



Northampton School *for Boys*

Child Protection & Safeguarding Policy

Approved by:

Governor Welfare Committee

Date:

September 2021

Review Date: September 2022

CHILD PROTECTION & SAFEGUARDING POLICY

The protection of students from harm is a responsibility shared between Statutory and Voluntary agencies with the principles established by the Children Act 1989 and Children Act 2004 and Keeping Children safe in Education September 2020 being applied. Certain parts of these Acts and Statutory Guidance affect schools and details are given below:

1. The school has a statutory duty to promote and safeguard the welfare of all its students.
2. The school has a duty to protect and support any student who is subjected to suspected or proven abuse.
3. All matters involving the possibility of child abuse will be taken seriously.
4. All personnel will familiarise themselves with the types and symptoms of child abuse.
5. Staff must be in no doubt what action to take if there is any reason to believe that child abuse is or may be occurring.
6. If doubt exists as to whether or not a case falls into the child abuse sphere, advice may be obtained from the teacher designated to co-ordinate all child abuse information. The Designated Senior Leaders (DSLs) at this time are Mr M Kneeshaw & Mr C Armstrong. In Mr Kneeshaw's absence Mr C Armstrong should be contacted. The Child Protection Governor is Mrs Morcea Walker.

SPONSOR: Governors' Welfare Committee

DATE: September 2021

If you would like a copy of the full Child Protection & Safeguarding Policy and Procedures, please contact Mr M Kneeshaw or Mr C Armstrong through the School office.

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Northampton School *for Boys* fully recognises its responsibilities for child protection and safeguarding.

Our policy applies to all staff, governors and volunteers working in the school.

1. Principles

- The school will ensure that the welfare of children is given paramount consideration when developing and delivering all school activity
- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection
- All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm in accordance with this guidance
- All pupils and staff involved in child protection issues will receive appropriate support from the senior management of the school who will follow this policy guidance in doing so

Aims

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- To provide all staff with the necessary information to enable them to meet their statutory responsibilities to promote and safeguard the wellbeing of children
- To ensure consistent good practice across the school
- Staff are properly trained in recognising and reporting safeguarding issues

To demonstrate the school's commitment with regard to safeguarding children

We recognise that because of the day to day contact with students, school staff are well placed to observe the outward signs of abuse. The school will therefore:

- Establish and maintain an environment where students feel secure, are encouraged to talk, and are listened to.
- Ensure students know that there are adults in the school whom they can approach if they are worried.
- Include opportunities in Citizenship & Guidance curriculum for students to develop the skills they need to recognise and stay safe from abuse.

- Recognise that each student’s welfare is of paramount importance and that some students may be especially vulnerable to abuse e.g. those with SEND, those living in adverse circumstances etc.

2. Legislation and Guidance

This policy is based on the Department for Education’s statutory guidance Keeping Children Safe in Education (2021) and Working Together to Safeguard Children (2018), and the Governance Handbook. We comply with this guidance and the arrangements agreed and published by our local safeguarding partners.

This policy is also based on the following legislation:

- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what ‘regulated activity’ is in relation to children
- Statutory guidance on the Prevent duty, which explains schools’ duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- Safeguarding Children and Safer Recruitment in Education (DFeS 2007)
- Working together to Safeguard Children (DCSF 2010)
- What to do if you are worried a child is being abused (DFeS 2006)
- This policy also complies with our funding agreement and articles of association.

We will follow the procedures set out by the West Northamptonshire Safeguarding Children Board and take account of guidance issued by the Department for Education to:

- Ensure we have a designated senior leader for child protection and support team to facilitate best practice who have received appropriate training and support for this role (Mr M Kneeshaw as DSL; Mr C Armstrong as Deputy DSL and Ms I Farkas as a DSL CP coordinator; a team of Deputy DSLs and EHA coordinators).
- Ensure every member of staff (including temporary and supply staff and volunteers) and governing body know the name of the Designated Senior Leaders responsible for child protection and their role.
- Ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse and responsibility for referring any concerns to the Designated Senior Leaders responsible for child protection.
- The Governing Body access “Governors’ responsibilities for safeguarding children in Education” and the Key for School Governors guidance.

- Ensure all staff undertake full safeguarding/child protection training every 2 years; update training on a minimum yearly basis and new staff have induction training to equip them to carry out their responsibilities.
- Notify social services if there is an unexplained absence of more than two days of a student who is subject to a Child Protection Plan.
- Develop effective links with relevant agencies and co-operate as required with their enquiries regarding child protection matters including attendance at case conferences.
- Keep written records of concerns about students, even where there is no need to refer the matter immediately.
- Ensure all records are kept securely; separate from the main student file, and in locked locations.
- Develop and then follow procedures where an allegation is made against a member of staff or volunteer.
- Ensure safe recruitment practices are always followed.

3. Definitions

Safeguarding and promoting the welfare of children means:

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

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

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

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

Children includes everyone under the age of 18.

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

Children includes everyone under the age of 18.

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

- The local authority (West Northamptonshire County Council LA)
- A clinical commissioning group for an area within the LA (Northampton General Hospital NHS Trust)
- The chief officer of police for a police area in the LA area (Nick Adderley)

4. Equality statement

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

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities or health conditions (see appendix)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers

5. Roles and responsibilities

Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

The school

will endeavour to support the student through:

- The content of the curriculum.
- The school ethos which promotes a positive, supportive and secure environment and gives students a sense of being valued.
- The school behaviour policy which is aimed at supporting vulnerable students in the school. The school will ensure that the student knows that some behaviour is unacceptable but they are valued and not to be blamed for any abuse which has occurred.
- Liaison with other agencies that support the pupil such as Social Services, Child and Adolescent Mental Health Service, Education Entitlement Team and Educational Psychology Service.
- Ensuring that, where a student on the child protection register leaves, their information is transferred to the new school immediately and that the child's social worker is informed.

All Staff:

Staff who work directly with children are expected to read at least part 1 of Keeping Children Safe in Education (KCSIE).

All staff will read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually.

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

Training and update sessions are provided to staff throughout a year in a variety of formats.

All staff will be aware of:

- Our systems which support safeguarding, including the staff code of conduct, the role of the designated safeguarding lead (DSL), the behaviour policy, and the safeguarding response to children who go missing from education
- The early help process (sometimes known as Early Help Assessment) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as CSE or FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as peer-on-peer abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe

The Designated Safeguarding Leader (DSL)

The school has nominated a senior member of staff to coordinate child protection arrangements and the DSL has responsibility for child protection and wider safeguarding requirements.

The DSL is Matt Kneeshaw, Deputy Headteacher with Craig Armstrong, Assistant Headteacher as Deputy DSL and Ilona Farkas, ESD Leader as Child Protection Co-ordinator. Year Team Leaders are also all trained as 'other' Deputy DSLs operating within the team.

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

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly

The DSL will also keep the headteacher informed of any issues and liaise with local authority case managers and designated officers for child protection concerns as appropriate.

The school has ensured that the Designated Senior Leader:

- is appropriately trained

- acts as a source of support and expertise to the school community
- has an understanding of the Safeguarding Children Board procedures
- keeps written records of all concerns when noted and reported by staff or when disclosed by a child, ensuring that such records are stored securely and reported onward in accordance with this policy guidance, but kept separately from the child's general file
- refers cases of suspected neglect and/or abuse to children's social care or police in accordance with this guidance and local procedure (see below at footnote)
- notifies children's social care if a child with a child protection plan is absent for more than two days without explanation
- ensures that when a child with a child protection plan leaves the school, their information is passed to their new school and the child's social worker is informed
- attends and/or contributes to child protection conferences in accordance with local procedure and guidance
- coordinates the school's contribution to child protection plans
- develops effective links with relevant statutory and voluntary agencies
- ensures that all staff sign to indicate that they have read and understood this policy
- ensures that the child protection policy is updated annually
- liaises with the nominated governor and head teacher (where the role is not carried out by the head teacher) as appropriate
- keeps a record of staff attendance at child protection training
- makes this policy available to parents.

The deputy designated leader(s) is/are appropriately trained and, in the absence of the designated leader, carries out those functions necessary to ensure the ongoing safety and protection of children. In the event of the long-term absence of the designated person, the deputy will assume all of the functions above.

The governing body ensures that the school has:

The governing board will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation
- Appoint a senior board level (or equivalent) lead [or, link governor] to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL
- The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate (see appendix 3).
- **All welfare governors will read Keeping Children Safe in Education in its entirety.**

The Headmaster

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

- Ensuring that the safeguarding and child protection policy and procedures are implemented and followed by all staff as part of their induction and through ongoing training

- Communicating this policy to parents when their child joins the school and via the school website
- Allocating sufficient time and resources to enable the DSL and deputy to carry out their roles effectively, including the assessment of pupils and attendance at strategy discussions and other necessary meetings
- Ensuring that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the school's whistle blowing procedures
- Ensuring that child's safety and welfare is addressed through the curriculum.
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)

6. Confidentiality

Northampton School *for Boys* has regard to issues about Information Sharing. Personal information about children and families held by the school should not normally be disclosed without the consent of the subject. The law permits, however, the disclosure of confidential information necessary to safeguard the child or act in their best interests.

The Multi Agency Safeguarding Hub has direct access to timely information through the DSL co-ordinator during the day and out of hours DSL contact in the evenings.

Staff guidance below directs staff to make a child aware that they cannot promise they will not tell anyone as this may not be in the child's best interests

The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe

If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk

Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests

Concern or anxiety about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children

The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information

If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy)

Confidentiality is also addressed in this policy with respect to record-keeping, and allegations of abuse against staff.

7. Recognising abuse and taking action

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

Teachers, volunteers and governors in school are well placed to observe any physical, emotional or behavioural signs which indicate that a child may be suffering significant harm. The relationships between staff, volunteers and governors, students, parents and the public which foster respect, confidence and trust can lead to disclosures of abuse, and/or school staff being alerted to concerns.

- All concerns regarding any pupils will be discussed with a Designated Senior Leader (or a Deputy DSL in the absence of the DSL) prior to any action being taken
- All concerns must also be recorded
- An internal email should be sent to the account called '**child protection**' safeguarding@nsb.northants.sch.uk
- You will receive a response notice within an hour

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

If at school, contact the DSL immediately if the child is in immediate danger or at risk of significant harm. The DSL will then make a referral to children's social care and/or the police immediately.

If out of school contact the MASH help desk by phone. Anyone can make a referral. Then inform the DSL by telephone and email (contact details in appendixes)

If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions. Tell / Explain / Describe (TED)
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care through MASH and/or the police directly, and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.

Serious Violent Crime

Staff need to know the indicators that may signal that children are at risk from, or are involved with, serious violent crime. Including:

- Unexplained gifts/new possessions – these can indicate children have been approached by/involved with individuals associated with criminal networks/gangs
- Increased absence from school
- Change in friendship/relationships with others/groups
- Significant decline in performance
- Signs of self-harm/significant change in wellbeing
- Signs of assault/unexplained injuries

Staff should also be aware of the associated risks and understand the measures in place to manage them. Training in each September and advice from DSLs will give clarification to this.

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

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

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

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

Any teacher who either:

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

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

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children’s social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a pupil under 18 must speak to the DSL and follow our local safeguarding procedures. The duty for teachers mentioned above does not apply in cases where a pupil is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

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

If you have concerns about a child (as opposed to a child being in immediate danger)

- Where possible, speak to the DSL first to agree a course of action. Alternatively, make a referral to local authority children’s social care directly (MASH)
- You can also contact the charity NSPCC on 0808 800 5000 if you need advice on the appropriate action.

Early help

If early help is appropriate, the DSL will support you in liaising with other agencies and setting up an inter-agency assessment as appropriate.

The DSL co-ordinator will keep the case under constant review and the school will consider a referral to local authority children’s social care if the situation does not seem to be improving.

Timelines of interventions will be monitored and reviewed.

Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will nominate a Designated Leader who will make the referral or support you to do so.

If you make a referral directly you must tell the DSL as soon as possible.

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 (MASH) 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 contact the local authority and make sure the case is reconsidered to ensure the concerns have been addressed and the child's situation improves.

If you have concerns about extremism

If a child is not at immediate risk of harm, where possible, speak to the DSL first to agree a course of action.

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

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

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk.

Note that this is not for use in emergency situations.

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

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

Alternatively, make a referral to local authority children's social care directly if appropriate (see 'Referral' above).

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

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, that school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

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

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

Figure 1: procedure if you have concerns about a child's welfare (no immediate danger)



Concerns about a staff member or volunteer (See appendix 3)

If you have concerns about a member of staff or volunteer, speak to the headmaster. If you have concerns about the headmaster, speak to the chair of governors. You can also discuss any concerns about any staff member or volunteer with the DSL.

The headmaster/chair of governors/DSL will then follow the procedures set out in appendix 3, if appropriate.

The DSL (or chair of governors, in the case of a concern about the headmaster) will also inform the designated officer for the local authority.

Abuse of trust

All school staff are aware that inappropriate behaviour towards children is unacceptable and that their conduct towards all children must be beyond reproach.

In addition, staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the school staff and a child under 18 may be a criminal offence, even if that child is over the age of consent.

Special consideration includes the provision of safeguarding information, resources and support services in community languages and accessible formats.

Support for those involved in a child protection issue.

Child neglect and abuse is devastating for the child and can also result in distress and anxiety for staff who become involved. We will support the children and their families and staff by:

- taking all suspicions and disclosures seriously
- nominating a link person who will keep all parties informed and be the central point of contact. Where a member of staff is the subject of an allegation made by a child, a separate link person will be nominated to avoid any conflict of interest
- responding sympathetically to any request from a child or member of staff for time out to deal with distress or anxiety
- maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies
- storing records securely
- offering details of help lines, counselling or other avenues of external support
- following the procedures laid down in our whistle blowing, complaints and disciplinary procedures
- cooperating fully with relevant statutory agencies.

Complaints procedure in respect of poor practice behaviour

Our school complaints procedure will be followed where a child or parent raises a concern about poor practice towards a child that initially does not reach the threshold for child protection action.

Complaints from staff are dealt with under the school's complaints and disciplinary and grievance procedures.

Allegations of abuse made against other pupils – Peer on Peer Abuse (Appendix 10)

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

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

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

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

- You must tell the DSL and record the allegation, but do not investigate it
- The DSL will contact the local authority children’s social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved – both the victim(s) and the child(ren) against whom the allegation has been made – with a named person they can talk to if needed
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

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

- Challenging any form of derogatory or sexualised language or behaviour
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensuring pupils know they can talk to staff confidentially by arranging a meeting with a DSL
- Ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

Ensure staff are trained to understand:

- How to recognise the indicators and signs of peer-on-peer abuse, and know how to identify it and respond to reports
- That even if there are no reports of peer-on-peer abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
- That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:

Children can show signs or act in ways they hope adults will notice and react to

- A friend may make a report
- A member of staff may overhear a conversation
- A child’s behaviour might indicate that something is wrong
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation

- That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing peer-on-peer abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns

8. Notifying parents

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

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

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

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

9. Online safety and mobile technology

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

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

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

- Content – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism
- Contact – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as 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

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

Educate pupils about online safety as part of our curriculum. For example:

- The safe use of social media, the internet and technology

- Keeping personal information private
- How to recognise unacceptable behaviour online
- How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim

Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training once each academic year

Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety

Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:

- Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
- Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Pupils, parents/carers, staff, volunteers and governors aware through various media that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- The Behaviour Policy outlines sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Staff, pupils and parents/carers should be aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation
- There is a robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems

We carry out an annual review of our approach to online safety that considers and reflects the risks faced by our school community

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

This is a suggested approach based on guidance from the UK Council for Internet Safety for all staff and for DSLs and senior leaders. Amend or add to this as applicable to reflect your own approach.

Your responsibilities when responding to an incident

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

You must not:

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

- Say or do anything to blame or shame any young people involved
- You should explain that you need to report the incident and reassure the pupil(s) that they will receive support and help from the DSL.

Initial review meeting

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

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

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

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

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

Further review by the DSL

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

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

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

Informing parents/carers

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

Referring to the police.

If it is necessary to refer an incident to the police, this will be done through [insert details of your existing arrangements, e.g. a safer schools officer, a police community support officer, local neighbourhood police, dialling 101].

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded.

Curriculum coverage

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our relationships and sex education within our PSHE framework. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

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

Pupils also learn the strategies and skills needed to manage:

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

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

10. Complaints and concerns about school safeguarding practices

Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).

Whistleblowing

What is whistleblowing? A whistle-blower is a person who raises a genuine concern. Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

- child protection and/or safeguarding concerns;

For reference on whistleblowing see personnel policy page 194

11. Record Keeping

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

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

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.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.

Records are kept both electronically and as paper in some cases (see below). These are held securely and archived by the DSL Coordinator. All information should be given to a DSL who can ensure they are stored appropriately. Any formal documentation will be kept and archived for 25 years.

Any other material will be kept in line with GDPR

In addition:

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks
- Appendix 3&4 sets out our policy on record-keeping with respect to allegations of abuse made against staff

And:

The Designated Senior Leader should ensure that:

- Accurate records are kept and clearly distinguish between observation, fact, opinion and hypothesis. All records will be signed and dated, any information given will be recorded verbatim, where possible, and a note made of the location and description of any injuries seen. (Appendix 5 – sample “Cause for Concern” form).
- All safeguarding/child protection documents are retained in a “Child Protection/Safeguarding” file, separate from the child’s main file. This will be kept securely and only accessible to the Headmaster and Designated Senior Leaders.
- These records will be copied and the copy transferred to any school or setting the child moves to, clearly marked “Child Protection/Confidential, for attention of Designated Senior Leader for Child Protection”. The sending and receiving of files should be evidenced. The original file should be kept by the establishment.
- When details of the receiving establishment are not known by the DSL, we follow the “Missing Child” procedure. If the child is subject to a Child Protection Plan the Social Worker is informed and arrangements must be made to transfer the files.
- When admitting a new pupil where there is existing child protection records that have not been passed on, these records must be chased within a reasonable timescale.

12. Training & Recruitment

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures, to ensure they understand the school’s safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from our local safeguarding children board.

All staff sign to confirm they have received a copy of the child protection policy

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

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

Safer recruitment

Our school endeavours to ensure that we do our utmost to employ 'safe' staff by following the guidance in Keeping Children Safe in Education (KCSiE) 2021 together with the school's individual procedures.

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

Safer recruitment means that all applicants will be required to undertake at least the following tasks:

- complete an application form
- provide two referees, including at least one who can comment on the applicant's suitability to work with children
- provide evidence of identity and qualifications
- provide evidence of their right to work in the UK and be mentally and physically able to undertake the role
- be checked through the DBS as appropriate to their role and also be checked against the barred list
- be interviewed

The DSL and [deputy/deputies]

The DSL and [deputy/deputies] 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.

Governors

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

13. Monitoring arrangements

This policy will be reviewed annually by Mr M Kneeshaw, DSL. At every review, it will be approved by the full governing board.

SPONSOR: Governors' Welfare Committee

Matt Kneeshaw Deputy Headteacher, Pastoral

APPENDIX 1

Types of Abuse

Definitions

As in the Children Acts 1989 and 2004, and the new guidance on child protection 'Keeping children safe in Education 2015', a child is anyone who has not yet reached his/her 18th birthday.

Harm means ill-treatment or impairment of health or development, including, for example, impairment suffered from seeing or hearing the ill-treatment of another; Development means physical, intellectual, emotional, social or behavioural development; Health includes physical and mental health; Ill-treatment includes sexual abuse and other forms of ill-treatment which are not physical.

Abuse and Neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm or failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting; by those known to them, or, more rarely, by a stranger. They may be abused by an adult or adults or another child or children.

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.

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 (e.g. rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, or 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.

Emotional Abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or "making fun" of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying (including cyber-bullying) causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

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 and clothing, 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); or
- ensure access to appropriate medical care or treatment
- it may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Child Sexual Exploitation (CSE) Sexual exploitation of children and young people (under 18) involves exploitative situations, contexts and relationships where the young person receives something (e.g. food, money, drink, drugs etc.) as a result of them performing on another, or others performing on them, sexual activities. Risk indicators of CSE are:

- exclusion/ not engaged in school/ unexplained absences from school
- disclosure of sexual/ physical assault followed by withdrawal of allegation
- expressions of despair (self-harm, overdose, eating disorder, challenging behaviour, aggression)
- STI's, pregnancy and termination
- Substance misuse
- Unexplained injuries
- Associating with other young people involved in exploitation
- Displaying inappropriate sexualised behaviour
- Criminal behaviour
- Periods of going missing overnight or for longer
- Entering/ leaving vehicles driven by unknown adults
- Older 'boyfriend'/ relationship with controlling adult
- Unexplained amounts of money, expensive clothing or other items.

Female Genital Mutilation (FGM) – (further information available in Appendix 7 below)

FGM is classed as a form of child abuse in the UK. As with other types of abuse, therefore it needs to be treated as a serious child protection issue by schools. Risk indicators are:

- Anxiety leading up to holidays
- Talk of a 'special ceremony'
- Extended absences
- Psychological effects and Physical signs

APPENDIX 2

Safer recruitment and DBS checks

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.

The recruitment steps outlined below are based on part 3 of Keeping Children Safe in Education.

Appointing new staff

Advertising

When advertising roles, we will make clear:

- Our school's commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

Application forms

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)

Shortlisting

- Our shortlisting process will involve at least 2 people and will:
- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns

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

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

Seeking references and checking employment history

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

When seeking references we will:

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

Interview and selection

When interviewing candidates, we will:

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

Pre-appointment vetting checks

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

New staff

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

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

- For all staff, including teaching positions: criminal records checks for overseas applicants
- For teaching positions: obtaining a letter of professional standing from the professional regulating authority in the country where the applicant has worked
- ***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***

Regulated activity means a person who will be:

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

Existing staff

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

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more
- We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:
- We believe the individual has engaged in relevant conduct; or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

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

Contractors

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

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 12 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

Trainee/student teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

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

From our own Teaching School documentation will be provided for all students in line with SCITT safeguarding guidance on initial teacher training and child protection and safeguarding.

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
- Obtain an enhanced DBS check without barred list information for all volunteers who are not in regulated activity, but who have an opportunity to come into contact with children on a regular basis, for example, supervised volunteers
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check for any volunteers not engaging in regulated activity

Governors

- All governors and trustees will have an enhanced DBS check without barred list information
- They will have an enhanced DBS check with barred list information if working in regulated activity.
- The chair of the board will have their DBS check countersigned by the secretary of state.
- All proprietors, trustees, local governors and members will also have the following checks:
- A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008). *[Section 128 checks are only required for local governors if they have retained or been delegated any management responsibilities.]*

Adults who supervise pupils on work experience

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

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

Pupils staying with host families

Due to the risk thresholds and requirements of overseas schools and authorities Northampton School *for Boys* has made the decision to discontinue staying with host families in line with the requirements in Keeping Children Safer in Education September 2018.

APPENDIX 3

This section is based on ‘Section 1: Allegations that may meet the harms threshold’ in part 4 of Keeping Children Safe in Education (2021).

Allegations against people who work with children

All school staff should take care not to place themselves in a vulnerable position with a child (*Ref. Headteacher in line with national guidance*)

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

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school

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

A ‘case manager’ will lead any investigation. This will be the headteacher, deputy headteacher or the chair of governors where the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

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

Managing Allegations

Northampton School *for Boys* will follow the (West Northamptonshire Safeguarding Children Board Inter-Agency Procedure

All allegations are taken seriously and investigated properly and in line with agreed procedures.

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

Suspension of the accused until the case is resolved

Suspension of the accused 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 there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

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

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

If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

Initial Action

- The person who has received an allegation or witnessed an incident will immediately inform the Headteacher (Mr. R Bernard) and DSL (Mr. M Kneeshaw) and make a record. (If the person receiving information or witnessing an incident is from an external service or agency then they should also notify their own line manager.)
- In the event that an allegation is made against the Headteacher the matter will be reported to the Chair of Governors who will proceed as the "Headteacher"
- The Headteacher will take steps, where necessary, to secure the immediate safety of children and attend to any urgent medical needs
- The member of staff will not be approached at this stage unless it is necessary in order to address the immediate safety of children
- The Headteacher may need to clarify any information regarding the allegation; however, no person will be interviewed at this stage.

Initial Consideration

The Headteacher and/or DSL will have an initial consultation with operational Local Authority Designated Officer (Formerly known as LADO)

For referrals regarding adults in education:

Contact Details

Designated Officer Administrator - 01604 364031

Designated Officer Andy Smith - 01604 367862

Designated Officer Christine York - 01604 362633

- Consideration will be given throughout to the support and information needs of pupils, parents and members of staff
- The Headteacher will liaise with the Chair of Governors

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)

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 consider what other support is appropriate. At Northampton School for Boys we

have designated counselling provision and advice through our DSL team. Trade Union representation is also available through school based representatives.

- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

If the 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 National College for Teaching and Leadership.

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.

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

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the school's personnel adviser will discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If 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 NCTL to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

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

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

Unsubstantiated or malicious allegations

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

Confidentiality

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

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

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

Record-keeping

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

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

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as

described in section 1 of this appendix, we will refer it to the designated officer at the local authority

- Retained at least until the individual leaves employment at the school

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. We will retain these 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.

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

APPENDIX 4

Specific safeguarding issues

Children missing from education (CME)

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
- 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. This includes informing the local authority through the Education Inclusion Partnership Team (EIPT) 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 the Northamptonshire Safeguarding Children Board and EIPT 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, through the Multi Agency Safeguarding Hub (MASH) if the child is in immediate danger or at risk of harm.
- The new safeguarding partners and child death review partner arrangements are now in place with the LA

Senior leadership team, DSL and governing board should be aware of and follow these new local arrangements – this includes:

- Local authority (LA)
- Clinical commissioning group within the LA
- Chief office of police within the LA

Further information available through Northamptonshire Safeguarding Children Partnership – Local Safeguarding Arrangements on the web

Child sexual exploitation (see appendix 8)

Child sexual exploitation (CSE) is a form of sexual abuse where children are sexually exploited for money, power or status.

This can involve violent, humiliating and degrading sexual assaults, but does not always involve physical contact and can 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.

Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

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 criminal exploitation

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

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

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

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

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

So-called ‘honour-based’ abuse (including FGM and forced marriage)

So-called ‘honour-based’ abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

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

FGM (see appendix 7)

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

Section 7 of this policy and appendix 7 sets out recognition guidance and the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Forced marriage

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

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

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

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority’s designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fm@fco.gov.uk
- Refer the pupil to an education officer (EIPT), AIT mentor, Year Team Leader, or school counsellor, as appropriate

Domestic abuse

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.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home.

Older children may also experience domestic abuse and/or violence in their own personal relationships.

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

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day.

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.

Peer-on-peer abuse

Peer-on-peer abuse is when children abuse other children. This type of abuse can take place inside and outside of school and online.

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

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between peers
- 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 nudes images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

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

If staff have any concerns about peer-on-peer abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

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

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

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

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

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

Staff should be aware of the importance of:

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

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

Serious violence

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

- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing

- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

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

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

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

Preventing radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. 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.

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 children board and local police force.

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

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

Staff will be alert to changes in pupils' behaviour.

The government website Educate Against Hate and charity NSPCC say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use

- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will follow our procedures set out in section 7 of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

Checking the identity and suitability of visitors

All visitors to the school sign in and out through our online system in reception and if not named on the Single Central Record are considered as guests that must be accompanied and supervised at all times. All visitors will be required to verify their identity to the satisfaction of trained reception staff.

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 if required.

Visitors are expected to sign the visitors' INVENTORY system and wear a visitor's badge.

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

Non-collection of children

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

Contact emergency contact numbers in order of preference stated through data collection. Any child repeatedly left uncollected would initiate a meeting with family and possible referral to EIPT and Social Services through MASH.

Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will:

Contact the Local Authority - EIPT through the online referral form. Contact will also be made immediately to the police and details of the Child Missing from Education (CME) will be shared with each agency.

APPENDIX 5

Northampton School for Boys
SAFEGUARDING CHILDREN IN EDUCATION

PUPIL WELFARE - CHILD PROTECTION

Pupil's Name: _____

Form: _____

Date: _____

Time: _____

Areas of Concern (Person Reporting)

Member of Staff: _____

Signed: _____

Advice Given /Actions Taken (DL)

Referral to NSCB / MASH contacted / EHA / no action (give details)

Member of Staff: _____

Signed:

Passed to Designated Senior Leader – Name: _____

Date: _____

Shared with Parent/Carer/Other professional? Y/N

Date: _____ Time: _____

Actions Taken / Follow Up by DSL or DL

Referral to NSCB and MASH contacted / EHA / no action (give details)

Signed: _____

Date: _____ Time: _____

APPENDIX 6

Staff Confirmation Slip

Child Protection Policy and Procedures

Please sign below to confirm that you have read and understood the information contained within this documentation.

Once signed, this sheet should be returned to the Head Teacher's PA.

Name :

I have read and understood Northampton School *for Boy's* Child Protection & Safeguarding Policy and Appendices including aspects on CSE, FGM and Peer on Peer abuse and understand the procedures.

Date :

Signature :

APPENDIX 7

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 occurs mainly in Africa and to a lesser extent, in the Middle East and Asia. Although it is believed by many to be a religious issue, it is a cultural practice. There are no health benefits.

Communities particularly affected by FGM in the UK include girls from: Somalia, Kenya, Ethiopia, Sierra Leone, Sudan, Egypt, Nigeria, Eritrea, Yemen, Indonesia and Afghanistan.

In the UK, FGM tends to occur in areas with larger populations of communities who practise FGM, such as first-generation immigrants, refugees and asylum seekers. These areas include: London, Cardiff, Manchester, Sheffield, Northampton, Birmingham, Oxford, Crawley, Reading, Slough and Milton Keynes.

In England and Wales, 23,000 girls under 15 could be at risk of FGM.

Key Points:

- Not a religious practice
- Occurs mostly to girls aged from 5 – 8 years old; but up to around 15
- Criminal offence in UK since 1985
- Offence since 2003 to take girls abroad
- Criminal penalties include up to 14 years in prison

Reasons for this cultural practice include:

- Cultural identity – An initiation into womanhood
- Gender Identity – Moving from girl to woman – enhancing femininity
- Sexual control – reduce the woman's desire for sex
- Hygiene/cleanliness – un mutilated women are regarded as unclean

Risk Factors include:

- low level of integration into UK society
- mother or sister who has undergone FGM
- girls who are withdrawn from PSHE
- a visiting female elder from the country of origin
- being taken on a long holiday to the family's country of origin

- talk about a ‘special’ event or procedure to ‘become a woman’

High Risk Time

This procedure often takes place in the summer, as the recovery period after FGM can be 6 to 9 weeks. Schools should be alert to the possibility of FGM as a reason why a girl in a high risk group is absent from school or where the family request an ‘authorised absence’ for just before or just after the summer school holidays.

Although, it is difficult to identify girls before FGM takes place, where girls from these high risk groups return from a long period of absence with symptoms of FGM, advice should be sought from the police or social services.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues

A girl:

- Having difficulty walking, sitting or standing, or looking uncomfortable
- Finding it hard to sit still for long periods of time (where this was not a problem previously)
- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Having frequent urinary, menstrual or stomach problems
- Avoiding physical exercise or missing PE
- Being repeatedly absent from school, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

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

- The girl’s family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl’s community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues

A girl:

- Having a mother, older sibling or cousin who has undergone FGM
- Having limited level of integration within UK society
- Confiding to a professional that she is to have a “special procedure” or to attend a special occasion to “become a woman”
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM

- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
- Being unexpectedly absent from school
- Having sections missing from her ‘red book’ (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

Longer Term problems include:

- difficulties urinating or incontinence
- frequent or chronic vaginal, pelvic or urinary infections
- menstrual problems
- kidney damage and possible failure
- cysts and abscesses
- pain when having sex
- infertility
- complications during pregnancy and childbirth
- emotional and mental health problems

APPENDIX 8

Child Sexual Exploitation

The Government deplors the sexual exploitation of children, and will not tolerate failure at any level to prevent harm, support victims and bring offenders to justice.

* *Tackling Child Sexual Exploitation, March 2015, page 3.*

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE). Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males; abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

* *Keeping Children Safe in Education Sept 2021, statutory guidance.*

There can be a significant age gap between the young person and the perpetrator, though this is not always the case. Any young person is at risk of CSE, regardless of age, race, cultural background. Incidents of Child Sexual Exploitation involving peers is rising statistically.

Child Sexual Exploitation is a form of child abuse. This appendix must be read in conjunction with the schools Child Protection & Safeguarding policy. Any concerns about a child must be responded to urgently following the procedures outlined in the policy.

In keeping with statutory guidance, no child under 13 years can be assessed as low risk if behaviours indicate involvement in CSE.

Guidance for DSLs if CSE is reported

- Complete the online assessment which is referred to in the section above.
- Contact the MASH.
- If a young person discloses and there is evidence to suggest that a crime has been or may have been committed against them, contact the police and report the crime noting the incident number for future reference.

- Send in a referral to social care following the procedures in the Thresholds and Pathways document. Attach the completed CSE Toolkit as supporting evidence to the referral form itself and submit them electronically.

Upon a concern about CSE being raised in relation to a child or young person by a staff member in school or a member of the public, DSLs will need to complete the following actions as soon as possible and within 2 hours:

- speak with the child/young person if appropriate
- complete the online CSE assessment
- contact the MASH and, if needed, Northants police
- submit a referral into social care with the completed toolkit - attached

If a child or young person goes missing at any point during this process, the MASH and the Police must be contacted immediately and the Missing protocols must be followed which can be found at:

<https://www3.northamptonshire.gov.uk/councilservices/children-families-education/schools-and-education/information-for-school-staff/pupil-support-and-inclusion/attendance-and-behaviour/Pages/children.aspx>

E-Safety and sexual exploitation

All young people are at risk of online grooming which could result in sexual exploitation. We will ensure that our e-safety procedures are robust and that pupils are taught online safety skills so they know:

- online risks
- how to recognise unsafe online contact
- to be confident to report any concerns about themselves or others to staff in school staff.

The school is aware that pupils with the following vulnerabilities are more at risk of being sexually exploited:

- Children and young people who have been excluded
- Children and young people recorded as Missing Education
- Children and young people with Special Educational Needs
- Children and young people in Care of the Local Authority (LAC)
- Poverty and deprivation
- Previous sexual, physical and/or emotional abuse
- Familial and community offending patterns
- Prevalence of undiagnosed mental health problems/ Family History of Mental Health difficulties.
- Family History of Abuse or Neglect
- Family History of Domestic Abuse
- Family History of Substance Misuse
- Breakdown of Family Relationships
- Low Self-Esteem
- Children frequently missing from home

Possible Warning Signs/Risk Indicators

The school is aware that children are groomed in different ways. The following can indicate or signify if children are being groomed or being sexually exploited:

- Being secretive or withdrawn.
- Being hostile or physically aggressive in their relationship with parents/carers and other family members.
- Associating/developing relationship of a sexual nature with a significantly older man or a woman.
- Having money, mobile phones, clothes, jewellery or other items not given by parents/carers.
- Changing physical appearance - new clothes, more make-up.
- Being defensive about where they have been and what they've been doing.
- Having increasing health-related problems.
- Staying out late and/or going missing.
- Returning home after long intervals but appearing to be well cared for.
- Becoming disruptive or using abusive language.
- Getting involved in petty crime.
- Volatile behaviour.
- Having marks or scars on their body which they try to conceal by refusing to undress or uncover parts of their body.
- Having a mobile phone at school, or additional/new mobile phones.
- Expressions of despair (self-harm, overdose, onset of disordered eating, challenging behaviour, aggression, appearing drunk or under the influence of drugs, suicidal tendencies, looking tired or ill, sleeping during the day.)
- Use of the internet that causes concern.
- Isolated from peers and social networks; not mixing with their usual friends.
- Lack of positive relationship with a protective, nurturing adult.
- Exclusion and/or unexplained absences from school or not engaged in education or training.

Other Significant risk indicators

- Periods of going missing overnight or longer.
- Older 'boyfriend/girlfriend' or relationship with a controlling adult.
- Physical or emotional abuse by that 'boyfriend/girlfriend' or controlling adult.
- Entering and/or leaving vehicles driven by unknown adults.
- Unexplained amounts of money, expensive clothing or other items.
- Physical injury without plausible explanation.

APPENDIX 9

TAKING ACTION TO ENSURE THAT CHILDREN ARE SAFE AT SCHOOL AND AT HOME AND THE MANAGEMENT OF REFERRALS TO CHILDREN AND YOUNG PEOPLE'S SERVICE SOCIAL CARE

It is **not** the responsibility of the school staff to investigate concerns or to determine the truth of any disclosure or allegation.

1. Staff will immediately report to the DSL:

- any suspicion that a child is injured, marked, or bruised in a way which is not readily attributable to the normal knocks or scrapes received in play and could be evidence of serious violence (Sept 2020)
- any explanation for injury given which appears inconsistent or suspicious
- any behaviours which give rise to suspicions that a child may have suffered harm (e.g. worrying drawings or play)
- any concerns that a child may be suffering from inadequate care, ill treatment, or emotional maltreatment
- any concerns that a child is presenting signs or symptoms of abuse or neglect
- any significant changes in a child's presentation, including non-attendance
- any hint or disclosure of abuse from any person
- any concerns regarding person(s) who may pose a risk to children (e.g. living in a household with children present)

2. Responding to Disclosure:

Disclosures or information may be received from pupils, parents or other members of the public. Northampton School *for Boys* recognises that those who disclose such information may do so with difficulty, having chosen carefully to whom they will speak. Accordingly, all staff will handle disclosures with sensitivity.

Such information cannot remain confidential and staff will immediately communicate what they have been told to the Designated Senior Leader and make a contemporaneous record.

Staff will:

- listen to and take seriously any disclosure or information that a child may be at risk of harm and ensure that the child knows staff cannot keep secrets
- not investigate
- try to ensure that the child disclosing does not have to speak to another member of school staff
- clarify the information
- try to keep questions to a minimum and of an "open nature e.g. "Tell me", "Explain" and "Describe" (TED) rather than "Did x hit you?"
- try not to show signs of shock, horror or surprise
- not express feelings or judgements regarding any person alleged to have harmed the child
- explain sensitively to the child that the senior designated person will have to be informed
- reassure and support as far as possible and be honest
- explain that only those who "need to know" will be told

- explain what will happen next and that the child will be involved as appropriate

3. Action by the Designated Senior Leader or other Deputy Designated Safeguarding Lead in their absence – Main Procedural Steps

- Begin a case file for pupils where there are concerns, with an overview chronology, which will hold a record of communications and actions. This must be stored securely (see Section on Records and Monitoring).
- Where initial enquiries do not justify a referral to the investigating agencies inform the initiating adult and monitor the situation. If in doubt, seek advice from the Multi-Agency Safeguarding Hub: 0300 126 1000.
- Share information confidentially with those who need to know.
- Where there is a child protection concern requiring immediate, same day, intervention from Children’s Social Care (Priority 1), the Multi-Agency Safeguarding Hub (MASH) should be contacted immediately by phone. Written confirmation should follow within 24 hours on the Local Agency Referral Form. All other referrals should be made firstly through a telephone conversation with the Multi-Agency Safeguarding Hub and then by following up with the online form, where requested to do so. The Multi-Agency Safeguarding Hub is available for advice on the advice line number given in the contact details on page 3 of this document.
- If it appears that urgent medical attention is required arrange for the child to be taken to hospital (normally this means calling an ambulance) accompanied by a member of staff who must inform medical staff that non-accidental injury is suspected. Parents must be informed that the child has been taken to hospital.
- Exceptional circumstances: If it is feared that the child might be at immediate risk on leaving school, take advice from the Multi-Agency Safeguarding Hub (for instance about difficulties if the school day has ended, or on whether to contact the police). Remain with the child until the Social Worker or Police take responsibility. If in these circumstances a parent arrives to collect the child, the member of staff has no right to withhold the child, unless there are current legal restrictions in force (e.g. a restraining order). If there are clear signs of physical risk or threat, the Multi-Agency Safeguarding Hub should be updated and the Police should be contacted immediately.

The DSL will also consider:

- wherever possible, to talk to parents, unless to do so may place a child at risk of significant harm, impede any police investigation and/or place the member of staff or others at risk. It is important that the potential impact upon outcomes for children is borne in mind when judgements are made about when it is or is not appropriate to share concerns with parents/carers).
- that reasons for NOT notifying parents before making a referral or concerns about doing so will be discussed with the MASH and recorded.

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

- By telephone contact to the Multi-Agency Safeguarding Hub: 0300 126 1000;
- By e-mail to: MASH@northamptonshire.gcsx.gov.uk
- In an emergency outside office hours, by contacting the Emergency Duty Team or the Police.
- If a child is in immediate danger at any time, left alone or missing, you should contact the police directly and/or an ambulance using 999.

Multi-Agency Safeguarding Hub (M.A.S.H)

The Multi-Agency Safeguarding Hub (MASH) deals with referrals from professionals and members of the public who may have concerns about a child's welfare following contact with the helpline that is now also based in the Multi-Agency Safeguarding Hub. It makes the process of dealing with referrals quicker and more effective by improving the way county council: Children's social care, Northamptonshire Fire and Rescue Service (NFRS), Youth Offending Service (YOS) and education, work alongside other partner agency colleagues including Northamptonshire police, Northamptonshire health partners, National Probation Service, and the East Midlands Ambulance Service (EMAS) to share information.

Out of Hours 01604 626938

All referrals will be followed up by using the Inter-Agency Referral Form within 1 working day : northamptonshirecb.org.uk

The DSL may decide:

- not to make a referral at this stage
- that further monitoring is necessary
- that an assessment of need is required and/or make a referral for other services.

Children and young people are supported most effectively when services are planned and delivered in a co-ordinated way to offer integrated support across the continuum of needs and services (www.northamptonshire.gov.uk "Thresholds and Pathways"). A matrix of vulnerability is included in this guidance.

All information and actions taken, including the reasons for any decisions made, will be fully documented.

4. Action following a child protection referral

The Designated Senior Leader or other appropriate member of staff will:

- make regular contact with M.A.S.H. for outcome of referral
- wherever possible, contribute to any Strategy Discussion (STRAT)
- provide a report for, attend and contribute to any subsequent Child Protection Conference
- if the child or children become subject to a Child Protection Plan, contribute to the Plan and attend Core Group Meetings and Review Child Protection Conferences
- where possible, share all reports with parents prior to meetings
- where there is disagreement with a decision made e.g. not to apply Child Protection Procedures or not to convene a Child Protection Conference, attempts should be made to address issues via line management
- where a child is subject to a Child Protection Plan and moves from the school or goes missing, immediately inform the key worker in Social Care and Education Inclusion Partnership Team (EIPT)

5. Supporting the Child and Partnership with Parents

- School recognises that the child's welfare is paramount, however good child protection/safeguarding practice and outcome relies on a positive, open and honest working partnership with parents.

- Whilst we may, on occasion, need to make referrals without consultation with parents, we will make every effort to maintain a positive working relationship with them whilst fulfilling our duties to protect any child. The impact on outcomes for children must be borne in mind when making any decisions about discussing concerns with parents/carers.
- We acknowledge that lack of parental consent should not be a barrier to services for children.
- We will provide a secure, caring, supportive and protective relationship for the child.
- Children will be given a proper explanation (appropriate to age and understanding) of what action is being taken on their behalf and why.
- We will endeavour always to preserve the privacy, dignity and right to confidentiality of the child and parents. The Designated Senior Leader will determine which members of staff “need to know” personal information and what they “need to know” for the purpose of supporting and protecting the child and themselves.

For cases involving children of a more complex set of issues the following further steps are in place to support the child.

For adults linked to children who also demonstrate vulnerability:

Safeguarding Vulnerable Adults

Any concerns relating to vulnerable adults: contact Adult Care Team

Email adultcare@northamptonshire.gov.uk

Call 01604 362900

Tiered response in safeguarding

Level of Need Identified	Further assessment required	Referral/action/support
Level 1: Universal	No additional assessment needed.	Child, young person or family directed to relevant universal services for advice/support.
Level 2: Early Help	If a single clear issue or area of need identified – Early Help Assessment (EHA) may not be necessary.	Offer support yourself or direct to relevant universal or early help support service for relevant support.
	If a number of issues or needs at Level 2 are identified, an EHA must be undertaken.	Contact the Early Help Support Service: www.northamptonshire.gov.uk/earlyhelpsupportservice Based on results of Early Help Assessment – access appropriate early help service/s. Establish Team around the Family (TAF) meeting.
Level 3: Targeted Response	If an Early Help Assessment has already been done, new information should be sent to the services already involved, to update the EHA.	Contact the Early Help Support Service: www.northamptonshire.gov.uk/earlyhelpsupportservice and then feed any new information to the lead professional handling the EHA.
	If not already done, an EHA must be undertaken.	Contact the Early Help Support Service: www.northamptonshire.gov.uk/earlyhelpsupportservice Appropriate support to be accessed by lead

		professional.
Level 4: Specialist/Statutory	Likely that an EHA has been done but if not the EHA process should not be used at this point and referral should not be delayed.	Immediate referral should be made to the Multi Agency Safeguarding Hub (MASH): www.northamptonshire.gov.uk/MASH

APPENDIX 10

Peer on Peer Abuse

Introduction Keeping Children Safe in Education, 2019 and updates for September 2020 state that ‘Governing bodies and proprietors must ensure their child protection policy includes procedures to minimise the risk of peer on peer abuse and sets out how allegations of peer on peer abuse will be investigated and dealt with’

Purpose and Aim

Children and young people may be harmful to one another in a number of ways which would be classified as peer on peer abuse. The purpose of this appendix is to explore the many forms of peer on peer abuse and include a planned and supportive response to the issues.

Introduction to abuse and harmful behaviour

Abusive behaviour can happen to pupils in schools and settings and it is necessary to consider what abuse is and looks like, how it can be managed and what appropriate support and intervention can be put in place to meet the needs of the individual and what preventative strategies may be put in place to reduce further risk of harm. Abuse is abuse and should never be tolerated or passed off as ‘banter’ or ‘part of growing up’.

Equally, abuse issues can sometimes be gender specific and it is more likely that girls will be victims and boys will be perpetrators however there will be many examples where boys are also victims e.g. boys being subject to initiation/hazing type violence

It is important to consider the forms abuse may take and the subsequent actions required.

Types of abuse

There are many forms of abuse that may occur between peers and this list is not exhaustive. Each form of abuse or prejudiced behaviour is described in detail followed by advice and support on actions to be taken

Physical abuse

Physical abuse may include, hitting, kicking, nipping, shaking, biting, hair pulling, or otherwise causing physical harm to another person. There may be many reasons why a child harms another and it is important to understand why a young person has engaged in such behaviour, including accidentally before considering the action or punishment to be undertaken.

Sexually harmful behaviour/sexual abuse

Sexually harmful behaviour from young people is not always contrived or with the intent to harm others. There may be many reasons why a young person engages in sexually harmful behaviour and it may be just as distressing to the young person who instigates it as well as the young person it is intended towards. Sexually harmful behaviour may range from inappropriate sexual language, inappropriate role play, to sexually touching another or sexual assault/abuse.

Bullying

Bullying is unwanted, aggressive behaviour among school aged children that involves a real or perceived power imbalance. The behaviour is repeated, or has the potential to be repeated, over time. Both young people who are bullied and who bully others may have serious, lasting problems. In order to be considered bullying, the behaviour must be aggressive and include:

- An Imbalance of Power: Young people who bully use their power—such as physical strength, access to embarrassing information, or popularity—to control or harm others. Power imbalances can change over time and in different situations, even if they involve the same people.

- Repetition: Bullying behaviours happen more than once or have the potential to happen more than once. Bullying includes actions such as making threats, spreading rumours, attacking someone physically or verbally or for a particular reason e.g. size, hair colour, gender, sexual orientation, and excluding someone from a group on purpose.

Cyber bullying

Cyberbullying is the use of phones, instant messaging, e-mail, chat rooms or social networking sites such as Snapchat, Instagram and Twitter to harass threaten or intimidate someone for the same reasons as stated above. It is important to state that cyber bullying can very easily fall into criminal behaviour under the Malicious Communications Act 1988 under section 1 which states that electronic communications which are indecent or grossly offensive, convey a threat or false information or demonstrate that there is an intention to cause distress or anxiety to the victim would be deemed to be criminal. This is also supported by the Communications Act 2003, Section 127 which states that electronic communications which are grossly offensive or indecent, obscene or menacing, or false, used again for the purpose of causing annoyance, inconvenience or needless anxiety to another could also be deemed to be criminal behaviour. If the behaviour involves the use of taking or distributing indecent images of young people under the age of 18 then this is also a criminal offence under the Sexual Offences Act 2003. Outside of the immediate support young people may require in these instances, the school will have no choice but to involve the police to investigate these situations.

Sexting

Sexting is when someone sends or receives a sexually explicit text, image or video. This includes sending 'nude pics', 'rude pics' or 'nude selfies'. Pressuring someone into sending a nude picture can happen in any relationship and to anyone, whatever their age, gender or sexual preference. However, once the image is taken and sent, the sender has lost control of the image and these images could end up anywhere. By having in their possession, or distributing, indecent images of a person under 18 on to someone else, young people are not even aware that they could be breaking the law as stated as these are offences under the Sexual Offences Act 2003.

Upskirting

This is now a criminal offence. Upskirting is typically when a photograph is taken under a person's clothing without them knowing, for sexual gratification or to cause the victim humiliation, distress or alarm.

Initiation/Hazing

Hazing is a form of initiation ceremony which is used to induct newcomers into an organisation such as a private school, sports team etc. There are a number of different forms, from relatively mild rituals to severe and sometimes violent ceremonies. The idea behind this practice is that it welcomes newcomers by subjecting them to a series of trials which promote a bond between them. After the hazing is over, the newcomers also have something in common with older members of the organisation, because they all experienced it as part of a rite of passage. Many rituals involve humiliation, embarrassment, abuse, and harassment.

Prejudiced Behaviour

The term prejudice-related bullying refers to a range of hurtful behaviour, physical or emotional or both, which causes someone to feel powerless, worthless, excluded or marginalised, and which is connected with prejudices around belonging, identity and equality in wider society – in particular, prejudices to do with disabilities and special educational needs, ethnic, cultural and religious backgrounds, gender, home life, (for example in relation

to issues of care, parental occupation, poverty and social class) and sexual identity (homosexual, bisexual, transsexual).

Expected action taken from all staff

Although the type of abuse may have a varying effect on the victim and initiator of the harm, these simple steps can help clarify the situation and establish the facts before deciding the consequences for those involved in perpetrating harm.

It is important to deal with a situation of peer abuse immediately and sensitively. It is necessary to gather the information as soon as possible to get the true facts around what has occurred as soon after the child(ren) may have forgotten.

It is equally important to deal with it sensitively and think about the language used and the impact of that language on both the children and the parents when they become involved. For example; do not use the word perpetrator, this can quickly create a 'blame' culture and leave a child labelled. In all cases of peer on peer abuse it is necessary that all staff are trained in dealing with such incidents, talking to young people and instigating immediate support in a calm and consistent manner.

Staff should not be prejudiced, judgemental, dismissive or irresponsible in dealing with such sensitive matters.

Gather the Facts

Speak to all the young people involved separately, gain a statement of facts from them and use consistent language and open questions for each account. The easiest way to do this is not to have a line of questioning but to ask the young people to tell you what happened. Only interrupt the young person from this to gain clarity with open questions, 'where, when, why, who'. (What happened? Who observed the incident? What was seen? What was heard? Did anyone intervene?)

Consider the Intent (begin to Risk Assess) Has this been a deliberate or contrived situation for a young person to be able to harm another?

Decide on your next course of action

If from the information that you gather you believe any young person to be at risk of significant harm you must make an internal safeguarding referral to child protection who will contact social care through the MASH helpdesk (where a crime has been committed the police should be involved also).

If this is the case, once social care has been contacted and made a decision on what will happen next then the school and yourself will be informed on your next steps. If social care and the police intend to pursue this further they may ask to interview the young people in school or they may ask for parents to come to school to be spoken to also. It is important to be prepared for every situation and the potential time it may take. It may also be that social care feel that it does not meet their criteria in which case you may challenge that decision, with that individual or their line manager. If on discussion however, you agree with the decision, you may then be left to inform parents.

Points to consider:

Where did the incident or incidents take place?

What was the explanation by all children involved of what occurred?

What is each of the children's own understanding of what occurred?

Repetition?

In most cases the DSLs and Child Protection team will plan support for the child that has been harmed and intervention where required for the child that has displayed harmful behaviour. These will often for the latter fall in line with the behaviour policy.

APPENDIX 11

Pupils with special educational needs, disabilities or health issues

We recognise that pupils with special educational needs (SEN) or disabilities or certain health conditions 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 condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges

We offer extra pastoral support for these pupils. This includes:

- Support available through the Additional Intervention Team during all unstructured times
- A safe space in G3
- All students with medical conditions have a dedicated AIT staff member and support from supporting LA organisations
- A personal support worker highlighted at the beginning of Y7 who remains in regular contact throughout their time at school and is monitored and supported by SENCo and DSL
- 2 SEMH support mentors
- 2 ASD mentors
- A physical difficulties specialist
- An HI and VI Mentor
-

Pupils with a social worker

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

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

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

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support

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, Craig Armstrong, Assistant Headteacher who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

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

SICKNESS ABSENCE AND SICK PAY

This policy applies to employees of the Academy only. It does not form part of any employee's terms and conditions of employment and is not intended to have any contractual effect. The Academy reserves the right to amend this policy at any time.

Sickness absence notification and certification requirements

Teaching Staff

For absences not known in advance, the following steps should normally be taken when informing absence and upon returning to work after an absence.

Teaching staff are required to contact the person responsible for arranging cover **and** the Head of Department before 7.30am on the first day of absence, informing him or her of:

- the fact of their sickness absence;
- the reasons for it;
- its expected duration; and
- the action the employee is intending to take e.g. visiting their G.P, seeking advice from a pharmacist etc.

When informing the person responsible for arranging cover **and** the Head of Department of their absence, teaching staff should also provide work to be carried out in their classes. The person responsible for arranging cover **and** the Head of Department will then ensure that work is either handed over to the cover supervisor/supply teacher or place it on the teacher's desk where cover is to be carried out.

Teaching staff must contact the [the person responsible for arranging cover **and** the Head of Department] on each day of absence to ensure that appropriate work is being set for the classes. The [the person responsible for arranging cover **and** the Head of Department] will ensure that all absences in the employee's department have been covered.

In exceptional circumstances when it is not practical to contact the person responsible for arranging cover **and** the Head of Department on the first or subsequent days of absence, each department should have contingency arrangements to ensure appropriate work is being set. When a member of teaching staff intends to return to work after a period of absence lasting more than one week he or she should inform the person responsible for arranging cover **and** the Head of Department on the day **before** he or she returns to work.

Support Staff

For absences not known in advance the following steps must be taken when informing absence and upon returning to work after an absence.

Employees are required to notify the cover manager by 8.15am on the first day of sickness absence.

Employees should notify the cover manager personally by telephone informing him or her of:

- the fact of their sickness absence;
- the reasons for it;
- its expected duration;
- the action the employee is intending to take e.g. visiting their G.P, seeking advice from a pharmacist etc; and
- any scheduled work that needs to be completed.

Absence records will be kept by the Personnel Manager who will provide statistics for the Headmaster and the Governing Body.

When a member of support staff intends to return to work after a period of absence lasting more than one week he or she should inform the Personnel Manager on the day **before** he or she returns to work.

General notification requirements applicable to all staff

Text messages, e-mails or messages left with colleagues will not satisfy the Academy's sickness absence notification requirements and may result in any absence being deemed to be unauthorised (and hence subject to disciplinary action) and in the forfeiture of sickness payments, if any, that the employee would have otherwise been entitled to.

Notification must be by the employee him or herself unless his or her incapacity is such that this is not possible in which case the employee should authorise a family member or friend to contact the Academy in his or her stead.

During sickness absence

It is essential that employees keep the Academy updated on the circumstances of their absence and its estimated duration and employees are required, where they have not indicated a likely return date on the first day of their sickness absence, to telephone the Academy on each subsequent day of absence.

Where an employee's sickness absence lasts more than seven calendar days the employee is required to notify the Personnel Manager of the fact and a Medical Certificate stating that he or she is not fit for work and the reason(s) why, completed and signed by a medical practitioner must be forwarded to the Personnel Manager to cover the period of absence. Thereafter Medical Certificates or a Fit for Work plan must be submitted for any continued sickness absence on a weekly basis, or at those intervals determined by the employee's medical certificate or Fit for Work plan itself.

Communication with the Academy and conduct during sickness absence

During any period of sickness absence employees may be required to respond to any enquiries from the Academy during normal working hours, to attend meetings or receive home visits from authorised Academy personnel to discuss their condition and to liaise with Occupational Health, where the Academy considers this is required.

In all cases of sickness or injury, which necessitate taking time off work, it is expected that employees will do their utmost to facilitate a speedy return to fitness and to work. In this regard, employees are expected to act sensibly and honestly. As detailed above, employees are expected to keep in regular contact with the School during any period of sickness and employees are expected to be honest and open about the progress of their illness or injury.

The School would not in the normal case expect any employee who is absent from work due to sickness or injury to:

- a) Participate in any sports, hobbies or social, political, union or any other activities, meetings etc which are in any way inconsistent with their alleged illness or injuries or which could aggravate the illness or injury or which could delay recovery. Healthy exercise, however, as an aid to recovery would of course be sensible and would cause no concern on School's part;
- b) Undertake any other employment whether paid or unpaid. If an employee declares themselves as unfit for work in relation to their employment with the School, it may be deemed gross or serious misconduct to undertake any other duties whilst absent, unless the employee has discussed this with the School prior to undertaking such other employment and demonstrated that doing so will not delay their recovery;
- c) Engage in any work around the home in terms of home improvements or the like or outside the home such as gardening or cleaning cars or doing any work on cars etc where this contradictory to the symptoms, injury or illness reported;
- d) Engage in any activity which is inconsistent with the nature of the alleged illness or injuries (e.g. be seen walking around town with bags of shopping with an alleged injury);
- e) Have elective surgery or any form of cosmetic treatment unless this has first been authorised in advance by the Headmaster~~teacher~~. It is up to the Headmaster's discretion whether this is counted as paid or unpaid sick leave or whether the School asks the employee to take paid holiday for this purpose;
- f) Take any holiday whether planned or unplanned unless this has first been authorised by the Headteacher. Holiday advised in writing by the employee's doctor for recuperative purposes will be allowed as part of sick leave and will not be counted as holiday;
- g) Call in sick or write in sick once the employee has started any period of leave, holiday, vacation etc. Once the employee starts their holiday, they are deemed to be on holiday and this will not count as sick leave. However, if the employee is too ill to take any holiday just before they are due to start any annual leave, then at the Head~~each~~master's discretion and subject to providing satisfactory medical evidence, this absence may be permitted to count as sick leave and not annual leave and the employee will then be permitted to take holiday at another time.

Please note that the School may request a Fit Note for any sickness absence one day before, during or one day after a bank holiday or School holiday period before any School sick pay is paid.

Arrangements for return to work

If an employee's doctor provides a certificate stating that he or she "may be fit for work", or if the employee received a Fit for Work plan which indicates the employee can return if such a plan is followed, the employee should inform the Headmaster immediately. The Academy will discuss with the employee any additional measures that may be needed to facilitate a return to work, taking account of medical advice and any Fit for Work plan. This may take place at a Back to Work interview on the employee's return to work after a period of sickness absence or prior to a return to work being agreed as appropriate.

On return from a period of sickness absence of less than 7 days, employees are required to complete a sickness absence self-certification form and submit this to his or the Personnel Manager.

Employees may be required to attend a Back to Work interview on or prior to their return to work after any period of sickness absence. This will usually be held by the employee's Senior Line Manager and during the meeting the reasons for the employee's absence will be discussed and the employee's Medical Certificate(s) or any Fit for Work plan as appropriate will be considered.

Failure to comply with the above

Failure to comply with the Academy's sickness absence notification and certification procedures above may result in rendering the employee's absence unauthorised and hence subject to disciplinary action which may result in the delay or forfeiture of payments for sickness absence that the employee might have otherwise been entitled to had they complied.

Requirement for medical or occupational health report

From time to time it may be necessary for the Academy to require the employee to be examined by and obtain a medical or occupational health report from an employee's doctor, a medical practitioner nominated by the Academy or an occupational health adviser to gather information about the employee's medical condition, its probable effect on the employee's future attendance at work or ability to do his or her job. Employees are required to co-operate with the Academy in obtaining such information and should be aware that failure to do so may constitute a breach of the terms of his or her contract of employment with the Academy and result in the Academy having to proceed with sickness absence management without the benefit of specialist advice on the basis of the existing information available.

Access to Medical Reports Act 1988

Employees have certain rights under the Access to Medical reports Act 1988. Should the Academy find it necessary to obtain a medical report concerning an employee's fitness for work or any other relevant matter the employee will be asked for his or her written consent. At the time of the request the employee will be advised of his or her rights under the Act.

Managing sickness absence policy

Long term or frequent absences may, in certain circumstances, lead to the termination of the employee's employment with the Academy in accordance with the Academy's Managing Sickness Absence policy.

Statutory sick pay

Employees who are absent from work because of sickness will normally be entitled to receive Statutory Sick Pay (SSP) from the academy provided they meet the relevant criteria.

Once the criteria have been met, SSP is not normally payable for the first three days of sickness absence, unless the employee has been absent and in receipt of SSP within the previous eight weeks. Thereafter the Academy will normally pay SSP at the statutory rate in force for a maximum of 28 weeks to employees who are eligible for SSP and who have satisfied the Academy's sickness absence and notification requirements above. The Academy reserves the right to withhold payment of SSP where an employee fails to follow the correct procedure.

If two periods of incapacity from work of four or more days (PIW) occur within 56 days of each other they are linked to form one PIW. Each PIW has an entitlement of 28 weeks payment and SSP is paid on a daily basis, in respect of qualifying days, which are those days normally worked.

Academy sick pay

The Academy also operates an Academy Sick Pay Scheme in accordance with the national conditions of service for teaching staff and the national conditions of service for National Joint Council (NJC) staff. All payments made under this Scheme will include SSP payments where they fall due.

Teaching staff

Teaching staff are entitled to the following sick pay in respect of bona fide sickness absence notified and certified in accordance with the required procedure set out above:

During the first year of continuous service	Full Pay for 25 working days and after completing 4 calendar months' service, half pay for 50 working days
During the second year of continuous service	Full pay for 50 working days and then half pay for 50 working days
During the third year of continuous service	Full pay for 75 working days and half pay for 75 working days
During the fourth and subsequent years of continuous service	Full pay for 100 working days and half pay for 100 working days

For the purposes of the above scheme:

- "working days" means teaching and non teaching days within "directed time" or in the case of a Head-teacher, normal working days; and
- "a year" is deemed to begin on 1 April and end on 31 March.

The above entitlement will be pro-rated for part-time employees.

Support staff

Support Staff on NJC Conditions for Local Government Services are entitled to the following sick pay in respect of bona fide sickness absence notified and certified in accordance with the required procedure set out above.

During the second year of continuous service	2 months full pay and 2 months half pay
During the third year of continuous service	4 months full pay and 4 months half pay
During the fourth and fifth year of continuous service	5 months full pay and 5 months half pay
During the sixth and subsequent years of service	6 months full pay and 6 months half pay

For the purposes of the above, one month means the employee's normal working days over the period of a calendar month. The above entitlement will be pro-rated for part-time employees.

The employee's length of service for the above purposes will be calculated from the first day of sickness absence.

For the purposes of the above scheme a "year" is deemed to be a rolling 12-month period.

The calculation of Academy Sick Pay will take into account any previous payments of Academy Sick Pay made in the year (as defined above in relation to Teaching and Support Staff) immediately before the first day of the current sickness absence.

Employees should claim any Social Security sickness benefits such as invalidity or incapacity benefits to which they may be entitled and are required to notify the Academy of any such payments which the Academy will deduct from the employee's Academy Sick Pay.

The rules of the Academy Sick Pay Scheme do not imply that termination of employment may not take place before payment of Academy Sick Pay has been exhausted.

Sickness absence and disciplinary or grievance or performance issues

The Academy reserves the right to suspend any or all payments of sick pay where the timing of the sickness absence for such reasons e.g. stress, depression, anxiety etc. coincides with any disciplinary or performance or grievance issues. So if you are at work or have disciplinary or performance issue/investigation and/or hearing or any adverse decision has been received and you then go "sick" with stress, depression, anxiety etc., sick pay may or will be suspended until management is satisfied that the illness was not in any way triggered by any of the matters above i.e. that the medical condition or absence was not casually or temporally related.

Sickness absence and annual leave

While it is recognised that during a period of sickness absence, time away from home for example going on holiday or visiting family may be therapeutically helpful, you are required to seek prior approval from the Academy. A decision to take time away from home during a period of sick leave without giving prior notice to the Academy may result in a loss of your Occupational Sick Pay during that period.

If, during that period you would prefer not to be required to respond to academy enquiries, attend meetings or receive home visits, we can discuss treating this period as annual leave or unpaid leave, at the Academy's discretion.

Please note that the requirements in your employment contract regarding requesting annual leave will continue to apply during any period of sickness absence.

Please refer to the Academy's Annual Leave Policy for further details relating to this.

SOCIAL MEDIA POLICY

This policy applies to all Academy staff regardless of their employment status. It is to be read in conjunction with the Academy's Electronic Communications Policy. This policy does not form part of the terms and conditions of employee's employment with the Academy and is not intended to have contractual effect. It does however set out the Academy's current practices and required standard of conduct and all staff are required to comply with its contents. Breach of provisions of this policy will be treated as a disciplinary offence which may result in disciplinary action up to and including summary dismissal in accordance with the Academy's Disciplinary Policy and Procedure.

This Policy may be amended from time to time and staff will be notified of any changes no later than one month from the date those changes are intended to take effect.

Purpose of this Policy

The Academy recognises that the internet provides unique opportunities to participate in interactive discussions and share information on particular topics using a wide variety of social media, such as Facebook, Twitter, LinkedIn, Wikipedia, Tinder, Grinder, Snapchat, Instagram, YouTube, together with all other social networking sites and other internet postings, including blogs. However, staff use of social media can pose risks to the academy's confidential and proprietary information, its reputation and it can jeopardise our compliance with our legal obligations.

To minimise these risks, avoid loss of productivity and to ensure that our IT resources and communications systems are used only for appropriate work related purposes, all Academy staff are required to comply with the provisions in this policy.

Who is covered by this policy?

This policy covers all individuals working at all levels and grades within the Academy, including senior managers, officers, governors, employees, consultants, contractors, trainees, homeworkers, part-time and fixed-term employees, casual and agency staff and volunteers (collectively referred to as Staff in this policy).

Third parties who have access to our electronic communication systems and equipment are also required to comply with this policy.

Scope and Purpose of this Policy

This policy deals with the use of all forms of social media including Facebook, Twitter, LinkedIn, Wikipedia, Tinder, Grinder, Snapchat, Instagram, YouTube, together with all other social networking sites and other internet postings, including blogs.

It applies to the use of social media for both work and personal purposes, whether during work hours or otherwise. The policy applies regardless of whether the social media is accessed using our IT facilities and equipment or equipment belonging to members of staff.

Breach of this policy may result in disciplinary action up to and including dismissal.

Disciplinary action may be taken regardless of whether the breach is committed during working hours, and regardless of whether the Academy's equipment or facilities are used for the purpose of committing the breach. Any member of staff suspected of committing a breach of this policy will be required to co-operate with our investigation, which may involve handing over relevant passwords and login details.

Staff may be required to remove internet postings which are deemed to constitute a breach of this policy. Failure to comply with such a request may in itself result in disciplinary action.

Personnel responsible for implementing the policy

The Board of Governors have overall responsibility for the effective operation of this policy, but have delegated day-to-day responsibility for its operation to the [Principal/Headmaster](#).

Responsibility for monitoring and reviewing the operation of this policy and making recommendations for change to minimise risks also lies with the Headmaster in liaison with relevant senior staff.

All senior Academy Staff have a specific responsibility for operating within the boundaries of this policy, ensuring that all staff understand the standards of behaviour expected of them and taking action when behaviour falls below its requirements.

All Academy Staff are responsible for the success of this policy and should ensure that they take the time to read and understand it. Any misuse of social media should be reported to the Headmaster in the first instance. Questions regarding the content or application of this policy should be directed by email to the Headmaster.

Compliance with related policies and agreements

Social media should never be used in a way that breaches any of our other policies. If an internet post would breach any of our policies in another forum, it will also breach them in an online forum. For example, employees are prohibited from using social media to:

- breach our Electronic information and communications systems policy;
- breach our obligations with respect to the rules of relevant regulatory bodies;
- breach any obligations they may have relating to confidentiality;
- breach our Disciplinary Rules;
- defame or disparage the Academy, its Staff, its pupils or parents, its affiliates, partners, suppliers, vendors or other stakeholders;
- harass or bully other Staff in any way or breach our Anti-harassment and bullying policy;
- unlawfully discriminate against other Staff or third parties or breach our Equal opportunities policy;
- breach our Data protection policy (for example, never disclose personal information about a colleague online);
- breach any other laws or ethical standards (for example, never use social media in a false or misleading way, such as by claiming to be someone other than yourself or by making misleading statements).

Staff should never provide references for other individuals on social or professional networking sites, as such references, positive and negative, can be attributed to the Academy and create legal liability for both the author of the reference and the organisation.

Staff who breach any of the above policies will be subject to disciplinary action up to and including termination of employment.

Personal use of social media

Personal use of social media is never permitted during working time or by means of our computers, networks and other IT resources and communications systems.

You should not use a work email address to sign up to any social media and any personal social media page should not make reference to your employment with the Trust (excluding LinkedIn, where prior permission is sought from any member of Senior Staff).

Staff must not take photos or posts from social media that belongs to the Trust for their own personal use.

Monitoring

The contents of our IT resources and communications systems are the Academy's property. Therefore, staff should have no expectation of privacy in any message, files, data, document, facsimile, telephone conversation, social media post conversation or message, or any other kind of information or communications transmitted to, received or printed from, or stored or recorded on our electronic information and communications systems.

The Academy reserves the right to monitor, intercept and review, without further notice, staff activities using our IT resources and communications systems, including but not limited to social media postings and activities, to ensure that our rules are being complied with and for legitimate business purposes and you consent to such monitoring by your acknowledgement of this policy and your use of such resources and systems. This might include, without limitation, the monitoring, interception, accessing, recording, disclosing, inspecting, reviewing, retrieving and printing of transactions, messages, communications, postings, log-ins, recordings and other uses of the systems as well as keystroke capturing and other network monitoring technologies.

The Academy may store copies of such data or communications for a period of time after they are created, and may delete such copies from time to time without notice.

All Staff are advised not to use our IT resources and communications systems for any matter that he or she wishes to be kept private or confidential from the Academy.

Educational or Extra Curricular Use of Social Media

If your duties require you to speak on behalf of the Academy in a social media environment, you must follow the protocol outlined below.

The Headmaster may require you to undergo training before you use social media on behalf of the Academy and impose certain requirements and restrictions with regard to your activities.

Likewise, if you are contacted for comments about the Academy for publication anywhere, including in any social media outlet, you must direct the inquiry to the Headmaster and must not respond without advanced written approval.

Recruitment

The Academy may use internet searches to perform pre-employment checks on candidates in the course of recruitment. Where the Academy does this, it will act in accordance with its data protection and equal opportunities obligations.

Responsible use of Social Media

The following sections of the policy provide staff with common-sense guidelines and recommendations for using social media responsibly and safely.

Photographs for use of Social Media

Any photos for social media posts may only be taken using academy cameras/devices or devices that have been approved in advance by the senior link line - manager. Where any device is used that does not belong to the Trust all photos must be deleted immediately from the device, once the photos have been uploaded to a device belonging to the Academy.

Staff Protocol for use of Social Media

Where any post is going to be made on the Trust/Academy's own social media the following steps must be taken:

- Ensure that permission from the child's parent has been sought before information is used on social media (via the Parent/School - Social Media Agreement).
- Ensure that there is no identifying information relating to a child/children in the post - for example any certificates in photos are blank/without names or the child's name cannot be seen on the piece of work.
- The post must be a positive and relevant post relating to the children, the good work of staff, the Academy or any achievements.
- Social Media can also be used to issue updates or reminders to parents/guardians and an Assistant Headteacher will have overall responsibility for this. Should you wish for any reminders to be issued you should contact MKN to ensure that any post can be issued.
- The proposed post must be presented to the senior line manager for confirmation that the post can 'go live' before it is posted on any social media site.
- The IT/ Media manager will post the information, but all staff have responsibility to ensure that the Social Media Policy has been adhered to.

Protecting our business reputation

Staff must not post disparaging or defamatory statements about:

- the Academy;
- current, past or prospective Staff as defined in this policy
- current, past or prospective pupils
- parents, carers or families of (iii)
- the Academy's suppliers and services providers; and
- other affiliates and stakeholders.

Staff should also avoid social media communications that might be misconstrued in a way that could damage the Academy's reputation, even indirectly.

If Staff are using social media they should make it clear in any social media postings that they are speaking on their own behalf. Staff should write in the first person and use a personal rather than Academy e-mail address when communicating via social media.

Staff are personally responsible for what they communicate in social media. Staff should remember that what they publish might be available to be read by the masses (including the Academy itself, future employers and social acquaintances) for a long time. Staff should keep this in mind before they post content.

If Staff disclose whether directly or indirectly their affiliation to the Academy as a member of Staff whether past, current or prospective, they must also state that their views do not represent those of the Academy.

Staff must ensure that their profile and any content posted are consistent with the professional image they are required to present to colleagues, pupils and parents.

Staff must avoid posting comments about confidential or sensitive Academy related topics. Even if Staff make it clear that their views on such topics do not represent those of the Academy, such comments could still damage the Academy's reputation and incur potential liability.

If a member of Staff is uncertain or concerned about the appropriateness of any statement or posting, he or she should refrain from making the communication until he or she has discussed it with his Line Manager or Head of Department.

If a member of Staff sees content in social media that disparages or reflects poorly on the Academy, its Staff, pupils, parents, service providers or stakeholders, he or she is required to report this in the first instance to the Headmaster without unreasonable delay. All staff are responsible for protecting the Academy's reputation.

Respecting intellectual property and confidential information

Staff should not do anything to jeopardise Academy confidential information and intellectual property through the use of social media.

In addition, Staff should avoid misappropriating or infringing the intellectual property of other Academy's, organisations, companies and individuals, which can create liability for the Academy, as well as the individual author.

Staff must not use the Academy's logos, brand names, slogans or other trademarks, or post any of our confidential or proprietary information without express prior written permission from the Headmaster.

To protect yourself and the Academy against liability for copyright infringement, where appropriate, reference sources of particular information you post or upload and cite them accurately. If you have any questions about whether a particular post or upload might violate anyone's copyright or trademark, ask the Headmaster in the first instance before making the communication.

Respecting colleagues, pupils, parents, clients, service providers and stakeholders

Staff must not post anything that their colleagues, the Academy's past, current or prospective pupils, parents, service providers or stakeholders may find offensive, including discriminatory comments, insults or obscenity.

Staff must not post anything related to colleagues, the Academy's past, current or prospective pupils, parents, service providers or stakeholders without their advanced written permission.

Monitoring and review of this policy

The Headmaster shall be responsible for reviewing this policy from time to time to ensure that it meets legal requirements and reflects best practice. The Board of Governors has responsibility for approving any amendments prior to implementation.

The Headmaster has responsibility for ensuring that any person who may be involved with administration or investigations carried out under this policy receives regular and appropriate training to assist them with these duties.

If Staff have any questions about this policy or suggestions for additions that they would like to be considered on review, they may do so by emailing the Headmaster.

WHISTLEBLOWING POLICY AND PROCEDURE

The Academy is committed to conducting its business with honesty and integrity and expects all staff to maintain high standards in accordance with their contractual obligations and the Academy's policies and procedures from time to time in force.

However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring or to address them when they do occur.

The aims of this policy are:

- To encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected;
- To provide staff with guidance as to how to raise those concerns;
- To reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

This policy takes account of the Whistleblowing Arrangements Code of Practice issued by the British Standards Institute and Public Concern at Work.

This policy does not form part of any employee's contract of employment and is not intended to have contractual effect. It is provided for guidance to all members of staff at the Academy and the Academy reserves the right to amend its content at any time. This Policy reflects the Academy's current practices and applies to all individuals working at all levels of the organisation, including the Headmaster, Heads of Department, members of the Senior Leadership Group, officers, Directors, employees, consultants, contractors, trainees, homeworkers, part-time and fixed-term workers, casual and agency staff (collectively referred to as "Staff" in this policy) who are advised to familiarise themselves with its content.

What is whistleblowing?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

- criminal activity;
- child protection and/or safeguarding concerns;
- miscarriages of justice;
- danger to health and safety;
- damage to the environment;
- failure to comply with any legal or professional obligation or regulatory requirements;
- financial fraud or mismanagement;
- negligence;
- breach of our internal policies and procedures including our Code of Conduct;
- conduct likely to damage the Academy's reputation;
- unauthorised disclosure of confidential information;
- the deliberate concealment of any of the above matters.

A whistle-blower is a person who raises a genuine concern that he/she believes is in the public interest relating to any of the above. If the member of staff has any genuine concerns related to suspected wrongdoing or danger affecting any of the Academy's activities (a whistleblowing concern) they should report it under this policy.

This policy should not be used for complaints relating to Staff's own personal circumstances, such as the way they have been treated at work. In those cases they should use the Grievance Policy and Procedure or Anti-harassment and Bullying Policy as appropriate.

If Staff are uncertain whether something is within the scope of this policy they should seek advice from the Headmaster.

Raising a whistleblowing concern

The Academy hopes that in many cases Staff will be able to raise any concerns with their Line Manager and/or Head of Department speaking to them in person or putting the matter in writing if prefer. They may be able to agree a way of resolving the concern quickly and effectively. In some cases they may refer the matter to the Governing Body.

However, where the matter is more serious, or the Line Manager/Head of Department has not addressed the concern, or the member of staff would prefer not to raise it with them for any reason, then they should contact one of the following:

- The Headmaster
- The Chair of Governors

The Academy will arrange a meeting with the member of staff as soon as possible to discuss their concern. Staff may bring a colleague or trade union representative to any meetings under this policy who must respect the confidentiality of the disclosure and any subsequent investigation.

The Academy will take down a written summary of the concern raised and provide the member of the staff with a copy as soon as practicable after the meeting. The Academy will also aim to give the member of staff an indication of how we propose to deal with the matter.

Confidentiality

The Academy hope that Staff will feel able to voice whistle blowing concerns openly under this policy. However, if a member of staff wants to raise his or her concern confidentially, the Academy will endeavour to keep his or her identity secret in so far as it is possible to do so when following this policy and procedure. If it is necessary for anyone investigating that member of staff's concern to know their identity, the Academy will discuss this with the member of staff first.

The Academy does not encourage Staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if the Academy cannot obtain further information. It is also more difficult to establish whether any allegations are credible. Whistle-blowers who are concerned about possible reprisals if their identity is revealed should come forward to one of the contacts listed above and appropriate measures can then be taken to preserve confidentiality.

If a member of staff is in any doubt they can seek advice from Public Concern at Work, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are:

[Protect Public Concern at Work](#)

(Independent whistleblowing charity)

Helpline: (020) 7404 6609

E-mail: whistle@pcaw.org.uk

Website: www.pcaw.org.uk

Investigation and outcome

Once a member of Staff has raised a concern, the Academy will carry out an initial assessment to determine the scope of any investigation. The Academy will inform the member of staff of the outcome of its assessment. The member of staff raising the concern may be required to attend additional meetings in order to provide further information.

In some cases the Academy may appoint an investigator or team of investigators including Staff with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable the Academy to minimise the risk of future wrongdoing.

The Academy will aim to keep the member of staff informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent the Academy from giving specific details of the investigation or any disciplinary action taken as a result. The member of staff is required to treat any information about the investigation as strictly confidential.

If the Academy concludes that a whistle-blower has made false allegations maliciously or with a view to personal gain, the whistle-blower will be subject to disciplinary action under the Academy's Disciplinary Policy and Procedure.

If you are not satisfied

Whilst the Academy cannot always guarantee the outcome a particular member of staff is seeking, the Academy will try to deal with the concern fairly and in an appropriate way. If a member of staff is not happy with the way in which his or her concern has been handled, he or she can raise it with one of the other key contacts outlined above.

External disclosures

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases Staff should not find it necessary to alert anyone externally.

The law recognises that in some circumstances it may be appropriate for Staff to report their concerns to an external body such as a regulator. It will very rarely if ever be appropriate to alert the media. We strongly encourage a member of staff to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, ~~Public Concern at Work~~ [Protect](#), operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern.

Whistleblowing concerns usually relate to the conduct of Academy Staff, but they may sometimes relate to the actions of a third party, such as a service provider. In some circumstances the law will protect you if you raise the matter with the third party. However,

Staff are encouraged to report such concerns internally first. Staff should contact one of the other individuals set out above for guidance.

Protection and support for whistle-blowers

It is understandable that whistle-blowers are sometimes worried about possible repercussions. The Academy aims to encourage openness and will support Staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

Staff must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If a member of staff believes that he or she has suffered any such treatment, he or she should inform the [Principal/Headmaster](#) immediately. If the matter is not remedied the member of staff should raise it formally using the Academy's Grievance Policy and Procedure.

Staff must not threaten or retaliate against whistle-blowers in any way. Anyone involved in such conduct will be subject to disciplinary action.

All Staff are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing. Staff are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Headmaster in the first instance.