



# **Child Protection and Safeguarding Policy and Procedures**

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

<b>Designated Safeguarding Lead</b>	<b>Deputy Designated Safeguarding Leads</b>	<b>Safeguarding Governor</b>
Mrs Catherine Ogilvie (responsible for Policy)	All Heads of Year and Mrs Lynda King	Mr Adrian Winkle

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

<b>Designated Senior Manager</b>	<b>Deputy Designated Senior Manager</b>	<b>Chair of Governors (in the event of an allegation against the Principal)</b>
Mr Ben Baines, Principal	Mr Jonathan Firth, Vice Principal Mrs Catherine Ogilvie, Assistant Principal	Mr Tim Foster
Local authority Designated Officer (LADO) Sheila Kempster on 07831 123193	Sheila Kempster on 07831 123193	

<b>1. AIM OF POLICY</b>
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Rushden Academy recognises our statutory responsibility to safeguard and promote the welfare of all pupils. We will endeavour to provide a safe and welcoming environment where children are respected and valued. We will be alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice.

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

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

**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
- ensure that we are protecting children from maltreatment or harm

**Scope** - This policy applies to all teaching, non-teaching, support, supply, peripatetic, contract staff, governors, volunteers 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.

## 2. DEFINITIONS

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

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

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

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

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

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

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

**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.

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

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

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

**Children** include everyone under the age of 18.

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- The chief officer of police for a police area in the LA area

**Within this policy:**

- 'Parent' refers to birth parents and other adults in a parenting role for example adoptive parents, step parents 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 Rushden Academy
- Keeping Children Safe in Education (2023) may be abbreviated to 'KCSIE'

**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.

### 3. LEGISLATION AND STATUTORY GUIDANCE

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

This policy is based on the Department for Education's (DfE's) statutory guidance [Keeping Children Safe in Education \(2023\)](#) and [Working Together to Safeguard Children \(2018\)](#), and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)
- [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination

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

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 school policies and procedures, including:**

- Anti-bullying /Behaviour Policy
- Staff Code of Conduct
- Complaints policy
- Health and safety policy
- Attendance policy
- SEND policy
- Equality policy
- Sex and relationship education policy
- First aid policy
- Curriculum policy
- Designated teacher for looked-after and previously looked-after children policy
- Privacy notices
- Online Safety and ICT AUP policy

#### **4. EQUALITY STATEMENT**

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 give special consideration to children who:**

- Have special educational needs and/or disabilities (SEND) or health conditions
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after
- Are absent from education for prolonged periods and/or repeat occasions
- Whose parent/carer has expressed an intention to remove them from school to be home educated

#### **5. CONFIDENTIALITY AND INFORMATION SHARING**

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

keeping children safe and ensuring they get the support they need.

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

### 5.1 Sharing information with parents

Rushden academy will ensure the Safeguarding and Child Protection Policy is available publicly via the school website.

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 5.2 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.

### 5.2 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), Rushden 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
- 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

If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:

- There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies

- The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
- The DSL should consider that:
  - Parents or carers should normally be informed (unless this would put the victim at greater risk)
  - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
  - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains
- Regarding anonymity, all staff will:
  - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
  - Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
  - Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)
- Confidentiality is also addressed in this policy with respect to record-keeping

## 6. 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 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities

### 6.1 Governing bodies and proprietors

Governing bodies and proprietors have a strategic leadership responsibility for Rushden Academy's safeguarding arrangements. The governing body will appoint a senior board level (or equivalent) Governor Safeguarding Lead to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL.

The Governor Safeguarding Lead is Mr Adrian Winkle.

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

record will be kept of this on the SSS Learning tracker document.

The trust and school play 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, transphobia and sexual violence/harassment. This will be underpinned by the school's:

- Behaviour policy
- Pastoral support system
- Planned programme of relationships, sex and health education (RSHE), which is included and delivered regularly, tackling issues such as:
  - Healthy and respectful relationships
  - Boundaries and consent
  - Stereotyping, prejudice and equality
  - Body confidence and self-esteem
  - How to recognise an abusive relationship (including coercive and controlling behaviour)
  - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support
  - What constitutes sexual harassment and sexual violence and why they're always unacceptable

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

- ensure that they comply with their duties under statutory guidance and legislation 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 Rushden academy are effective and comply with the law at all times and that they allow concerns to be responded to in a timely manner
- ensure that safeguarding training for staff, including online safety training, is integrated, aligned and considered as part of the whole school
- Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:
  - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
  - Reviewing the [DfE's filtering and monitoring standards](#), and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards
- safeguarding approach and wider staff training and 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/college 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 Code of Conduct;
- ensure that all staff undergo safeguarding and child protection training on induction; consider a whole-school approach to online safety, including the use of mobile technology in school
- ensure that there are clear systems and processes in place for identifying when children may be experiencing mental health problems
- ensure that children are taught about safeguarding, including online safety
- ensure that an appropriate safeguarding response for children who are absent from education is in place
- appoint an appropriate member of staff from the senior leadership team to the role of Designated Safeguarding Lead and ensure that the DSL has the appropriate status and authority 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 and that 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
- ensure that there are appropriate procedures in place to manage safeguarding concerns, or allegations against staff; and respond to allegations of abuse against the Principal. The Chair of Governors will act as the 'case manager' in the event that an allegation of abuse is made against the Principal, where appropriate

## 6.2 The Principal

The Principal is responsible for the implementation of this policy. The Principal **Ben Baines** 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
- Act as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate
- Ensure that online safety training is included in staff safeguarding and child protection training
- 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
- ensure that all recruitment follows the safer recruitment guidance (see Part 3 of KCSIE) and a single,

central record is maintained with details of all members of staff who are in contact with children; respond to allegations of abuse against all other members of staff and act as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate

- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required
- ensure that the academy works with social care, the police, health services and other services to; promote the welfare of children; provide a coordinated offer of early help when need is identified; contribute to inter-agency plans for children subject to children protection plans and to protect children from harm  
safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties (Teaching Standards, 2012)
- ensure that children's social care (from the host local authority or placing authority) have access to the school's to conduct, or to consider whether to conduct a section 47 or section 17 assessment, as per Keeping Children Safe in Education (September 2023)

### **6.3 The Designated Safeguarding Lead (DSL)**

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

The DSL is a member of the Senior Leadership Team. Our DSL is Catherine Ogilvie -Assistant Principal. The DSL takes lead responsibility for child protection and wider safeguarding. The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

When the Lead DSL is absent, the deputy DSLs/Heads of Year will act as cover. If the DSL and Deputy DSL are not available the Principal will act as cover (for example, during out-of-hours/out-of-term activities).

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

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

The Designated Safeguarding Lead will be given be given time, funding, training, resources and support to:

- 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
- Take part in strategy discussions and interagency meetings and/or support other staff to do so
- Advise on the response to safeguarding concerns
- Liaise with the Local Authority and work with other agencies in line with 'Working Together to Safeguard Children (2018)
- Identify if children may benefit from early help
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- Make referrals to the Channel programme where there is a radicalisation concern and/or support staff that make a referral to Channel
- Support the school with regards to their responsibilities under the Prevent duty 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 deputy will be made available

- Undertake training to equip them with the skills to carry out the role and update every two years
- Ensure all staff that work directly with children have read and understood Part 1 and Annex B of Keeping Children Safe in Education (September 2023)
- Ensure all staff that do not work directly with children have read Part 1 and Annex B of Keeping Children Safe in Education (2023)
- Update their knowledge and skills regularly and keep up with any developments relevant to their role
- Contribute to the assessment of children
- Have a good understanding of the filtering and monitoring systems and processes in place at Rushden Academy
- 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
- Provide staff in school with the knowledge, skills and support required to safeguard children
- 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
- Attend or ensure an appropriate representative attends multi-agency safeguarding or child protection meetings
- Work closely with other relevant education professionals to ensure children with additional vulnerabilities are safeguarded
- Help to promote educational outcomes of children who have experienced or are experiencing safeguarding or child protection issues by sharing relevant information with teachers and the school leadership team; The DSL(s) will take lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement. This will include understanding their academic progress and attainment and maintaining a culture of high aspirations for this cohort and supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential.
- We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health. The DSL will use the information that they hold about children with a social worker to make decisions in the best interests of the child's safety, welfare and help promote educational outcomes. The DSL will ensure 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.
- Promote a 'culture of safeguarding', in which every member of the school community acts in the best interests of the child
- Have a good understanding of harmful sexual behaviour
- 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
- Regularly meet with the safeguarding link governor and/or Chair of Governors to review safeguarding at the school/college; and Liaise with the Principal regarding safeguarding cases and issues

The DSL will also:

- Keep the Principal Ben Baines informed of any issues
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- Be confident that they 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

The full responsibilities of the DSL and deputies are set out in their job description.

The DSL can also be contacted out of school hours if necessary e.g. telephone: 07428 441286 or at [c.ogilvie@rushden-academy.net](mailto:c.ogilvie@rushden-academy.net)

#### **6.4 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 and neglect as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- will be made aware of systems in the school/college 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
- should ensure that they know what to do if a child makes a disclosure of abuse and never promise confidentiality when a child makes a disclosure
- will be made aware of and should be clear on the school's policy and procedures with regards to child on child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it
- will be made aware of the early help process and understand their role in it
- should be prepared to identify children who may benefit from early help and will discuss early help requirements with the 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 (through 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
- 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; 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)
- Reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns

All staff will be aware of:-

- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans(LGBT) can be targeted by other children
- What to look for to identify children who need help or protection

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 from education.

All staff regardless of position within the school will be provided with a copy of, and must read, Part 1 and Annex B of Keeping Children Safe in Education (September 2023) annually and will receive annually updated training on their safeguarding roles and responsibilities.

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 speak to the Designated Safeguarding Lead without delay, so that additional training can be put in place.

### **Virtual School Heads**

Virtual school heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker.

They should also identify and engage with key professionals, e.g. DSLs, special educational needs co-ordinators (SENCOs), social workers, mental health leads and others.

### **Training - All staff**

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

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the schools' safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the 3 safeguarding partners

- Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring
- Have regard to the Teachers' Standards to support the expectation that all teachers:
  - Manage behaviour effectively to ensure a good and safe environment
  - Have a clear understanding of the needs of all pupils

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

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

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

Volunteers will receive appropriate training, if applicable

All staff have access to an online training safeguarding suite 'SSS Learning' and receive weekly updates via the '7 minute safeguarding briefing'.

## 7. Recognising Abuse

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

### 7.1 All staff

- All staff members will undertake safeguarding and child protection training at induction (including online safety and whistle-blowing procedures) to ensure they understand the academy's safeguarding systems, their responsibilities and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from the 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
- 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
- Volunteers will receive appropriate training, as applicable

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

### 7.2 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

### 7.3 Governors

- All governors receive safeguarding training, (including online safety) 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.
- As the chair of governors or proprietor may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Principal, they should receive training in managing allegations for this purpose

### 7.4 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 (2023), and will be in line with local safeguarding procedures.

### 7.5 Specific safeguarding issues

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

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

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

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

- children in the court system
- children absent 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
- children with mental health problems

## 8. 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 deputy safeguarding lead/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) 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 indicate that they have been harmed or are at risk of harm, including unusual changes in mood or behaviour, concerning use of language and/or concerning drawings or stories
- any significant changes in attendance or punctuality
- any significant changes in a child's presentation
- any indicators that a child may be experiencing child on child abuse
- any concerns relating to people who may pose a risk of harm to a child
- any disclosures of abuse that children have made

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

The following procedures are in line with statutory guidance (see Section 4) and the Northamptonshire Safeguarding Children Partnership's Threshold Guidance (2018). Referral procedures can be found in section 8.5.

### 8.1 If a child discloses that they are suffering or at risk of suffering abuse, or in immediate danger

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

Tell the DSL as soon as possible if you make a referral directly.

You can find below the following link to the GOV.UK webpage for reporting child abuse to your local council:

<https://www.gov.uk/report-child-abuse-to-local-council>

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

- listen to what is being said without displaying shock or disbelief
- accept what is being said
- allow the child to talk freely
- reassure the child, but do not make promises which it might not be possible to keep
- never promise a child that they will not tell anyone - as this may ultimately not be in the best interests of the child
- reassure him or her that what has happened is not his or her fault
- stress that it was the right thing to tell
- listen, only asking questions when necessary to clarify
- not criticise the alleged perpetrator
- explain what has to be done next and who has to be told
- make a written record (see Record Keeping)
- pass the information to the Designated Safeguarding Lead without delay.

A written report should be submitted via our electronic reporting system 'My Concern'. If the child is in immediate danger then you must consult with the DLS/deputy DSL's immediately. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 8.2), 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 will bear in mind 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

## **8.2 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 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.

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

Figure 1 on page 15 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 8.2).

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 Thresholds Guidance](#). If it is decided to make a referral to children's social care the parent will be informed, unless to do so would place the child at further risk or undermine the collection of evidence.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

All concerns, discussions and decisions will be recorded electronically.

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 early help coordinator/s
- an Early Help Assessment
- a referral for statutory services where the child is or might be in need or suffering or likely to suffer significant harm

### **8.4 Early help**

All staff should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. If early 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 an early help assessment, in some cases acting as the lead practitioner. Any such cases should be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services if the child's situation does not appear to be improving or is getting worse. Timelines of interventions will be monitored and reviewed.

All staff will be made aware of the early help process, and understand their role in identifying emerging problems, sharing information with other professionals to support early identification and assessment of a child's needs. It is important for children to receive the right help at the right time to address risks and prevent issues escalating. This also includes staff monitoring the situation and feeding back to the 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 early help. However, we will be particularly vigilant to potential need for early help if a child:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care

Plan)

- has a mental health need
- is a young carer
- is showing signs of being drawn in to antisocial or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently absent from care or from home;
- is at risk of modern slavery, trafficking, sexual or criminal exploitation
- is at risk of being radicalised or exploited
- has a family member in prison, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing drugs or alcohol themselves
- has returned home to their family from care
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child
- is persistently absent from education, including persistent absences for part of the school day

### **8.5 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, 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.

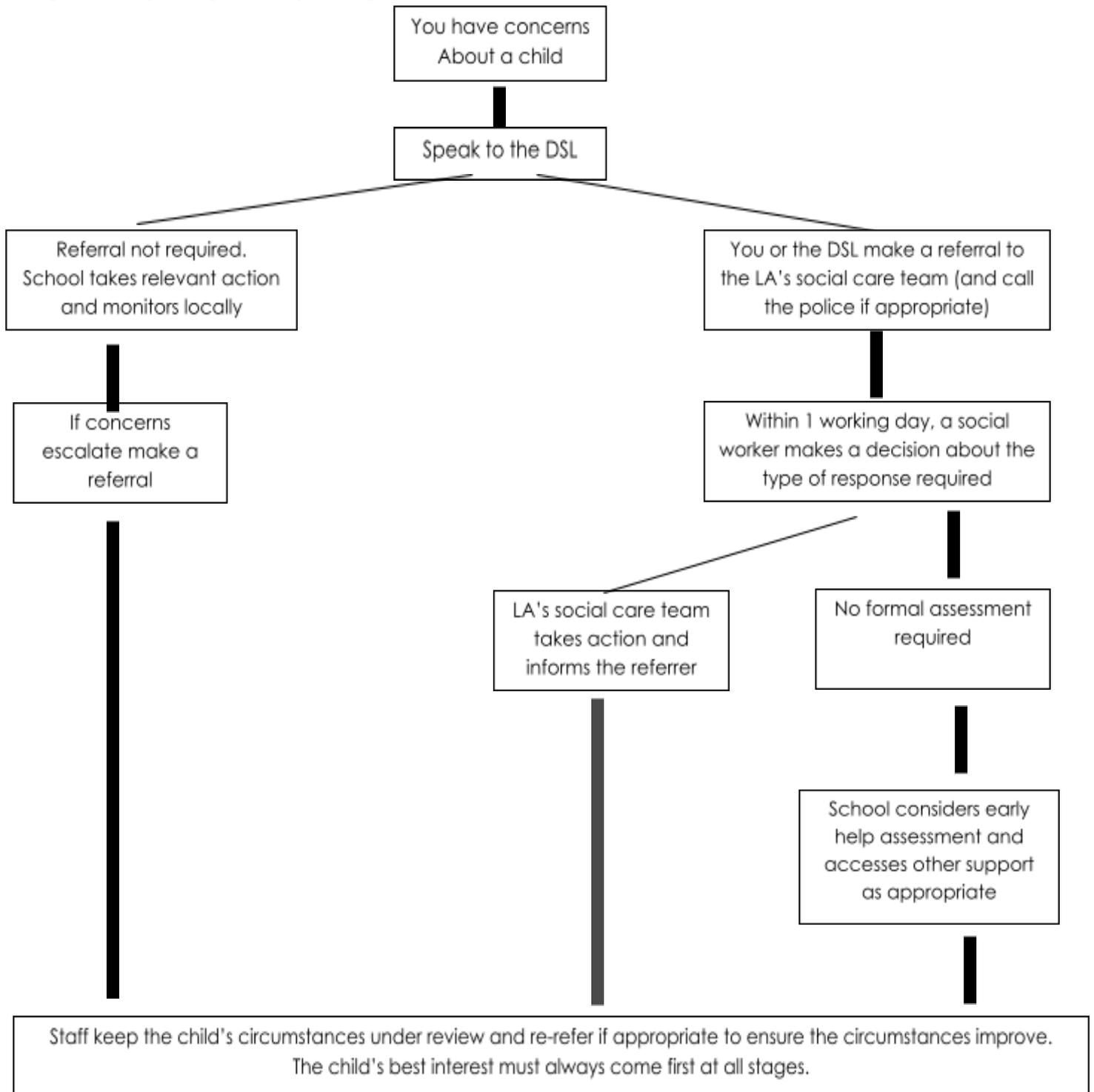
The DSL should refer all cases of suspected abuse or neglect to the Multi Agency Safeguarding Hub (MASH), police (cases where a crime may have been committed) and to the Channel programme where there is a radicalisation concern. Safeguarding Referrals must be made in one of the following ways:

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

**Procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger.**

*If the DSL is not available, this should not delay action*

8.6 Figure 1: Reporting and responding to concerns flowchart



## 9. SPECIFIC SAFEGUARDING ISSUES

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

### **9.1 Female Genital Mutilation (FGM)**

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

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

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

**Any teacher** who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

[Local Safeguarding procedures](#)

### **9.2 Radicalisation and extremism**

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

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

The DfE also has a dedicated telephone helpline, 020 7340 7264, which school staff [and local governors – if applicable] can call to raise concerns about extremism with respect to a pupil. You can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Note that this is not for use in emergency situations.

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

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

### **9.3 Children potentially at greater risk of harm**

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

The DSL will hold information relating to social workers working with children at the academy. 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 education;
- Children absent from home or care.

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

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

#### **9.4 Mental health**

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

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

If staff have a mental health concern about a child 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 8.

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

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

At Rushden Academy we have a close working relationship with the organisation Grace Foundation - 'Ethos Team' who are based at the school and offer a wide range of emotional support for our pupils. Referrals can be made via the Pastoral team and DSL

We are also working in partnership with Mental Health Support Teams (MHST) who provide early intervention, low intensity, mental health support within schools for children and young people with mild to moderate mental health difficulties. The MHST also support the Mental Health Lead at Rushden to introduce and develop their Whole School Approach. The purpose of the MHST is to improve the mental health and wellbeing of children and young people and is driven by the Green Paper 'Transforming Children and Young People's Mental Health Provision' ([www.gov.uk](http://www.gov.uk))

Refer to the Department for Education guidance on [mental health and behaviour in schools](#) for more information.

#### **9.5 Child on child abuse**

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

## 9.6 Online safety

Our AUP is set out in a separate document and more information can be found in Appendix F of this policy. We ensure that we have effective mechanisms to identify, intervene in, and escalate any incident where appropriate. Online safety is included in our curriculum at all levels and information is also provided to parents/carers.

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

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

Staff must read the Acceptable usage Policy in conjunction with our Code of Conduct in relation to personal online behaviour.

## 10. Pupils with special educational needs and disabilities (SEND)

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

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

We offer extra pastoral support for pupils with SEN and disabilities via our 'HUB' provision within school.

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

- [Directory of Services for Children with Disabilities: Specialist support for SEND<sup>1</sup>](#)
- [Northamptonshire's Local Offer: SEND Local Offer](#)

## 11. 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.

The role of the virtual school head now includes a non-statutory responsibility for oversight of the attendance, attainment and progress of children with a social worker

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 unauthorised absence or absent from 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 (for example in a local lockdown during Covid) or they would usually attend but have to self-isolate.

Each child has an individual plan, which sets out:

- 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
- All contact is recorded on 'My Concern'

We have agreed these plans with children's social care where relevant, and will review them regularly. If we can't make contact with their allocated social worker or MASH. If necessary, we would make contact with the police and our community police officer.

## 12. 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, Catherine Ogilvie/Assistant Principal, 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:

- The DT will 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 plan

## 13. RECORD KEEPING

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

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

- record as soon as possible after the conversation using the internal electronic system
- Volunteers will use the paper version 'Pinks' and hand over to the DSL - this will be scanned and uploaded onto the system
- do not destroy any paper notes in case they are needed by a court. These will be scanned and upload on to the recording system
- The recording system will prompt them to record the date, time, place
- record any noticeable non-verbal behaviour and the words used by the child
- Use the template on the electronic system to indicate the position of any injuries if relevant
- record statements and observations rather than interpretations or assumptions

All records need to be indicated to the DSL promptly. No paper 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 on the electronic system.

Records will include:

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

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 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 the 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.

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

## **14. RELATIONSHIPS, SEX AND HEALTH EDUCATION (RHSE)**

At Rushden Academy we provide opportunities for our pupils to gain knowledge and skills so that they can succeed and be highly successful citizens in modern Britain. We endeavour to make their learning experiences fun and relevant to real life situations. We aim to reach out to our community and beyond to celebrate local

traditions and explore all possibilities to enrich their lives. We intend that the teaching of RSE and HE and other Personal Development content will occur in line with and with clear connections to the main curriculum, providing skills under these 3 headings:

### **Aspire**

Pupils are taught to aim high, to appreciate the world of work and hold onto dreams and ambitions. We do this through our successful learning for life days, Skills lessons, and enterprise and careers activities. We provide lessons dedicated to teaching aspiration and resilience strategies, with the intention to embed these skills in our pupils for the future.

### **Explore**

Pupils are encouraged to discuss and share ideas and listen to other people's views. Pupils explore their own heritage and that of other cultures, so they have a diverse and rich understanding. The curriculum provides opportunities to develop explorative skills, and apply their skills to debating and performing so that learning is not only enjoyable, but active.

### **Succeed**

Pupils build their knowledge and skills throughout key stage 3 and 4, with RSE, HE, and other Personal Development content appropriate to their age and development, to enable them to apply their learning to their own lives and aid positive decision-making in the present and in preparation for the future.

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
- Boundaries and consent
- Stereotyping, prejudice and equality
- Body confidence and self-esteem
- How to recognise an abusive relationship (including coercive and controlling behaviour)
- The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support
- What constitutes sexual harassment and sexual violence and why they're always unacceptable

See the RSHE policy via the link provided: [Rushden Academy Policies](#)

## **15. SAFER WORKING PRACTICES**

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 should receive training on safer working practice and should be familiar with the guidance contained in the **staff handbook/school code of conduct/staff behaviour policy** and Safer Recruitment Consortium document

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

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

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

Staff are expected to adhere to the staff Code of Conduct at all times. In the event of any concerns or allegations, the school will deal with them promptly, in line with local guidance and KCSIE (2023).

### **15.1 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. 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.

## **16 SAFEGUARDING CONCERNS ABOUT A STAFF MEMBER, SUPPLY TEACHER, VOLUNTEER OR CONTRACTOR**

### **16.1 Allegations that may meet the harms threshold**

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the Principal Ben Baines as soon as possible. If the concerns/allegations are about the principal Ben Baines, speak to the Chair of Governors Tim Foster.

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

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

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 (2023) and Northamptonshire Safeguarding Children Partnership guidance. See Appendix E 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 may not be suitable to work

with children; and/or

- staff behaving or possibly behaving in a way that indicates they may not be suitable to work with children.

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

### **Allegations against the Principal**

If an allegation is made against the Principal, it must be reported to Tim Foster Chair of Governors.

### **Allegations against staff**

If a concern or allegation of abuse arises against any member of staff, supply teacher or volunteer other than the Principal, it must be reported to the Principal 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 Principal or Chair of Governors as appropriate and not discussed directly with the person involved.

The Principal or Chair of Governors 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 resigned.

## **16.2 Safeguarding concerns that do not meet the harm threshold (low level concerns)**

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

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

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work
- 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.

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

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.

Staff will receive training about what may constitute a low-level concern. More information can be found in Part 4 of KCSIE (2023).

### **Reporting low level concerns**

Low level concerns should be reported to the Principal.

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 in a spreadsheet linked to the SCR.

The Principal 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 Principal 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
- revise policies or implement extra training as appropriate, to minimise the risk of behaviour happening again

We will retain low level concerns information for a period of time until the person is no longer employed by the school.

### **16.3 Supply staff**

Although the school 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.

Governing body will liaise with the supply agency to determine whether to suspend or redeploy the supply teacher whilst they carry out their investigation.

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.

### **Allegations of abuse made against other pupils**

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

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

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

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

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

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

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

- If allegations are made verbally to a staff member, these will be reported via MyConcern by the staff member typing the incident in as a concern, all students involved will be linked to the concern.
- The staff member will comfort the student and offer them further support through the Pastoral Hub where necessary.
- The safeguarding team will investigate the allegation and take actions based on the outcome.
- All outcomes and actions will be recorded with the concern in order to enable tracking.
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

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.

- Where students become anxious or worried about events, the Pastoral Team will support in reintegrating them into lessons to ensure comfort in their learning.
- In some instances, witnesses may also require support from the Pastoral or SEND Hubs.
- Before returning to mainstream lessons, those who have taken part in harmful behaviours will be supported to avoid re offence through the Pastoral Team.
- Parents/Carers will be involved in conversations with any students who have displayed harmful behaviours, this is to ensure that these are not repeated and that families are aware of concerns.
- Restorative conversations between parties may occur, this is organised on a case by case basis as is not appropriate in all situations.

## 17. COMPLAINTS AND CONCERNS ABOUT SCHOOL SAFEGUARDING POLICIES

### 17.1 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 16). Further guidance can be found in our Complaints Policy; [Rushden Academy Policies](#)

### 17.2 Whistle-blowing

Rushden academy has an internal whistleblowing procedure for all our employees, including temporary staff and contractors. [Rushden Academy Policies](#)

*The Secretary of State for Education is the prescribed person for matters relating to education for whistle-blowers in education who do not want to raise matters directly with their employer. Referrals can be made at: [www.education.gov.uk/contactus](http://www.education.gov.uk/contactus). Volunteer staff who have concerns about our school should complain through the school's complaints procedure. You may also be able to complain directly to the LA or the Department for Education (see link above), depending on the substance of your complaint.*

## 18. IMPLEMENTATION, MONITORING AND REVIEW OF THE CHILD PROTECTION POLICY

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

This policy was approved by the board on: September 2023

Signature of LGB Chair:



Name of LGB Chair: Tim Foster

Date of renewal: September 2024



### Child on Child abuse

Child on child abuse is any abuse of a child or children that is perpetrated by another child or children. This includes all forms of sexual harassment, sexual violence and abuse. We strive to create a culture of safety, where children are free from harassment or abuse of any kind. We take a zero-tolerance approach to 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.

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

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

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.

#### **Creating a supportive environment in school and minimising the risk of child-on-child abuse**

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

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent

- Ensure pupils are able to easily and confidently report abuse using our reporting systems
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- Ensure staff are trained to understand:
  - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
  - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
  - That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
    - Children can show signs or act in ways they hope adults will notice and react to
    - A friend may make a report
    - A member of staff may overhear a conversation
    - A child’s behaviour might indicate that something is wrong
  - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
  - That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
  - The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
  - That they should speak to the DSL if they have any concerns
  - That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

The DSL will take the lead role in any disciplining of the alleged perpetrator(s), where needed. We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA children’s social care to determine this

- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

### **Procedures for minimising opportunities for child on child abuse**

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

- have a robust behaviour policy, 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 training staff and regularly updating them throughout the academic year
- 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
- 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 within the curriculum and across the school**

Our curriculum makes sure that pupils are taught about safeguarding, including how to stay safe online. Our curriculum tackles (in an age-appropriate and inclusive way) issues such as:

- Healthy and respectful relationships
- What respectful behaviour looks like
- Consent and safe sex
- Gender roles, stereotyping and equality
- Body confidence and self-esteem
- Prejudiced behaviour
- Sexual violence and sexual harassment
- Online relationships, grooming and CSE
- Risk taking behaviours
- Online safety
- Gangs and county lines

A full programme of our RSHE programme can be found on our website

We ensure that our systems for reporting all safeguarding concerns are well promoted, easily understood and easily accessible for pupils to confidently report abuse, knowing their concerns will be treated seriously. We ensure that our pupils are aware of our safeguarding and child protection procedures, including how to raise concerns about child on child abuse, by continually providing them with guidance via assemblies, from tutor, posters around the academy and the students safeguarding notice board.

### **Additional Vulnerabilities**

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

- Offering a drop in to the Ethos Team - a team of staff who offer a wide range of support for our pupils
- Ethos Blog - offering online advice on a wide variety of topics
- The 'Hub' is a provision in the academy that enables our more vulnerable pupils drop in to obtain support
- We operate a LGBTQ club once a week - providing pupils with the opportunity to discuss and concerns in a safe non-judgemental environment

### **How to report concerns**

#### **Our pupils**

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:

- Speak to any member of staff in person
- Report a concern via the website Report a bullying/safeguarding (this is monitored on a daily basis and DSL is alerted to reported incidents)
- Pupils are encouraged to email tutors

All of these methods can be used to report any form of harm or abuse, or can be used by pupils to share worries 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.

#### **Our staff**

Any member of staff that has concerns about child on child abuse should follow the procedure set out in Section 8 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's Complaints Policy.

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

We will adhere to Keeping Children Safe in Education (2023) and the DfE guidance document 'Sexual violence and sexual harassment between children in schools and colleges' (2023) (where applicable) when responding to incidents of child on child abuse. The academy 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 is always a zero tolerance approach, it is never acceptable and it will not be tolerated. We will pay special importance not to pass off any sexual violence or sexual harassment as "banter", "just having a laugh", "part of growing up" or "boys being boys" as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

The subsequent action taken will vary depending on the type of child on child abuse and the severity of the incident/s disclosed. The Designated Safeguarding Lead 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 pupils involved
- any power imbalance between the pupils, including consideration of the age of pupils and whether they have special educational needs or disabilities
- the impact on the victim
- that sexual violence and sexual harassment can take place in intimate personal relationships between peers
- if the alleged incident is a one-off or a sustained pattern of abuse
- if there are ongoing risks to the victim, other children, adult students or school or college staff
- 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 Early Help
- Refer the case to Children's Services via a MASH referral
- Liaise with social workers working with pupils 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 This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
- whether there may have been other victims
- the alleged perpetrator(s)
- all the other pupils, (and, if appropriate, adult students and staff) at the academy, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms

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

### **Recording procedures**

The management of an allegation of sexual violence or sexual harassment is carefully considered, planned and recorded. Records will include the following:

- Pupil and staff statements – staff taking statements will write their own statement of each meeting with a pupil in which they give information about the incident on 'My Concern'
- Individual Student risk assessment – child on child abuse Record (A)
- Serious incident chronology - child on child abuse (B)
- Sexual violence or harassment between children – Ongoing Support Record – Victim (C) and Ongoing Support Record – Alleged Perpetrator (D)
- All the above documentation will be stored on 'My Concern' file section

Planning and decision making will take account of KCSIE 2023 [Keeping children safe in education](#) and [Sexual violence and sexual harassment between children in schools and colleges](#)

and other relevant advice and guidance, including that on behaviour, discipline and suspension from school.

Members of staff will follow the procedures for recording a disclosure as outlined in Section 8 of this policy.

### **How we support victims of child on child abuse**

The academy recognises that child on child abuse has a significant impact on young people and victims are likely to need ongoing support. Pupils who are victims of sexual violence and sexual harassment wherever it happens, will likely find the experience stressful and distressing. Appropriate support will be put in place for victims of child on child abuse whilst investigation is taking place and following the initial response. Support will continue for as long as it is needed and will be reviewed regularly to ensure the victim is receiving appropriate care. The academy will do everything we can to maintain the victim's normal routine. We will do everything we can to protect the victim from further bullying, harassment or abuse as a result of their disclosure.

Any support the academy provides for our pupils will be handled with sensitivity and always in consultation with the victims and their families. We would consider the following (albeit not exhaustive):

- Referral to MHST (Northamptonshire Healthcare NHS foundation Trust)
- Referral to Serenity Sexual Assault Referral centre
- School nursing team service
- Early Help
- CAMHS (Child and Mental Health Services)
- Provide a named member of staff for both the victim and the family

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**

We have a responsibility to safeguard and support all children. We will adhere to KCSIE (2023) when managing reports of child on child abuse and decide on action and support on a case by case basis.

The academy 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:

- Access to Google Classroom
- Provide a home tutor
- Temporary placement in a neighbouring school or off-site provision
- Provide an academic mentor

We recognise that children who perpetrate child on child abuse may be being abused themselves. The academy 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.

The academy 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 academy's Behaviour Policy in determining the level and severity of sanction.

Where a child is cautioned or receives a conviction related to an incident of child on child abuse, the academy will put in place all appropriate support to ensure both victim and perpetrator are supported.

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**

All pupils who are directly or indirectly affected by an incident of child on child abuse will be supported by our pastoral team, offered counselling via the Ethos Team or if necessary sign posted to other professional support

### **Local Safeguarding Arrangements and making referrals**

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

For further details of how the academy 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** will be informed of incidents unless sharing information puts a child at greater risk of harm. Pupils 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
- Refer pupils to Ethos intervention programmes
  - **Outside the box** - A seven session RSE intervention course for referred older teenage girls at risk of Child sexual exploitation or grooming
  - **LIFT Project Boys intervention course** - six session course for younger boys designed to raise self-esteem, manage transitions, foster emotional maturity, develop healthy masculinity, and master goal setting
  - **The Boys Project Course** - A six-week programme designed to support identified male students towards emotional maturity, understanding what it is like to be a man, encouraging positive behaviour and build healthy relationships

### **Sharing of nudes and semi-nudes ('sexting')**

[guidance from the UK Council for Internet Safety](#)

### **Your responsibilities when responding to an incident**

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

You must **not**:

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

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

### **Initial review meeting**

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

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

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

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

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

### **Further review by the DSL**

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

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

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

### **Informing parents/carers**

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

### **Referring to the police**

If it is necessary to refer an incident to the police, this will be done through calling 101 and also inform our School Liaison Officer, Marc Barnett, Tel 101 ext 347308, mob: 07866933573, email [marc.barnett@northants.police.uk](mailto:marc.barnett@northants.police.uk)

### **Recording incidents**

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in policy apply to recording these incidents.

### **Curriculum coverage**

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our RSHE curriculum. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

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

Pupils also learn the strategies and skills needed to manage:

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

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

### Types of abuse

This appendix is based on the advice in Annex B of Keeping Children Safe in Education 2023.

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

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

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

Emotional abuse may involve:

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

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

The activities may involve:

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

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

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

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

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger

- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment

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

### **Children absent from education**

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

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

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Are absent 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 are absent from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of them being absent in the future. We will always follow up with parents/carers when pupils are not at school. This means we need to have at least two, up to date, contacts for parents/carers. Parents/carers should remember to update the school as soon as possible where these contact details change. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

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

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

### **Child criminal exploitation**

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

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

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

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

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

Indicators of CCE can include a child:

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

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

### **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
- 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

- 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-on-child abuse**

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the 2.

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are no reports, that doesn't mean that this kind of abuse isn't happening.

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

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between peers (this is sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)

- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nude 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
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

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

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the referral procedures set out in this policy.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

### **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 educate our pupils on the importance of keeping themselves safe on roads and stranger danger. We alert both pupils and parents if we are notified of any potential risks that may be present as and when they arise.*

In order to keep children safe at school we:

- Have a secure site. The two main gate entrances are locked (these are locked until the end of the school day)
- No visitors or parents can access the school site without permission
- We operate a coloured lanyard system
  - Blue - staff with full DBS
  - Orange - visitors with full DBS
  - Red for visitors who are accompanied at all times
- Staff are on duty at the start and end of the day
- Staff are on duty at every break time and lunch period around the site
- We have CCTV cameras around the site
- Notifications are put onto Sims to inform of any restrictions from adults for the pupil (court orders etc...)

- Numerous visual posters located around the school site detailing pictorially the Lead DSL and Safeguarding Team and helplines etc...

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
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If we have concerns about a child and possible risk of being drawn into cybercrime, the 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 **Service Six - TARGET Project (Targeting and Reducing Grooming, Exploitation & Trading of Children and young people online)** and will 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.

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

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.

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Older children may also experience domestic abuse and/or violence in their own personal relationships. See Appendix B: child on child abuse for more details.

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

At Rushden academy we are working in partnership with North Northamptonshire Council and Northamptonshire Police to identify and provide appropriate support to pupils who have experienced domestic abuse in their household; nationally this scheme is called Operation Encompass. In order to achieve this, North Northamptonshire Council and West Northamptonshire Council will share police information with the 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 into the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

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

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

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing. Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

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

### **Female Genital Mutilation-FGM**

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

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

Indicators that FGM has already occurred include:

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

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

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

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

### **Forced marriage**

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

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

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 [fm@fco.gov.uk](mailto:fm@fco.gov.uk)
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

### **Private Fostering**

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

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

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

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

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

School staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The school itself has a duty to inform the local authority of the private fostering arrangements.

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

### **Preventing radicalisation**

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

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

**Terrorism** is an action that:

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

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

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

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

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

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

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

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem, or 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 8 of this policy, including discussing their concerns with the DSL. Staff should always take action if they are worried.

Further information on the academy's measures to prevent radicalisation are set out in other policies and procedures, including Curriculum, RSE, Behaviour and AUP policies.

### **Sexual violence and sexual harassment between children in schools**

Sexual violence and sexual harassment can occur:

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

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

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

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

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns

- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in this policy, as appropriate.

### **Serious violence**

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

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

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

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

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

### **Checking the identity and suitability of visitors**

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 in and wear an appropriate coloured 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:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

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.

All parents must collect their child from reception if they are leaving the site during school hours. No child will be sent off to meet parents in the carpark. If appropriate a code word will be in place for identified vulnerable children in respect of any absence.

### **Absent pupils**

Our procedures are designed to ensure that an absent child is found and returned to effective supervision as soon as possible. Please refer to the attendance policy for further guidance.

### Safer recruitment

The recruitment steps outlined below are based on part 3 of Keeping Children Safe in Education 2023. Amend or add to this as applicable to reflect your own approach.

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

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

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

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:

- Application from

### 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
- 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

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

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns

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

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
  - If they have a criminal history
  - Whether they are included on the barred list
  - Whether they are prohibited from teaching
  - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
  - Any relevant overseas information
- Sign a declaration confirming the information they have provided is true

We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we may carry out these checks as part of our due diligence process.

### **Seeking references and checking employment history**

We will obtain references before the interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references we will:

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

### **Interview and selection**

When interviewing candidates, we will:

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

### **Pre-appointment vetting checks**

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

### **New staff**

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

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. 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
- Check that candidates taking up a management position\* are not subject to a prohibition from management (section 128) direction made by the secretary of state

\* Management positions are most likely to include, but are not limited to, headteachers, principals and deputy/assistant headteachers.

**Regulated activity** means a person who will be:

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

### **Existing staff**

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

- There are concerns about an existing member of staff's suitability to work with children; or

- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more

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

- We believe the individual has engaged in [relevant conduct](#); or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

### **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.

### **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.

### **Volunteers**

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity

- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment

### **Trustees, members and governors**

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

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

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

- A section 128 check (to check prohibition on participation in management under [section 128 of the Education and Skills Act 2008](#)) – though 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

### **Staff working in alternative provision settings**

Where we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

### **Adults who supervise pupils on work experience**

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

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

### **Pupils staying with host families**

Where the school makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

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

### How the academy 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 or volunteer, or contractor has:

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

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

If we are in any doubt as to whether a concern meets the harm threshold, we will consult our 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 academy responds to low-level concerns (concerns do not meet the harms threshold) please see Section 16 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 Trust**, 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 academy 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 academy so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted

- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the academy trust

### Definitions for outcomes of allegation investigations

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

### Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, **The Principal (or chair of governors** where the Principal 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 academy is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or Children's Social Care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the

police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice

- Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child
- If the academy 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 governing board/academy trust** will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

### **Additional considerations for supply staff and all contracted 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 academy will take the lead in collecting the necessary information and providing it to the local authority designated officer as required.

We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary).

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

### **Timescales**

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

### **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 Principal, or other appropriate person in the case of an allegation against the Principal, 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

### **Non-recent allegations**

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

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

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

### **Section 2: concerns that do not meet the harm threshold**

The section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education. Amend or add to this as applicable to reflect your own approach.

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

Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

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

## Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

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

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

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

## Sharing low-level concerns

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

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per section 7.7 of this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school or trust's safeguarding system

## Responding to low-level concerns

If the concern is raised via a third party, the [headteacher/head of school] will collect evidence where necessary by speaking:

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

The Principal, Ben Baines will use the information collected to categorise the type of behaviour and determine any further action, in line with the code of conduct. The Principal, Ben Baines will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

Keeping Children Safe in Education- [Developing and implementing a low-level concerns policy: A guide for organisations which work with children](#)]

## Record keeping

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

Records will be:

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

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

## References

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

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

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

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

## The Chair of Governors in this school is:

Mr Tim Foster (contactable via The Principal's PA at Rushden Academy)

## In the absence of the Chair of Governors, the Vice Chair should be contacted. The Vice Chair in this school is:

Ms Julia Hales (contactable via The Principal's PA at Rushden Academy)

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.



### Online Safety and the use of mobile technology

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 online to protect and educate pupils, students, and staff in their use of technology and establish 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):

To address this, the school aims to:

- Have robust processes in place (including filtering and monitoring) to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

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. 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, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism
- **contact:** being subjected to harmful online interaction with other users; for example: child to child pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes'
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying
- **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.

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

- Educate pupils about online safety as part of our curriculum. For example:
  - The safe use of social media, the internet and technology
  - Keeping personal information private
  - How to recognise unacceptable behaviour online
  - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and their expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
  - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
  - Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community
- Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

This section summarises our approach to online safety and mobile phone use. For full details about our schools' policies in these areas, please refer to our online safety and mobile phone policies which can be found on our website [link here](#):

**Filtering and monitoring**

In order to keep children safe when using school IT equipment, we use an education-oriented filtering system, robust antivirus and workstation monitoring. Smoothwall Monitor is used which is a real-time, proactive digital monitoring solution that alerts the safeguarding team to risks such as cyberbullying and self-harm as they happen.

We are mindful that “over-blocking” can lead to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding and mitigating against this by detailed lesson planning. The appropriateness of any filters and monitoring systems are a matter for which will be informed in part, by the risk assessment required by the Prevent Duty.

### **How to report online safety concerns**

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

Students can also report a Safeguarding and bullying incident via the academy's website.

### **Regular review of our approach to online safety**

We recognise that technology, and risks and harms related to it evolve and can change 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.

### **More information**

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

## **Declaration for Staff – September 2023**

### **Academic year 2023/2024**

As part of the on-going safeguarding training staff will access SSS Learning tracker document and verify that they have read and are familiar with the content of the following documents and that they understand their role and responsibilities as set out in these documents:

1. Part 1 and Annex B of Keeping Children Safe in Education 2023
2. Rushden Academy Child Protection and Safeguarding Policy 2023/2024
3. Rushden Academy Acceptable Usage Policy
4. Rushden Academy Code of Conduct
5. Rushden Behaviour Policy
6. Guidance for Safer Working Practice Addendum April 2020

**The document tracker facility on SSS learning training suite provides evidence that staff have read our key documents.**