East Midlands Academy Trust

Safeguarding & Child Protection Policy

'Every child deserves to be the best they can be'

Scope: East Midlands Academy Trust & Academies within the Trust	
Version: V10 *(NCC template adopted)*	**Filename:** EMAT Safeguarding and Child Protection Policy
Approval: September 2026 *Approved by the Trust Board*	**Next Review: September 2027** *This Policy will be reviewed by the Owner and approved by the Trust Board annually*
Owner: Thompson Team	**Union Status:** Not Applicable

Policy type:	
Statutory	Replaces Academy's current policy

RevisionDate	Revisor	Description of Revision
August 2026 V10	Thompson Team	Reviewed to reflect key changes to KCSIE 2026 and changes to EYFS framework 2026
February 2026 v9.1	J Lawson	Strengthening of approach to mobile phone use.
September 2025 V9	Thompson Team	Reviewed to reflect key changes to KCSIE 2025 and changes to EYFS framework 2025 Removed DfE Cybersecurity standards, replaced with link Addition of Appendix G – Early Years
September 2024 V8	Thompson Team	Reviewed policy to ensure all updates to KCSIE 2024 had been made throughout the Policy. Reference made to 'exploitation', addressing issues at the earliest opportunity, seeing hearing or experiencing the effects of Domestic Violence and awareness of issues that may take place inside the home and at school.
December 2023 V7.1	Thompson Team	Reviewed policy to ensure all updates to Working Together to Safeguard Children 2023 had been made throughout the Policy. Addition of Section 5 Multi Agency Safeguarding Arrangements. Updated to reflect HR departmental changes and addition of Filtering & Monitoring appendix.

September 2023 V7	Thompson Team	Reviewed policy to ensure all updates to KCSIE 2023 had been made throughout the Policy.
February 2023 V6	Thompson Team	Updated information about allegations against the head and updated due to staffing changes.
September 2022 - V5	Thompson Team and DSLs	Reviewed policy to ensure all updates to KCSIE 2022 had been made throughout the Policy, including changes to terminology, and added to or amended relevant sections.
September 2021 – V4	M Juan	New NCC Child Protection and Safeguarding Policy model adopted to include KCSE 2021 changes. All revisions included agreed by Safeguarding working party. Policy issued to all schools to personalise.
April 2021 – V3	M Juan	Updated Policy to include ***Everyone's Invited*** statement
February 2021 V2	M Juan	New NCC Child Protection and Safeguarding Policy model adopted and issued to all schools to ensure compliance
July 2020 – v1	M Juan	New EMAT Child Protection and Safeguarding Policy issued to all schools

Safeguarding and Child Protection Policy for Education Settings

IMPORTANT: East Midlands Academy Trust uses the NCC Example Safeguarding and Child Protection Policy for Education Settings template. Each school in the Trust has adjusted the policy content according to the school arrangements and safeguarding procedures specific to the setting. Please visit the school website to view their Safeguarding Policy.

CEO	Chair of the Trust Board	Trust Safeguarding Governor	EMAT Independent Safeguarding Advisors
Joshua Coleman ***Joshua.Coleman@emat.uk***	***Stephen Morales*** governance@emat.uk	***Nick Bell*** governance@emat.uk	**Thompson Team: Rebecca Thompson and Melanie Clarke** info@thompsonteam.co.uk

PERSON RESPONSIBLE FOR POLICY:	***JOSHUA COLEMAN - CEO***
APPROVED:	***SEPTEMBER 2026***
SIGNED:	
TO BE REVIEWED:	***SEPTEMBER 2027***

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 **Vivup on 0330 380 0658** or by visiting their website **www.vivup.co.uk**

If you are troubled about possible wrongdoing at work, please don't keep it to yourself. Our **Speak Up 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** – Alexandra Rigler - **alexandra.rigler@central.emat.uk**
- **EMAT Head of People & Culture** – Vicky Donnelly – **vicky.donnelly@central.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 Protect Advice Line**

PERSON RESPONSIBLE FOR POLICY:	***LUCI CLAPTON***
APPROVED:	***SEPTEMBER 2026***
SIGNED:	***LUCI CLAPTON***
TO BE REVIEWED:	***SEPTEMBER 2027***

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

Designated Safeguarding Lead	**Deputy Designated Safeguarding Lead(s)**	**Safeguarding Governor and Chair of Governors**
Luke Spurway **luke.spurway@culworth.emat.uk**	Luci Clapton **luci.clapton@central.emat.uk**	TBC **governance@emat.uk**

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

Designated Senior Manager (normally the DfE Named Headteacher)	**Deputy Designated Senior Manager**	**CEO in the event of an allegation against the DfE Named Headteacher)**
Luci Clapton - Executive Head Teacher	**Luke Spurway –** Acting Head Teacher	**Josh Coleman** - **joshua.coleman@emat.uk**
Designated Teacher of LAC	**Arrangements for out of hours contact:**	
Luke Spurway – Acting Head of School	**Luci Clapton** – (07925583395)	
DfE Named Headteacher		
Luci Clapton - Executive Head Teacher		

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School Context

Culworth CofE Academy is a village school which serves the local community. Our school context creates a range of safeguarding needs to consider.

The main issues that we as a school must continually be aware of and ensure all staff are vigilant regarding are:

- County Lines: Culworth CofE Academy is located near Banbury where County Lines is a high-profile issue. This risk is increased for our school community with us being located near to the town where motorways and train lines are very accessible and in easy reach.
- Toxic Trio (parental mental health, parental drug and alcohol abuse and domestic abuse): Through our safeguarding CPD offer, all staff are made aware of the toxic trio and how these contribute to the development of adverse childhood experiences in our children. Due to our school context, we must be aware of pressures that could increase the risk factor of the Toxic Trio, such as financial constraints, lack of education and lack of job opportunities as these are realities that some of our families face.

1. Aim of policy

Culworth CofE Academy recognises its 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, neglect and exploitation and follow our procedures to ensure that children receive effective support, protection and justice.

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

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

The aim of this policy is to;

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

2. Scope

This policy applies to all teaching, non-teaching, support, supply, peripatetic, contract staff, governors, volunteers and trustees working in or on behalf of the school. All references in this document to 'staff' or 'members of staff' should be interpreted as relating to the aforementioned unless otherwise stated.

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

3. Definitions

Safeguarding and promoting the welfare of children is defined in Keeping Children Safe in Education (KCSIE) 2026 as;

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

Family Help - Family Help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. Any child may benefit from support before statutory intervention, including from universal services and community-based Family Help, or the targeted Family Help level of Family Help.

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

- supporting pupils' health, safety and well-being, including their mental health.
- providing early help support, to improve outcomes for children and families at the earliest possible opportunity.
- 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, including filtering and monitoring.
- appropriate arrangements to ensure school security, taking into account the local context.
- keeping children safe from risks, harm and exploitation.
- child protection.

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

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known

to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development[2]. Neglect may occur during pregnancy, for example, 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 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.

Child-on-child abuse refers to the abuse of a child or children perpetrated by another child or children and it can happen both inside and outside of school and online. Child-on-child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- discriminatory behaviour, including racism, faith-targeted abuse, and other prejudice-based incidents;
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse');
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- serious physical assault and harm, or the threat of harm with a weapon;
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual making or sharing of nudes and semi nude images and or videos; Note: For the purposes of this policy, the term 'making or sharing nudes and semi-nudes' refers to the creation, sending or posting of nude or semi-nude images by young people under the age of 18. The term 'images' includes all visual content, such as photographs, videos and livestreams. Images may be taken by the child themselves (sometimes referred to as 'self-generated imagery') or taken or created by another person. They may also be digitally altered or wholly generated using artificial intelligence, including what are sometimes described as 'deepfakes' or 'deep nudes', upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual

[2] See Appendix B for more information about abuse and neglect.

gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

For the purposes of this Policy and in line with Keeping Children Safe in Education 2026, **children** includes everyone under the age of 18.

Within this policy:

- **'Parent'** refers to birth parents and other adults in a parenting role for example adoptive parents, step parents, kinship carers and foster carers.
- **'Staff'** or **'members of staff'** refers to all teaching, non-teaching, support, supply, peripatetic, contract staff, governors, volunteers and **trustees** working in or on behalf of **the school.**
- **Victim** is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.
- **Alleged perpetrator(s)** and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.
- Keeping Children Safe in Education (2026) may be abbreviated to 'KCSIE'.

4. Legislation and statutory guidance

The school adheres to all relevant safeguarding legislation, statutory guidance and guidance from the Northamptonshire Safeguarding Children Partnership. This includes (but is not limited to):

Statutory Guidance

- Keeping Children Safe in Education (2026)
- Working Together to Safeguard Children (2026)
- Early Years Foundation Stage statutory Framework (2026) Early Years Foundation Stage (2026)
- Children missing education (statutory for local authorities) (2025)
- Working together to improve school attendance (2026)

Legislation

- The Children Act 1989 and The Children Act 2004
- Section 5B (11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015
- The Rehabilitation of Offenders Act 1974
- Safeguarding Vulnerable Groups Act 2006
- Counter-Terrorism and Security Act 2015 (and the Prevent Duty guidance, updated 2023)

- The Education Act 2002
- The School Staffing (England) Regulations 2009
- Part 1 of the schedule to the Non-Maintained Special Schools (England) Regulations 2015.
- The Equality Act (2010)
- The Human Rights Act (1998)
- The Public Sector Equality Duty (PSED)
- The Childcare (Disqualification) Regulations 2009 (and 2018 amendment)
- The Childcare Act 2006 (all schools with pupils aged under 8)
- Information Sharing Duty (September 2026)
- Data Protection Act 2018,
- the UK General Data Protection Regulation (UK GDPR),
- and the Data (Use and Access) Act 2025

Guidance from the Northamptonshire Safeguarding Children Partnership (NSCP) can be found here: Home - Northamptonshire SCP.

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

- What to do if you are worried a child is being abused (2015)
- Guidance for safer working practice for those working with children and young people in education settings (2022)

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

- Behaviour policy
- Colleague Code of Conduct
- Complaints policy
- Data Protection policy
- Health and Safety policy
- Attendance policy
- Online Safety policy
- SEND policy
- Equality policy
- Sex and Relationship Education policy
- First Aid policy
- Supporting Pupils with medical Conditions and administering medication policy
- Allergy Safety Policy
- Designated teacher for CLA & PLAC policy
- Privacy notices
- Speak Up (Whistleblowing) policy
- Antibullying policy
- IT acceptable use policy
- Mental Health and Wellbeing policy
- Dealing with allegations of abuse against staff members Policy
- Early Years Foundation Stage policy

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

We recognise that the Public Sector Equality Duty applies to all protected characteristics and means that whenever significant decisions are being made or policies developed, specific consideration will be given to the equality implications of these such as, for example, the need to eliminate unlawful behaviours that relate to them, such as sexual violence and sexual harassment including online, misogyny/misandry, racism and faith based prejudice.

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

5. Multi-agency safeguarding arrangements

As outlined in Working Together to Safeguard Children (2026) we are committed to working closely with organisations and agencies to safeguard children and promote their welfare. This means:

- there is a clear, shared vision for how to improve outcomes for children locally across all levels of need and all types of harm
- when a child is identified as suffering or likely to suffer significant harm there is a prompt, appropriate and effective response to ensure the protection and support of the child
- organisations and agencies are challenged appropriately, effectively holding one another to account
- the voice of children and families combined with the knowledge of experienced practitioners and insights from data, provides a greater understanding of the areas of strength and/or improvement within arrangements and practice
- information is sought, analysed, shared, and broken down by protected characteristics to facilitate more accurate and timely decision-making for children and families, and to understand outcomes for different communities of children
- effective collection, sharing and analysis of data, enables early identification of new safeguarding risks, issues, emerging threats, and joined-up responses across relevant agencies
- senior leaders promote and embed a learning culture which supports local services to become more reflective and implement changes to practice
- senior leaders have a good knowledge and understanding about the quality of local practice and its impact on children and families

6. Confidentiality and Information Sharing

Information sharing is vital in identifying and tackling all forms of abuse, neglect and exploitation, and in promoting children's welfare, including their educational outcomes. Schools and colleges have clear powers

to share, hold and use information for these purposes. The General Data Protection Regulation (GDPR) does not prevent, or limit, the sharing of information for the purposes of keeping children safe. Lawful and secure information sharing between schools, Children's Social Care, and other local agencies, is essential for keeping children safe and ensuring they get the support they need.

The school adheres to all 'data protection laws. Please see EMAT Data Protection Policy and Privacy Notice for more information.

6.1 Sharing information with parents

Culworth CofE Academy will ensure the Safeguarding and Child Protection Policy is available publicly via the school website and available through the school office.

Where appropriate, we will discuss any concerns about a child with the child's parents. The Designated Safeguarding Lead (DSL) will normally do this in the event of a concern, 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 (see Section 6.2 for more details). In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved.

6.2 Consent

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

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

When considering whether, or not, to share safeguarding information (especially with other agencies), Culworth CofE 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 that should also be recorded within the safeguarding file.

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

- Staff should never promise a child that they will not tell anyone about an allegation, as this may not be in the child's best interests.
- Staff who receive information about children and their families in the course of their work should share that information only within appropriate professional contexts.
- Timely information sharing is essential to effective safeguarding. This includes the transference of

child protection files from one school to another, which should be completed within five days.

- Information must only be shared on a 'need-to-know' basis, but consent is not required to share information if a child is suffering, or at risk of, serious harm.[3]

7. Roles and responsibilities

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 the three safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

7.1 EMAT Trustees and Local Advisory Boards

EMAT's Trustees have a strategic leadership responsibility for the Trust's safeguarding arrangements. Trustees delegate the monitoring of safeguarding in schools to the Local Advisory Board (LAB). The LAB will appoint a Governor Safeguarding Lead to monitor the effectiveness of this policy in conjunction with the full Local Advisory Board. This is always a different person from the DSL. The Governor Safeguarding Lead is detailed on the front page.

All governors and trustees will receive safeguarding and child protection training, including online safety, at induction and at regular intervals thereafter. This training will equip governors to provide strategic challenge and assurance regarding safeguarding arrangements.

Governors and EMAT's Trustees will ensure that there are mechanisms in place to assist staff in understanding and discharging their statutory safeguarding roles and responsibilities. Governors will ensure that the school is working with local safeguarding partners and that the school contributes to multi-agency working, adhering to Working Together to Safeguard Children (2026). All those involved in governance will read KCSIE (2026) and a record will be kept of this.

Part 2 of KCSIE (2026) sets out the responsibilities of governing bodies and our school governors will adhere to this guidance at all times. As part of these responsibilities the governors will;

- receive an appropriate level of training to provide them with the necessary knowledge to ensure safeguarding policies and procedures are effective. This may be delivered face to face or online;
- ensure that they comply with their duties under statutory guidance and legislation including its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements;
- work to facilitate a whole school approach to safeguarding, by ensuring that safeguarding and child protection underpin all relevant aspects of policy and process;
- ensure that policies, procedure and training at the school are effective and understood and comply with the law at all times and that they allow concerns to be responded to in a timely manner;
- ensure that safeguarding training for staff, including online safety training, is integrated, aligned and considered as part of the whole school or college safeguarding approach and wider staff training and

[3] See Working Together to Safeguard Children (2026) for more information.

curriculum planning;

- ensure that the school takes into account local criteria for action and protocol for assessment and supply information as requested by the three safeguarding partners;
- ensure that the school has an effective Child Protection Policy, which is published on the school website and/or available by other means and review this annually;
- ensure that the school has systems in place to allow children to raise concerns, which are well-promoted, well-understood and easily accessible;
- ensure that the school takes safeguarding concerns seriously and takes the wishes and feelings of children into account;
- ensure that there are systems in place for young people to safely express their views and give feedback on safeguarding practice;
- ensure that the school has a suitable behaviour policy for pupils and a staff behaviour policy or Code of Conduct;
- ensure that all staff undergo safeguarding and child protection training (including online safety which, amongst other things, will include an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) on induction and regularly thereafter;
- consider a whole-school approach to online safety, including the use of mobile technology in school;
- ensure that there are clear systems and processes in place for identifying when children may be experiencing mental health problems;
- ensure that children are taught about safeguarding, including online safety. See section 10.6 and Appendix E of this policy for further information;
- ensure that appropriate safeguarding arrangements are in place to respond to children missing from education and those who are absent from education, particularly on repeat occasions and/or for prolonged periods;
- appoint an appropriate member of staff from the senior leadership team to the role of Designated Safeguarding Lead to take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place) and ensure that the DSL has the appropriate status and authority, skills and experience to carry out their job, including additional time, funding, training, resources and support;
- ensure that appropriate filters and monitoring systems are in place to keep children safe online;
- ensure that the Trust meets the 'Digital and technology standards in schools and colleges and the DfE Filtering and monitoring standards for schools and colleges;
- ensure that there are appropriate procedures in place to manage both allegations against staff (including supply staff, trainee teachers, volunteers and contractors) and concerns that do not meet the harm threshold (low level concerns); and
- respond to allegations of abuse against the headteacher. The Chair of Governors will act as the 'case manager' in the event that an allegation of abuse is made against the head teacher, where appropriate (see Appendix D).

7.2 The Headteacher

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

- ensure that this policy is reviewed annually and ratified by the governing body;

- ensure that this policy and associated procedures are adhered to by all staff and take action as necessary if not;
- ensure that staff (including temporary staff) and volunteers are informed of our systems that support safeguarding, including this policy, as part of their induction.
- ensure that all staff are made aware of the named governor for safeguarding and the Designated Safeguarding Lead;
- ensure that the role of 'Designated Safeguarding Lead' is explicit in the role-holder's job description, that they have appropriate time, funding, training and resources and that there is always adequate cover if the DSL is absent;
- decide whether to have one or more deputy safeguarding leads and ensure they are trained to the same standard as the Designated Safeguarding Lead;
- organise appropriate cover for the role of Designated Safeguarding Lead for any out of hours/out of term activities;
- appoint a 'Designated Teacher for Looked After and Previously Looked After Children' to promote the educational achievement of children looked after and previously looked after;
- appoint a lead for online safety. This may be a DSL or a DDSL;
- review filtering and monitoring provision at least annually;
- oversee filtering and monitoring reports;
- making sure that all staff understand their role, are appropriately trained, follow policies, processes and procedures and act on reports and concerns;
- ensure that all recruitment follows the safer recruitment guidance (see Part 3 of KCSIE) and a single, central record is maintained with details of all members of staff who are in contact with children;
- respond to allegations of abuse against all other members of staff and act as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate:
- make decisions regarding all low-level concerns;
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required;
- ensure that the school works with social care, the police, health services and other services to; promote the welfare of children; provide a co-ordinated offer of universal and community based Family Help and targeted support through Family Help when need is identified; contribute to inter-agency plans for children subject to children protection plans and to protect children from harm; safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties (Teaching Standards, 2012);
- ensure that children's social care (from the host local authority or placing authority) have access to the school to conduct, or to consider whether to conduct a section 47 or section 17 assessment, as per Keeping Children Safe in Education (September 2026); ensure the relevant staffing ratios are met, where applicable (Early years providers and primary schools);
- make sure each child in the Early Years Foundation Stage is assigned a key person (Early years providers).

7.3 The Designated Safeguarding Lead (DSL)

The full responsibilities of the DSL are set out in Annex B, KCSIE (2026).

The DSL is a member of the Senior Leadership Team~~.~~ and will be named on the front page of ~~this~~ each school's policy. The DSL takes lead responsibility for child protection and wider safeguarding.

The DSL will be given additional time, funding, training, resources and support needed to carry out their role effectively.

When the DSL is absent, the DDSLs will act as cover. Details of these can be found on the front page.

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

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

When a task is delegated to a DDSL it is expected that the DDSL will complete the task in line with the guidance set out in their training and will act in line with the expectation placed upon them. If they are not clear about the task or the expectation of them or they are unhappy with the instruction they should seek clarification from the DSL, the Headteacher or seek support from the Trust.

The Designated Safeguarding Lead should take lead responsibility for safeguarding and child protection including online safety and understanding the filtering and monitoring systems and processes in place.

All staff should receive appropriate safeguarding and child protection training including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring.

In line with the Department for Education filtering and monitoring standards, DSLs should:

- understand their roles and responsibilities to manage filtering and monitoring systems.
- work with the headteacher and the Trust to review filtering and monitoring provision at least annually.
- Ensure that harmful and inappropriate content is blocked without unreasonably impacting teaching and learning.
- have effective monitoring strategies in place that meet their safeguarding needs

The Designated Safeguarding Lead will;

- Act as a source of support and expertise on matters relating to safeguarding and child protection to ensure that other members of staff can carry out their safeguarding duty;
- Advise on the response to safeguarding concerns;
- Liaise with the local authority and work with other agencies in line with 'Working Together to Safeguard Children (2026);
- Identify if children may benefit from community based Family Help and targeted support through Family Help;

- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- Make referrals to the Channel Programme where there is a radicalisation concern and/or support staff that make a referral to Channel;
- Support the school with regards to their responsibilities under the Prevent duty and provide advice and support on protecting children from radicalisation;
- Refer cases to the police where a crime may have been committed;
- Be available during school or college hours for staff to discuss any safeguarding concerns. In the event that they are not available, a DDSL will be made available;
- Be responsible for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place);
- Undertake training to equip them with the skills to carry out the role and update this every two years;
- Ensure all staff that work directly with children have read and understood Part 1 and Annex A of Keeping Children Safe in Education (September 2026);
- Ensure all staff that do not work directly with children have read Part 1 of Keeping Children Safe in Education (2026);
- Update their knowledge and skills regularly and keep up with any developments relevant to their role;
- Provide staff in school with the knowledge, skills and support required to safeguard children;
- Work with attendance leads as being absent, as well as missing, from education can be a warning sign of a range of safeguarding concerns, including sexual abuse, sexual exploitation or child criminal exploitation;
- Take responsibility for the accurate and timely recording of safeguarding and child protection concerns and take overall responsibility for safeguarding and child protection files;
- Take responsibility for the transfer of safeguarding files when a child leaves the school within five days of departure;
- The DSL will consider whether safeguarding information should be transferred in advance of a pupil moving education settings where that information may assist in the management of risk or continuation of support.
- Attend or ensure an appropriate representative attends multi-agency safeguarding or child protection meetings;
- Work closely with other relevant education professionals (e.g. SENCO, Virtual School Head) to ensure children with additional vulnerabilities are safeguarded;
- Support children who have experienced or are experiencing safeguarding or child protection issues by using information they hold about children with a social worker to make decisions in the best interests of the child's safety, welfare and to help promote educational outcomes. This will include ensuring that 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;
- Help to promote educational outcomes of children who have experienced or are experiencing safeguarding or child protection issues by sharing relevant information with teachers and the school leadership team;

- Promote a 'culture of safeguarding', in which every member of the school community acts in the best interests of the child;
- Ensure that staff are aware of the school's unauthorised absence procedures and children missing education procedures;
- Be aware of the requirement for children to have an appropriate adult present where necessary;
- Have a good understanding of harmful sexual behaviour and how to support children in the event that this issue arises;
- Regularly meet with the safeguarding link governor and/or Chair of Governors to review safeguarding at the school;
- Know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support;
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search and understand;
- The DSL will ensure appropriate risk assessment, information sharing and safeguarding planning is undertaken where serious violence, weapon-carrying or weapon-related incidents are identified;
- The DSL will oversee safeguarding responses relating to Artificial Intelligence, deepfakes, AI-generated abuse material and emerging online harms and
- Liaise with the headteacher regarding safeguarding cases and issues.

Details of the way to contact the DSL out of school hours are detailed on the front page of this policy.

7.4 All staff

Staff play a particularly important role because they are in a position to identify concerns in order to provide help for children. All staff;

- have a responsibility to provide a safe environment, where children can learn;
- will be trained so that they know what to do if a child tells them that he/she is being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals;
- will be able to identify indicators of abuse, neglect and exploitation;
- will understand that children may experience prejudice-based harm, including racism, faith-based prejudice, and other forms of discrimination, and recognise that this may have a significant impact on a child's welfare;
- will be made aware of systems in the school that support safeguarding and child protection;
- will be made aware of safeguarding issues that put children at risk of harm and behaviours associated with these risks;
- will have an awareness that children can be at risk from harm inside and outside of the school, inside and outside of the home, and online;
- will receive appropriate safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring);
- will understand the importance of exercising professional curiosity;

- will receive and access directed updated training as appropriate;
- should ensure that they know what to do if a child makes a disclosure of abuse and never promise confidentiality when a child makes a disclosure;
- will be aware that children may not feel ready or know how to tell someone that they are being abused;
- will be made aware of and should be clear on the school's or college's policy and procedures with regards to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it;
- will be made aware of the process for universal and community based Family Help and targeted Family Help and understand their role in it; should be prepared to identify children who may benefit from Family Help and will discuss Family Help requirements with the safeguarding lead in the first instance;
- may be required to support social workers and other agencies following a referral;
- will be made aware of the process for making referrals to Children's Social Care (though the MASH), understand statutory assessments and the role that they may be expected to play in such assessments;
- should be prepared to make referrals to the MASH if they have concerns about a child's welfare and understand the role that they may be expected to play in such assessments;
- will receive regularly updated safeguarding and child protection training to cover all of the above, as well as online safety (including IT filtering and monitoring procedures and how to report related safeguarding or technical concerns);
- will receive safeguarding updates throughout the year as part of continuous professional development;
- will be encouraged to contribute to the development of safeguarding policy and practice;
- should always seek advice from the Designated Safeguarding Lead if they are unsure;
- provide a safe space for pupils who are LGBT to speak out and share their concerns; and
- all teachers should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties (Teaching Standards, 2012).

All staff will be made aware of our systems and documents that support safeguarding, including this policy, the staff code of conduct, the role and identity of the Designated Safeguarding Lead (DSL) and any deputies, the behaviour policy and the safeguarding response to children who are absent or go missing from education, particularly on repeat occasions and/or for prolonged periods.

All staff that work directly with children will be provided with a copy of, and must read, Part 1 and Annex A of Keeping Children Safe in Education (September 2026) annually and will receive annual updated training on their safeguarding roles and responsibilities. All EMAT staff and those working within our organisation will be asked to read Part 1 of KCSIE to ensure that they can support our rigorous culture of safeguarding.

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

8. Recognising Abuse

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

8.1 All staff

- All staff members will undertake safeguarding and child protection training at induction (including online safety, FGM, the Prevent duty and whistleblowing procedures) to ensure they understand the school's safeguarding systems, their responsibilities and can identify signs of possible abuse, neglect and exploitation. This training will be regularly updated and will be in line with advice from the three 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.
- All staff will receive appropriate safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring).
- 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, as applicable.

Teachers will receive training to ensure that they can manage behaviour effectively to ensure a safe educational environment, and they should have a clear understanding of the needs of all pupils.

8.2 The DSL and Deputy DSLs

- The DSL and Deputy DSLs will undertake child protection and safeguarding training at least every 2 years.
- In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).
- They will also undertake Prevent awareness training and online safety training (including an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring).

8.3 Governors and Trustees

- All governors receive safeguarding training appropriate to their role at induction, which is regularly updated, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities, including providing strategic challenge and ensuring there is a whole school approach to safeguarding.

This includes training on:

- the Prevent duty.
- Online safety.
- The expectations, applicable roles and responsibilities in relation to filtering and monitoring.
- As the chair of governors or a Trustee may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Headteacher, they should receive training in managing allegations for this purpose.

8.4 Recruitment – interview panels

At least one person conducting any interview for a post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, KCSIE (2026), and will be in line with local safeguarding procedures.

8.5 Supervision

- All staff who have contact with children and families will be offered opportunities for regular supervision which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.
- All DSLs are able to access external supervision and support at least six times a year.
- All staff are able to access support through their line manager, EMAT Central Team and the Employee Assist Programme.

8.6 Specific safeguarding issues

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

- physical abuse;
- sexual abuse;
- child sexual exploitation;
- emotional abuse;
- neglect;
- child criminal exploitation (including involvement in county lines and financial exploitation);
- domestic abuse;
- fabricated or induced illness;
- faith-based abuse;
- female genital mutilation;
- forced marriage;
- gangs or youth violence;
- gender-based violence;
- hate;
- online safety;
- child-on-child abuse, including harassment and violence;
- radicalisation and extremism;

- relationship abuse including physical, sexual, emotional abuse and stalking;
- serious violence;
- sexual violence or sexual harassment (including child-on-child abuse);
- sexting or sharing of nudes;
- honour or faith-based' abuse;
- mental health and wellbeing concerns;
- teenage relationship abuse;
- trafficking and modern slavery;
- weapon carrying;
- AI-generated abuse material; deepfake imagery;
- financial exploitation;
- technology facilitated abuse;
- online misogyny and misandry;
- harmful online influencers.

All staff will be made aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments (including online). All staff are expected to consider whether children are at risk of abuse or exploitation in situations outside their families (extra-familial harm).

Staff will also be made aware of the additional safeguarding vulnerabilities of;

- children in the court system;
- children who are absent or missing from education;
- children with family members in prison;
- children who are homeless;
- child who have or have had a social worker;
- children who are young carers;
- children looked after or previously looked after (including those living in kinship care arrangements); and
- children with mental health problems.

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

If a member of staff, parent or member of the public is concerned about a pupil's welfare, they should report it to the DSL as soon as possible. On occasions when the DSL is not available, it should be reported to the DDSL/s without delay. If in exceptional circumstances, the DSL (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from local children's social care.

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

All staff will be alert to indicators of abuse (including child-on-child abuse, including harassment and violence) and will report any of the following to the Designated Safeguarding Lead immediately;

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

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

The following procedures are in line with statutory guidance (see Section 4) and the Northamptonshire Safeguarding Children Partnership's Right Help, Right Time A continuum of need guidance (2025) . Referral procedures can be found in section 9.5.

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

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

- listen to what is being said without displaying shock or disbelief;
- accept what is being said;
- allow the child to talk freely;
- reassure the child whilst not promising them that it will be ok or that 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 them that what has happened is not their 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 but do not ask the child to write their own account (see Record Keeping); and
- pass the information to the Designated Safeguarding Lead without delay using the record procedures outlined in section 14. Where possible all information should be shared using MyConcern. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 9.2), and tell the DSL as soon as possible that you have done so.

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

We recognise that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected.
- Not recognise their experiences as harmful.
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers.

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

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

If you think that a child is suffering or at risk of suffering significant harm, you must report this to the Designated Safeguarding Lead immediately. On occasions when the Designated Safeguarding Lead is not available, it should be reported to the Deputy Designated Safeguarding Lead without delay or a senior member of staff.

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

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

Figure in section 9.6 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 (see 9.2).

The DSL will decide on the most appropriate course of action and whether the concerns should be referred to children's social care, using the 'Northamptonshire Right Help, Right Time A continuum of Need'. If it is decided to make a referral to children's social care the parent will be informed, unless to do so would place the child at further risk or undermine the collection of evidence. See section 6.1 for more details.

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

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;
- seeking advice from the local Family Help partnership co-ordinator/s;
- Universal services and community based Family Help or the targeted Family Help level of Family Help ora referral for statutory services where the child is or might be in need or suffering or likely to suffer significant harm.

9.4 Family Help

All staff should be prepared to identify children who may benefit from Family Help. Family Help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. If Family Help is appropriate, the DSL 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 a Family 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 will be made aware of the Family 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 social care if the child's situation does not appear to be improving.

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

Staff will also be made aware of the additional safeguarding vulnerabilities of a child who;

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

9.5 Referrals

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 9), you must tell the DSL as soon as possible. Children's social care assessments should consider where children are being harmed in contexts outside the home, so the school will provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm.

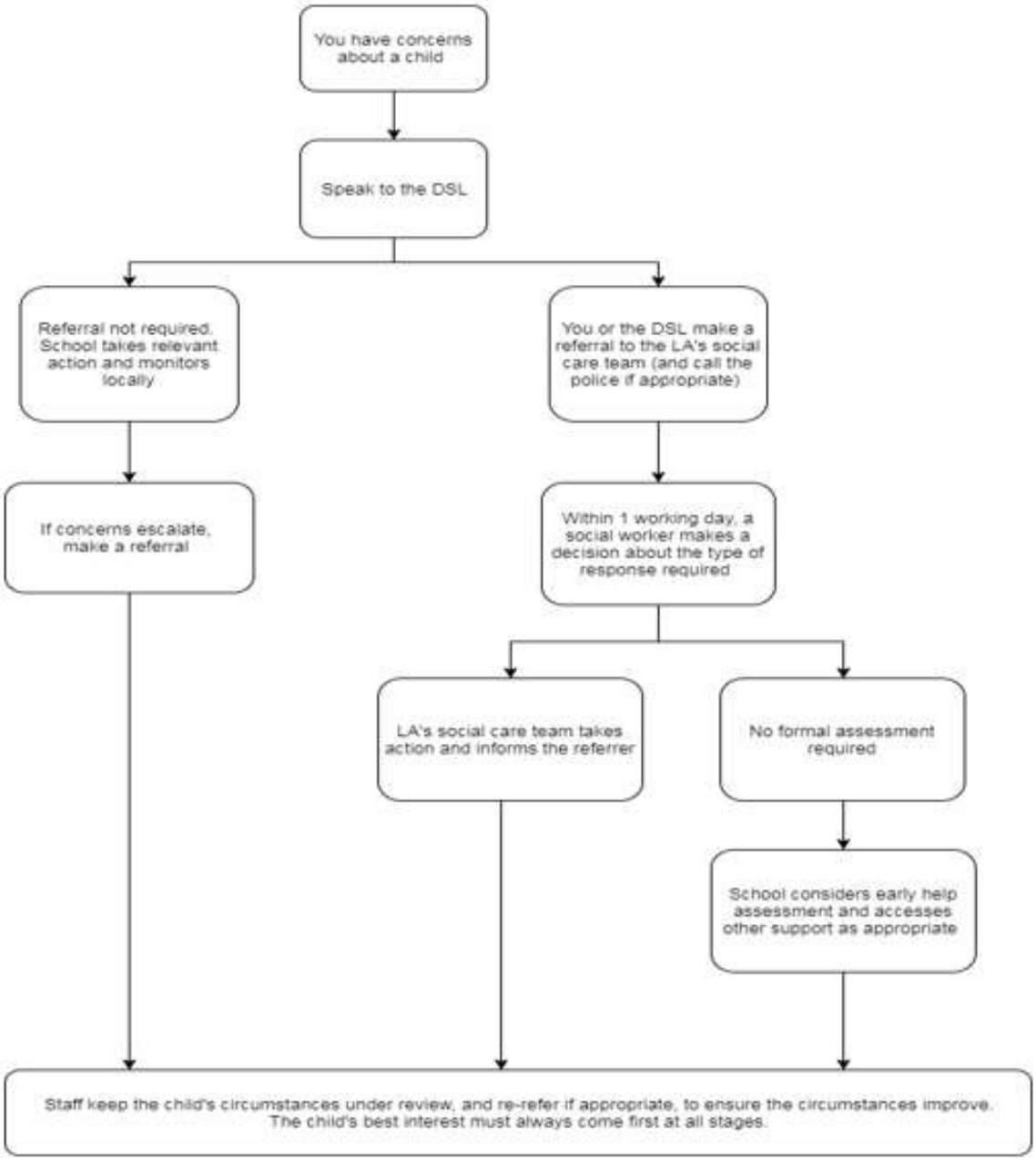
The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and 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 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 0300 126 7000 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.

9.6 Figure 1: Reporting and responding to concerns flowchart



10. Specific safeguarding issues

For more information relating to specific safeguarding issues, please see Appendix B. For more information about child-on-child (including harassment and violence), please see Appendix A.

10.1 Female Genital Mutilation (FGM)

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 student under the age of 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.

10.2 Radicalisation and extremism

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

We adhere to the Prevent Duty statutory guidance (2023).

10.3 Children potentially at greater risk of harm

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

The DSL will hold information relating to social workers working with children at the school/college. This information will inform decisions about safeguarding and promoting welfare (including the provision of pastoral and/or academic support).

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

- Children absent or missing education.
- Children missing from home or care.

There are other familial issues that can have a detrimental impact on children. We work with other agencies in line with Keeping Children Safe in Education (2026) to support children and families in the following circumstances:

- Children facing the court procedures and/or children in the court system.
- Children with family members in prison.

- Children who are homeless.
- Children who need a social worker.

10.4 Mental health

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

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, neglect and exploitation, 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 a child is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which education staff are well placed to recognise.

These could include:

- significant changes in behaviour,
- ongoing difficulty sleeping,
- withdrawing from social situations,
- not wanting to do things they usually like, and
- physical signs of self-harm or neglecting themselves.

Not every child who exhibits these behaviours is suicidal or has a mental health concern. However, by identifying these and other potential warning signs, education staff can identify children who may be struggling with their mental health and contemplating suicide and offer support and vital early intervention. Schools and colleges should ensure that any interventions they offer are evidenced as safe and effective and appropriate for the need and phase of 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 9.

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

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

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 through our curriculum.

Schools will only signpost any app or online tool offering mental health support to pupils which is regulated by the Medicines and Healthcare Products Regulatory Agency.

Refer to the Department for Education guidance on mental health and behaviour in schools for more information.

10.5 Child-on-child abuse, including harassment and violence

The school/college takes all reports and concerns about child-on-child abuse, including harassment and violence, very seriously. This includes any reports or concerns that have occurred outside of the school or college premises, or online.

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

10.6 Online safety, including filtering and monitoring

Our Online Safety Policy is set out in a separate document and more information can be found in Appendix E of this policy. 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;
- what staff should be alert to, what to report and how staff should report any concerns – including those related to the efficacy of filtering and monitoring systems;
- 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 Staff Code of Conduct in relation to personal online behaviour.

Governing bodies and proprietors should regularly review the effectiveness of school filters and monitoring systems. They should ensure that the leadership team and relevant staff are:

- aware of and understand the systems in place
- manage them effectively
- know how to escalate concerns when identified.

Communications with parents and carers should be used to reinforce the importance of children being safe online. Schools should share information with parents/carers about:

- what systems they have in place to filter and monitor online use
- what they are asking children to do online, including the sites they will asked to access
- who from the school (if anyone) their child is going to be interacting with online.

Pupil mobile phones

In accordance with the government's guidance, EMAT schools do not permit the use of mobile phones during the school day and encourage phone-free learning environments that support pupils' learning and personal development. However, we understand that for security reasons travelling to and from school, some pupils may have a mobile phone. These must be stored during the school day.

All primary school pupils with mobile phones are required to hand their device into the school office or class teacher at the start of the day and collect them from the school office at 3.15pm.

All secondary school pupils are required to turn their mobile phone off and store it in their bag during the school day. Any phone seen outside of a pupil's bag will be confiscated to the school reception until 3.15pm, or parents will be requested to collect.

Culworth CofE Academy is aware of the safeguarding risks which may be posed by new technology such as Smart Glasses, including making discreet recording, live-streaming, and instant sharing increasingly accessible.

While innovative, these devices raise significant concerns within a school setting, particularly around privacy, safeguarding, and data protection. Smart glasses can capture images or video without consent and may inadvertently reveal sensitive or identifying information about pupils, staff, or visitors. Their use could also potentially breach UK GDPR and the Data Protection Act 2018.

To ensure our school remains a safe and secure environment, smart glasses are not permitted on site for pupils, parents, visitors, or staff.

10.7 Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. All staff will be made aware that children can be victims of domestic abuse. This abuse:

- can be psychological, physical, sexual, financial, or emotional.
- can impact on children through seeing, hearing or experiencing the effects of domestic abuse and/or experiencing it through their own intimate relationships.

All can have a detrimental and long-term impact on their health, well-being, development, and ability to learn. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Operation Encompass helps police and schools work together to provide emotional and practical help to children. When the police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult, usually the Designated Safeguarding Lead (or a deputy) in school before the child or children arrive at school the following day. The Designated Safeguarding Lead will ensure the school has up to date relevant information about the child's circumstances to enable immediate support to be put in place, according to the child's need. Where appropriate, the Designated Safeguarding Lead will make a referral to local authority children's social care if they are concerned about a child's welfare.

Operation Encompass provides an advice and helpline for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8AM to 1PM, Monday to Friday on 0204 513 9990 (charged at local rate). Further information and resources for staff are available in Keeping Children Safe in Education (KCSIE) 2026.

10.8 Children who are lesbian gay, bisexual

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

We will:

- Create a culture where these children are able to speak out and share their concerns;
- Support and safeguard children in line with guidance and legislation;

10.8 Children who are questioning their gender

The school will follow KCSIE 2026 and any subsequent statutory guidance issued by the Department for Education.

Where a child or their parent has raised a request relating to social transition our school will respond. We will seek to understand the thoughts and feelings of children who are questioning their gender and will remain aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs. We will maintain flexibility and avoid rigid rules based on gender stereotypes.

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

We recognise that pupils with special educational needs and disabilities (SEND) can face additional safeguarding challenges. Additional barriers can exist when recognising abuse, neglect and exploitation 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 disproportionally impacted by behaviours such as bullying, without outwardly showing any signs; and/or communication barriers and difficulties in managing or reporting these challenges risks that they do not understand that what is happening to them is abuse

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

We offer extra pastoral support for pupils with SEND. This includes:

- Lunch Club
- Meet and greet sessions
- Sensory Circuits
- Inclusion team support
- After School Club
- Breakfast Club

More information can be found about local support for children with SEND here:

- **SEND Code of Practice**
- Northamptonshire's Local Offer: SEND Local Offer

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

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

Children who have, or have previously had, a social worker may experience additional safeguarding vulnerabilities. The school recognises the significant impact that abuse, neglect, exploitation and trauma can have upon educational attendance, behaviour, learning and emotional wellbeing.

We work with the local authority to ensure that we are providing effective support for this group of children. The role of virtual school head now includes a non-statutory responsibility for oversight of the attendance, attainment and progress of children with a social worker and children in kinship care.

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 un-authorised absence or missing education where there are known safeguarding risks; and
- 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.

Each child has an individual plan, which sets out:

- How often the school will make contact – this will be at least once a week
- Which staff member(s) will make contact – as far as possible, this will be staff who know the family well
- How staff will make contact – this will be over the phone, doorstep visits, or a combination of both

We have agreed these plans with children's social care where relevant and will review them termly. If we can't make contact, we will inform the child/children's social worker, and the police where appropriate.

13. Looked after and previously looked after children

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

- 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 as detailed on the front page of this policy 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 collaboratively with the DSL to ensure safeguarding risks, attendance concerns, mental health needs and educational outcomes are addressed holistically
- 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.

14. Record-keeping

All safeguarding concerns, discussions and decisions made and the reasons for those decisions must be recorded in writing. This includes instances where referrals were or were not made to another agency. If in doubt about recording requirements staff should discuss this with the DSL.

When a child has made a disclosure, the member of staff/volunteer must;

- record as soon as possible after the conversation. Use the school system of recording using MyConcern wherever possible. If MyConcern is not available then record on writing;
- not destroy any notes in case they are needed for legal reasons;
- record the date, time, place and any noticeable non-verbal behaviour and the words used by the child;
- use the body map or draw a diagram to indicate the position of any injuries if relevant; and
- record facts, quotes and observations rather than interpretations or assumptions.

All staff will receive training on what good recording of concerns looks like. All written records must be given to the DSL 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. All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely.

Records will include:

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

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 to enable the new school or college to continue supporting victims of abuse, incidents that may indicate concerns about serious violence or harmful behaviours and/or details of those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives.

To allow the new school/college to have support in place when the child arrives, this should be within:

- 5 days for an in-year transfer, or within
- The first 5 days of the start of a new term

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 particularly where the information would support an assessment of risk to others in the school as well as the individual pupil.

Where information indicates a risk to others and/or the individual pupil, for example where a pupil has previously carried, threatened with, or used a knife or weapon, the school will assess risk, and put in place a safety and support plan for when the child arrives.

Receiving schools and colleges should ensure key staff such as designated safeguarding leads and special educational needs coordinators (SENCOs) or the named persons with oversight for special educational needs and disabilities (SEND) in a college, are aware of this information as required. It is for the designated safeguarding lead to consider what other information should be shared with other relevant staff and when appropriate to do so.

Appendix C sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks. Appendix D sets out our policy on record-keeping with respect to allegations of abuse made against staff.

15. Relationships, sex and health education (RSHE)

Promoting safeguarding and welfare in the curriculum

Our school follows the EMAT RSHE policy**.**

The aims of our policy with regard to RSHE are:

- Provide a framework in which sensitive discussions can take place.
- To prepare students for the changes that occur to their bodies, minds and emotions as a consequence of growth from childhood to adulthood.
- Prepare pupils for puberty and give them an understanding of sexual development and the importance of health and hygiene.
- Help pupils develop feelings of self-respect, confidence and empathy.
- Create a positive culture around issues of sexuality and relationships.
- Teach pupils the correct vocabulary to describe themselves and their bodies.
- To support all young people to stay safe and prepare for life in modern Britain.

Underpinning our teaching of RSE are the EMAT values: **inclusion, innovation and impact.**

The Trust's sex and relationship education programme aims to support the personal and social development of all children, ensuring that they have the ability to accept their own and others' sexuality, to express their sexuality in positive ways and to enjoy relationships based on mutual respect and responsibility, free from any abuse.

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment. This will be underpinned by our:

- Behaviour policy
- Pastoral support system
- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
  - Healthy and respectful relationships.
  - Consent and personal boundaries.
  - coercive and controlling behaviour;
  - stereotyping and prejudice;
  - body confidence and self-esteem;
  - child-on-child abuse;
  - sexual violence and sexual harassment;
  - online safety;
  - digital resilience;
  - image sharing;
  - pornography;
  - deepfake and AI-generated content;
  - misogynistic influencers;
  - online exploitation;
  - healthy online relationships;
  - where and how to access support

The curriculum will remain age-appropriate, inclusive and responsive to emerging safeguarding risks.

16. Safer working practice

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

We expect all staff to act with professionalism at all times. To reduce the risk of unsafe or harmful practice, all staff will receive training on safer working practice and should be familiar with the guidance contained in the staff handbook and the Colleague Code of Conduct and Safer Recruitment Consortium document Guidance for safer working practice for those working with children and young people in education settings (September 2022).

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

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

Governors and Trustees will help to identify any weakness in the school's safeguarding system through their monitoring.

Staff are expected to adhere to the Colleague Code of Conduct at all times. In the event of any concerns or allegations, the school will deal with them promptly, in line with EMAT policy, local guidance and KCSIE (2026).

16.1 Staff use of mobile phones

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. Guidance for staff is outlined in the Acceptable Use Policy and the school's Staff Handbook. 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.

Staff must exercise professional judgement when using AI platforms and digital technologies and must ensure confidential or personal information is not uploaded into systems unless authorised and compliant with data protection requirements.

17. Safeguarding concerns about and allegations against members of staff

17.1 Allegations that may meet the harms threshold

In the event that there is an allegation of abuse against a member of staff, we will adhere to Part 4, Section 1 of KCSIE (2026) and Northamptonshire Safeguarding Children Partnership guidance and the EMAT Dealing with allegations of abuse against staff members Policy - See Appendix D for more details.

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

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

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

Allegations against staff

If there is a concern about any member of staff, supply teacher or volunteer other than the Headteacher, this must be reported to the Headteacher without delay. This includes supply staff, volunteers and anyone working in or on behalf of the school, whether paid or unpaid. Allegations of abuse against staff must be reported to the Headteacher or, where the allegation is against the head, to the CEO and not discussed directly with the person involved.

The Headteacher or CEO should consider if the concern or allegation meets the threshold for Designated Officer intervention.

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

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

Should there be information shared about an ex-member of staff, the Headteacher should refer that straight to the police.

Allegations against the Headteacher

KCSIE states that, where there are concerns/allegations about the Headteacher, this should be referred to the Chair of Governors. In the case of EMAT, that role is fulfilled by the CEO, Josh Coleman. Therefore, if an allegation is made against the Headteacher it must be brought to the attention of the CEO in the first instance. The CEO will then ensure EMAT's Head of Governance and Compliance and the Head of People and Culture are informed. They will inform and support the Chair of Governors who will act as case manager where required.

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

The school recognises the distinction between allegations that meet the harms threshold and safeguarding concerns that do not meet the harms threshold (low-level concerns).
Patterns of low-level concerns may indicate emerging safeguarding risks and will be reviewed accordingly.

In the event that there is a safeguarding concern about a member of staff, we will adhere to guidance outlined in Part 4, Section 2 of KCSIE (2026) and Northamptonshire Safeguarding Children Partnership guidance.

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

- is inconsistent with the Colleague Code of Conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

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

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

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating pupils

Staff will receive training about what may constitute a low-level concern. More information can be found in Part 4 of KCSIE (2026).

Reporting low level concerns

Low level concerns should be reported to the Headteacher.

All low-level concerns should be recorded in writing. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible. These records will be kept for as long as this member of staff remains employed.

The Headteacher may:

- Speak directly to the person who raised the concern (unless it has been raised anonymously).
- Speak to the individual involved and/or witnesses.

The Headteacher will then categorise the type of behaviour and decide on an appropriate course of action. This will be recorded, along with rationale for any decisions made and details of action taken.

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

- take action through our disciplinary procedures;
- refer behaviour to the local authority designated officer/s where a pattern of behaviour moves from a concern to meeting the harms threshold; and/or
- revise policies or implement extra training as appropriate, to minimise the risk of behaviour happening again.

We will retain low level concerns information until the person is no longer employed by the school.

17.3 Supply staff

Although the school/college does not directly employ supply teachers, we will ensure that any concerns or allegations against supply teachers are handled properly. We will never cease to use a supply teacher for safeguarding reasons without finding out the facts and liaising with the Local Authority Designated Officer to reach a suitable outcome.

Schools will liaise with the supply agency to determine whether to suspend or redeploy the supply teacher whilst they carry out their investigation. Governors and/or trustees will be kept informed.

The school will inform supply agencies of its process for managing allegations and will take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. Informing supply agencies of our process for managing allegations includes inviting the agency's human resource manager (or equivalent) to meetings and regularly updating agencies on relevant school policies.

17.4 Allegations relating to an incident that happened when an individual or organisation is using school premises

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

18. Complaints and concerns about school safeguarding policies

18.1 Complaints against staff

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

If the school receives a complaint against a teacher who no longer works at the school, they will be referred to the police.

18.2 Other complaints

For safeguarding related complaints of other types, for example those related to pupils or premises, we will ask the complainant to put this in writing to the Executive Headteacher or Head of School before deciding on the necessary course of action.

18.3 Speak Up (Whistleblowing)

All EMAT schools have clear Speak Up policy and procedures. All staff have the ability to raise concerns. Staff have many routes in which to raise concerns including an anonymous route through the charity Protect, which offers independent advice to everybody involved with EMAT.

All staff are given a copy of the **Speak Up policy** at the beginning of the academic year. This is available through the school's website.

19. Use of school or college premises for non-school activities

Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll) we will:

- Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
- Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
- Make sure that safeguarding requirements are a condition of using the school premises, including in any transfer of control agreement and that any agreement to use the premises would be terminated if the other body fails to comply.

In the event that the school/college receives an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children, we will follow our safeguarding policies and procedures, including informing the LADO.

20. How we safeguard pupils attending alternative provision

When placing a pupil with an alternative provision provider, the school continues to be responsible for the safeguarding of that pupil. The school will undertake all checks necessary to satisfy ourselves that the provider meets the pupil's needs and keeps them safe.

The School will obtain written information from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at their establishment (i.e. those checks that schools would otherwise perform on their own staff). This includes written confirmation that the alternative provider will inform the commissioning school of any arrangements that may put the child at risk (i.e. staff changes), so that the commissioning school can ensure itself that appropriate safeguarding checks have been carried out on new staff.

The School will have processes in place to know where a child is based during school hours. This includes having records of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend. We will regularly review the alternative provision placements and review them at a minimum of half termly to ensure that the child is regularly attending and the placement continues to be safe and meets the child's needs. Where safeguarding concerns arise, the placement will be immediately ended if any concerns are not addressed.

The School will ensure that safeguarding arrangements within alternative provision are reviewed regularly and that live information regarding attendance, welfare and safeguarding incidents is shared appropriately. Where concerns arise regarding safeguarding standards within alternative provision settings, immediate action will be taken.

Written confirmation will be sought to ensure all statutory safeguarding checks have been carried out for individuals working at the establishment which are in line with those we would conduct on our own staff. Safeguarding arrangements will be agreed, including the arrangements for reporting pupils' attendance. School staff will follow guidance in EMAT Alternative Provision Commissioning Arrangements.

21. Elective home education

We understand that some parents choose to educate their children at home, are legally able to do so and this in itself is not a safeguarding issue. We encourage parents who are considering removing a pupil from roll for home education to meet with us prior to making a final decision to discuss this with us. This is particularly important where a child has special educational needs or a disability, and/or has a social worker, and/or is otherwise vulnerable.

The school will not promote the concept of elective home education in any form and will challenge all statements of intent to home educate made by parents. A standard letter will be used to dissuade parents from making this decision – appendix F.

From September 2016 the Education (Pupil Registration) (England) Regulations 2006 were amended so that schools must inform their LA of all deletions from their admission register when a child is taken off roll. As such, we will notify the LA when a child is removed from roll to be educated at home.

The school will consider the safeguarding implications of any request for elective home education and will liaise with any agencies as required to ensure the safety of the child.

22. Policy implementation, monitoring and review

This policy will be reviewed at least annually and more frequently if required following changes to legislation, statutory guidance, local safeguarding arrangements, safeguarding practice reviews or emerging safeguarding risks.

The governing body will receive regular safeguarding assurance information throughout the year to support effective strategic oversight.

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. In addition, EMAT also undertakes an annual review of the implementation of this policy.

Appendix A: Child-on-child abuse (Including harassment and violence)

Child-on-child abuse is any abuse of a child or children that is perpetrated by another child or children. This includes all forms of sexual harassment, sexual violence and abuse. We commit to creating a culture of safety, where children are free from harassment or abuse of any kind. We take a zero-tolerance approach to any forms of abuse including sexual violence and sexual harassment – it is never acceptable and it will not be tolerated.

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

We will not down play incidents of banter as 'having a laugh' or being part of growing up. We have a zero tolerance approach to low level abuse in our school because we understand that this could develop into a unacceptable culture. We are driven to prevent this becoming normalised.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- discriminatory behaviour, including racism, faith-targeted abuse, and other prejudice
- based incidents;
- abuse in intimate personal relationships between children (sometimes known as
- 'teenage relationship abuse');
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- Serious physical assault and harm, or the threat of harm with a weapon;
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual making or sharing of nudes and semi nude images and or videos (also known as sexting or youth produced sexual imagery);
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element). (KCSIE 2026)

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

Harmful sexual behaviour (HSB)

We recognise that children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. We refer to problematic, abusive and violent sexual behaviour as 'harmful sexual behaviour'.

When responding to HSB, we will:

- Consider the behaviours in a child protection context;
- Consider the ages and developmental stages of the children involved;
- Take action in line with local thresholds and pathways guidance and relevant statutory guidance; and
- Seek specialist support as required.

We will take action at the earliest possible point, to safeguard children and to prevent problematic, abusive and/or violent behaviour in the future.

We recognise that children displaying HSB have often experienced their own abuse and trauma and we will offer support as required.

Staff training

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

Procedures for minimising opportunities for child-on-child abuse, including harassment and violence

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

- have robust behaviour and anti-bullying policies, which makes it clear that we have a zero tolerance approach to any kind of child-on-child abuse;
- ensure staff understand what is meant by child-on-child abuse and the school policy on child-on-child abuse by carrying out robust training on the issue and ensuring that all staff have read the relevant sections of KCSIE 2026;
- train staff thoroughly so that they challenge inappropriate behaviour (even if it appears to be relatively innocuous);

- train staff thoroughly so that they are confident to challenge inappropriate behaviours between peers, that are actually abusive in nature;
- never downplay certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys", as this can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it;
- refer to this in the Colleague Code of Conduct which governs how we expect all adults to behaviour;
- have an understanding of intra-familial harms and any necessary support for siblings following incidents;
- recognise that sexual harassment and sexual violence, as well as other forms of child-on-child abuse, may be happening even if they are not reported.

How we address child-on-child abuse, including harassment and violence, within the curriculum and across the school

As part of our PSHE curriculum we focus on healthy relationships, consent, pornography and sharing of nude images or videos, what to do if you're worried about something, your rights as a child, personal space, body privacy and who can help us. Through this, we are building their ability and confidence to speak out when they feel hurt or unsafe.

We ensure that our systems for reporting all safeguarding concerns are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously. We ensure that children are aware of our safeguarding and child protection procedures, including how to raise concerns about child-on-child abuse, by identifying trusted adults that children can speak to, together with providing access to our pastoral staff e.g. at lunchtimes / breaktimes.

Additional Vulnerabilities

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

Children who identify as LGBTQ+ can be targeted by their peers. In some cases, a child who is perceived by their peers to be LGBTQ+ (whether they are or not) can be just as vulnerable as children who identify as LGBTQ+. Our schools will be a safe space for children to speak to, or share concerns, with staff.

We work to protect children with additional vulnerabilities by:

- Providing additional support through our pastoral team
- Liaising with families where appropriate in order to offer and provide support

- Ensuring there is an open culture in classrooms where children feel confident and happy to raise concerns

How to report concerns

Our pupils

It is repeatedly made explicit to pupils how and from whom they can seek help.

If a young person witnesses or experiences any form of child-on-child abuse, we strongly encourage them to speak to a trusted member of staff, parent or trusted adult about it. If a child discloses to an adult outside of school, the adult should contact the Designated Safeguarding Lead without delay to report the issue.

All victims will be taken seriously, regardless of how long it has taken them to come forward and they will be supported and kept safe. Abuse that occurs online or outside of the school will be treated equally seriously. A victim will never be given the impression that they are creating a problem by reporting child-on-child abuse, including sexual violence or sexual harassment. A victim will never be made to feel ashamed for making a report or have their experience minimised.

In school, pupils can:

- Use worry boxes
- Speak to any member of staff about their concerns
- Access pastoral and inclusion support

All of these methods can be used to report any form of harm or abuse or can be used by pupils to share worried or concerns about any issue, including child-on-child abuse.

In the event that a pupil reports or discloses child-on-child abuse, we will take their report seriously, take prompt action to respond and to safeguard the child or children involved and we will ensure that we are listening to the voice of the child when deciding on the best course of action to take. We will always act in the best interests of children. Following any disclosures or reports of child-on-child abuse, we will review our school systems, training and policies to determine if any learning can be derived from the situation to further strengthen our approach to this issue. We will always encourage our pupils to safely express their views and give feedback on how they have been supported following a safeguarding concern. We will ensure that the child is never given the impression that they are creating a problem by reporting a case of child-on-child abuse. We will explain that the law is in place to protect children and young people rather than to criminalise them.

Our staff

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

Others

We encourage everyone to report any form of abuse or harm perpetrated by or against our pupils. Any concerns should be reported to the Designated Safeguarding Lead, using the details on the front page of this policy.

Wider concerns

We strive to create a safe and welcoming environment for all children. If you have any concerns about our culture of safeguarding, policy or procedures, please direct these to the Safeguarding Lead immediately, or follow our school Complaints Policy.

What happens when an allegation of child-on-child abuse, including harassment and violence, is made?

We will adhere to Keeping Children Safe in Education (2026) when responding to incidents of child-on-child abuse. The school takes child-on-child abuse seriously and will respond to all concerns or disclosures of child-on-child abuse, including those that have occurred outside of school and online, immediately.

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

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

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

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 ages and developmental stages of the children involved;
- any power imbalance between the children, including consideration of the age of children and whether children have special educational needs or disabilities;
- the impact on the victim;
- that sexual violence and sexual harassment can take place in intimate personal relationships between children;
- if the alleged incident is a one-off or a sustained pattern of abuse;

- if are there ongoing risks to the victim, other children, adult students or school or college staff; and
- other related issues and wider context, such as links to child criminal or child sexual exploitation.

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

- Seek further information from those involved and witnesses.
- Undertake a risk assessment and needs assessment to ascertain steps necessary to safeguard the victim, alleged perpetrator, adults and other children.
- Decide to manage the concern internally.
- Organise a meeting with relevant staff and agencies to assess risk and agree a safety plan.
- Refer the victim and/or the perpetrator to local services for targeted Family Help.
- Refer the case to Children's Services via a MASH referral.
- Liaise with social workers working with children involved (if applicable).
- Make a report to the police.
- Liaise with specialist services.

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

- the victim, especially their protection and support;
- whether there may have been other victims, including consideration of siblings who may be at risk;
- the alleged perpetrator(s); and
- all the other children, (and, if appropriate, adult students and staff) at the school or college, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

More information about these options in relation to sexual violence and sexual harassment can be found in Part 5 of KCSIE (2026).

Recording procedures

Issues of child-on-child abuse, including harassment and violence, are recorded on MyConcern. These concerns are reviewed regularly by Designated Safeguarding Leads. They are also reported to the local advisory board during termly LAB meetings. Members of staff will follow procedures for recording a disclosure as previously outlined.

Members of staff will follow the procedures for recording a disclosure as outlined in Sections 9 and 14 of this policy.

How we support victims of child-on-child abuse, including harassment and violence

The school recognises that child-on-child abuse has a significant impact on young people and victims are likely to need ongoing support. Children who are victims of sexual violence and sexual harassment wherever it happens, will likely find the experience stressful and distressing. Age appropriate support will be put in place for victims of child-on-child 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. We will do everything we can to protect the victim from further bullying, harassment or abuse as a result of their disclosure.

The needs and wishes of the victim should be paramount (along with protecting the child) in any response. It is important they feel in as much control of the process as is reasonably possible. Wherever possible, the victim, if they wish, should be able to continue in their normal routine. Overall, the priority should be to make the victim's daily experience as normal as possible, so that the school or college is a safe space for them.

We will consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse. Schools and colleges should be aware that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator(s).

The victim should never be made to feel they are the problem for making a report or made to feel ashamed for making a report.

We will consider the proportionality of the response and support should be tailored on a case by-case basis. If a victim of child-on-child abuse moves to a new setting, the Designated Safeguarding Lead will share the necessary information to ensure that support for the child continues.

How we will support alleged perpetrators and perpetrators of child-on-child abuse, including harassment and violence

We have a responsibility to safeguard and support all children. We will adhere to KCSIE (2026) when managing reports of child-on-child abuse and decide on action and support on a case by case basis.

The school has a responsibility to ensure that an alleged perpetrator continues to receive a suitable education and will consider a range of options in continuing educational provision if they are unable to attend school. Options may include;

- work being set by the school, completed at home, and marked at school;
- the provision of an on-line course of education to cover the period of any investigation;
- an alternative placement being agreed with another school for the duration of any investigation.

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

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

All risk and needs assessment and action plans whether internal or multi-agency will be reviewed and updated on a regular basis. If things do not improve or deteriorate the situation should be reconsidered.

The school may choose to impose a sanction or punishment on the alleged perpetrator following an incident of child-on-child abuse. In this case, we will follow the school Behaviour Policy in determining the level and severity of sanction. The school will use KCSIE 2026 for further guidance on the use of sanctions.

Where a child is cautioned or receives a conviction related to an incident of child on child abuse, the school will follow the guidance in KCSIE Part 5 with a close analysis of the requirements of any conviction. Each case is likely to be highly individual and will require its own risk assessment and conviction response in line with advice and guidance from the children's social care team and the police.

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

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

How we will support other children who may have been affected by child-on-child abuse, including harassment and violence

The school recognises that other students may be affected by a serious case of child-on-child abuse (e.g. friends or those in relationships with the victim or alleged perpetrator) and will offer support to these students through;

- Pastoral care and mentoring;
- Referrals to appropriate counselling services;
- Communication with parents/carers where appropriate;
- Referrals to the school nurse or other health professional.

Local Safeguarding Arrangements and making referrals

The school adheres to local safeguarding arrangements, as outlined by the Northamptonshire Safeguarding Children Partnership.

For further details of how the school works with partner agencies in responding to safeguarding incidents (including incidents of child-on-child abuse), please see the main body of this policy.

Parents

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

Whole school response

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

- Dedicate more teaching time to a particular issue or topic;
- Deliver additional staff training;
- Invite outside speakers to work with pupils or groups of pupils.

The designated safeguarding lead will refer to relevant assessment tools and guidance as appropriate such as:

- Keeping Children Safe in Education (2026) part five
- Sharing nudes and semi-nudes: advice for education settings working with children and young people
- Searching, screening and confiscation at school
- Behaviour in schools
- School suspension and permanent exclusion
- Stop it Now Sexual Behaviours Traffic Light Tool
- NSCP Thresholds Document
- NSCP Safeguarding Children Procedures,
- When to call the police – guidance for schools and colleges

When appropriate the designated safeguarding lead may seek further advice from local or national safeguarding contacts.

Governance

Any form of child-on-child abuse including Sexual Harassment and any Sexual Violence is reported termly to the LAB as well as the Board of Trustees through the Performance report collated by the Headteacher of the school.

Appendix B: Types of abuse

This appendix is based on the advice in Annex A of Keeping Children Safe in Education 2026.

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
- Verbal abuse, such as persistent criticism, belittling, or name-calling

Sexual abuse involves forcing, causing or inciting a child to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening.

The activities may involve:

- Physical contact, such as acts of penetration, whether that is with part of a person's body or an object (e.g. rape or assault by penetration) and non-penetrative acts such as masturbation, kissing, rubbing, and touching over 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 online).

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
- Provide a suitable education

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

Children with Medical Conditions

A safeguarding referral would only be needed where an incident highlighted concern that the child or young person might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family unit because of their medical condition. This might occur where relevant information about a child or young person's medical condition is not provided to a school, college or setting, or where they are repeatedly sent without essential medication, thereby putting the individual at risk.

Children who are absent from education

Children being absent from education for prolonged periods and/or on repeat occasions and children missing education can act as a vital warning sign to a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation (particularly county lines), or issues such as mental health problems, substance abuse, risk of travelling to conflict zones, risk of FGM honour or faith-based abuse 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, neglect and exploitation, including sexual exploitation, and to help prevent the risks of going missing in future. This includes when problems are first emerging but also where children are already known to local authority children's social

care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.
When the whereabouts and circumstances of a child are unclear or unknown, we will work together with local authorities to make enquiries that enable us to, as far as reasonably possible, identify the location of suspected CME and any provision of education they are receiving. We will follow statutory guidance as outlined in DfE Children missing education: statutory guidance for local authorities and schools (2025).

We will always follow up with parents/carers when pupils are not at school. This means we require 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.

Children with family members in prison

Are at risk of poor outcomes as a result of poverty, stigma, isolation and poor mental health. School and college staff should be aware that children who have experienced parental imprisonment are more likely to be absent (or excluded) than their peers, to experience mental ill health and drug and alcohol misuse; they are also less likely to be in education, training or employment in later life. Staff should understand the need for tailored, trauma informed and sensitive support that can help mitigate potential harm and help encourage stability.

Child criminal exploitation

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

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

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories,

shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

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

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including, sexual identity, cognitive ability, having a physical or learning disability, or being neurodivergent, communication ability, physical strength, status, and access to economic or other resources.

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

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions which could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal and sexual exploitation
- 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.

Serious violence

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

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

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

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

If a member of staff suspects a child is involved in or at risk of serious violent crime, they will discuss this with the DSL. 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.

Child sexual exploitation

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

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

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

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

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

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

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

If a member of staff suspects CSE, they will discuss this with the DSL. 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.

Child abduction and community safety incidents

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

In order to keep children safe on the way to and from school we retain close links with local Police Community Support Officers, teach children about 'Stranger Danger' through the PSHE curriculum, only allow children in Year 5 and 6, and secondary school children, to walk to and from school independently, gain permission from parents in Year 5 and 6 in order to allow children to walk to and from school independently, and encourage parents to report any concerns to the school linked to our children in the community.

In order to keep children safe at school we have clear school rules, a Behaviour Policy, staff who are First Aid trained, teach children our school values, have a robust PSHE and E-Safety curriculum, and have regular assemblies where we promote safety as a priority.

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

Cybercrime

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

Cyber-dependent crimes include;

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

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

Domestic abuse

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

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse.

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. Children may experience domestic abuse directly, witness domestic abuse, hear domestic abuse or experience its wider effects. Such experiences can have significant short and long-term impacts on wellbeing, behaviour, mental health and educational outcomes. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims. Older children may also experience domestic abuse and/or violence

in their own personal relationships. See Appendix A: Child on child abuse, including harassment and violence for more details.

Our academies work in partnership with West Northamptonshire Council and Northamptonshire Police to identify and provide appropriate support to pupils who have experienced domestic abuse in their household; nationally this scheme is called Operation Encompass. In order to achieve this, West Northamptonshire 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 'NSCP 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.

Honour or faith-based abuse (including FGM and forced marriage)

Honour or faith-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.

Female Genital Mutilation

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

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

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

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

- The girl's family having a history of practicing FGM (this is the biggest risk factor to consider)
- FGM being known to be practiced in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
    - Having a mother, older sibling or cousin who has undergone FGM
    - Having limited level of integration within UK society
    - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
    - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period
    - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
    - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
    - Being unexpectedly absent from school
    - 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.

Since February 2023 it has been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. Forced marriage legislation applies to non-binding, unofficial 'marriages' as well as legal marriages.

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

Modern Slavery and Trafficking

Modern slavery and trafficking are forms of child abuse. Safeguarding referrals will be made where indicators suggest a child may be a victim of trafficking, servitude, forced labour or criminal exploitation.

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, neglect and exploitation, 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 local authority. The school itself has a duty to inform the local authority of the private fostering arrangements.

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

Preventing radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. Children may be susceptible to radicalisation into terrorism.

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

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.

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 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 may be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will follow our procedures set out in Section 9 of this policy, including discussing their concerns with the DSL. 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 our behaviour policy, curriculum policy, antibullying policy, acceptable use policy, PSHE policy, equality policy and online safety policy.

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 is absent, the school office will contact the parent or carer on the first day of absence and continue to make every effort to locate the pupil. The School Attendance Officer and Family Support Worker will complete a home visit, if the school office are unable to make contact with the parent/carer. Should contact not be made during phone calls home or a home visit, the Attendance Officer will complete a referral to the local authority's SASS Team. No children will be removed from the school roll without thorough safeguarding checks. School may also inform other relevant professionals and agencies as appropriate.

Non-collection of children

If a child is not collected at the end of the session/day, we will telephone contacts according to the child's school records. Whilst we wait for an adult to collect a child, the child is looked after in school by members of staff. Should we be unable to make contact with a parent/carer after an hour (4.15pm), we will then seek further advice through contact with children's social care and the police.

Appendix C: Safer recruitment

We adhere to Part 3 of Keeping Children Safe in Education at all times. We consider safeguarding throughout the recruitment process, including when defining and advertising roles.

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

Pre-appointment safer recruitment

We will include the following in all job advertisements:

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

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

All applicants will be provided with:

- A copy of the school's Safeguarding policy and the policies and practices for child protection in the application pack. They will be directed to the link for this on the school's website.

Applicants

We require applicants to provide:

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

We will not accept copies of curriculum vitae in place of an application form.

Shortlisting and selection

Shortlisted candidates will be asked to complete a self-declaration of their criminal record or information that would make them unsuitable to work with children. For more details of what this will contain, please see Part 3 of Keeping Children Safe in Education (2026).

At least two people will carry out shortlisting and they will explore any potential concerns, including inconsistencies and/or gaps in unemployment.

We will seek references on all shortlisted candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments. The references requested will ask specific questions about the suitability of the applicant to work with children. The EMAT expectation is that two references should be collected. The minimum that will be accepted is one from the previous employer.

When asked to provide references, we will ensure the information confirms whether we are satisfied with the applicant's suitability to work with children and provide the facts of any substantiated safeguarding allegations.

As part of the shortlisting process we may carry out an online search as part of our due diligence on shortlisted candidates. This may help us to identify any incidents or issues that have happened, and are publicly available online, which we might want to explore with the applicant at interview. We will inform shortlisted candidates that online searches may be done as part of due diligence checks.

Interviews

During the interview process at least one person on an interview panel will have completed the training for Safer Recruitment. Pupils will be included in the recruitment process in a meaningful ways with their voice given careful consideration.

New staff

When appointing new staff, we will:

- verify a candidate's identity. This includes demonstrating an awareness for the potential for individuals changing their name. Best practice is checking the name on their birth certificate, where this is available;
- obtain (via the applicant) an enhanced DBS check (including children's barred list information, for those who will be engaging in regulated activity with children regardless of whether they are supervised or not). When using the DBS update service we will ensure that the school obtains the original, physical certificate;
- obtain a separate children's barred list check if an individual will start work in regulated activity with children before the DBS certificate is available (This does not apply to 16-19 academies or any settings subject to the EYFS framework, as an individual will not be able to start work in regulated activity until they obtain an enhanced DBS plus barred list check);
- verify the candidate's mental and physical fitness to carry out their work responsibilities using the Home Office guidance or by obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that there are not sanctions against them;

- verify the person's right to work in the UK, including EU nationals;
- If the person has lived or worked outside the UK, make any further checks the school or college consider appropriate;
- verify professional qualifications, as appropriate; and
- ensure that an applicant to be employed to carry out teaching work is not subject to a prohibition order.
- Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the Secretary of State.

- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
    - For all staff, including teaching positions: **criminal records checks for overseas applicants.**
    - For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach.

For schools with pupils aged under 8, 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.

Regulated activity includes:

a) paid and unpaid work that involves teaching, training, instructing, caring for or supervising children, or providing advice or guidance on physical, emotional or educational well-being, or driving a vehicle only for children;

b) any other type of paid work for a limited range of establishments (known as 'specified places', which include schools and colleges), with the opportunity for contact with children. Work under (a) or (b) is regulated activity only if done frequently, on more than 3 days in a 30-day period or overnight. Some activities are always regulated activities, regardless of frequency. This includes:

c) relevant personal care, or health care provided by or provided under the supervision of a health care professional:

- personal care includes helping a child with eating and drinking for reasons of illness or disability or in connection with toileting, washing, bathing and dressing for reasons of age, illness or disability;
- health care means care for children provided by, or under the direction or supervision of, a regulated health care professional.

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.

Schools with pupils aged under 8:

- 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.

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.

Volunteers

Where volunteers undertake more than 3 days volunteering in a 30 day period in a role that involves teaching, training, instructing or supervising children frequently then an enhanced DBS check with barred list check is required. This is also the case if the 3 days in 30 criteria is met through the volunteer volunteering at more than one setting (e.g. they do one day a month at four different settings).

Where volunteers are working in schools that are also subject to the EYFS framework, volunteers will not be permitted to begin working within the settings covered by the EYFS framework until an enhanced DBS check with barred list has taken place.

We will:

- Obtain an enhanced DBS check with barred list information for all volunteers regardless of whether they are supervised or not if they are classed as undertaking more than 3 days volunteering in a 30 day period in a role that involves teaching, training, instructing or supervising children
- 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.

Governance

- All trustees, local governors and members will have an enhanced DBS check without barred list information.
- They will have an enhanced DBS check with barred list information if working in regulated activity.

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

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

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

All governors and trustees will also have the following training:

- Appropriate safeguarding and child protection (including online) training at induction.

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.

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and advised 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/lanyard.

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.

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

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

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

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

If we're in any doubt as to whether a concern meets the harm threshold, we will consult out local authority designated officer (LADO).

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

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

Suspension of the accused until the case is resolved

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

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

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

- Temporarily redeploying the individual to another role in a different location, for example to an alternative school.

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 CEO (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 single point of contact from the school to keep them informed of the progress of the case and considering what other support is appropriate. The EMAT Employees' Assist Programme would also be available to anyone requiring support.
- 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 in the Early Years 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.
- Allegations relating to incidents occurring when an individual or organisation uses any of EMAT schools premises. Schools will follow their safeguarding policies and procedures, including informing the Local Authority Designated Officer (LADO).
- 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 Local Advisory Board and/or the Board of Trustees 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 never cease to use a supply teacher for safeguarding reasons without first finding out the facts and liaising with the Local Authority Designated Officer to reach 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 5 working days.
- If a disciplinary hearing is required and can be held without further investigation, should be held normally within 48 hours or as soon as practicably possible.

Specific actions

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

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

If the individual concerned is a member of teaching staff, the case manager 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) please visit: https://northamptonshirescp.org.uk/working-with-children-professionals/designated-officer-lado

Multi-Agency Safeguarding Hub: **0300 126 7000 (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.

Appendix E: Online Safety

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

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

- curriculum planning and RSHE;
- teacher training;
- the role and responsibilities of the designated safeguarding lead;
- parental engagement;
- induction of staff, volunteers and pupils, and
- resource management.

This appendix complements and should be read alongside our Online Safety policy. Staff must read the Online Safety Policy in conjunction with our Code of Conduct in relation to personal online behaviour. All staff receive online safety training at induction, with regular updates and formal annual training thereafter.

The Designated Safeguarding Lead (DSL) takes lead responsibility for online safety and understanding the filtering and monitoring systems and processes in place. The DSL attends training regularly to ensure that they understand the unique risks associated with online safety and to ensure that they are confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school.

Risks to children

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

- content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories,
- contact: being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes,
- conduct: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, including those generated using AI and online bullying,
- commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

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

How to report online safety concerns

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

Regular review of our approach to online safety

We recognise that technology, and risks and harms related to it evolve and changes rapidly. We carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks their children face. This is informed by local and national training and regular updates.

The governing bodies and proprietors will regularly review the effectiveness of school filters and monitoring systems. They will ensure that the leadership team and relevant staff are:

- aware of and understand the systems in place
- manage them effectively
- know how to escalate concerns when identified.

Filtering and monitoring

Our filtering and monitoring procedures, including our review process and how we keep children safe when using school IT equipment, are informed by the DfE guidance manual 'Meeting digital and technology standards in schools and colleges'. For more information about the filtering and monitoring standards we adhere to, see 'Filtering and monitoring standards for schools and colleges'. Schools can use the DFE 'Plan technology for your school service' to self-assess against the filtering and monitoring standards.

We will ensure that a review of the Filtering and Monitoring effectiveness is carried out at least once every academic year. Reviews will be carried out by the SLT member responsible for filtering and monitoring, with the support of the school's designated safeguarding lead and IT support. They will include checks that filtering is working appropriately on all internet-connected devices in all relevant locations, and a record will be kept of these checks.

Cybersecurity

We ensure that we have the appropriate level of security protection procedures in place in order to safeguard systems, staff and children and we review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies. This is informed by the DfE document '**Cyber security standards for schools and colleges**'.

Generative AI

The school will take account of guidance published by the DFE Generative AI: product safety expectations to support us to use generative artificial intelligence safely.
The school recognises that Artificial Intelligence technologies may create safeguarding risks through:

- deepfake imagery;
- AI-generated sexual content;
- impersonation;
- misinformation;
- image manipulation;
- exploitation through AI chatbots;
- technology-facilitated abuse.

Concerns relating to AI will be managed through existing safeguarding procedures.

Communication with parents

Schools and colleges will use communications with parents and carers to reinforce the importance of children being safe online. We will share information with parents/carers about:

- what systems they have in place to filter and monitor online use
- what they are asking children to do online, including the sites they will asked to access
- who from the school or college (if anyone) their child is going to be interacting with online.

More information
For more information about online safety including remote learning, please see Keeping Children Safe in Education (2026) and the EMAT online safety policy.

Appendix F: Elective Home Education

Standard letter to recommend against elective home education

DATE

Dear Parent/Carer,

Further to your request for information about home schooling your child, I would like to clarify that the school does not recommend this course of action for students. We believe that a very high standard of education is provided in school and that the school is well placed to ensure your child's broader social and emotional education is comprehensively addressed. We have safeguarding systems that ensure that children are well protected, and also pursue a safeguarding curriculum that covers vital information about how children can keep themselves safe in the modern world.

Furthermore, the school works closely with the exam regulators to ensure that students are fully prepared for the range of qualifications that they need to progress to their chosen career, as well as careers advice as they move through school.

Please note that students who leave the school may find if difficult to return if the home-schooling is less successful due to the pressure that we have on places.

Yours faithfully,

NAME

Head Teacher

Appendix G: Additional information - Early Years Providers

Paediatric First Aid

At least one person who has a current paediatric first aid (PFA) certificate must be on the premises and available at all times when children are present and must accompany children on outings. PFA must be renewed every three years. All staff who obtained a level 2 and/or level 3 qualification since 30 June 2016 must obtain a PFA qualification within three months of starting work in order to be included in the required staff: child ratios at level 2 or level 3 in an early years setting. All staff who have completed the experience-based route must obtain a PFA qualification before they can be included in the staff:child ratios at level 3. To continue to be included in the ratio requirement the certificate must be renewed every 3 years.

Staff PFA qualifications must have been delivered by a competent training provider, ideally one who is identified on the Register of Regulated Qualifications (**http://register.ofqual.gov.uk/qualification**).

Providers should have regard to paediatric first aid requirements while on outings. (This means the group on the outing should have a PFA with them.

Staff: child ratios

Staffing arrangements must meet the needs of all children and ensure their safety. Providers must ensure that children are adequately supervised, especially whilst eating, and decide how to use staff to ensure children's needs are met. Providers must inform parents and/or carers about how staff are organised, and, when relevant and practical, aim to involve them in these decisions.

For children aged under two:

- There must be at least one member of staff for every three children.
- At least one member of staff must hold an approved level 3 qualification or have received approval to be included in the ratios at level 3 after attaining experience-based route status and be suitably experienced in working with children under two.
- At least half of all other staff must hold an approved level 2 qualification.
- At least half of all staff must have received training that specifically addresses the care of babies.
- Where there is a room for under two-year-olds, the member of staff in charge of that room must, in the judgement of the provider, have suitable experience of working with under twos.

For children aged two:

- There must be at least one member of staff for every four children.
- The trust permits use of the optional flexibility introduced in 2023: 1:5 ratio, subject to risk assessment and leadership approval.
- At least one member of staff must hold an approved level 3 qualification, or have received approval to be included in the ratios at level 3 after attaining experience-based route status.
- At least half of all other staff must hold an approved level 2 qualification.

For children aged three and over in registered early years provision at any time where a person with Qualified Teacher Status, Early Years Professional Status, Early Years Teacher Status is working directly with children:

- There must be at least one member of staff for every 13 children.
- At least one other member of staff must hold an approved level 3 qualification, or have received approval to be included in the ratios at level 3 after attaining experience-based route status.

For children aged three and over in registered early years provision where a person with Qualified Teacher Status, Early Years Professional Status, or Early Years Teacher Status is not working directly with children:

- There must be at least one member of staff for every eight children.
- At least one other member of staff must hold an approved level 3 qualification, or have received approval to be included in the ratios at level 3 after attaining experience-based route status.
- At least half of all other staff must hold an approved level 2 qualification.

For children aged three and over in independent schools (including in nursery classes in free schools and academies) where a person with Qualified Teacher Status, Early Years Professional Status, Early Years Teacher Status, an instructor, or another suitably qualified overseas trained teacher, is working directly with children:

- For classes where the majority of children will reach the age of five or older within the school year, there must be at least one member of staff for every 30 children. For all other classes there must be at least one other member of staff for every 13 children.
- At least one other member of staff must hold an approved level 3 qualification, or have received approval to be included in the ratios at level 3 after attaining experience-based route status.

Staff:child ratios apply "across the whole provision, not just each room."

Safer eating

Whilst children are eating there should always be a member of staff in the room with a valid paediatric first aid certificate for a full course.

Before a child is admitted to the setting the provider must obtain information about any special dietary requirements, preferences, food allergies and intolerances that the child has, and any special health requirements. This information must be shared by the provider with all staff involved in the preparing and handling of food. At each mealtime and snack time providers must be clear about who is responsible for checking that the food being provided meets all the requirements for each child.

Providers must have ongoing discussions with parents and/or carers and, where appropriate, health professionals to develop allergy action plans for managing any known allergies and intolerances. This information must be kept up to date by the provider and shared with all staff. Providers should refer to the British Society for Allergy and Clinical Immunology (BSACI) allergy action plan. Providers must ensure that all staff are aware of the symptoms and treatments for allergies and anaphylaxis, the differences between allergies and intolerances and that children can develop allergies at any time, especially during the introduction of solid foods which is sometimes called complementary feeding or weaning. Providers should refer to the NHS advice on food allergies: Food allergy - NHS (www.nhs.uk) and treatment of anaphylaxis: Anaphylaxis - NHS (www.nhs.uk).

Providers must have ongoing discussions with parents and/or carers about the stage their child is at in regard to introducing solid foods, including to understand the textures the child is familiar with. Assumptions must not be made based on age. Providers must prepare food in a suitable way for each child's individual developmental needs, working with parents and/or carers to help children move on to the next stage at a pace right for the child. The NHS has some advice providers should refer to: Weaning - Start for Life - NHS (www.nhs.uk).

Providers must prepare food in a way to prevent choking. This guidance on food safety for young children: Food safety - Help for early years providers - GOV.UK (education.gov.uk) includes advice on food and drink to avoid, how to reduce the risk of choking and links to other useful resources for early years providers.

Babies and young children should be seated safely in a highchair or appropriately sized low chair while eating. Where possible there should be a designated eating space

where distractions are minimised.

Children must always be within sight and hearing of a member of staff whilst eating. Choking can be completely silent, therefore, it is important for providers to be alert to when a child may be starting to choke. Where possible, providers should sit facing children whilst they eat, so they can make sure children are eating in a way to prevent choking and so they can prevent food sharing and be aware of any unexpected allergic reactions.

When a child experiences a choking incident that requires intervention, providers should record details of where and how the child choked and ensure parents and/or carers are made aware. The records should be reviewed periodically to identify if there are trends or common features of incidents that could be addressed to reduce the risk of choking. Appropriate action should be taken to address any identified concerns.

Sleeping arrangements

Babies and children must be placed down to sleep safely. For children under 2 years old, the following requirements apply:

- Children must be placed down on their back in their own separate sleep space on a firm flat surface such as a cot, bed or mattress on the floor. Babies aged 12 months and under must only be placed to sleep in a cot.
- Sleep spaces must only contain a firm, flat, waterproof mattress and lightweight bedding which is firmly tucked in around the child below their shoulders to prevent head covering. Alternatively, a well fitted baby sleep bag may be used. Check the manufacturer recommendations before using a baby sleep bag.
- Where blankets are used, the child must be placed feet-to-foot at the bottom of the cot, with blankets tucked in.
- Cots must not contain extra items such as toys, pillows, extra blankets, bumpers, wedges or straps.
- Children should not get too hot or cold. The recommended room temperature for babies is 16 – 20˚C.
- Children's heads must not be covered.
- Babies under six months of age must always have an adult with them in the same room for every sleep. All children must be frequently checked when sleeping.
- Children must always be within sight and hearing of staff when sleeping.

Practitioners must read NHS advice on Sudden infant death syndrome (SIDS) – NHS. More information on safer sleep guidance is available from The Lullaby Trust.

Baby room

There should be a separate baby room for children under the age of two. However, providers must ensure that children in a baby room have contact with older children and are moved into the older age group when appropriate.

Toilets and intimate hygiene

- There are suitable hygienic changing facilities for changing any children who are in nappies.
- Children's privacy is considered and balanced with safeguarding and support needs when changing nappies and toileting.
- There is an adequate supply of clean bedding, towels, spare clothes, and any other necessary items.

Children's screen use

- Providers must have regard to the following guidance on children's screen use in early years settings: Help for early years providers: Screen use.

Banned dog breeds

Banned dog breeds (meaning dogs to which section 1 of the Dangerous Dogs Act 1991 applies including the XL Bully type), must not be kept or present on the premises at any time.

Changes that must be notified to Ofsted

All registered early years providers must notify Ofsted of:

- Any change to the address of the premises (and must obtain prior approval to operate from those premises where appropriate).
- Any change to the premises which may affect the space available to children and the quality of childcare available to them.
- Any change to the name or address of the provider, or the provider's other contact information.
- Any change to the persons aged 16 years or older living or working on any domestic premises from which childcare is provided.
- Any change to the person who is managing the early years provision.
- Any proposal to change the hours during which childcare is to be provided which will entail the provision of overnight care.
- Any significant event which is likely to affect the suitability of the early years provider to look after children.
- Any significant event which is likely to affect the suitability of any person who cares for/is in regular contact with children on the premises.
- Where the early years provision is provided by a company, any change in the name or registered number of the company.
- Where the early years provision is provided by a charity, any change in the name or registration number of the charity.
- Where the childcare is provided by a partnership, body corporate or unincorporated association, any change to the "nominated individual".
- Where the childcare is provided by a partnership, body corporate or unincorporated association whose sole or main purpose is the provision of childcare, any change to the individuals who are partners in, or a director, secretary or other officer or members of its governing body. entail the provision of overnight care.

Suitable people

Registered group and school-based providers, except CoDP providers, must obtain an enhanced criminal records check and barred list check for every person aged 16 and over including all volunteers who:

- Works directly with children.
- Lives on the premises on which the childcare is provided (unless there is no access to the part of the premises when and where children are cared for) and/or
- Works on the premises on which the childcare is provided (unless they do not work on the part of the premises where the childcare takes place, or do not work there at times when children are present).

Staff/prospective staff must disclose arrests and charges, not just convictions, cautions, court orders, reprimands and warnings; and providers must not allow individuals to begin working or volunteering until the enhanced DBS/barred list check is received (previously the restriction applied only to unsupervised contact).

Providers must obtain "at least one written reference" (previously just "a reference").

References must be provided for current and previous employees on request (previously previous employees only).

Disqualification-by-association rules for CoDP providers living with a disqualified person, and the Ofsted waiver process; "caution" is a disqualifying ground alongside orders/determinations/convictions.