FOUNDATIONS FOR CHILDREN NURSERY SCHOOLS FEDERATION & CAMROSE EARLY YEARS CENTRE

PERSON RESPONSIBLE FOR POLICY:	**LYNDSEY BARNETT** **EXECUTIVE HEADTEACHER**
APPROVED:	
SIGNED:	
TO BE REVIEWED:	

At *Croyland Nursery School* the named personnel with designated responsibility for safeguarding are:

Designated Safeguarding Lead	**Deputy Designated Safeguarding Lead(s)**	**Safeguarding Governor and Chair of Governors**
Jo Newman	Angela Whitney Jo Summers Emma Annis Lyndsey Barnett	Chair of Governors: **Cath Draper** governors@croyland-nur.northants.sch.uk Safeguarding Governor: **Toni Oelrich**

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

Designated Senior Manager	**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**
Lyndsey Barnett-Executive Headteacher	Jo Newman- Assistant Head	Chair of Governors: Cath Draper **governors@croyland-nur.northants.sch.uk**

At *Highfield Nursery School* the named personnel with designated responsibility for safeguarding are:

Designated Safeguarding Lead	**Deputy Designated Safeguarding Lead(s)**	**Safeguarding Governor and Chair of Governors**
Katie Buchanan	Jo Newman Lyndsey Barnett	Chair of Governors: **Cath Draper** governors@croyland-nur.northants.sch.uk Safeguarding Governor: **Toni Oelrich**

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

Designated Senior Manager	**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**
Lyndsey Barnett-Executive Headteacher	Jo Newman- Assistant Head	Chair of Governors: Cath Draper **governors@croyland-nur.northants.sch.uk**

At *Parklands Nursery School* the named personnel with designated responsibility for safeguarding are:

Designated Safeguarding Lead	**Deputy Designated Safeguarding Lead(s)**	**Safeguarding Governor and Chair of Governors**
Lauren Jacques	Candiece Spencer Lyndsey Barnett	Chair of Governors: Cath Draper **governors@croyland-nur.northants.sch.uk** Safeguarding Governor: **Toni Oelrich**

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

Designated Senior Manager	**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**
Lyndsey Barnett-Executive Headteacher	Jo Newman- Assistant Head	Chair of Governors: Cath Draper **governors@croyland-nur.northants.sch.uk**

At *Camrose Early Years Centre* the named personnel with designated responsibility for safeguarding are:

Designated Safeguarding Lead	**Deputy Designated Safeguarding Lead(s)**	**Safeguarding Governor and Chair of Governors**
Diane Berrie	Penny Bavester Angie Howes Amy James Anna Bywater Paula Stafford Lyndsey Barnett	Chair of Governors: Cath Draper **governors@croyland-nur.northants.sch.uk** Safeguarding Governor: **Toni Oelrich**

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

Designated Senior Manager	**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**
Lyndsey Barnett-Executive Headteacher	Diane Berrie	Chair of Governors: Cath Draper **governors@croyland-nur.northants.sch.uk**

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1. Aim of policy

Foundations for Children Nursery Schools Federation (FfCNS) and Camrose Early Years Centre (Camrose) recognise our statutory responsibility to safeguard and promote the welfare of all children. We will endeavour to provide a safe and welcoming environment where children are respected and valued. We will be alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice.

Safeguarding is everyone's responsibility. We recognise that our schools are 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 peer on peer abuse) through training, education and robust response procedures.[1]

The aim of this policy is to;

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

2. Scope

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

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

3. Definitions

Safeguarding and promoting the welfare of children is defined in Keeping Children Safe in Education (KCSIE) 2021 as;

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

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

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

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

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

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

Peer on peer abuse refers to the abuse of a child or children perpetrated by another child or children. Peer on peer abuse is most likely to include, but may not be limited to:

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nudes and semi nude images and or videos (also known as sexting or youth produced sexual imagery);
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).[3]

Children includes everyone under the age of 18.

Within this policy:

- **'Parent'** refers to birth parents and other adults in a parenting role for example adoptive parents, step parents and foster carers.
- **'Staff'** or **'members of staff'** refers to all teaching, non-teaching, support, supply, peripatetic, contract staff, governors, volunteers and trustees working in or on behalf of the four schools**.**
- Keeping Children Safe in Education (2021) may be abbreviated to 'KCSIE'.

4. Legislation and statutory guidance

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

Statutory Guidance

- Keeping Children Safe in Education (2021)
- Working Together to Safeguard Children (2018)
- Multi-agency statutory guidance on female genital mutilation (July 2020)
- **Early Years Foundation Stage**

[3] Keeping Children Safe in Education (2021)

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)
- The Education Act 2002
- The School Staffing (England) Regulations 2009
- The Equality Act (2010)
- **The Childcare (Disqualification) Regulations 2009 (and 2018 amendment)**
- **The Childcare Act 2006 (all schools with children aged under 8)**

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

The schools also have regard relevant to non-statutory guidance relating to safeguarding, including:

- What to do if you are worried a child is being abused (2015)
- Guidance for safer working practice for those working with children and young people in education settings (2019 and the addendum added April 2020)
- Sexual violence and sexual harassment between children in schools and colleges (2021)

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

- **Behaviour Policy**
- **Whistleblowing Policy**
- **Acceptable use Policy**
- **Staff Code of Conduct**
- **Complaints Policy**
- **Outings Policy**
- **Health and Safety Policy**
- **Attendance Policy**
- **SEND Policy**
- **Equality Policy**
- **Medicines and First Aid Policy**
- **Curriculum Policy**
- **Designated teacher for looked-after and previously looked-after child Policy**
- **Privacy Notices and GDPR Policy**

Our public health emergency (COVID-19) procedures can be found at Appendix A.

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.

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

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

6.1 Sharing information with parents

FfCNS Federation and Camrose will ensure the Safeguarding and Child Protection Policy is available publicly via the schools' websites, on displays in the schools and available at Reception.

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), FfCNS Federation and Camrose 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 the schools 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

7.1 Governing bodies

Governing bodies have a strategic leadership responsibility for schools' safeguarding arrangements. The FfCNS Federation and Camrose governing bodies will each 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 Leads are:
Liz Nicholson – Foundations for Children Nursery Schools Federation
Toni Oelrich – Camrose

[4] See Working Together to Safeguard Children (2018), pages 18-22 for more information.

Governors 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 schools are working with local safeguarding partners and that the school contributes to multi-agency working, adhering to Working Together to Safeguard Children (2018). All governors will read KCSIE (2021) and a record will be kept of this.

Part 2 of KCSIE (2021) sets out the responsibilities of governing bodies and 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;
- work to facilitate a whole school approach to safeguarding, by ensuring that safeguarding and child protection underpin all relevant aspects of policy and process;
- ensure that policies, procedure and training at the schools are effective and comply with the law at all times and that they allow concerns to be responded to in a timely manner;
- ensure that safeguarding training for staff, including online safety training, is integrated, aligned and considered as part of the whole federation safeguarding approach and wider staff training and curriculum planning;
- ensure that the schools take into account local criteria for action and protocol for assessment and supply information as requested by the three safeguarding partners;
- ensure that the schools have an effective child protection policy, which is published on the website and/or available by other means and review this annually;
- ensure that the schools have systems in place to allow children to raise concerns, which are well-promoted, well-understood and easily accessible;
- ensure that the schools 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 schools have a suitable behaviour policy for children and a staff behaviour policy or Code of Conduct;
- ensure that all staff undergo safeguarding and children's protection training on induction;
- consider a whole-school approach to online safety, including the use of mobile technology in school;
- ensure that there are clear systems and processes in place for identifying when children may be experiencing mental health problems;
- ensure that children are taught about safeguarding, including online safety. See section 10.6 and Appendix F of this policy for further information;
- ensure that an appropriate safeguarding response for children who go missing from education is in place;
- appoint an appropriate member of staff from the senior leadership team to the role of Designated Safeguarding Lead;
- ensure that appropriate filters and monitoring systems are in place to keep children safe online;
- ensure that there are appropriate procedures in place to manage safeguarding concerns, or allegations against staff; 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 headteacher, where appropriate (see Appendix E).

7.2 The headteacher

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 governors 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 (usually the DSL – see Annex C KCSIE);
- ensure that all recruitment follows the safer recruitment guidance (see Part 3 of KCSIE) and a single, central record is maintained with details of all members of staff who are in contact with children;
- respond to allegations of abuse against all other members of staff and act as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate;
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required;
- ensure that the schools work with social care, the police, health services and other services to; promote the welfare of children; provide a co-ordinated offer of early help when need is identified; contribute to inter-agency plans for children subject to children protection plans and to protect children from harm;
- safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties (Teaching Standards, 2012);
- ensure that children's social care (from the host local authority or placing authority) have access to the schools to conduct, or to consider whether to conduct a section 47 or section 17 assessment, as per Keeping Children Safe in Education (September 2021);
- ensure the relevant staffing ratios are met, where applicable
- make sure each child in the schools is assigned a key person

7.3 The Designated Safeguarding Lead (DSL)

The full responsibilities of the DSL are set out in Annex C, KCSIE (2021).

The DSL is a member of the Senior Leadership Team. Our DSL's:

Croyland Nursery School	Highfield Nursery School	Parklands Nursery School	Camrose Early Years Centre
Jodie Goodwin Senior Family Worker	Jodie Goodwin Senior Family Worker	Lauren Jacques Senior Family Worker	Angie Howes and Diane Berrie Senior Practitioners

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

When the DSL is absent, the deputies will act as cover.

Croyland Nursery School	Highfield Nursery School	Parklands Nursery School	Camrose Early Years Centre
Angela Whitney Nursery Manager Paula Stafford Nursery Manager Emma Annia Deputy Manager Jo Newman Assistant Head Lyndsey Barnett Executive Head	Katie Buchanan Assistant Head Jo Newman Assistant Head Lyndsey Barnett Executive Head	Lauren Jacques Senior Family Worker Jo Newman Assistant Head Lyndsey Barnett Executive Head	Angie Howes and Diane Berrie Senior Practitioners Lyndsey Barnett Executive Head

If the DSL and deputies are not available, the School Business Managers will act as cover (for example, during out-of-hours/out-of-term activities).

Any deputies will be trained to the same standard as the Designated Safeguarding Lead.

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

The Designated Safeguarding Lead will:

- 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 (2018);
- Identify if children may benefit from early help;
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- Make referrals to the Channel programme where there is a radicalisation concern and/or support staff that make a referral to Channel;
- Support the school with regards to their responsibilities under the Prevent duty and provide advice and support on protecting children from radicalisation;
- Refer cases to the police where a crime may have been committed;
- Be available during school or college hours for staff to discuss any safeguarding concerns. In the event that they are not available, a deputy will be made available;
- Undertake training to equip them with the skills to carry out the role and update this every two years;
- Ensure all staff that work directly with children have read and understood Part 1 and Annex B of Keeping Children Safe in Education (September 2021);
- Ensure all staff that do not work directly with children have read either Part 1 or Annex A (as appropriate) of Keeping Children Safe in Education (2021);
- 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 schools;
- 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;
- Help to promote educational outcomes of children who have experienced or are experiencing safeguarding or child protection issues by sharing relevant information with teachers and the school leadership team;
- Promote a 'culture of safeguarding', in which every member of the schools community acts in the best interests of the child;
- Regularly meet with the safeguarding link governor and/or Chair of Governors to review safeguarding at the school; and
- Liaise with the headteacher regarding safeguarding cases and issues.

Contact out of school hours:

Croyland Nursery School	**Highfield Nursery School**	**Parklands Nursery School**	**Camrose Early Years Centre**
Jodie Goodwin Senior Family Worker	Jodie Goodwin Senior Family Worker	Lauren Jacques Senior Family Worker	Angie Howes and Diane Berrie - Senior Practitioners
senco@highfield-nur.northants.ecl.gov.uk School: 01933 279 681 Mob: 07904 515482	**senco@highfield-nur.northants.ecl.gov.uk** School: 01933 225 039 Mob: 07904 515482	**senco@parklands-nur.northants.ecl.gov.uk** School: 01604 642118 Mob: 07904 515482	**DBerrie@camrose.northants.sch.uk** **ahowes@camrose.northants.sch.uk** School: 01604 585219 Mob: 07904 515482

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 and neglect;
- 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 policy and procedures with regards to peer on peer abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it;
- will be made aware of the early help process and understand their role in it;
- should be prepared to identify children who may benefit from early help and will discuss early help requirements with the safeguarding lead in the first instance;
- may be required to support social workers and other agencies following a referral;
- will be made aware of the process for making referrals to Children's Social Care (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;
- will receive safeguarding updates throughout the year as part of continuous professional development;
- will be encouraged to contribute to the development of safeguarding policy and practice;
- should always seek advice from the Designated Safeguarding Lead if they are unsure; and
- all teachers should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties (Teaching Standards, 2012).

All staff will be made aware of our systems and documents that support safeguarding, including this policy, the staff code of conduct, the role and identity of the Designated Safeguarding Lead (DSL) and any deputies, the Behaviour Policy and the safeguarding response to children who go missing from education.

All staff that work directly with children will be provided with a copy of, and must read, Part 1 and Annex B of Keeping Children Safe in Education (September 2021) annually and will receive annually updated training on their safeguarding roles and responsibilities. Staff that do not work directly with children will be provided with a copy of either Part 1 of Keeping Children Safe in Education (2021) and must read this document.

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

8.1 All staff

- All staff members will undertake safeguarding and child protection training at induction (including online safety and whistle-blowing procedures) to ensure they understand the 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.

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

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.

8.3 Governors

- All governors receive safeguarding training, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.
- 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 should receive training in managing allegations for this purpose.

8.4 Recruitment – interview panels

At least one person conducting any interview for a post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, KCSIE (2021), and will be in line with local safeguarding procedures.

8.5 Supervision

- All staff who have contact with children and families will have supervision which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.
- Supervision is provided as when requested by staff members as well as planned one to one termly. There are also group supervision sessions planned for teams with at least one a term. Supervision sessions are documented with a copy of notes provided for each staff member. (see Wellbeing Policy)

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);
- domestic abuse;
- fabricated or induced illness;
- faith-based abuse;
- female genital mutilation;
- forced marriage;
- gangs or youth violence;
- gender-based violence;
- hate;
- online safety;
- peer on peer abuse;
- radicalisation;
- relationship abuse;
- serious violence;
- sexual violence or sexual harassment (including peer on peer abuse);
- sexting or sharing of youth produced sexual imagery;
- so-called 'honour-based' abuse;
- trafficking and modern slavery.

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

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

- children in the court system;
- children missing from education;
- children with family members in prison;
- children who are homeless;
- child who have or have had a social worker;
- children who are young carers;
- children looked after or previously looked after; and
- children with mental health problems.

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

If a member of staff, parent or member of the public is concerned about a child'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 peer on peer abuse) and will report any of the following to the Designated Safeguarding Lead immediately;

- any concern or suspicion that a child has sustained an injury outside what is reasonably attributable to normal play;
- any concerning behaviours exhibited by children that may indicated that they have been harmed or are at risk of harm, including unusual changes in mood or behaviour, concerning use of language and/or concerning drawings or stories;
- any significant changes in attendance or punctuality;
- any significant changes in a child's presentation;
- any indicators that a child may be experiencing peer on peer 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 peer on peer abuse (including sexual violence and sexual harassment) can be found at Appendix B.

The following procedures are in line with statutory guidance (see Section 4) and the Northamptonshire Safeguarding Children Partnership's Threshold Guidance (2018)[5]. 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;

[5] **https://www.nctrust.co.uk/help-and-protection-for-children/Documents/NSCB%20Thresholds%20Guidance.pdf**

- make a written record (see Record Keeping); and
- pass the information to the Designated Safeguarding Lead without delay and record on a cause for concern form and alert sheet. With the DSL there will be agreed actions or follow ups from the disclosure. 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.

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 20 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 Thresholds Guidance. If it is decided to make a referral to children's social care the parent will be informed, unless to do so would place the child at further risk or undermine the collection of evidence. 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 early help co-ordinator/s;
- an Early Help Assessment; or
- a referral for statutory services where the child is or might be in need or suffering or likely to suffer significant harm.

9.4 Early help

All staff should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.[6] If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases should be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services if the child's situation does not appear to be improving or is getting worse. Timelines of interventions will be monitored and reviewed.

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

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

- is disabled or has certain health conditions and has specific additional needs;
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- has a mental health need;
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from care or from home;
- is at risk of modern slavery, trafficking, sexual or criminal exploitation;
- is at risk of being radicalised or exploited;
- has a family member in prison, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves;
- has returned home to their family from care;
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
- is a privately fostered child; and
- is persistently absent from education, including persistent absences for part of the school day.

[6] For more information about Early Help, please see: **https://www.nctrust.co.uk/help-and-protection-for-children/protecting-children-information-for-professionals/Pages/early-help.aspx**

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.[7]

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:

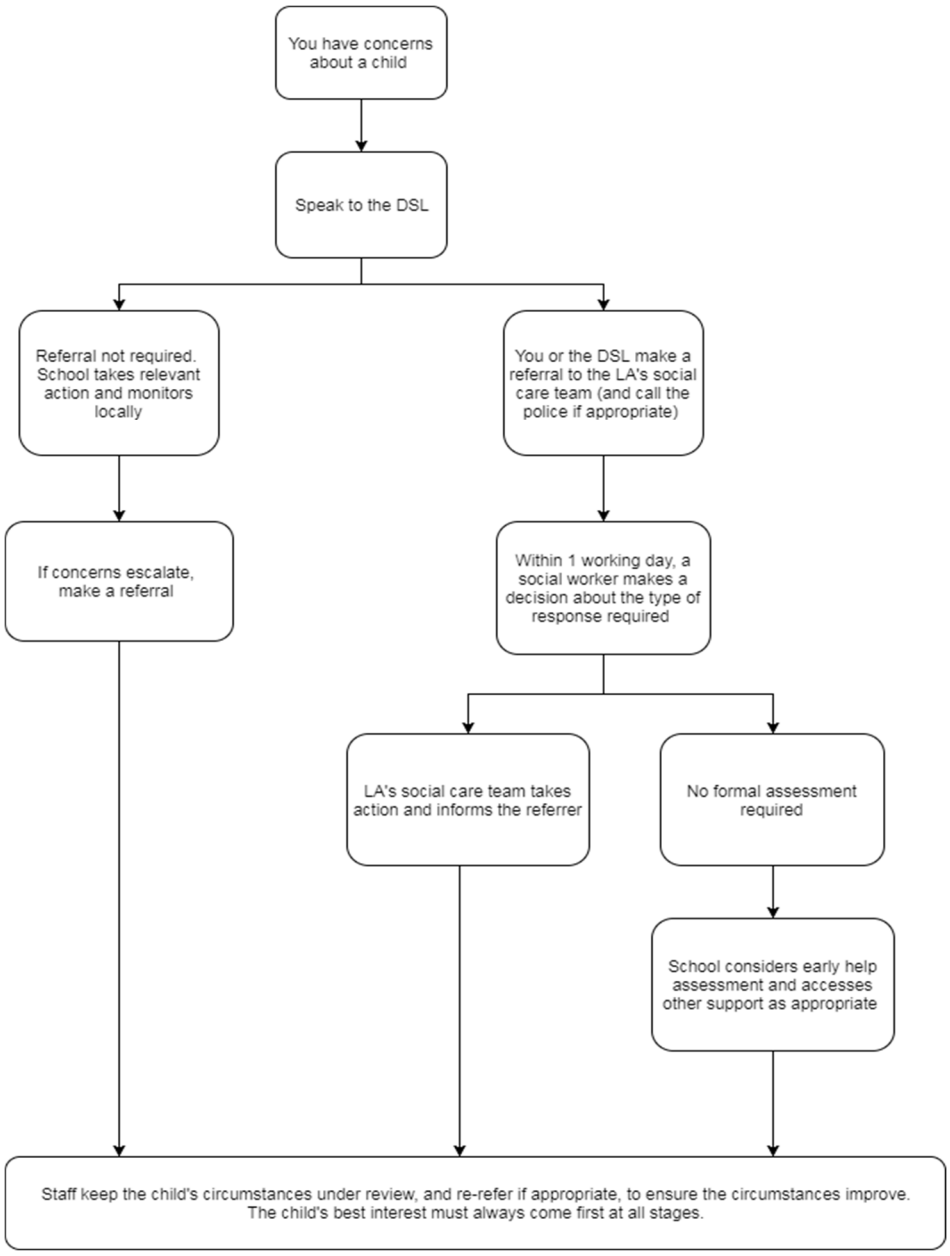
- By telephone contact to the Multi-Agency Safeguarding Hub (MASH): **0300 126 7000** (Option 1).
- By using the online referral form found at: **MASH ONLINE REFERRAL**[8]
- In an emergency outside office hours, contact children's social care out of hours team on 01604 626938 or the Police[9]
- If a child is in immediate danger at any time, left alone or missing, you should contact the police directly and/or an ambulance using 999.

[7] The NSCP Case and Conflict Resolution Protocol can be found here: **http://www.northamptonshirescb.org.uk/schools/case-conflict-resolution-protocol/**

[8] **https://www.nctrust.co.uk/Pages/home.aspx**

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

9.6 Figure 1: Reporting and responding to concerns flowchart



10. Specific safeguarding issues

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

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 child 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 child 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 child is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine children.

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

10.2 Radicalisation and extremism

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

10.3 Children potentially at greater risk of harm

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

The DSL will hold information relating to social workers working with children at the relevant 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 (2021) 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.

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

Termly reviews will be carried out on the children's wellbeing and staff will discuss concerns about children's mental health with agreed actions or interventions of support.

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

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in Section 9.

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

Only appropriately trained professionals should attempt to make a diagnosis of a mental health concern. However, FfCNS Federation and Camrose 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.

Interventions of support for children's mental health is provided across the schools, this includes nurture programmes, or specific individual support from SEND specialist staff.

Senior Family Workers and Special Educational Needs Co-ordinators are available to help identify, support and refer children and parents where there are mental health concerns.

Refer to the Department for Education guidance on **mental health and behaviour in schools**[10] for more information.

10.5 Peer on peer abuse

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

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

In order to ensure that our policy on peer on peer abuse is well-promoted, easily understood and accessible, we have included information about our approach to minimising and responding to peer on peer abuse as an appendix. Full details of how the schools prevent, respond to and support victims of peer on peer abuse can be found at Appendix B.

10.6 Online safety

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

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

- creating a safer online environment – including training requirements, filters and monitoring;
- giving everyone the skills, knowledge and understanding to help children and young people stay safe on-line;
- inspiring safe and responsible use and behaviour;
- safe use of mobile phones both within school and on school trips/outings;
- safe use of camera equipment, including camera phones; 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.

Parents are informed no mobile phone use on any of the schools' sites.

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

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

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

The Special Educational Needs Co-ordinator will ensure regular monitoring of children's welfare and meet termly to review progress with parents.

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

- **Directory of Services for Children with Disabilities: Specialist support for SEND**[11]
- **Northamptonshire's Local Offer: SEND Local Offer**[12]

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

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

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

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

- responding to behaviour absence or missing education where there are known safeguarding risks; and
- the provision of pastoral and/or academic support.

We have contact plans for children with a social worker, and other children who we have safeguarding concerns about, for circumstances where they won't be attending school (for example in a local lockdown during Covid) or they would usually attend but have to self-isolate.

Each child has an individual plan, which sets out

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

[11] **https://www.northamptonshire.gov.uk/councilservices/children-families-education/SEND/specialist-support-for-send/Pages/default.aspx**

[12] **https://www.northamptonshire.gov.uk/councilservices/children-families-education/SEND/local-offer**

We have agreed these plans with children's social care where relevant, and will review them during review meetings with social worker. If we can't make contact, we will contact children's social care or the police.

13. Looked after and previously looked after children

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

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

- We have appointed a designated teacher at each school, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children, in line with statutory guidance.[13]
- The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

Croyland Nursery School	**Highfield Nursery School**	**Parklands Nursery School**	**Camrose Early Years Centre**
Jo Newman	Katie Buchanan	Lauren Jacques	Angie Howes/Diane Berrie

As part of their role, the designated teacher will:

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

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

14. Record-keeping

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

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

- record as soon as possible after the conversation. Use the school cause for concern sheet;
- 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 (Child 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;
- details of how the concern was followed up and resolved; and
- a note of any action taken, decisions reached and the outcome.

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

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

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

15. Relationships, sex and health education (RSHE)

Promoting safeguarding and welfare in the curriculum

Interwoven through the curriculum is the core principle of the 'voice of the child.' Promoting, encouraging and nurturing the child's voice to be heard, whether verbal or nonverbal is key to ensuring we safeguard children.
All aspects of the curriculum topics and planning will focus on developing children's self-worth and value to be listened to and important. This encourages children to recognise their value and the importance and keeping themselves safe and the right to be safe and secure.
Topics and routines within the year covers aspects of health living- healthy minds and healthy bodies- this is right from birth when we role model and promote how to rest, exercise, eat healthy, respect privacy, relax and manage our feelings and emotions.
The curriculum is based on our Image of the Child which focuses on the key characterises we strive for every child which includes, being safe, regulating our emotions, being respectful and fostering positive relationships.

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 code of conduct and Safer Recruitment Consortium document **Guidance for safer working practice for those working with children and young people in education settings (September 2019).**[14]

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/proprietors will help to identify any weakness in the schools' safeguarding systems.

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

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 (2021).

16.1 Staff use of mobile phones

Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when children are not present. Staff members' personal phones will remain in their bags stored in lockers during contact time with children. Staff will not take pictures or recordings of children on their personal phones or cameras. Please see staff code of conduct 2021.

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.

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 (2021) and Northamptonshire Safeguarding Children Partnership guidance. See Appendix E for more details.

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

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

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

Allegations against the headteacher

If an allegation is made against the Headteacher, it must be reported to either Cath Draper-(Chair of Governors, FfCNS Federation) or Toni Oelrich (Chair of Governors, Camrose).

In the event of concerns/allegations about the headteacher, or a situation where there is a conflict of interest in reporting the matter to the headteacher, this should be reported directly to the local authority designated officer(s) (LADOs).

Allegations against staff

If a concern or allegation of abuse arises against any member of staff, supply teacher or volunteer other than the Headteacher, it must be reported to the Headteacher without delay. This includes supply staff, volunteers and anyone working in or on behalf of the school, whether paid or unpaid. Allegations of abuse against staff must be reported to the Headteacher or 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.

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)

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 (2021) and Northamptonshire Safeguarding Children Partnership guidance.

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

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

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

Staff will receive training about what may constitute a low-level concern. More information can be found in Part 4 of KCSIE (2021).

Reporting low level concerns

Low level concerns should be reported to the Headteacher.

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

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 for a period of at least 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.

The Headteacher 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

18.1 Complaints against staff

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

18.2 Other complaints

Parents can make complaints following the Schools Complaints Policy- displayed on the school website and in each school. The Policy outlines the three stages of reporting a complaint including the option to refer a complaint to Ofsted.

18.3 Whistle-blowing

FfCNS Federation and Camrose encourage individuals to come forward with genuine concerns in the knowledge that they will be taken seriously. The schools recognise that the decision to report a concern can be a difficult one to make. No individual will be victimised, harassed or treated unfairly for raising a genuine concern under this policy. This means that the continued employment and opportunities for future promotion or training of the worker will not be prejudiced because he/she has raised a genuine concern. The Whistleblowing Policy outlines how to report concerns of poor or unsafe practice and the procedures followed to manage these. See Whistleblowing Policy 2020.

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

Please see Room Hire Policy:

If an external organisation enquires for use of the premises, a meeting with the School Business Manager (SBM) would be held to decide upon whether the non-school activities are deemed appropriate and identifying any risks or safety measures required.

Applicants would complete the form attached to the Policy and risk assessments completed by the SBM before consideration.

If the room hire is confirmed, further stages and checks (including health and safety and safeguarding procedures) would be completed before use starts. See Room Hire Policy 2019.

20. Policy implementation, monitoring and review

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

Appendix A: Public health emergency (COVID-19) arrangements

COVID-19: outbreak management plan

FOUNDATIONS FOR CHILDREN NURSERY SCHOOLS FEDERATION & CAMROSE EARLY YEARS CENTRE

This plan is based on the **contingency framework for managing local outbreaks** of COVID-19 and the **schools operational guidance**, provided by the Department for Education (DfE).

We will only implement some, or all, of the measures in this plan in response to recommendations provided by our local authority (LA), directors of public health (DsPH), Public Health England (PHE) health protection team or the national government.

It may be necessary to implement these measures in the following circumstances, for example:

- To help manage a COVID-19 outbreak within the school. Actions will be considered when either of the following thresholds are met:

- There are 5 positive cases amongst children or staff who are likely to have mixed closely within a 10-day period
- 10% of children or staff who are likely to have mixed closely test positive within a 10-day period

- If COVID-19 infection rates in the community are extremely high, and other measures have failed to reduce transmission
- As part of a package of measures responding to a 'variant of concern' (VoC)
- To prevent unsustainable pressure on the NHS.

When one of the thresholds above is met, we will review the testing, hygiene and ventilation measures already in place.

We will also seek public health advice from a director of public health or health protection team. The School Business Manager in each school will be responsible for seeking this advice, and will do so by telephoning the DfE helpline (0800 046 8687)

3. Shielding

We will adhere to national guidance on the reintroduction of shielding, which would apply to those on the **shielded patient list (SPL)**.

We will speak to individuals required to shield about additional protective measures in school or arrangements for home working or learning.

4. Other measures

Parents, carers, children and staff will be informed promptly about the introduction of control measures. This will be done via email, text messaging service and letters sent home with children once a decision has been made.

If recommended, we will limit:

- Educational visits
- Open days
- Transition or taster days
- Parents coming into school
- Live performances

If recommended, we will (re)introduce:

- Bubbles, to reduce mixing between groups
- Face coverings in communal areas and classrooms for staff and visitors (unless exempt)

5. Attendance restrictions

Attendance restrictions will only be recommended as a last resort. If recommended, we will implement the measures in this section.

5.1 Eligibility to remain in school

If restrictions are recommended, we will stay open for:

- Vulnerable children
- Children of critical workers

5.2 Education and support for children at home

All other children will be required to stay at home and will receive remote education.

We will aim to deliver remote education that meets the same quality and quantity of education that children would receive in school through virtual experiences and home learning resources.

5.4 Safeguarding

We will review our child protection policy to make sure it reflects the local restrictions and remains effective.

We will aim to have a trained DSL or deputy DSL on site wherever possible.

If our DSL (or deputy) can't be on site, they can be contacted remotely by details outlined in the Safeguarding Policy

If our DSL (or deputy) is unavailable, we will share a DSL with another school in the Federation(Croyland, Highfield, Parklands) or with Camrose. Their DSL can be contacted at:

Croyland Nursery School, Wellingborough 01933 279681

Highfield Nursery School, Wellingborough: 01933 225039

Parklands Nursery School, Northampton 01604 642118

Camrose Early Years Centre, Northampton 01604 585219

On occasions where there is no DSL or deputy on site, a senior leader will take responsibility for co-ordinating safeguarding on site.

When vulnerable children are absent, we will:

- Speak to parents/carers and, where applicable, social workers and the local authority, to work out the reason for absence
- Encourage attendance
- Make sure vulnerable children can access appropriate education and support while at home
- Maintain contact, and check regularly that the child is able to access remote education provision

Roles and Responsibilities for managing outbreak:

1. Seeking advice from Public Heath or Heath Protection Team or self-isolation service hub: School Business Manager (SBM)
2. Co-ordinating communication with parents: Admin as instructed by SBM
3. Co-ordinating communication with staff and managing staff deployment: Deputy Head or Senior Leads
4. Co-ordinating home learning and attendance of eligible: Executive Head, Deputy, Senior Leads
5. Co-ordinating safeguarding and vulnerable children: Designated Safeguarding Lead for School:

   (Croyland and Highfield- Jodie Goodwin, Parklands- Lauren Jacques, Camrose- Diane Berrie and Angie Howes)

All settings should seek public health advice if a child, student, child or staff member is admitted to hospital with COVID-19. They can do this by phoning the DfE helpline (0800 046 8687, option 1), or in line with other local arrangements. Hospitalisation could indicate increased severity of illness or a new variant of concern. Settings may be offered public health support in managing risk assessments and communicating with staff and parents.

For all cases relating to staff, please also see the guidance for workplaces: NHS Test and Trace in the workplace. Employers should call the Self-Isolation Service Hub on 0203 743 6715 as soon as they are made aware that any of their workers have tested positive.

If cases amongst staff mean a setting meets the threshold, described above, employers will need to provide the 8-digit NHS Test and Trace Account ID (sometimes referred to as a CTAS number) of the person who tested positive, alongside the names of co-workers identified as close contacts.

This will ensure that all workplace contacts are registered with NHS Test and Trace and can receive the necessary public health advice, including the support available to help people to self-isolate.

Appendix B: Peer on peer (child on child) abuse

Peer on peer 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 peer on peer abuse, it does not mean that it is not happening. We support and encourage anyone – especially our children – to come forward to share any concerns about peer on peer abuse so that we can take action to keep all children safe.

Peer on peer abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nudes and semi nude images and or videos (also known as sexting or youth produced sexual imagery);
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).[15]

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

[15] Keeping Children Safe in Education (2021)

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 peer on peer abuse in order to identify it and respond appropriately to reports. All staff will be made aware of the schools' procedures with regards to peer on peer 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 peer on peer abuse

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

- have a robust behaviour policy, which makes it clear that we have a zero tolerance approach to any kind of peer on peer abuse;
- ensure staff understand what is meant by peer on peer abuse and the school policy on peer on peer abuse through regular training and team meetings focused on behaviour management
- train staff thoroughly so that they challenge inappropriate behaviour (even if it appears to be relatively innocuous);
- train staff thoroughly so that they are confident to challenge inappropriate behaviours between peers, that are actually abusive in nature;
- never downplay certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys", as this can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it; and
- recognise that sexual harassment and sexual violence, as well as other forms of peer on peer abuse, may be happening even if they are not reported.

Additional Vulnerabilities

We recognise that some children may be more vulnerable to peer on peer 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 peer on peer abuse than other children. We recognise that girls are more likely to be the victims of peer on peer 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 identifying our most vulnerable children, monitoring them closely and ensuring we provide appropriate interventions and support either though the curriculum, the family support workers, or the SENCO.

How to report concerns

Our children

If a young person witnesses or experiences any form of peer on peer abuse, we strongly encourage them to speak to a trusted member of staff, parent or trusted adult about it.

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 peer on peer 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:

- Disclose concerns to their trusted key workers

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

In the event that a child reports or discloses peer on peer 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 peer on peer 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 children 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 peer on peer 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 children. Any concerns should be reported to the Designated Safeguarding Lead, using the details on the front page of this policy.

Wider concerns

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

What happens when an allegation of peer on peer abuse is made?

We will adhere to Keeping Children Safe in Education (2021) and the DfE guidance document 'Sexual violence and sexual harassment between children in schools and colleges' (2021)

(where applicable) when responding to incidents of peer on peer abuse. The school takes peer on peer abuse seriously and will respond to all concerns or disclosures of peer on peer abuse, including those that have occurred outside of school and online, immediately.

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

Our starting point regarding any report of peer on peer 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 and an unsafe environment for children.

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

The Designated Safeguarding Lead will always consider the following;

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

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

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

- Make a report to the police.
- Liaise with specialist services.

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

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

Within the Nursery Schools all staff will be vigilant to any signs of peer on peer abuse or disclosures of concerns from parents or older siblings, and follow the appropriate steps to safeguard the child.

More information about these options in relation to sexual violence and sexual harassment can be found in Part 5 of KCSIE (2021).

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 peer on peer abuse

The school recognises that peer on peer 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 peer on peer abuse whilst investigation is taking place and following the initial response. Support will continue for as long as it is needed and will be reviewed regularly to ensure the victim is receiving appropriate care. The school will do everything we can to maintain the victim's normal routine. 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 peer on peer abuse moves to a new setting, the Designated Safeguarding Lead will share the necessary information to ensure that support for the child continues.

How we will support alleged perpetrators and perpetrators of peer on peer abuse

We have a responsibility to safeguard and support all children. We will adhere to KCSIE (2021) when managing reports of peer on peer 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 peer on peer abuse may be being abused themselves. The school will continue to safeguard the alleged perpetrator and provide them with support.

Local Safeguarding Arrangements and making referrals

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

Parents

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

Whole school response

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

Appendix C: Types of abuse

This appendix is based on the advice in Annex B of Keeping Children Safe in Education 2021

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

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

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

Emotional abuse may involve:

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

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

The activities may involve:

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

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

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

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

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

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

Children missing from education

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

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

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

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. We will always follow up with parents/carers when children 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.

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

Indicators of CCE can include a child:

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

Within our Nursery Schools staff may suspect a parent or an older sibling of CCE. 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.
Within our Nursery Schools staff may suspect a parent or an older sibling as part of a gang or organised criminal 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 or a family member is involved in or at risk of serious violent crime, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

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

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

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

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

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

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

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

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

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

In order to keep children safe on the way to and from school we include safety education, information for parents on our website and school displays. Reminders are communicated on how to keep children safe in and around the site.

The Family Support Workers identify families that may need additional support with keeping children safe.

In order to keep children safe at school we follow the legal ratios to ensure all children are adequately supervised and kept safe. The keyworker approach ensures children remain safe with trusted keyworkers. Key contacts are kept securely, along with details of legal parent rights. Doors remain secure at all times apart from the beginning and end of sessions, when children are supervised by a staff member who is familiar with all parents and children before allowing entrance or exit.

Procedures are in place for details of unsafe family members that cannot access the school site.

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 offer early help and will refer to children's social care if we think a child is suffering or is at risk of suffering harm.

Staff in the Nursery Schools will be vigilant of older siblings and other family members that may be involved in cyber crime.

Domestic abuse
Domestic Abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological; physical; sexual; financial; and emotional.
All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

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

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

All information sharing and resulting actions will be undertaken in accordance with the **'NSCP Protocol for Domestic Abuse – Notifications to Schools'**. We will record this information and store this information in accordance with the record keeping procedures outlined in this policy.

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

Homelessness
Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL [and deputy/deputies] will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).
Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

So-called 'honour-based' abuse (including FGM and forced marriage)
So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.
Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.
All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

Female Genital Mutilation
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 child is at risk of FGM.
Indicators that FGM has already occurred include:

- A child confiding in a professional that FGM has taken place

- A mother/family member disclosing that FGM has been carried out
- A family/child 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 child may be at risk of FGM include:

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

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

Forced marriage

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

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

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

The DSL will:

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

Private Fostering

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

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

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

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

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

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

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

Preventing radicalisation

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

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

Terrorism is an action that:

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

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause. Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

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

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

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

Staff will be alert to changes in childrens' behaviour. The government website **Educate Against Hate**[16] and charity **NSPCC**[17] say that signs that a child 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

[16] **https://educateagainsthate.com/signs-of-radicalisation/**

[17] **https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/protecting-children-from-radicalisation/**

- 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 child, they will follow our procedures set out in Section 9 of this policy, including discussing their concerns with the DSL. Staff should always take action if they are worried.
Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures, including **our curriculum policy and behaviour policy.**

Missing children
Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will:
Contact Police and parents immediately.
After event record all factual information of the events and report to Ofsted and NNC/WNC.
See link to North Northamptonshire Council/West Northamptonshire Council procedures for Children Missing Education[18]

Non-collection of children
If a child is not collected at the end of the session/day, we will:
Contact parents on the emergency contacts.
Arrange appropriate care of the child by familiar keyperson
After one hour of no contact- we may try and visit the home (two staff members)
After one hour of no contact- contact MASH/Police.
Record all factual events of incident on cause for concern form.

[18] **https://www.northamptonshire.gov.uk/councilservices/children-families-education/schools-and-education/information-for-school-staff/child-support-and-inclusion/attendance-and-behaviour/Pages/children.aspx**

Appendix D: Safer recruitment

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

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

Pre-appointment safer recruitment

We will include the following in all job advertisements:

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

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

All applicants will be provided with:

- **a copy of the school's Safeguarding and child protection policy, refer to the Safer recruitment policy on the website and a copy of the Code of Conduct.**

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 (2021).

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.

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);
- 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 or college consider appropriate;
- verify professional qualifications, as appropriate; and
- ensure that an applicant to be employed to carry out teaching work is not subject to a prohibition order.
- Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the Secretary of State.

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

Existing staff

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

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

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

Agency and third-party staff

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

Contractors

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

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children
- We will obtain the DBS check for self-employed contractors.
- We will not keep copies of such checks for longer than 6 months.
- Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.
- We will check the identity of all contractors and their staff on arrival at the school.

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

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

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity.
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity.
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment.
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Governors

- All governors will have an enhanced DBS check without barred list information.
- They will have an enhanced DBS check with barred list information if working in regulated activity.
- All governors will also have a section 128 check (as a section 128 direction disqualifies an individual from being a maintained school governor).

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

Checking the identity and suitability of visitors

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

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification. Visitors are expected to sign the visitors' book and wear a visitor's badge.

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

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise children or staff.

Appendix E: 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 or volunteer, has:

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

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

We will deal with any allegation of abuse against a member of staff or volunteer 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 an HR 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.
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the local authority.

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 practicably possible after contacting the police).
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies.
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate.
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details.
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation.
- **If it is decided that further action is needed**, take steps as agreed with the designated

officer to initiate the appropriate action in school and/or liaise with the police and/or Children's Social Care services as appropriate.

- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. The named representative would be a member of management of the FfCNS Federation or Camrose not linked to the case and will offer support and signposting for further counselling.
- 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**.**

All schools continue with:

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

Additional considerations for supply staff

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

We will never cease to use a supply teacher for safeguarding reasons without first finding out the facts and liaising with the Local Authority Designated Officer to reach a suitable outcome. The Headteacher 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 child(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 child.

Confidentiality
The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.
The case manager will take advice from the local authority's designated officer, police and children's social care services, as appropriate, to agree:

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

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

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

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

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

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

Learning lessons
After any cases where the allegations are *substantiated*, we will review the circumstances of the case with the local authority's designated officer to determine whether there are any

improvements that we can make to the school's procedures or practice to help prevent similar events in the future.
This will include consideration of (as applicable):

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

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

The Chair of Governors for the schools are:

Cath Draper	Foundations for Children Nursery Schools Federation CONTACT NUMBER: 07716 759212
Toni Oelrich	Camrose Early Years Centre CONTACT NUMBER: 07833 247529

In the absence of the Chair of Governors, the Vice Chair should be contacted. The Vice Chairs for the schools are:

Abigail Mosley	Foundations for Children Nursery Schools Federation CONTACT NUMBER: 07712 584581
Jenny Conroy	Camrose Early Years Centre CONTACT NUMBER: 07507 161442

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 F: Online Safety

Teaching children 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 safety, to protect and educate children, 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 PSED;
- 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. 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, homophobia, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- **contact**: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention of grooming or exploiting them for sexual, criminal, financial or other purposes.
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams.

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

Filtering and monitoring

In order to keep children safe when using school IT equipment, we ensure all devices have appropriate filtering systems updated and children are supervised when using devices. Staff will only access educational websites and report any concerns to the School Business Manager for investigation.

Staff devices are outlined in the Acceptable Use Policy to ensure staff follow appropriate measure for using devices safely.

How to report online safety concerns

If children, 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 at the front of this policy.

Regular review of our approach to online safety

We recognise that technology, and the risks and harms related to it evolves 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 that children face. This is informed by local and national training and regular updates.

More information

For more information about online safety, please see Annex D of Keeping Children Safe in Education (2021).