ben Shirley c/o info@nia.emat.uk	Lorna Beard Lorna.Beard@castle.emat.uk



The Everyone's Invited campaign has rightly served to focus our minds on the need to continue to work together to protect children.

We, at EMAT, believe that schools play a crucial role in teaching pupils about sex and relationships, equality and diversity and modern citizenship as well as preparing them for the modern world. This is enacted through each school's culture, its curriculum, and all policies. We aim to give all pupils and staff a voice to enable them to act in a protective manner towards themselves and others. This includes developing a robust whistleblowing culture as well as fostering a culture of integrity and mutual respect.

We recognise that we have the responsibility of tackling sexual violence and harassment, instilling values in our stakeholders and encourage all to be driven by their strong moral compass. Like so much of education, our work must complement that undertaken by parents and carers so that young people receive a consistent message, and they can go about their lives free from harassment and abuse.

All of our schools will continue to engage with their stakeholders, listen to their concerns and signpost necessary support and provision within and beyond its schools. We ask that anyone who has experienced such behaviour, or who is suffering because of it, to report it to an appropriate adult either in the school or within the EMAT team so they can be supported, and steps can be taken to address the issue.

A dedicated NSPCC helpline is now available to support anyone who has experienced sexual abuse in educational settings or has concerns about someone or the issues raised. The dedicated **NSPCC helpline number is 0800 136 663 or by emailing help@nspcc.org.uk**

Staff members can also seek support from **Employee's Assist on 08000 305 182.**

If you are troubled about possible wrongdoing at work, please don't keep it to yourself. Our [Whistleblowing Policy](#) is there to reassure you that it is safe and acceptable to speak up and to enable you to raise any concern you may have at an early stage and in the right way. If you feel unable to raise the matter with your manager, for whatever reason, please raise the matter with:

- **EMAT Head of Governance & Compliance** – Monica Juan – monica.juan@emat.uk
- **EMAT Senior Workforce Planning & HRBP** – Ruhena Mahmood – Ruhena.mahmood@emat.uk

If you are unsure about raising a concern you can get free and independent advice from **Protect helpline on 020 3117 2520 or by emailing whistle@protect-advice.org.uk**

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1. AIM OF POLICY	

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

The procedures contained in this policy apply to all staff, volunteers and governors/ members of Northampton International Academy and are consistent with those of Northamptonshire Safeguarding Children Partnership (NSCP). The Northamptonshire Safeguarding Partnership arrangements can be found here [NSCP](#)

The aim of this Policy is to ensure that:-

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

2. LEGISLATION AND STATUTORY GUIDANCE

This policy is based on the Department for Education's statutory guidance, Keeping Children Safe in Education 2020* (**NIA is working to the newest documentation of Keeping Children Safe in Education 2021 and our new policy will reflect these changes*) and Working Together to Safeguard Children 2018, and the Governance Handbook. We comply with this guidance and the arrangements agreed and published by our three local safeguarding partners.

This policy is also based on the following legislation and statutory guidance:-

- The Children Act 1989 and The Children Act 2004 amendment-Section 11 of the Children Act 2004 places duties on a range of organisations and individuals to ensure their functions, and any services that they contract out to others, are discharged having regard to the need to safeguard and promote the welfare 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
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- 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, which explains schools' duties under the Counter- Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- 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 on a school interview/appointment panel 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 Childcare (Disqualification) Regulations 2009 (and 2018 amendment) 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.

Please note that the DFE Guidance on Safeguarding during COVID has been withdrawn and new guidance to cover the full reopening of schools has been incorporated into KCSIE 2020 and is referenced in this policy. Schools should ensure that this policy is reviewed regularly during the Covid-19 pandemic to take account of any local or national lockdown arrangements. It may be necessary to add a COVID addendum during particular periods to take account of a temporary change in practice needed to cover a local or national lockdown.

3. DEFINITIONS

Safeguarding and promoting the welfare of children is defined in KCSIE 2020 as:-

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

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

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm.

Appendix 1 explains the different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. *Appendix 1 defines neglect in more detail.*

Children includes everyone under the age of 18.

Sexting (also known as youth produced sexual imagery) is the sharing of sexual imagery (photos or videos) by children

Safeguarding is not just about protecting children from deliberate harm. It also relates to the broader aspects of care and education including:

- Pupils' health and safety and well-being, including their mental health.
- Meeting the needs of children with special educational needs and/or disabilities.
- The use of reasonable force.
- Meeting the needs of children with medical conditions.
- Providing first aid.
- Educational visits.
- Intimate care and emotional wellbeing.
- Online safety and associated issues.
- Appropriate arrangements to ensure school security, taking into account the local context.
- Keeping children safe from risks, harm and exploitation

Safeguarding can involve a range of potential issues such as:

- Neglect, physical abuse, sexual abuse and emotional abuse.
- Contextualised abuse.
- Bullying, including online bullying (by text message, on social networking sites, etc) and prejudice based bullying.
- Peer on Peer abuse.
- Racist, disability and homophobic, bi-phobic or transphobic abuse.
- Gender based violence/violence against women and girls.
- Extremist behaviour and/or radicalisation.
- Child sexual exploitation and human trafficking.
- The impact of new technologies, including 'sexting' and accessing pornography.
- Child on Child Sexual Violence and Sexual Harassment
- Substance misuse.
- Issues which may be specific to a local area or population, for example gang activity and youth violence (County Lines).
- Serious Violence
- Particular issues affecting children including domestic violence, female genital mutilation and honour-based violence and forced marriage.
- 'Up skirting'- a criminal offence from 2019
- Extra Familial Harm – (Contextual Safeguarding)

All staff should be aware that Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

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.

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities
- 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
- Are at risk due to either their own or a family member’s mental health needs
- Are looked after or previously looked after
- Children who have a social worker

5. ROLES AND RESPONSIBILITIES

Safeguarding and child protection is everyone’s responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of Northamptonshire Safeguarding Children Partnership. (NSCP)

The school has a pivotal role to play in multi-agency safeguarding arrangements and contributes to multi-agency working in line with statutory guidance Working Together to Safeguard Children 2018.

The three statutory safeguarding partners (Northamptonshire County Council, Health, and Police) have made arrangements to allow all schools and colleges in the local area to be fully engaged, involved and included in the new safeguarding arrangements. As a named relevant agency we are under a statutory duty to co-operate with the published arrangements.

THE SCHOOL IS AWARE OF AND WILL ALWAYS ACT IN LINE WITH THE NSCP POLICIES AND PROCEDURES AND PRACTICE GUIDANCE

Our policy and procedures also apply to extended school and off-site activities.

We will include opportunities across the curriculum, including PSHCE and IT for children to be taught about safeguarding and to develop the skills they need to recognise danger and know where to seek help.

RHSE Relationship, Sex and Health Education is compulsory. As a school we have developed our approaches to meet statutory requirements and the teaching of this. This will include equality, diversity and difference.

The PSHCE provision at Northampton International Academy has been designed and built to reflect the need of our students, the ethos of our school and the statutory legal requirements relating to the delivery of RSE.

The curriculum is split into five global pillars, which are present in our teaching across the wider curriculum.

These are:

- Wider Community: Thinking about the community we live in and the pressures and issues young people have to face.
- Collaboration: Focusing on working together to support others through difficult times, dealing with emotional issues and learning to work together.
- Active Global Citizens: Promoting an understanding of world issues, the role of democracy and how to impact change.
- Employability: Ensuring our students have the right skills and knowledge to access all the next steps available to them post 16, whilst educating them to have a good understanding of the world of work and how to manage money.
- Rights and respect: Equipping students with a good knowledge of their legal rights whilst also addressing the need to respect and support the rights of others.
- The sixth unit focuses on ensuring all our Relationships/ Sex/ Health Education lesson content is included as per the statutory framework. The PSHCE Curriculum can be viewed in Appendix 6.

We acknowledge that there may be times during the teaching of RSHE, that children may need an opportunity to talk to a trusted adult in the school. Children may want to talk about experiences at home or in the community that may trigger discussions with the Designated Safeguarding Lead, who will then decide on any next steps around listening and responding to the child.

We will maintain an attitude of “it could happen here” where safeguarding is concerned.

5.1 All Staff

All staff will read and understand Part I and Annex A of the Department for Education’s statutory safeguarding guidance, [Keeping Children Safe in Education 2020](#) and review this guidance at least annually.

All staff will be aware of:

- Our systems which support safeguarding, including the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and any deputies, the behaviour policy, and the safeguarding response to children who go missing from education
- The early help process 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 how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation.

5.2 The Designated Safeguarding Lead (DSL)

The DSL is a member of the Senior Leadership Team.

Our DSL is Emma Ruffles Deputy Headteacher Pastoral

The DSL takes lead responsibility for child protection and wider safeguarding.

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

We will ensure appropriate cover arrangements for any out of hours/out of term activities.

To contact the DSL during out of hours/out of term activities please email:

emma.ruffles@nia.emat.uk or telephone: 07909 872550

When the DSL is absent, the Senior Deputy Eno Hall will act as cover. email: Eno-Abasi.Hall@nia.emat.uk
07909 872550

If the DSL and Deputy not available, Dr Jo Trevenna, the headteacher will act as cover (for example, during out-of-hours/out-of-term activities).

Any deputies will be trained to the same standard as the designated safeguarding lead.

The DSL will be given the time, funding, training, resources and support to:

- 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
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- The DSL will also keep the head teacher informed of any issues, and liaise with Local Authority case managers and Designated Officers for child protection concerns as appropriate.

Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead; this lead responsibility should not be delegated. (*Annex B; Paragraph 2 Keeping Children Safe in Education 2020.*)

The full responsibilities of the DSL are set out in Annex B KCSIE 2020.

5.3 The Local Advisory Board (LAB)

The Local Advisory Board will approve this policy at each review, ensure it complies with the law and hold the head teacher to account for its implementation.

The Local Advisory Board will appoint a senior board level (or equivalent) Governor Safeguarding Lead: Mr Ben Shirley to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL.

The Chair of Governors will act as the 'case manager' in the event that an allegation of abuse is made against the head teacher, where appropriate (see Appendix 3).

All governors will read Keeping Children Safe in Education 2020.

5.4 The Headteacher

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

- Ensuring that staff (including temporary staff) and volunteers are informed of our systems that support safeguarding, including this policy as part of their induction
- Communicating this policy to parents when their child joins the school and via the school website

- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this 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 (EYFS & Primary)
- Making sure each child in the Early Years Foundation Stage is assigned a key person (EYFS)

6. CONFIDENTIALITY AND INFORMATION SHARING

Information sharing is vital in identifying and tackling all forms of abuse and neglect. GDPR does not prevent, or limit, the sharing of information for the purposes of keeping children safe. Lawful and secure information sharing between schools, Children's Social Care, and other local agencies, is essential for keeping children safe and ensuring they get the support they need.

The Data Protection Act 2018 introduced 'safeguarding' as a reason to be able to process sensitive, personal information, even without consent (DPA, Part 2, 18; Schedule 8, 4)

When Designated Safeguarding Leads in schools are considering whether, or not, to share safeguarding information (especially with other agencies) Northampton International Academy will record who they are sharing that information with and for what reason. If we have taken a decision not to seek consent from the data subject and/or parent/carer that should also be recorded within the safeguarding file.

All relevant information can be shared without consent if to gain consent would place a child at risk.

Fears about sharing information must not be allowed to stand in the way of promoting the welfare and protecting the safety of children. As with all data sharing, appropriate organisational and technical safeguards should still be in place.

The Working Together on Safeguarding Children (2018) statutory guidance states the following:

1. Effective sharing of information is essential for early identification of need, assessment, and service provision to keep children safe.

2. All professionals responsible for children should be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to local authority children's social care (e.g. they are being supported as a child in need or have a child protection plan). You should be alert to sharing important information about any adults with whom that child has contact, which may affect the child's safety or welfare.
3. Information sharing is also essential for the identification of patterns of behaviour when a child has gone missing, when multiple children appear associated to the same context or locations of risk, or in relation to children in the secure estate where there may be multiple local authorities involved in a child's care.
4. 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, which must always be the paramount concern.

To ensure effective safeguarding arrangements:

- you should have arrangements in place that set out clearly the processes and the principles for sharing information. The arrangement should cover how information will be shared within your own organisation/agency; and with others who may be involved in a child's life
- all professionals responsible for children should not assume that someone else will pass on information that they think may be critical to keeping a child safe. If a member of staff has concerns about a child's welfare and considers that they may be a child in need or that the child has suffered or is likely to suffer significant harm, then they should share the information with local authority children's social care and/or the police. Staff should be particularly alert to the importance of sharing information when a child moves from one school to another, due to the risk that knowledge pertinent to keeping a child safe could be lost.
- you should aim to gain consent to share information, but should be mindful of situations where to do so would place a child at increased risk of harm. Information may be shared without consent if you have good reasons to do so, and believe that the sharing the information will enhance the safeguarding of a child in a timely manner. When decisions are made to share or withhold information, you should record who has been given the information and why.

Safeguarding children raises issues of confidentiality that must be clearly understood by all staff/volunteers in schools.

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

7. When to Be Concerned -Recognising Abuse and Taking Action

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

All staff and volunteers must be aware that the main categories of abuse are:

- Physical abuse
- Emotional abuse
- Sexual abuse including child sexual exploitation
- Neglect

These categories are described in more detail in Appendix 1. The abuse may be instigated by one or more adults, and/or other children and young people.

If any member of staff has a concern that a child in their care has suffered any of these forms of abuse, they must report their concerns to, and seek advice from, the Designated Safeguarding Lead (DSL), or in their absence, the Deputy Designated Safeguarding Lead (DDSL), as soon as possible, and never later than by the end of the working day. If there is concern as to whether it is safe to allow the child to go home that day, then all effort must be made to inform the Designated Safeguarding Lead (DSL) immediately so that the Multi Agency Safeguarding Hub (MASH) can be informed and the necessary protective measures implemented.

All concerns raised by members of staff must be recorded using "My Concern". all staff employed by NIA will have access and permissions to use "My concern" Once a concern has been logged the member of staff will be issued with a reference number for the case and the safeguarding team will be alerted to the concern. Staff are encouraged to speak directly (where possible) with a member of the safeguarding team to discuss the concern, however this should not detract from the concern being raised if this has not been possible.

A child may disclose sensitive information at any time of the day, and in particular this may occur outside normal lesson time, e.g. break periods or during before/after academy club sessions. It is therefore imperative that all staff are aware of the signs and behaviour which may indicate abuse.

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.

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. Safeguarding Referrals must be made in one of the following ways:

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

7.2. DEALING WITH A DISCLOSURE FROM A CHILD

All staff must:

Recognise that a disclosure may come directly from the child, or from a third party, e.g. friend, neighbour, other family member. Alternatively, it may be through the suspicion of staff based on a variety of symptoms and knowledge of possible indicators of abuse

Take seriously any disclosures made to them and provide reassurance to the child or young person/adult through their responses and behaviour

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

- Listen to what is being said without displaying shock or disbelief
- Accept what is being said
- Allow the child to talk freely

- Reassure the child, but do not make promises which it might not be possible to keep
- Never promise a child that they will not tell anyone - as this may ultimately not be in the best interests of the child.
- Reassure him or her that what has happened is not his or her fault
- Stress that it was the right thing to tell
- Listen, only asking questions when necessary to clarify
- Not criticise the alleged perpetrator
- Explain what has to be done next and who has to be told
- Make a written record (see Record Keeping)
- Pass the information to the Designated Safeguarding Lead without delay (working in line with your school's reporting system – Section 7). Alternatively, 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.

The member of staff who has the concern or received the disclosure must report the concern/disclosure to the Designated Safeguarding Lead (DSL), or in his/her absence, the Deputy Designated Safeguarding Lead (DDSL), immediately. The member of staff must provide the Designated Safeguarding Lead (DSL) with the record of concern via My Concern with any original notes taken uploaded onto the "My Concern" platform.

The same approach to receiving a disclosure must be taken if the discloser is not the allegedly abused child but another child or an adult.

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

The Department for Education's 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', '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.

Any teacher who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a pupil under 18 must immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it. Unless they have good reason not to, they should also discuss the case with the DSL and involve children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a pupil under 18 must speak to the DSL and follow our local safeguarding procedures.

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

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

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 on page 16 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.

The DSL will decide on the most appropriate course of action and whether the concerns should be referred to Children's Social Care - (refer to [Northamptonshire Thresholds Guidance](#)). If it is decided to make a referral to Children's Social care the parent will be informed, unless to do so would place the child at further risk or undermine the collection of evidence eg obtaining forensic 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 eg the child is or might be in need or suffering or likely to suffer significant harm

Early help

Early Help - If early help is appropriate, the DSL/DDSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. 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 should be 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 Designated Safeguarding Lead any ongoing/escalating

concerns so that consideration can be given to a referral to Children's Services if the child's situation does not appear to be improving.

Staff and volunteers working within the school should be alert to the potential need for early help for children also who are more vulnerable. For example:

- Children with a disability and/or specific additional needs.
- Children with special educational needs.
- Children who are acting as a young carer.
- Children who are showing signs of engaging in anti-social or criminal behaviour.
- Children whose family circumstances present challenges, such as substance abuse, adult mental health or learning disability, domestic violence.
- Children who are showing early signs of abuse and/or neglect.
- Children with a social worker Early Help Links:

Follow this link: [Early Help](#) to access Northamptonshire's information and support for professionals regarding Early Help.

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 (see section 7.1), you must tell the DSL as soon as possible.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL 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.

The NSCP Case and Conflict Resolution Protocol can be found here - [Case and Conflict Resolution Protocol](#)

Children in Need – A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. The Local Authority is required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989.

Children suffering or likely to suffer significant harm - Local authorities, with the help of other organisations as appropriate, have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation or other so-called honour-based violence, and extra-familial threats like radicalisation and sexual exploitation.

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

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

7.5 Concerns about extremism

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).

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.

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

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.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

If Staff have a mental health concern about a child we will respond to the concern, inform and discuss our concerns with parents/carers and seek ways to support the child in and out of school.

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.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health concern. However, this school will provide information and signposting services to children and parents and assist with the teaching of emotional health and wellbeing to children in our curriculum

At Northampton International Academy we also use a screening tool called "AS STEER" to identify possible mental health and vulnerabilities in a child both in school and at home. Every child who attends the school will be invited to complete an assessment at least once in the academic year. This information is then analysed and used to identify early help and prevent mental health problems from escalating. This information is shared with key pastoral staff to signpost further help and support both in and out of school. Students with mental health concerns at Northampton International Academy can be referred to receive further pastoral support in school via the tutor/ Head of Year/Key Stage Pastoral Managers or external support through support agencies such as the Lowdown Crisis cafes, Service Six and Child and Adolescent Mental Health Services (CAMHs).

The Department for Education guidance on [mental health and behaviour in schools](#) is available here for more information.

Ask Normen (www.asknormen.co.uk) is another support mechanism in Northamptonshire that provides a supportive toolkit for staff to use to help them manage young people's mental health at Northampton International Academy. It is also a useful resource for parents/carers and children and young people.

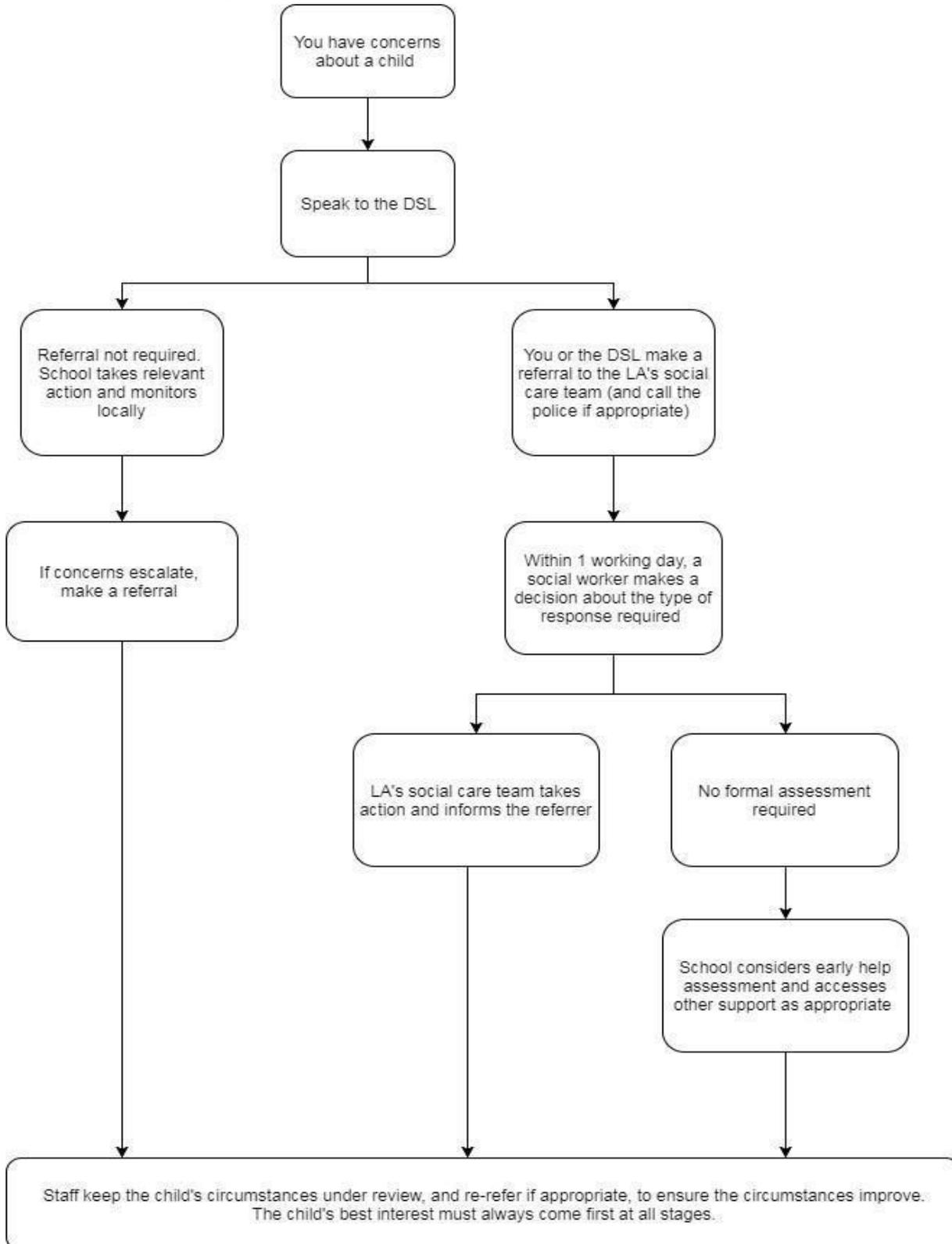


Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

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

8. CONCERNS ABOUT A STAFF MEMBER, SUPPLY TEACHER OR VOLUNTEER

If you have concerns about a member of staff (including a supply teacher or volunteer), or an allegation is made about a member of staff (including a supply teacher or volunteer) posing a risk of harm to children, speak to the head teacher.

If the concerns/allegations are about the head teacher, speak to the Chair of Governors.

The head teacher/chair of governors/DSL will then follow the procedures set out in Appendix 3, if appropriate.

The DSL (or chair of governors in the case of a concern about the head teacher) will also inform the Designated Officer for the Local Authority.

Where appropriate, the school will inform Ofsted of the allegation and actions taken, within the necessary timescale. (EYFS)

9. ALLEGATIONS OF ABUSE MADE AGAINST OTHER PUPILS

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”.

We also recognise the gendered nature of peer-on-peer abuse. However, all peer-on-peer 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:

- 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 harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including sexting)

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

- You must record 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
- 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) 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 Designated Safeguarding Lead will always consider the following;

- the wishes of the victim in terms of how they want to proceed. The victims will be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered;
- the nature of the alleged incident(s), including: the level of coercion or threat, whether a crime may have been committed and consideration of harmful sexual behaviour;
- both the chronological and developmental ages of the children involved;
- any power imbalance between the children, including consideration of the age of children and whether children have special educational needs or disabilities;
- the impact on the victim;
- if the alleged incident is a one-off or a sustained pattern of abuse; and
- if there are ongoing risks to the victim, other children, adult students or school or college staff.

Depending on the nature of the incident/s, the Designated Safeguarding Lead may

- Seek further information from those involved and witnesses.
- Undertake a risk assessment to ascertain steps necessary to safeguard the victim, alleged perpetrator, adults and other children.
- Decide to manage the concern internally.
- Organise a meeting with relevant staff and agencies to assess risk and agree a safety plan.
- Refer the victim and/or the perpetrator to local services for Early Help.
- Refer the case to Children's Services via a MASH referral.

- Liaise with social workers working with children involved (if applicable).
- Make a referral to the police.

Supporting the victim

The school recognises that peer on peer abuse has a significant impact on young people and victims are likely to need ongoing support.

Appropriate support will be put in place for victims of peer on peer abuse whilst investigation is taking place and following the initial response. Support will continue for as long as it is needed and will be reviewed regularly to ensure the victim is receiving appropriate care.

The school will do everything we can to maintain the victim's normal routine.

The school will do everything we can to protect the victim from further bullying and harassment as a result of their disclosure.

If a victim of peer on peer abuse moves to a new setting, the Designated Safeguarding Lead will share the necessary information to ensure that support for the child continues.

Supporting the alleged perpetrator

The school has a responsibility to ensure that an alleged perpetrator continues to receive a suitable education and will consider a range of options in continuing educational provision.

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

A plan to reduce the risk posed by the alleged perpetrator will be put in place as part of the risk assessment made following the alleged abuse.

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

The Designated Safeguarding Lead will take advice from children's social care, specialist services and the police as necessary.

The school may choose to impose a sanction or punishment on the alleged perpetrator following an incident of peer on peer abuse. In this case, we will follow the school Behaviour Policy in determining the level and severity of sanction.

We will minimise the risk of peer-on-peer abuse by:

- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images
- Being 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

- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensuring pupils know they can talk to staff confidentially by speaking directly to a member of the safeguarding team/head of Year/Head of House (Posters are available in all classrooms and available on the electronic televisions) or by emailing the said members of staff directly using their school email addresses.
- Ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

Northampton International Academy has a separate peer on peer abuse policy that will work alongside this Policy and will be reviewed in line with any changes to this policy.

10. SEXTING

Your responsibilities when responding to an incident

If you are made aware of an incident involving sexting (also known as ‘youth produced sexual imagery’), you must report it to the DSL immediately.

You must not:

- View, download or share 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 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 imagery in order to safeguard the young person (in most cases, imagery should not be viewed)
- What further information is required to decide on the best response

- Whether the imagery 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 from devices or online services
- 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 should be involved)

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 imagery 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 imagery is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming)

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.

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.

They will hold interviews with the pupils involved (if appropriate) to establish the facts and assess the risks. 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.

Informing parents

The DSL will inform parents 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 dialling 101

Recording incidents

All sexting incidents and the decisions made in responding to them will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording incidents of sexting.

Curriculum coverage

Pupils are taught about the issues surrounding sexting as part of our PSHCE education and computing programmes. Teaching covers the following in relation to sexting:

- 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
- 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 sexting is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

11. NOTIFYING PARENTS

Northampton International Academy will ensure the Safeguarding and Child Protection Policy is available publicly via the school or college website and by other means.

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

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

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

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

12. PUPILS WITH SPECIAL EDUCATIONAL NEEDS AND DISABILITIES

We recognise that pupils with special educational needs (SEN) and disabilities can face

additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- Pupils being more prone to peer group isolation than other pupils
- The potential for pupils with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers

We offer extra pastoral support for pupils with SEN and disabilities. This includes:

- The Hive is an area in the school where students with SEN and Disabilities can attend at social times (Break and Lunch) that is supervised by our SEN teaching assistants. Students have the opportunity to interact and play games with others in a smaller and more supportive supervised area.
- Each year group has at least one designated teaching assistant linked to the year group and both in class and out of class is offered to support the pastoral needs of the young person.
- There is a designated SENCo in both Secondary and Primary phases of the school.
- Additional pastoral support is offered at transition points when moving from one key stage to another. For example, the transition between primary and secondary school, option process in Year 9 and further support in Year 11 to support applications for post 16 provision.
- Non-Teaching Heads of Year/Pastoral Managers offer further support in addition to the young person's form tutor.
- Additional interventions are held to support emotional health such as zones of regulation and mentoring and support via the school's alternative provision programmes.
- External agencies support such as the Educational Psychologist (EP) Occupational Therapist (OT) and JOGO.

[Directory of Services for Children with Disabilities: Specialist-support-for SEND](#)

[Northamptonshire's Local Offer: SEND Local Offer](#)

13. 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. 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 unauthorized absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support

We have contact plans for children with a social worker, and other children who we have safeguarding concerns about, for circumstances where:

They won't be attending school (for example in a local lockdown during Covid) or,

They would usually attend but have to self-isolate

Each child has an individual plan, which sets out

- That contact is made at least once a week, unless it is deemed that the frequency needs to be increased.
- The relevant Key Stage Pastoral Manager will make this contact as they tend to know the family best. On occasions this may be delegated to the Head of Year or Tutor if it is deemed that they know the family better or have built a stronger relationship.
- Contact will be predominantly made via telephone calls or pre-arranged meetings alongside doorstep visits to conduct our welfare calls.
- Records of welfare checks will be made via my concern and the Pastoral Managers welfare calls tracker.
- We have agreed these plans with children's social care where relevant, and will review them at least half termly, but more frequently if the need is required.
- If we can't make contact, we will report this directly to the social worker and/or the police.

14. LOOKED-AFTER AND PREVIOUSLY LOOKED-AFTER CHILDREN

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

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant virtual school heads

- We have appointed a designated teacher, Emma Ruffles who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).
- The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

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

15. MOBILE PHONES AND CAMERAS

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 members' personal phones will remain in their bags or cupboards during contact time with pupils.

Staff will not take pictures or recordings of pupils on their personal phones or cameras.

We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the school.

Further information can be found in the EMAT Staff Code of Conduct Policy.

Staff members must only contact pupils/students via school/Trust authorised mechanisms. At no time should personal telephone numbers, email addresses or communication routes via personal accounts on social media platforms be used to communicate with pupils/students.

Staff members must report to the Headteacher any contact by a pupil/student by an inappropriate route.

Photographs/still images or video footage of pupils/students should only be taken using school equipment, for purposes authorised by the school/trust. Any such use should always be transparent and only occur in accordance with the Trust's Privacy Notice or where parental consent has been given.

16. COMPLAINTS AND CONCERNS ABOUT SCHOOL SAFEGUARDING POLICIES

16.1 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).

16.2 Other complaints

At Northampton International Academy all other complaints are managed using the guidelines outline in Section 5 of the EMAT complaints policy. These may be safeguarding concerns related to things such as other pupils or premises.

There are 3 stages to the complaints process are summarised below.

Stage 1 – Informal complaints will be responded to within 5 days and investigated within 20 days to find a resolution.

Stage 2 – Formal complaint made to the Headteacher in writing. A meeting will be held as soon as possible and an investigation will be conducted with the written conclusion shared within 20 days. This is in line with the Complaints procedure set out in the Statutory Framework for the Early Years Foundation Stage (paragraph 3.74) which states.

“Providers must put in place a written procedure for dealing with concerns and complaints from parents and/or carers, and must keep a written record of any complaints, and their outcome. All providers must investigate written complaints relating to their fulfilment of the EYFS requirements and notify complainants of the outcome of the investigation within 28 days of having received the complaint. The record of complaints must be made available to Ofsted or the relevant childminder agency on request. Stage 3 – Review Panel will be heard by the Local Advisory Board within 20 days of the complaint has been escalated following an unsatisfactory outcome from stage 2. The Chair of Governors will respond within 5 days and a panel of 3 (one independent) will be called to hear the case within 20 days. A written response will then be made within 20 days of the panel hearing.

Section 9 of the complaints policy outlines how these records are kept.

16.3 Whistle-blowing

EMAT-Whistleblowing-Policy-2021-2022 further information around whistleblowing can be found in the Whistle blowing Policy. The policy can be found on the EMAT website.

Section 6 of this policy outlines the procedures for raising concerns about the school’s safeguarding practice here.

There are existing procedures in place to enable employees to lodge a grievance relating to their own employment. This Policy is intended to cover major concerns that fall outside the scope of other procedures. Disclosures qualifying for protection under the Public Interest Disclosure Act 1998 and this policy are:

- a) That a criminal offence has been committed, is being committed or is likely to be committed;
- b) That a person has failed, is failing or is likely to fail to comply with any legal obligation to which he/she is subject;
- c) That a miscarriage of justice has occurred, is occurring or is likely to occur;
- d) That the health or safety of any individual has been, is being or is likely to be endangered
- e) That the environment has been, is being or is likely to be damaged, or
- f) That information tending to show any matter falling within any one of the preceding paragraphs has been, is being or is likely to be deliberately concealed.

The Whistleblowing procedure applies when a person has a serious concern that wrongdoing by the organisation; (its staff, volunteers, contractors or suppliers) has occurred. Where other procedures exist they should be considered before making a Whistle Blowing complaint. For example, this policy does not replace the Trust's complaints procedure.

Section 3 of the whistleblowing policy outlines how to raise a concern internally (within the organization)

Step 1: Employees should normally raise concerns with their immediate line manager or their superior. This depends, however, on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice.

Step 2: If staff feel unable to raise the matter with their manager, for whatever reason, they should raise the matter with:

- EMAT Head of Governance & Compliance – Monica Juan – monica.juan@emat.uk
- EMAT Senior Workforce Planning & HRBP – Ruhena Mahmood – Ruhena.mahmood@emat.uk

These people have been given special responsibility and training in dealing with whistleblowing concerns.

Step three: If these channels have been followed and staff still have concerns, or if they feel that the matter is so serious it cannot be discussed it with any of the above, they must contact:

- EMAT CEO – Joshua Coleman – Joshua.coleman@emat.uk
- EMAT Chair of Trustees – Kevin Crompton – kevin.crompton@btinternet.com

Section 4 of the Whistle Blowing Policy outlines how the trust will respond to such concerns.

The member of staff will normally receive a written response within 5 working days:

- Acknowledging that the concern has been received
- Indicating how it is proposed to deal with the matter

- Giving an estimate of how long it will take to provide a final response
- Advising whether any enquiries have been made
- Advising whether further enquiries will take place
- Informing them of support available whilst matters are looked into and following the outcome of the investigation
- Maintaining confidentiality wherever possible, but also explaining that it may not be possible that they can remain anonymous.

Section 2 of the whistle blowing policy outlines what assurances are provided to staff raising concerns

East Midlands Academy Trust recognise the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from those responsible for the malpractice. We will not tolerate harassment or victimisation and will take action to protect the employee when s/he has raised a concern.

East Midlands Academy Trust has liaised with the independent charity [Protect](#). If staff are unsure whether to use the whistleblowing policy or want confidential advice at any stage, they may contact the independent charity Protect on 020 3117 2520 or by email at whistle@protect-advice.org.uk

General guidance on whistleblowing can be found via: [Advice on Whistleblowing](#); and the [NSPCC's what you can do to report abuse dedicated helpline](#) is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school or college. Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk. [Alternatively, staff can write to: National Society for the Prevention of Cruelty to Children \(NSPCC\), Weston House, 42 Curtain, Road, London EC2A 3NH.](#)

The Statutory Framework for Early Years Foundation Stage (Paragraph 3.75) outlines that providers must make available to parents and/or carers details about how to contact Ofsted if they believe the provider is not meeting the EYFS requirements. Details of how parents and/or carers can contact Ofsted are detailed below.

Email: CIE@ofsted.gov.uk Phone: 0300 123 4666

17. SAFER WORKING PRACTICE

To reduce the risk of allegations, all staff should be aware of safer working practice and should be familiar with the guidance contained in the school code of conduct/staff behaviour policy and Safer Recruitment Consortium document [Guidance for safer working practice for those working with children and young people in education settings \(September 2019\)](#).

The document seeks to ensure that the responsibilities of school leaders towards children and staff are discharged by raising awareness of illegal, unsafe, unprofessional and unwise behaviour.

This includes guidelines for staff on positive behaviour management in line with the ban on corporal punishment (School Standards and Framework Act 1998). Please see the school/college's behaviour management policy for more information.

18. RECORD KEEPING

All safeguarding concerns, discussions and decisions made and the reasons for those decisions must be recorded in writing. If in doubt about recording requirements staff should discuss this with the Designated Safeguarding Lead.

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

- Record the information as soon as possible after the conversation, noting the date and time. "My Concern" is the platform used at Northampton International Academy to record safeguarding concerns" and written documentation taken should be uploaded with the concern.
- Do not destroy the original notes in case they are needed by a court. These should be passed to the DSL and placed on the child's safeguarding file.
- Record the date, time, place and any noticeable non-verbal behaviour and the words used by the child
- Use the body map feature on My Concern to indicate the position of any injuries
- Record statements and observations rather than interpretations or assumptions

All records need to be given to the Designated Safeguarding Lead promptly. No copies should be retained by the member of staff or volunteer.

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

Non-confidential records will be easily 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.

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

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and

provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

In addition: Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks

Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff

19. ONLINE SAFETY

Our *Safety Policy* is set out in a separate document. We ensure that we have effective mechanisms to identify, intervene in, and escalate any incident where appropriate. Online safety is included in our curriculum at all levels and information is also provided to parents/carers.

All staff are made aware of the school policy on Online Safety which sets our expectations relating to:

- Creating a safer online environment – including training requirements, filters and monitoring;
- Giving everyone the skills, knowledge and understanding to help children and young people stay safe on-line;
- Inspiring safe and responsible use and behaviour;
- Safe use of mobile phones both within school and on school trips/outings;
- Safe use of camera equipment, including camera phones; and
- What steps to take if you have concerns and where to go for further help.

Staff must read the *Online Safety Policy* in conjunction with our Code of Conduct in relation to personal online behaviour.

20. TRAINING

20.1 All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures, 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 in line with advice from the 3 safeguarding partners.

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. Staff will also receive regular safeguarding and child protection updates (for example, through emails, e-bulletins and staff meetings) as required, but at least annually.

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

20.2 The DSL and Deputy DSLs

The DSL and Deputy DSLs will undertake child protection and safeguarding training at least every 2 years.

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

They will also undertake Prevent awareness training.

20.3 Governors

All governors receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

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

20.4 Recruitment – interview panels

At least one person conducting any interview for a post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, Keeping Children Safe in Education 2020, and will be in line with local safeguarding procedures.

20.5 Staff who have contact with pupils and families.

All staff who have contact with children and families will have supervision which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues. (EYFS)

21. IMPLEMENTATION, MONITORING AND REVIEW OF THE SAFEGUARDING AND CHILD PROTECTION POLICY

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

22. LINKS WITH OTHER POLICIES

This policy links to the following policies and procedures: [Link to Trust Policies](#)

- Behaviour Policy
- Staff Code of Conduct Policy
- Complaints Policy
- Whistle Blowing Policy
- Health and safety Policy
- Equalities Policy
- Relationships and Sex Education Policy
- First aid Policy
- Special Educational Needs and Disability Policy
- Designated LAC Teacher Policy
- Dealing with allegations of abuse against staff
- Privacy notices

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 cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

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

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

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

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

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

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

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

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

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.

New staff

When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months
- 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
- 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, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent
- Academies, including free schools, and independent schools add:
- 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
- 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 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. (EYFS & Primary – under the age of 8)
- We will ask for written information about previous employment history and check that information is not contradictory or incomplete.

Regulated activity means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or

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

Existing staff

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

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

- We believe the individual has engaged in [relevant conduct](#); or
- The individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- The 'harm test' is satisfied in respect of the individual (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

Agency and third-party staff

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

Contractors

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

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children
- 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 2018 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. (EYFS & Primary – under the age of 8) 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 2018 Childcare Disqualification Regulations and Childcare Act 2006. (EYFS & Primary – under the age of 8)

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment
- 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 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 (EYFS & Primary – under the age of 8)

Governors

- All governors 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.
- All governors will also have a section 128 check (as a section 128 direction disqualifies an individual from being a maintained school governor).
- 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](#)). [Section 128 checks are only required for local governors if they have retained or been delegated any management responsibilities.]
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

All governors will also have the following checks:

- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

Staff working in alternative provision settings

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.

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.

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.

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

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

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

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

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

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

Suspension of the accused until the case is resolved

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

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

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

Definitions for outcomes of allegation investigations

- Substantiated: there is sufficient evidence to prove the allegation

- Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive

False: there is sufficient evidence to disprove the allegation

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

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the headteacher (or chair of governors [in independent schools: proprietor] where the headteacher is the subject of the allegation) – the ‘case manager’ – will take the following steps:

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

action should follow both in respect of the individual and those who made the initial allegation

- If it is decided that further action is needed, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. For example they are recommended to seek union support, they are given a named contact in the school and reminded about the Employee Assistance Programme with links.

Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice

- Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child
- We will 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. (EYFS)
- If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.
- Where the police are involved, wherever possible the academy trust 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.

Additional considerations for supply staff

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

We will not decide to stop using a supply teacher due to safeguarding concerns without finding out the facts and liaising with our local authority designated officer to determine a suitable outcome

The governing board will discuss with the agency whether it is appropriate to suspend the supply teacher, 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 local authority designated officer 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

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

Specifications

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

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

Individuals returning to work after suspension

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

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

Unsubstantiated or malicious allegations

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

Confidentiality

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

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

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

Record-keeping

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

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

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

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

The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

References

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

Learning lessons

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

This will include consideration of (as applicable):

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

For referrals regarding adults in education and other information on the role of the Designated Officer (formerly LADO) follow the link below:

[Local Authority Designated Officers](#)

Multi-Agency Safeguarding Hub: [0300 126 1000 \(Option 1\)](#)

If it is decided that the allegation does not meet the threshold for safeguarding, it will be handed back to the employer for consideration via the school's internal procedures.

The Chair of Governors in this school is:

NAME:

CONTACT:

Ben Shirley

info@nia.emat.uk

Appendix 4: Specific safeguarding issues - Further Information

This appendix is based on the advice in Annex A of Keeping Children Safe in Education 2020– you will need to adapt it to reflect your context and any locally agreed procedures.

Children missing from education

A child going missing from education, particularly repeatedly, 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 missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care ➤
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. We will always follow up with parents/carers when pupils are not at school. This means we need to have at least two, up to date, contacts for parents/carers. Parents/carers should remember to update the school as soon as possible where these contact details change. 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 missing, such as travelling to conflict zones, FGM and forced marriage.

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

Child criminal exploitation

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

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

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. 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 missing 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.

County Lines

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

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

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

Child sexual exploitation

Child sexual exploitation (CSE) is a form of 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.

Domestic abuse

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

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

violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Children can witness and be 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.

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.

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

All information sharing and resulting actions will be undertaken in accordance with the [‘NSCB Protocol for Domestic Abuse – Notifications to Schools’](#). We will record this information and store this information in accordance with the record keeping procedures outlined in this policy.

The DSL will provide support according to the child’s needs and update records about their circumstances.

Homelessness

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

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

Where a child has been harmed or is at risk of harm, the DSL 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.

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 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.

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 fmufco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

Private Fostering

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

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

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

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

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

School staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the child

involved to check that they are aware of their duty to inform the LA. The school itself has a duty to inform the local authority of the private fostering arrangements.

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

Preventing radicalisation

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

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

Terrorism is an action that:

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

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

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

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

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

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

Staff will be alert to changes in pupils' behaviour.

The government website [Educate Against Hate](#) 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 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.

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures, including [list any relevant policies here – for example you may cover this in your curriculum policy, behaviour policy, online/e-safety policy, and/or others].

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.

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

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

Non-collection of children

To ensure the safeguarding of all children, it is essential that the school has a procedure in place for the safe collection of all children at the end of a school day, and guidance for parents in the event of them being late/unable to collect their child. Should this situation arise, the staff member in charge should take the following action:

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

- Check with the office whether the parent/carer has telephoned and left instructions or an estimated time of arrival.
- If no contact has been made by the parent/carer, the office staff will attempt to contact the parent/carer and the emergency contact by telephone.
- Where appropriate, a member of staff will sensitively ask the child whether there is a reason that could account for their parent/carer being late.
- Where appropriate, a member of staff will ask the child if they have any additional contact information.
- School will continue to try and contact the parent/carer and the emergency contact/s.
- In an emergency – when the child has not been collected and multiple attempts to contact parents/carer have failed - school will contact the police.
- If contact cannot be made with the parent/carer or the emergency contact/s by 5 p.m., school will contact the children's social care service of the Local Authority.

To ensure someone can be contacted about a pupil, schools should endeavour to obtain, and keep on record, at least two emergency contacts for each pupil. These contact numbers should be for different individuals i.e. two contacts, not two numbers for one person.

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:

In the case of a Primary school pupil, follow the procedure outlined immediately.

- Gather all the children safely together and take the register/ head count to ensure that no other child is missing
- Conduct an initial sweep of the immediate area without causing panic amongst the other children, and/or leaving the children alone at any time
- When it is confirmed that a child is missing, the person in charge at that time should call for additional help from one of the following members of staff: the Headteacher and/or the Primary DSL
- Maintain all staff ratios
- Instigate a more thorough search of the premises and immediate surrounding area
- Advise Reception of a missing child so that all staff in the school can check their immediate area and that a wider search of the grounds can be carried out (buildings included) using the “missing child email group”.
- Contact should be maintained at all times with a senior member of staff
- If the child is not found within the first 10 minutes contact will be made with the child’s parents/guardians and the police. A full search should then be carried out.

In the case of a missing Secondary school pupil, the above action should be taken, with the exception that the Secondary DSL is contacted for additional help, rather than the Primary DSL.
Procedure once the child is located

- When a missing child has been located, all those previously notified (parents, police, SLT, Governors) must be notified immediately.
- Once the child has been found, a full written report of the incident is recorded in the child’s file by the member of staff who was responsible for the child at the time that they disappeared and an investigation into the incident will be carried out by the Headteacher/member of the Senior Leadership Team. The incident report will detail:
 - The date and time of the incident
 - Which staff/children were in the group to which the missing child belonged

- When the missing child was last seen
 - The estimated time that the child went missing
 - Circumstances surrounding the child's disappearance – what was the child doing/saying prior to going missing
- If the incident warrants police investigation, all staff are required to co-operate fully. In this case, the police will handle all aspects of the investigation, including interviewing staff. Social Care may be involved if it seems likely that there is a child protection issue to address.

[See link to NCC procedures for Children Missing Education](#)

Appendix 5 Role of the Designated Safeguarding Lead

The DSL role is set out in full in KCSIE 2020 Annex B and this should be explicit in the DSL's job description. They should be a senior member of staff on the school's leadership team and take lead responsibility for safeguarding and child protection (including online safety). They should be given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of children.

The DSL and Deputy (if appropriate) will:

Manage referrals

- Refer cases of suspected abuse to the local authority children's social care as required
- Support staff who make referrals to local authority children's social care
- Refer cases to the Channel panel through the universal referral form where there is a radicalisation concern as required
- Support staff who make referrals to the Channel panel
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- Refer cases where a crime may have been committed to the Police as required (the guidance NPCC- When to call the police should help DSLs understand when they should consider calling the police and what to expect when they do.)
- If after a referral the child's situation does not appear to be improving the DSL (or the person that made the referral) should press for re-consideration to ensure their concerns have been addressed and, most importantly, that the child's situation improves
- Access a range of advice to help them identify children in need of additional mental health support

Work with others

- Act as a point of contact with the three safeguarding partners
- Liaise with the Headteacher or principal to inform them of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations
- For Looked-After children have available the details of the child's social worker and the name of the virtual school head in the authority that looks after the child
- Liaise with staff on matters of safety and safeguarding (including online and digital safety,) and when deciding whether to make a referral by liaising with relevant agencies; and
- Act as a source of support, advice and expertise for staff
- Hold information on which children have a social worker so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes

- Report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement.

Undertake training

- Undergo training to provide them with the knowledge and skills required to carry out the role. This training should provide them with a good understanding of their own role and the process, procedures and responsibilities of other agencies, particularly children's social care and should be updated at least every two years.
- Undertake Prevent awareness training
- Refresh their knowledge and skills (this might be via e-bulletins, meeting other DSLs, or simply taking time to read and digest safeguarding developments and news at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role so they:
 - Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments;
 - Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
 - Ensure each member of staff has access to and understands the school's or college's child protection policy and procedures, especially new and part time staff;
 - Are alert to the specific needs of children in need, those with special educational needs and young carers;
 - Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation (GDPR).
 - Are able to keep detailed, accurate, secure written records of concerns and referrals;
 - Understand and support the school or college with regards to the requirements of the Prevent duty, including online safety and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
 - Obtain access to resources and attend any relevant or refresher training courses;
 - Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.
 - Understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school;
 - Recognise the additional risks that children with SEN and disabilities (SEND) face online, for example from online bullying, grooming and radicalisation and be confident and have the capacity to support SEND children to stay safe online.

Raise Awareness

- Ensure the school's child protection policies are known, understood and used appropriately.
- Ensure the school child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors and staff regarding this.
- Ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school or college in this; and
- Link with the safeguarding partner arrangements to make sure staff are aware of training opportunities and the latest local policies on safeguarding arrangements.
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school and college leadership staff. Their role could include ensuring that the school or college, and their staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.

Child protection records

- Where children leave the school or college ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt should be obtained. Receiving schools should ensure that key staff such as DSLs and SENCOs are aware as required. This includes in year transfers.
- In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.
- Ensure that CP records are retained for an appropriate length of time and the school has regard to any other requirement requiring specific retention periods. The current requirement under IICSA (Independent Inquiry into Child Sex Abuse) is that records of child sex abuse should be retained for the period of the inquiry.
- Ensure that, if a child goes missing or leaves to be educated at home, the child protection file is stored securely in school in line with school's data storage arrangements.
- Ensure that the worker from Children First Northamptonshire is informed where the child leaves the school.
- NCC Elective Home Education Policy and Procedures can be accessed for further guidance

Availability

- During term time always be available (during school hours) for staff in the school or college to discuss any safeguarding concerns. Whilst generally speaking the DSL (or deputy) would be expected to be available in person, it is a matter for individual schools, working with the DSL, to define what “available” means and whether in exceptional circumstances availability via phone and or Skype or other such mediums is acceptable
- It is a matter for individual schools and colleges and the DSL to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities
- It is a matter for individual schools and colleges as to whether they choose to have one or more deputy DSL(s). Any deputies should be trained to the same standard as the DSL.
- Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding and child protection, as set out above, remains with the DSL. This responsibility should not be delegated.

Appendix 6 – Overview of the PSHCE Curriculum

Curriculum Overview Key Stage 3

Term	Year 7	Year 8	Year 9
1. Wider Community	Who am I What does it mean to be a British Citizen Celebrating diversity Being tolerant Being charitable Making ethical decisions Gang culture/ Knife crime	Preventing extremism and radicalisation Dealing with Islamophobia Stereotyping, discrimination and prejudice LGBT+ (J) Teaching tolerance County lines	Sustainability Acid attacks Foreign Aid Immigration and diversity Challenging extremist views County lines/ gang culture/ Knife crime
2. Collaboration	Making friends Helping those who are struggling Physical and emotional health Working together Dealing with confrontation Changing family relationships	Emotional Literacy Healthy relationships Balance of power in relationships (J) Mental Health (J) Social injustice (J) Blood donation(J)	Peer pressure Mental health and ill health (J) Anxiety disorders (J) Depression (J) Managing emotional changes (J) Resilience(J)
3. Active Global Citizens	Understanding democracy	Caring for the environment Active Global citizens	Project based learning, exploring democracy

	Human rights Being politically engaged Promoting change How much influence do I have The UN and Global Goals	The power of the individual Poverty Zero hunger Global inequalities	within the school setting Identify a cause Creating an argument for change Mobilising supporters Campaigning for change
COVID Changes	As a result of lockdown students have been completing remote independent study units on personal Safety and Online Safety. These are sent through via Form tutors and engagement is monitored by Form tutors. For weeks 5 and 6 of this term KS3 students will start the employability unit early, accessing online lessons and tasks through our careers platform Unifrog. The unit on Active Global Citizenship will run on our return to in school teaching.		
4. Employability	Being an aspirational Student Wants and needs	Communication skills Personal Development and target setting	Developing interpersonal skills Enterprising personality
	Budgeting Creating a personal budget Understanding financial products Savings, loans and interest rates	Managing behaviours/ achieving targets Teamwork skills How can we be entrepreneurs Careers and finance- payslips	The world of work Growth Mindset Avoiding debt Consumer rights
5. Rights and Respect	Media portrayal of relationships (J) Healthy relationships(J) Assertiveness9J) Self-image Alcohol/ Drugs/ peer pressure Online safety/Sexting (J)	Personal Safety and first aid Online etiquette and personal safety (J) Consent Sexual exploitation Alcohol and risky behaviours(J) Bullying	Protection from discrimination and prejudice Young offenders Drugs legislation/ classification (J) CPR/ Substances and safety (J) Grooming (J) Sexual consent (J)
6. SRE	Puberty and body development (J) Intimate relationships (J) FGM (J) Consent (J)	Negative self-talk (J) Resilience (J) Pornography Behaviours in healthy and unhealthy relationships (J)	Power and control in intimate relationships (J) Sex and the law (J) Pornography and stereotypes (J)

	Mood changes(J) Vaccinations (J) Nutrition (J)	Intimate relationships (J) Physical attraction (J)	Family planning (J) STI's (J) Body and brain changes (J)
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Curriculum Overview Key Stage 4

Term	Year 10	Year 11
1. Wider Community	Homelessness Hate crimes Anti- social behaviour Overt and covert racism Crime/ Gangs/ County lines Fake News- critical thinking skills	*
2. Collaboration	Grief loss and bereavement (J) Ending relationships safely (J) Positive impact of volunteering (J) Organ donation (J) Stem Cells (J) Sustaining long term relationships(J) Common threats to health (J)	Managing exam stress (J) Stages of intimate relationships (J) Resilience- what to do when things go wrong (J) Why happiness is important First aid CPR (J) Mental health - gambling
	Mental health issues – Suicide and anxiety	
3. Active Global Citizens	Sustainable living International Women's Day Challenging inequality Amnesty international UN bill of human rights Charitable giving	*
COVID changes	Students in KS4 have been completing independent study work relating to Careers and routes through education. From W/C 18/1 they will be working through tasks and interactions on the Unifrog platform focused on employability and careers. The unit on Active Global citizens in year 10 will be removed from the curriculum this year to allow for the change in content and Virtual work experience later on in the academic year	

4. Employability	Managing time effectively Work place rights and responsibilities CV writing Preparing for work experience STEM careers Choosing a career	Health and safety at work Preparing for interview Applying to colleges and universities GCSE revision and study skills Digital footprint Trade unions
5. Rights and Respect	Criminal Justice system Misuse of prescription drugs (J) Use of online data- assessing and managing risk (J) Physical health and achieving goals (J) Binge drinking Tattoos and piercings	Internet- the dark web Cyber crime Equality relating to disability Sexual pressure (J) Honour based violence (J) FGM LGBTQ+ rights
6.SRE	Sexual health/ blood born infections (J) Sexual identity/ gender/ spectrum (J) Diet and long term health (J) Abuse in teenage relationships (J) Arranged marriages Stereotypes in romantic relationships (J)	STI's(J) Fertility (J) Contraception/ pregnancy truths and myths (J) Positive and negative connotations of sex (J) Coming out (J) Control and sexual experimentation

When reviewing the curriculum please note that all topic followed by a (J) have been taken from our Trust-wide resource Jigsaw. Jigsaw is a recognised provider of PSHCE. We have chosen to use mainly the S/R/E content from Jigsaw, as we already have a successful programme of study in place for the delivery of other aspects of the PSHCE curriculum.

Please find further information, taken from the Jigsaw PSHCE curriculum information below.

[Jigsaw-Overview and context for schools in England/following English curriculum guidance.](#)

Jigsaw, the mindful approach to PSHE, brings together Personal, Social, Health Education, emotional literacy, social skills, and mental health and resilience development in a comprehensive scheme of learning.

Teaching strategies are varied and are mindful of preferred learning styles and the need for differentiation.

The Jigsaw Programme is designed as a whole-school approach, with year groups working on the same theme (Puzzle) at the same time.

Jigsaw 11-16 builds on the Jigsaw 3-11 Programme, offering a holistic PSHE learning journey spanning the pupil’s school career, with a progressive, spiral curriculum that addresses real needs in a rapidly-changing world.

The unique support package Jigsaw provides offers teachers FREE access to the password-protected Community Area of the website with articles, mapping documents, training materials, sample policies, additional lesson plans, etc. On top of this, schools can choose to subscribe to the annual update/supplementary package, giving fresh lesson plans and resources each year.

Jigsaw is a programme for 11- to 16-year-olds, which comprises:

- A comprehensive and completely original scheme of work for 11- to 16-year-olds
- PSHE (Personal, Social, Health Education), resilience, mental health, emotional literacy, social and employability skills, British values, and SMSC (spiritual, moral, social, cultural development)
- Inclusive philosophy including Relationship and Sex Education • Detailed and flexible lesson plans for year groups (including all teaching resources) that can be adapted according to the structure of the timetable and that model best practice
- The Jigsaw Approach, underpinned by mindfulness philosophy and practice
- Data collection, impact measurement, skill development (CV development)
- Jigsaw 11-16 fulfils the requirements for statutory Relationships, Sex and Health Education in England, 2018, plus much more.

Appendix 7 - ADDITIONAL ADVICE AND SUPPORT

Abuse or Safeguarding issue	Link to guidance/advice	Source
Abuse	What to do if you're worried a child is being abused	DfE advice
	Domestic abuse: Various Information/Guidance	Home Office
	Faith based abuse: National Action Plan	DfE advice
	Relationship abuse: disrespect nobody	Home Office website

Bullying	Preventing bullying including cyberbullying Cyber bullying: advice for headteachers and school staff	DfE advice
Children missing from education, home or care	Children missing education	DfE statutory guidance
	Child missing from home or care	DfE statutory guidance
	Children and adults missing strategy	Home Office strategy
Children with family members in prison	National Information Centre on Children of Offenders	Barnardo's in partnership with Her Majesty's Prison and Probation Service (HMPPS) advice
Child Exploitation	County Lines: criminal exploitation of children and vulnerable adults	Home Office guidance
	Child sexual exploitation: guide for practitioners	DfE
	Trafficking: safeguarding children	DfE and HO guidance
Drugs	Drugs: advice for schools	DfE and ACPO advice
	Drug strategy 2017	Home Office strategy
	Information and advice on drugs	Talk to Frank website
	ADEPIS platform sharing information and resources for schools: covering drug (& alcohol) prevention	Website developed by Mentor UK
"Honour Based Violence"	Female genital mutilation: information and resources	Home Office
	Female genital mutilation: multi agency statutory guidance	DfE, DH, and HO statutory guidance
Abuse or Safeguarding issue	Link to guidance/advice	Source
	Forced marriage: information and practice guidelines	Foreign Commonwealth Office and Home Office
Health and Well-being	Fabricated or induced illness: safeguarding children	DfE, Department for Health and Home Office
	Rise Above: Free PSHE resources on health, wellbeing and resilience	Public Health England resources

	Medical-conditions: supporting pupils at school	DfE statutory guidance
	Mental health and behaviour	DfE advice
Homelessness	Homelessness: How local authorities should exercise their functions	HCLG
Online	Sexting: responding to incidents and safeguarding children UK Safer Internet Centre: appropriate filtering and monitoring	UK Council for Child Internet Safety UK Safer Internet Centre
Private fostering	Private fostering: local authorities	DfE - statutory guidance
Radicalisation	Prevent duty guidance	Home Office guidance
	Prevent duty advice for schools	DfE advice
	Educate Against Hate Website	DfE and Home Office
Upskirting	Upskirting know your rights	UK Government
Violence	Gangs and youth violence: for schools and colleges	Home Office advice
	Ending violence against women and girls 2016-2020 strategy	Home Office strategy
	Violence against women and girls: national statement of expectations for victims	Home Office guidance
	Sexual violence and sexual harassment between children in schools and colleges	DfE advice
	Serious violence strategy	Home Office Strategy