Safeguarding and Child Protection Policy

St Mary's Primary School Kettering

September 2026

PERSON RESPONSIBLE FOR POLICY:	***HANNAH STARKEY***
APPROVED:	***SEPTEMBER 26***
SIGNED:	***GOVERNORS***
TO BE REVIEWED:	***SEPTEMBER 27***

At *St Mary's CEVA Primary* the named personnel with designated responsibility for safeguarding are:

Designated Safeguarding Lead	**Deputy Designated Safeguarding Lead(s)**	**Safeguarding Governor and Chair of Governors**
Hannah Starkey	*Michelle Dix and Ben Collins*	*Mark Broughton via school office and school email*

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

Designated Senior Manager (normally the Head teacher)	**Deputy Designated Senior Manager**	**Chair of Governors/Proprietor (in the event of an allegation against the head teacher) OR LADO if headteacher is the sole proprietor**
Diane Wright	*Hannah Starkey*	*Mark Broughton*

Our Data Protection Officer is:	**Our Lead for Mental Health is:**	**Our Prevent SPOC is:**	**Our designated teacher for looked after children is:**
FusionHR	*Hannah Starkey*	*Hannah Starkey*	*Hannah Starkey*

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1. Aim of policy

St Mary's Primary Kettering 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, neglect and exploitation and follow our procedures to ensure that children receive effective support, protection and justice.

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

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

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

The aim of this policy is to;

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

2. Scope

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

3. Definitions

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

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

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

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

- Supporting pupils' health, safety and well-being, including their mental health.
- Providing early help support, to improve outcomes for children and families at the earliest possible opportunity.
- Meeting the needs of children with special educational needs and/or disabilities.
- The use of reasonable force.
- Meeting the needs of children with medical conditions.
- Providing first aid.
- Educational visits.
- Intimate care and emotional wellbeing.

- Online safety and associated issues, including IT filtering and monitoring procedures.
- Appropriate arrangements to ensure school security, taking into account the local context.
- Keeping children safe from risks, harm and exploitation.
- Child protection.

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

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

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

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

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

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

online element).[3]

Children means everyone under the age of 18.

Within this policy:

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

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

4. Legislation and statutory guidance

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

Statutory Guidance

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

Legislation

- The Children Act 1989 and The Children Act 2004
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015
- The Rehabilitation of Offenders Act 1974
- Safeguarding Vulnerable Groups Act 2006
- Counter-Terrorism and Security Act 2015 (and the Prevent Duty guidance, updated 2023)
- The Education Act 2002
- The School Staffing (England) Regulations 2009
- The Childcare (Disqualification) Regulations 2009 (and 2018 amendment)
- The Childcare Act 2006 (all schools with pupils aged under 8)
- The Human Rights Act (1998)

[3] Keeping Children Safe in Education (2025)

- The Equality Act (2010)
- The Public Sector Equality Duty (PSED)
- Data Protection Act 2018,
- the UK General Data Protection Regulation (UK GDPR),
- and the Data (Use and Access) Act 2025

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

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

- What to do if you're worried a child is being abused (2015)
- Guidance for safer working practice for those working with children and young people in education settings (2022)
- Working together to improve school attendance (2026)
- Meeting digital and technology standards in schools and colleges (DfE)
- Information Sharing; Advice for practitioners providing safeguarding services to children, young people, parents and carers (2024)

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

- Behaviour Policy, including our searching, screening and confiscation policy
- Staff Code of Conduct and Low Level Concerns Policy
- Complaints policy
- Health and safety policy including fire evacuation and lockdown procedures (Critical Incident)
- Attendance policy
- IT/Online Safety/acceptable Use 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
- Missing/Lost Child Policy
- Manual handling
- Intimate care
- Allegations Management – KCSIE 26

- Safer Recruitment Policy
- Use of Physical Intervention
- Whistleblowing Policy

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

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

6. Confidentiality and Information Sharing

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

The school adheres to all 'data protection laws.

6.1 Sharing information with parents

St Mary's Primary Kettering 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 6.2 for more details). In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved.

6.2 Consent

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

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

When considering whether, or not, to share safeguarding information (especially with other agencies), St Mary's Primary Kettering 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.[4]

7. Roles and responsibilities

Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the three safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

7.1 Governing bodies and proprietors

Governing bodies and proprietors have a strategic leadership responsibility for St Mary's Primary Kettering'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 Mark Broughton.

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

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 (2026). All governors will read KCSIE (2026) and a record will be kept of this.

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

- 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

[4] See Working Together to Safeguard Children (2023) for more information.

protection underpin all relevant aspects of policy and process;

- ensure that policies, procedure and training at the school are effective and understood and comply with the law at all times and that they allow concerns to be responded to in a timely manner;
- ensure that safeguarding training for staff, including online safety training, is integrated, aligned and considered as part of the whole school 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 safeguarding and child protection policy, which is published on the school website and/or available by other means and review this annually;
- ensure that the school has systems in place to allow children to raise concerns, which are well-promoted, well-understood and easily accessible;
- ensure that the school takes safeguarding concerns seriously and takes the wishes and feelings of children into account;
- ensure that there are systems in place for young people to safely express their views and give feedback on safeguarding practice;
- ensure that the school has a suitable behaviour policy for pupils and a staff behaviour policy or Code of Conduct;
- ensure that all staff undergo safeguarding and child protection training (including online safety which, amongst other things, will include an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) on induction and regularly thereafter;
- consider a whole-school approach to online safety, including the use of mobile technology in school;
- ensure that there are clear systems and processes in place for identifying when children may be experiencing mental health problems;
- ensure that children are taught about safeguarding, including online safety. See section 10.6 and Appendix E of this policy for further information;
- ensure that appropriate safeguarding arrangements are in place to respond to children missing from education and those who are absent from education, particularly on repeat occasions and/or for prolonged periods;
- appoint an appropriate member of staff from the senior leadership team to the role of Designated Safeguarding Lead to take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place*)* and ensure that the DSL has the appropriate status and authority, skills and experience to carry out their job, including additional time, funding, training, resources and support;
- ensure that appropriate filters and monitoring systems are in place to keep children safe online;
- 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 both allegations against staff (including supply staff, trainee teachers volunteers and contractors) and concerns that do not meet the harm threshold (low level concerns)[5]; and
- respond to allegations of abuse against the headteacher. The Chair of Governors will act as the 'case manager' in the event that an allegation of abuse is made against the head teacher, where appropriate (see Appendix D).

7.2 The headteacher

[5] See Appendix D for more details.

The headteacher is responsible for the implementation of this policy. The headteacher will:

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

7.3 The Designated Safeguarding Lead (DSL)

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

The DSL is a member of the Senior Leadership Team.
Our DSL is Hannah Starkey, Deputy Headteacher
The DSL takes lead responsibility for child protection and wider safeguarding including online safety.

When the DSL is absent, the deputies Ben Collins and Michelle Dix – will act as cover.
If the DSL and deputies are not available, Diane Wright, Headteacher will act as cover.

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

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

The Designated Safeguarding Lead will;

- Act as a source of support and expertise on matters relating to safeguarding and child protection to ensure that other members of staff can carry out their safeguarding duty;
- Advise on the response to safeguarding concerns;
- Liaise with the Local Authority and work with other agencies in line with 'Working Together to Safeguard Children (2026);
- Identify if children may benefit from community based Family Help and targeted support through Family Help;
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly;
- Make referrals to the Channel programme where there is a radicalisation concern and/or support staff that make a referral to Channel;
- Support the school with regards to their responsibilities under the Prevent duty and provide advice and support on protecting children from radicalisation;
- Refer cases to the police where a crime may have been committed;
- Be available during school 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 this every two years;
- Ensure all staff have read and understood Part 1 and **All staff with direct contact** with children should also read Annex A of Keeping Children Safe in Education (September 2026);
- Update their knowledge and skills regularly and keep up with any developments relevant to their role;
- Provide staff in school with the knowledge, skills and support required to safeguard children;
- 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
- The DSL will consider whether safeguarding information should be transferred in advance of a pupil moving education settings where that information may assist in the management of risk or continuation of support.
- Attend or ensure an appropriate representative attends multi-agency safeguarding or child protection meetings;
- Work closely with other relevant education professionals (e.g. SENCO, Virtual School Head) to ensure children with additional vulnerabilities are safeguarded;
- Support children who have experienced or are experiencing safeguarding or child protection issues by using information they hold about children with a social worker to make decisions in the best interests of the child's safety, welfare and to help promote educational outcomes. This will include ensuring that staff know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children;
- Promote a 'culture of safeguarding', in which every member of the School community acts in the best

interests of the child;

- Ensure that staff are aware of the School's unauthorised absence procedures and children missing education procedures;
- Regularly meet with the safeguarding link governor and/or Chair of Governors to review safeguarding at the School:
- Liaise with the headteacher regarding safeguarding cases and issues;
- Have a good understanding of harmful sexual behaviour and how to support children in the event that this issue arises;
- 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; and
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search and understand.
- The DSL will ensure appropriate risk assessment, information sharing and safeguarding planning is undertaken where serious violence, weapon-carrying or weapon-related incidents are identified.
- The DSL will oversee safeguarding responses relating to Artificial Intelligence, deepfakes, AI-generated abuse material and emerging online harms

DSLs all share their personal mobile numbers with police and MASH for contact during holidays

7.4 All staff

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

- have a responsibility to provide a safe environment, where children can learn;
- will be trained so that they know what to do if a child tells them that he/she is being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals;
- will be able to identify indicators of abuse, neglect and exploitation;
- will be made aware of systems in the school that support safeguarding and child protection;
- will be made aware of safeguarding issues that put children at risk of harm and behaviours associated with these risks;
- 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 or college's policy and procedures with regards to child on child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it;
- will be made aware of the process for universal and community based Family Help and targeted Family Help and understand their role in it;
- should be prepared to identify children who may benefit from Family Help and will discuss Family Help requirements with the safeguarding lead in the first instance;
- may be required to support social workers and other agencies following a referral;
- will be made aware of the process for making referrals to Children's Social Care (though the MASH), understand statutory assessments and the role that they may be expected to play in such assessments;
- should be prepared to make referrals to the MASH if they have concerns about a child's welfare and understand the role that they may be expected to play in such assessments;
- will receive regularly updated safeguarding and child protection training to cover all of the above, as well as online safety (including IT filtering and monitoring procedures and how to report related

safeguarding or technical concerns);
- 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);

- will receive safeguarding updates throughout the year as part of continuous professional development;
- will be encouraged to contribute to the development of safeguarding policy and practice;
- should always seek advice from the Designated Safeguarding Lead if they are unsure;
- provide a safe space for pupils who are LGBT to speak out and share their concerns; and
- all teachers should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties (Teaching Standards, 2012).

In addition:

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 missing from education and children who are absent from education, particularly on repeat occasions and/or for prolonged periods.

All staff will be provided with a copy of, and must read, Part 1 and a**ll staff with direct contact** with children should read Annex A. of Keeping Children Safe in Education (September 2026) annually and will receive annually updated training on their safeguarding roles and responsibilities.

All staff will sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.

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.

8. Recognising Abuse: Training

The school is committed to ensuring safeguarding training remains current, evidence-informed and responsive to emerging safeguarding threats. Training will be reviewed regularly to reflect changes within national guidance, local safeguarding trends and emerging technologies.

8.1 All staff

- All staff members will undertake safeguarding and child protection training at induction (including online safety, filtering and monitoring and whistle-blowing procedures) to ensure they understand the school'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.
- Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.
- Volunteers will receive appropriate training, as applicable.

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

8.2 The DSL and Deputy DSLs

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

8.3 Governors

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

  This includes training on:

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

8.4 Recruitment – interview panels

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

8.5 Supervision

Staff who have contact with safeguarding needs of children and families will have supervision, which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues. Lead DSL has termly (6 x yearly) supervision. DDSLs have supervision from lead DSL termly (6 x yearly)

8.6 Specific safeguarding issues

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

- physical abuse;
- sexual abuse;

- child sexual exploitation;
- emotional abuse;
- neglect;
- child criminal exploitation (including involvement in county lines and financial exploitation);
- domestic abuse;
- fabricated or induced illness;
- faith-based abuse;
- female genital mutilation;
- forced marriage;
- gangs or youth violence;
- gender-based violence;
- hate;
- online safety;
- child on child abuse; including harassment and violence
- radicalisation;
- relationship abuse; including physical, sexual, emotional abuse and stalking;
- serious violence;
- sexual violence or sexual harassment (including child on child abuse);
- sexting or sharing of nudes
- honour or faith-based abuse;
- trafficking and modern slavery.
- weapon carrying;
- AI-generated abuse material; deepfake imagery;
- financial exploitation;
- technology facilitated abuse;
- online misogyny and misandry;
- harmful online influencers.

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

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

If a member of staff, parent or member of the public is concerned about a pupil's welfare, they should report it to the DSL as soon as possible. On occasions when the DSL is not available, it should be reported to the 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 including harassment and violence) and will report any of the following to the Designated Safeguarding Lead immediately;

- any concern or suspicion that a child has sustained an injury outside what is reasonably attributable to normal play;
- any concerning behaviours exhibited by children that may 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; and/or
- any disclosures of abuse that children have made.

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

The following procedures are in line with statutory guidance (see Section 4) and the Northamptonshire Safeguarding Children Partnership's **Right Help, Right Time A continuum of need guidance** (2025)[1]. Referral procedures can be found in section 9.5.

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

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

- listen to what is being said without displaying shock or disbelief;
- accept what is being said;
- allow the child to talk freely;
- reassure the child, 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'); and
- pass the information to the Designated Safeguarding Lead without delay using My Concern. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 9.2), and tell the DSL as soon as possible that you have done so.

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

We recognise that some children may:

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

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

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

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

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

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

Figure 1 on page 23 illustrates the procedure to follow if you have any concerns about a child's welfare. Where possible, speak to the DSL first to agree a course of action (see 9.2).

The DSL will decide on the most appropriate course of action and whether the concerns should be referred to children's social care, using the **Northamptonshire Right Help, Right Time A continuum of Need[1].** If it is decided to make a referral to children's social care the parent will be informed, unless to do so would place the child at further risk or undermine the collection of evidence. See Section 6.1 for more details.

All concerns, discussions and decisions will be recorded in writing.
The DSL will provide guidance on the appropriate action. Options will include:

- managing any support for the child internally via the school's own pastoral support processes;
- seeking advice from the local Family Help partnership co-ordinator/s;
- Universal services and community based Family Help or the targeted Family Help level of Family Help or
- a referral for statutory services where the child is or might be in need or suffering or likely to suffer significant harm.

9.4 Family Help

All staff should be prepared to identify children who may benefit from Family Help. Family Help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. If Family Help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in a Family Help assessment, in some cases acting as the lead practitioner. Any such cases should be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services if the child's situation does not appear to be improving or is getting worse. Timelines of interventions will be monitored and reviewed.

All staff will be made aware of the 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 Family Help. However, we will be particularly vigilant to potential need for Family Help if a child;

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

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

9.5 Referrals

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so. If you make a referral directly (see Section 9), you must tell the DSL as soon as possible.

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

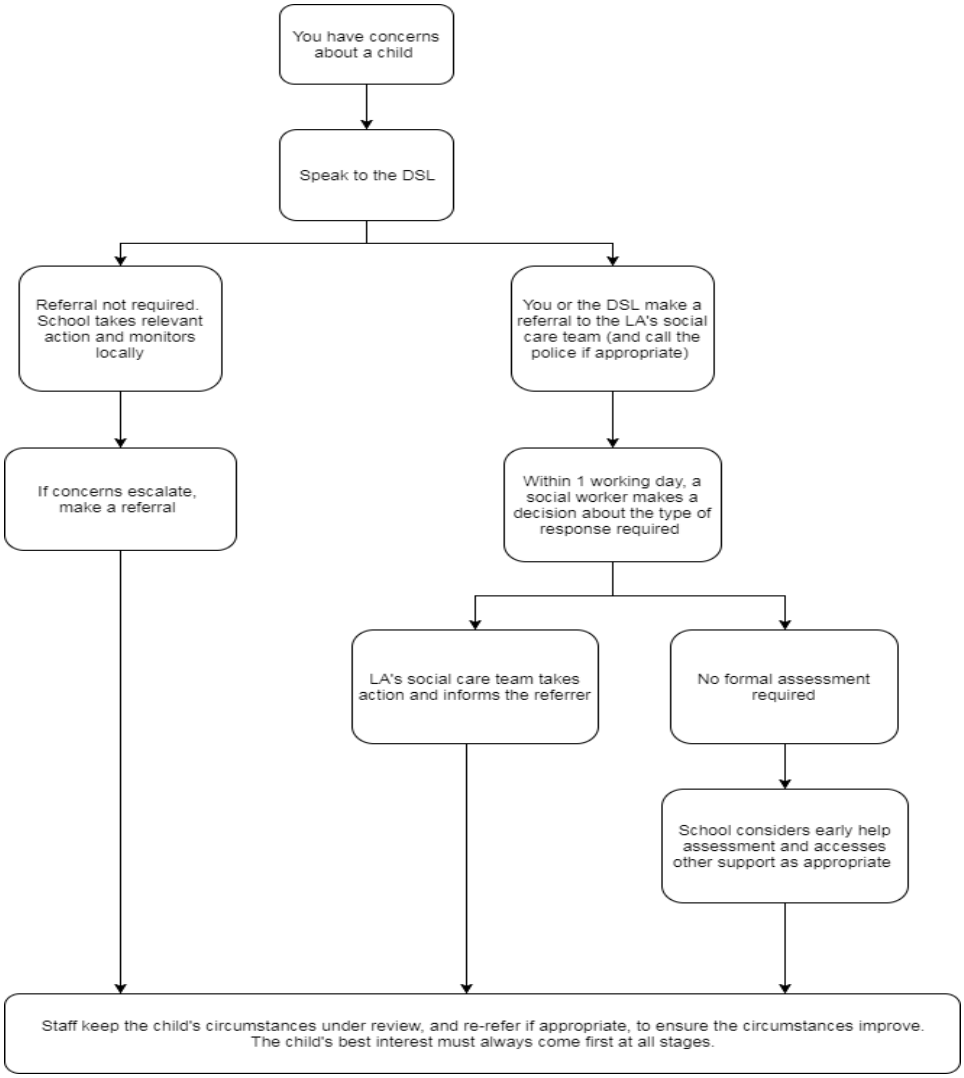
The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and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

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.[6]

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

- By telephone contact to the Multi-Agency Safeguarding Hub (MASH): **0300 126 7000** (Option 1).
- By using the online referral form found at: **MASH ONLINE REFERRAL**[7]
- In an emergency outside office hours, contact children's social care out of hours team on 0300 126 7000 or the Police[8]
- If a child is in immediate danger at any time, left alone or missing, you should contact the police directly and/or an ambulance using 999.

9.6 Figure 1: Reporting and responding to concerns flowchart



[6] The NSCP **Escalating for the right Outcome' – Professional Disagreements policy** can be found here: **http://www.northamptonshirescb.org.uk/schools/case-conflict-resolution-protocol/**

[7] **https://nctrust.co.uk/report-a-concern-or-request-support/**

[8] The Designated Safeguarding Lead may make use of the NPCC guidance **'When to call the police'**.

10. Specific safeguarding issues

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

10.1 Female Genital Mutilation (FGM)

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

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

Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out must speak to the DSL and follow our school safeguarding procedures,this would then involve a referral to police and MASH.

10.2 Radicalisation and extremism

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

We adhere to the Prevent Duty statutory guidance (2023) and have a specific risk assessment

10.3 Children potentially at greater risk of harm

St Mary's Primary Kettering recognises that some children need a social worker due to abuse, neglect, exploitation or family circumstances and that abuse and trauma can leave children vulnerable to further harm, as well as educational disadvantage.

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

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

- Children facing the court procedures and/or children in the court system.

- Children with family members in prison.
- Children who are homeless.
- Children who need a social worker.

10.4 Mental health

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

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

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

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

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

If staff have a mental health concern about a child we will respond to the concern, inform and discuss our concerns with parents/carers and seek ways to support the child in and out of school. If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in Section 9.

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

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

Only appropriately trained professionals should attempt to make a diagnosis of a mental health concern. However, we 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

We are a Mental Health Support Team linked school through NHFT

Refer to the Department for Education guidance on **mental health and behaviour in schools**[1] for more information.

[1] https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2

10.5 Child on child abuse, including harassment and violence

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

Full details of how the school prevents, responds to and supports victims of child on child abuse can be found in our separate Child on Child Abuse policy.

10.6 Online safety, including filtering and monitoring

All concerns relating to Online Safety are reported to DSLs using My Concern.

All incidents of children using the internet unsafely are reported electronically to the School Business Manager and informs DSLs with screenshots of activity if safe to do so.

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

All staff are made aware of the school policy on online safety, which sets our expectations relating to:

- creating a safer online environment – including training requirements, filters and monitoring;
- what staff should be alert to, what to report and how staff should report any concerns – including those related to the efficacy of filtering and monitoring systems;
- giving everyone the skills, knowledge and understanding to help children and young people stay safe on-line;
- inspiring safe and responsible use and behaviour;
- safe use of mobile phones both within school and on school trips/outings;
- safe use of camera equipment, including camera phones; and
- what steps to take if you have concerns and where to go for further help.

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

Any concerns related to children's safety online (either safeguarding or technical) should be reported to the DSL immediately.

Pupil mobile phones
Our Mobile Device Policy and Procedures contains all information

10.7 Children who are gay, lesbian, bisexual, or gender questioning

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

We will:

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

Children who are questioning their gender

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

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

10.8 Elective home education

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

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

11. 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, neglect and exploitation in this group, including;

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- pupils being more prone to peer group isolation than other pupils;
- the potential for pupils with SEN and disabilities being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs; and/or
- communication barriers and difficulties in managing or reporting these challenges risks that they do not understand that what is happening to them is abuse

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

- **SEND Code of Practice**[9]
- **Specialist SEND support services in North Northants**[10]

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

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

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

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

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

- responding to unauthorised absence or missing education where there are known safeguarding risks; and
- the provision of pastoral and/or academic support.
- The academic outcomes for children who have had or have a social worker are closely monitored by DSL team

We have a minimum of two contacts plans for all children, including children with a social worker, and other children who we have safeguarding concerns about. If a child does not come to school and we have not been advised about their absence, we will contact everybody on the list and consider the appropriateness of social care and police contact.

13. Looked after and previously looked after children

[9] **https://www.gov.uk/government/publications/send-code-of-practice-0-to-25**
[10] **https://www.northnorthants.gov.uk/specialist-send-support-services**

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, Hannah Starkey, DSL who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with **statutory guidance**.[11]
- 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 Designated Teacher and DSL will work collaboratively to ensure safeguarding risks, attendance concerns, mental health needs and educational outcomes are addressed holistically
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans.

14. Record-keeping

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

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

- record as soon as possible after the conversation. Use the school record of concern sheet wherever possible;
- not destroy the original notes in case they are needed by a court;
- record the date, time, place and any noticeable non-verbal behaviour and the words used by the child;
- draw a diagram to indicate the position of any injuries if relevant; and
- record statements and observations rather than interpretations or assumptions

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

The Designated Safeguarding Lead will ensure that all safeguarding records are managed in accordance with the Education (Pupil Information) (England) Regulations 2005. All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely.

Records will include:

- a clear and comprehensive summary of the concern;

[11] **https://www.gov.uk/government/publications/designated-teacher-for-looked-after-children**

- details of how the concern was followed up and resolved; and
- a note of any action taken, decisions reached rationale and the outcome.

Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them. We will hold records in line with our records retention schedule.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file to enable the new school or college to continue supporting victims of abuse, **incidents that may indicate concerns about serious violence or harmful behaviours and/or details of** those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives.

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

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

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child particularly where the information would support an assessment of risk to others in the school as well as the individual pupil.

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

Receiving schools should ensure key staff such as designated safeguarding leads and special educational needs coordinators (SENCOs) are aware of this information as required. It is for the designated safeguarding lead to consider what other information should be shared with other relevant staff and when appropriate to do so.

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

15. Relationships, sex and health education (RSHE)

Promoting safeguarding and welfare in the curriculum

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, racism, misogyny/misandry, homophobia, biphobia, sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict.

This will be underpinned by our:

Relationships and Behaviour policy
Pastoral support system

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

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

16. Safer working practice

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

We expect all staff to act with professionalism at all times. To reduce the risk of unsafe or harmful practice, all staff should receive training on safer working practice and should be familiar with the guidance contained in the School Behaviour Code of Conduct for Working with Children and Safer Recruitment Consortium document **Guidance for safer working practice for those working with children and young people in education settings (September 2022).**[12]

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 school 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 (2026).

16.1 Staff use of mobile phones and smart technology

[12] https://www.saferrecruitmentconsortium.org/

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.

Smart watches must be on silent and must not be used around children or present a distraction to staff working with children.

Staff may only use Microsoft Copilot AI for anything school related. Staff must not put anything into Copilot that could identify a child.

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.

We have a separate Mobile Devices Policy which details staff must not use their mobile phone around children **ever,** not to phone, message or take photos.

17. Safeguarding concerns about and allegations against members of staff

17.1 Allegations that may meet the harms threshold

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

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

If an allegation is made against the Headteacher, it must be reported to Mark Broughton, Chair of Governors. Contact can be made via email **m.broughton@stmarysprimarykettering.co.uk** or ask the office to contact Mr Broughton and request he phone.

Allegations against staff

If a concern or allegation of abuse arises against any member of staff, supply teacher, trainee teacher or volunteer other than the Headteacher, it must be reported to the Headteacher without delay. This includes supply staff, trainee teachers, volunteers and anyone working in or on behalf of the school, whether paid or unpaid. Allegations of abuse against staff must be reported to the Headteacher or Chair of Governors as appropriate and not discussed directly with the person involved.

The Headteacher or Chair of Governors should consider if the concern or allegation meets the threshold for Designated Officer intervention. The head teacher, or person identified by the headteacher to take action, will record their decision and rationale as to whether there is a referral to the LADO.

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

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

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

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

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

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the harms threshold. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school 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 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 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 (2026).

Reporting low level concerns

Low level concerns should be reported to the headteacher on site on a grey form.

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.

The headteacher may:

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

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

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

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

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

17.3 Supply staff

Although the school 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 bodies 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.

18. Complaints and concerns about school safeguarding policies

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 13).

Other complaints - Please see complaints policy on website

Whistleblowing - Please see Whistleblowing policy on website

19. Use of school premises for non-school activities

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

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

In the event that the school receives an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children, we will follow our safeguarding policies and procedures, including informing the LADO.[13]

20. How we safeguard pupils attending alternative provision

Where we place a pupil with an alternative provision provider, we understand that we continue to be responsible for the safeguarding of that pupil and we will satisfy ourselves that the placement meets the pupil's needs.

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

[13] Further information can be found here: **https://www.gov.uk/government/publications/keeping-children-safe-in-out-of-school-settings-code-of-practice/keeping-children-safe-during-community-activities-after-school-clubs-and-tuition-non-statutory-guidance-for-providers-running-out-of-school-settings**

The School will have processes in place to know where a child is based during school hours. This includes having records of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend. We will regularly review the alternative provision placements and review them at a minimum of half termly to ensure that the child is regularly attending and the placement continues to be safe and meets the child's needs.

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

- **Alternative Provision** DFE statutory guidance and
- **Education for children with health needs who cannot attend school** - GOV.UK (www.gov.uk) – DFE statutory guidance.

22. Policy implementation, monitoring and review

This policy will be reviewed at least annually and more frequently if required following changes to legislation, statutory guidance, local safeguarding arrangements, safeguarding practice reviews or emerging safeguarding risks.
The governing body will receive regular safeguarding assurance information throughout the year to support effective strategic oversight.

Appendix A: Child on child abuse, including harassment and violence

Child on child abuse is any abuse of a child or children that is perpetrated by another child or children. This includes all forms of sexual harassment, sexual violence and abuse. We 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 children (sometimes known as 'teenage relationship abuse');
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- Serious physical assault and harm, or the threat of harm with a weapon
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment,

which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual maiking or sharing of nudes and semi nude images and or videos (also known as sexting or youth produced sexual imagery);
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).[14]

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

Harmful sexual behaviour (HSB)

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

When responding to HSB, we will:

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

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

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

Staff training

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

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

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

[14] Keeping Children Safe in Education (2025)

- have a robust policies, which make 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 clear and frequent training
- 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, misogyny, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it; and
- 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

We ensure that our systems for reporting all safeguarding concerns are well promoted, easily understood and easily accessible for children to confidently 'Speak out to Stay Safe' and report abuse, knowing their concerns will be treated seriously. We ensure that children are aware of our safeguarding and child protection procedures, including how to raise concerns about child-on-child abuse. These posters are throughout school and visited weekly with children.



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 bespoking their PSHE curriculum, working closely with their grown-ups, offering additional inputs and referring to specialisms when appropriate.

Our children

If a young person witnesses or experiences any form of child-on-child abuse, we strongly encourage them to speak to a 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 children can:

- Verbally report to trusted adult
- Post a note to DSL x 3 in two boxes located in school – children are aware of these in Praise Parties and on our noticeboard and poster around school
- Worry monsters in all classes
- Childline number is known by all children
- 3 houses work completed 3 x yearly
- PASS survey 3 x yearly

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

In the event that a pupil reports or discloses child on child abuse, we will take their report seriously, take prompt action to respond and to safeguard the child or children involved and we will ensure that we are listening to the voice of the child when deciding on the best course of action to take. We will always act in the best interests of children. Following any disclosures or reports of child-on-child abuse, we will review our school systems, training and policies to determine if any learning can be derived from the situation to further strengthen our approach to this issue. We will always encourage our pupils to safely express their views and give feedback on how they have been supported following a safeguarding concern.

Our staff

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

Others

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

There is also a QR code on posters around school and at front office for anyone to access and report. Information is also on our website

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**.**

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

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

We have a separate Child on Child Abuse policy and will adhere to this.

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

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

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

Recording procedures

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

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

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

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

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

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

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

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

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

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

The school may choose to impose a sanction or punishment on the alleged perpetrator following an incident of child-on-child abuse. In this case, we will follow the school Relationships and 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 school will refer to KCSIE 26 and seek professional advice on procedure.

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.

Local Safeguarding Arrangements and making referrals

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

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

Parents

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

Whole school response

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

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

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

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

Appendix B: Types of abuse

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

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

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

Emotional abuse may involve:

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

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 penetration with an object) 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 because of maternal substance abuse.

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

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

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

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

Children who are absent from education

Children being absent from education for prolonged periods and/or on repeat occasions and children missing education can act as a vital warning sign to a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation (particularly county lines), or issues such as mental health problems, substance abuse, risk of travelling to conflict zones, risk of FGM honour or faith-based abuse or forced marriage.

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

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

We will follow our procedures for unauthorised absence, dealing with persistently absent pupils and children missing education to help identify the risk of abuse, neglect and exploitation and to help prevent the risks of going missing in future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.

We will always follow up with parents/carers when pupils are not at school. This means we need to have at least two, up to date, contacts for parents/carers. Parents/carers should remember to update the school as soon as possible where these contact details change.

This includes informing the local authority if a child leaves the school without a new school being named and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

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

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

Child criminal exploitation

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

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

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

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

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including, sexual identity, cognitive ability,

having a physical or learning disability, or being neurodivergent, communication ability, physical strength, status, and access to economic or other resources.

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

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions which could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal and sexual exploitation,
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education

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

County Lines

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

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

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

Serious violence

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

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

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

- being male;

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

If a member of staff suspects a child is involved in or at risk of serious violent crime, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child sexual exploitation

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

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

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

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

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

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

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

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

Child abduction and community safety incidents

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

We will always share community safety information from the police with parents.

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

Cybercrime

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

Cyber-dependent crimes include;

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

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

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.

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

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.

At St Mary's School we are working in partnership with North Northamptonshire Council and West Northamptonshire Council and Northamptonshire Police to identify and provide appropriate support to pupils who have experienced domestic abuse in their household; nationally this scheme is called Operation Encompass. In order to achieve this, North 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.

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

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

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

The DSL will:

- Speak to the pupil about the concerns in a secure and private place.
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer.
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or **fmu@fco.gov.uk** if required.
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate.

Modern Slavery and Trafficking

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

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

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.
Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

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

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

School staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the 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. Children may be susceptible to radicalisation into terrorism.

Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.
Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause

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

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force. We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.

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

Staff will be alerted to changes in pupils' behaviour. The government website **Educate Against Hate**[15] and the charity **NSPCC**[16] say that signs that a pupil is being radicalised can include:

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

Children who are at risk of radicalisation may have low self-esteem, or may be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong. If staff are concerned about a pupil, they will follow our procedures set out in Section 9 of this policy, including discussing their concerns with the DSL. Staff should always take action if they are worried.

Further information on the school's measures to prevent radicalisation is set out in other school policies and procedures, including our PREVENT risk assessment.

Missing pupils
Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child is missing, we follow the procedure set out in our Attendance Policy which adheres to LA processes.

- **Children missing education in North Northants.**[17]

Non-collection of children
If a child is not collected at the end of the session/day, we will contact all named people on our MIS for that child, carry out a home visit, refer to the police at 5.00pm.

Appendix C: Safer recruitment

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

[15] https://educateagainsthate.com/signs-of-radicalisation/
[16] https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/protecting-children-from-radicalisation/
[17] https://www.northnorthants.gov.uk/attendance-behaviour-and-home-schooling/tracking-children-and-their-families-who-have-gone-missing

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

Pre-appointment safer recruitment

We will include the following in all job advertisements:

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

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

All applicants will be provided with:

- A link to a copy of the school's safeguarding and child protection policy and practices and policy on employment of ex-offenders.

Applicants

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

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

Shortlisting and selection

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

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

We will seek references on all shortlisted candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments. The references requested will ask specific questions about the suitability of the applicant to work with children.

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

As part of due diligence checks, we will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online that we may wish to explore with candidates at interview.

New staff

When appointing new staff, we will:

- verify a candidate's identity. This includes demonstrating an awareness for the potential for individuals changing their name. Best practice is checking the name on their birth certificate, where this is available;
- obtain (via the applicant) an enhanced DBS check (including children's barred list information, for those who will be engaging in regulated activity with children regardless of whether they are supervised or not);
- obtain a separate children's barred list check if an individual will start work in regulated activity with children before the DBS certificate is available;
- verify the candidate's mental and physical fitness to carry out their work responsibilities;
- verify the person's right to work in the UK, including EU nationals;
- If the person has lived or worked outside the UK, make any further checks the school consider appropriate;
- verify professional qualifications, as appropriate; and
- ensure that an applicant to be employed to carry out teaching work is not subject to a prohibition order.
- Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the Secretary of State.
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
    - For all staff, including teaching positions: **criminal records checks for overseas applicants.**
    - For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach.

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

Regulated activity means a person who will be:

- Responsible, for more than 3 days in 30, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not.

Existing staff

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

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

- We believe the individual has engaged in **relevant conduct**;
  or
- The individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under the **Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009**; or
- The 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary checks (Barred list – Enhanced DBS – recent safeguarding and child protection training – code of conduct for adults working with children plus 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 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 also require contractors to read and sign to say they understand our safeguarding and child protection processes
- We will obtain the DBS check for self-employed contractors.
- We will not keep copies of such checks for longer than 6 months.
- Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.
- We will check the identity of all contractors and their staff on arrival at the school.
- For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Trainee/student teachers

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

In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

Volunteers

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

We will:

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

- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Governors

- All governors will have an enhanced DBS check without barred list information.
- They will have an enhanced DBS check with barred list information if working in regulated activity.
- The chair of the board will have their DBS check countersigned by the secretary of state.

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

- A section 128 check (to check prohibition on participation in management under **section 128 of the Education and Skills Act 2008**). [Section 128 checks are only required for local governors if they have retained or been delegated any management responsibilities.]
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

All governors will also have the following checks:

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

Staff working in alternative provision settings

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

Checking the identity and suitability of visitors

The Crime and Policing Act 2026 removes the 'supervision exemption'

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit (usually their bag or pocket) they will be advised not to use their phone during their visit - should they need to they must come back to the office.

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 photo identification.
Visitors are expected to sign in on the Ipad, read all instructions, sign to say they understand our safeguarding and child protection processes and wear a visitor's lanyard with their photo attached.

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

All other visitors, including visiting speakers, who cannot evidence an enhanced DBS and recent safeguarding and child protection training and photo identification will always be accompanied by a member of staff and wear a red lanyard. 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.

Children who are 16 and 17 must be enhanced DBS checked to work in regulated activity – this includes sixth form work experience placements for one week.

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

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

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

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

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

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

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

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

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

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

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

Definitions for outcomes of allegation investigations

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

Procedure for dealing with allegations
In the event of an allegation that meets the criteria above, the headteacher (or chair of governors where the headteacher is the subject of the allegation) – the 'case manager' – will take the following steps:

- Immediately discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as possible after contacting the police.)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies.

- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate.
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details.
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation.
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or Children's Social Care services as appropriate.
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child
- We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.
- If the school is made aware that the Secretary of State has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.
- Where the police are involved, wherever possible the governing body 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 school will take the lead in collecting the necessary information and providing it to the local authority designated officer as required.

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

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

Timescales

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

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

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

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

Individuals returning to work after suspension

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

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

Unsubstantiated or malicious allegations

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

Confidentiality

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

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

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

Record-keeping

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

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

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

Where records contain information about allegations of sexual abuse, we will preserve these in line with current guidance. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer. The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

References

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

Learning lessons

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

This will include consideration of (as applicable):

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

For referrals regarding adults in education and other information on the role of the Designated Officer (formerly LADO) please visit: **http://www.northamptonshirescb.org.uk/schools/referrals-eha/designated-officer/**

The Chair of Governors in this school is:

NAME: CONTACT NUMBER:
Mark Broughton _____01536 485500___

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

NAME: CONTACT NUMBER:
_Sarah Allen__ _____01536 485500___

Multi-Agency Safeguarding Hub: **0300 126 7000** **(Option 1)**

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

Appendix E: Online Safety

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

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

- curriculum planning and RSHE;
- teacher training;
- the role and responsibilities of the designated safeguarding lead; and
- parental engagement.

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

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

Risks to children

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

- **content**: being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories,
- **contact**: being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes,

- **conduct**: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, including those generated using AI and online bullying,
- **commerce**: risks such as online gambling, inappropriate advertising, phishing and or financial scams.
- **Consent:** have you given consent or have your asked for consent before sharing?

We refer to these five 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. These are in every child's PSHE book and are visiting weekly in Praise Party.

Filtering and monitoring

Our filtering and monitoring procedures, including our review process, are informed by the DfE guidance manual '**Meeting digital and technology standards in schools and colleges**'[1]. For more information about the filtering and monitoring standards we adhere to '**Filtering and monitoring standards for schools and colleges**' (March 2022).[2] We also use '**Plan technology for your school service'** to self-assess against the filtering and monitoring standards.

In order to keep children safe when using school IT equipment, we have robust filtering and monitoring in place. This is tested monthly and staff are duty bound to report any concerns or near misses to DSLs.

Staff devices are also robustly filtered and monitored

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 mitigate against this by reviewing blocked sites regularly. The appropriateness of any filters and monitoring systems will be informed in part, by the risk assessment required by the Prevent Duty.

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

Generative AI- We will take account of guidance published by the DFE **Generative AI: product safety** expectations to support us to use generative artificial intelligence safely.

The school recognises that Artificial Intelligence technologies may create safeguarding risks through:

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

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

[1] https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges
[2] https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/filtering-and-monitoring-standards-for-schools-and-colleges

Pupil mobile phones
See Mobile Devices Policy

See Section 16 of this policy for more details about staff use of mobile phones and smart technology.

Remote learning
In the unusual event that children are remote learning an Acceptable Use Agreement for Home Learning will be in place.

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. They can also report on My Concern using a log in or QR code in the front office.

Cybersecurity
We ensure that we have the appropriate level of security protection procedures in place in order to safeguard systems, staff and children and we review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies. This is informed by the DfE document '**Cyber security standards for schools and colleges**'.[18]

Regular review of our approach to online safety
We recognise that technology, and risks and harms related to it evolve and changes rapidly.
We carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks their children face. This is informed by local and national training, regular updates and the DfE guidance **'Meeting digital and technology standards in schools and colleges'**.[19]

More information
For more information about online safety, please see Part 1 of Keeping Children Safe in Education (2026).

[18] https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/cyber-security-standards-for-schools-and-colleges
[19] https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/cyber-security-standards-for-schools-and-colleges