The Hawksmoor Learning Trust

Marie Weller Primary School

Safeguarding and Child Protection Policy

September 2026 to August 2027

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*** Policy level: 1. Trust wide — one policy relevant to everyone and consistently applied across all schools and central departments with no variations, approved by the THLT Board of Trustees. 2. Trust core values — defines the values to be incorporated in all other policies on this subject, forming the basis of a localised school policy. 3. School policies — defined independently by schools as appropriate.*

Glossary of abbreviations and acronyms used in this policy

Abbreviation	Meaning
AAI	Adrenaline auto-injector
CCE	Child criminal exploitation
CPOMS	Child Protection Online Monitoring System (the trust's safeguarding recording system)
CSE	Child sexual exploitation
CWSA	Children's Wellbeing and Schools Act 2026
DBS	Disclosure and Barring Service
DPA	Data Protection Act
DSL	Designated Safeguarding Lead
ECHR	European Convention on Human Rights
EHCP	Education, Health and Care Plan
EYFS	Early Years Foundation Stage
FGM	Female genital mutilation
GDPR	General Data Protection Regulation
HBA	So-called honour-based abuse
HSB	Harmful sexual behaviour
IHP	Individual healthcare plan
KCSIE	Keeping Children Safe in Education
LADO	Local Authority Designated Officer (Designated Officer)
LGB	Lesbian, gay and bisexual
MASH	Multi-Agency Safeguarding Hub
MWPS	Marie Weller Primary School
NSCP	Northamptonshire Safeguarding Children Partnership
PSED	Public Sector Equality Duty
RHE	Relationships Education and Health Education
SCR	Single central record
SEND	Special educational needs and disabilities
THLT	The Hawksmoor Learning Trust
VAWG	Violence against women and girls

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Named personnel with designated responsibility for safeguarding

Each school within The Hawksmoor Learning Trust maintains a named safeguarding team. Full details for each school, including email addresses and out-of-hours arrangements, are set out in **Appendix 7**. Staff must know the names of their own school's Designated Safeguarding Lead and deputies.

Trust-level roles below are given by role title rather than by organisation, so that the table remains accurate if the trust's governance arrangements change.

Role	Postholder	Contact
Trust Safeguarding Lead	Andrea Curtis, CEO	ceo@thlt.academy
Trustee with lead responsibility for safeguarding	Chris Lofts	clofts@thlt.academy
Trust Data Protection Officer	Plumsun	info@plumsun.com
Designated Safeguarding Lead, MWPS	Caroline Lewis	dsl@mwps.thlt.academy

If you are worried about a child

Report it to your school's Designated Safeguarding Lead or a deputy immediately, and record it on CPOMS.

If a child is in immediate danger, left alone or missing, call the police and/or an ambulance on 999.

Northamptonshire Multi-Agency Safeguarding Hub (MASH): 0300 126 7000, option 1 — including out of hours.

Never delay taking action because the DSL is unavailable.

1. Aim of policy

1.1. The Hawksmoor Learning Trust recognises our statutory responsibility to safeguard and promote the welfare of all pupils across our four primary schools. We will endeavour to provide safe and welcoming environments where children are respected and valued. We will be alert to the signs of abuse, neglect and exploitation and follow our procedures to ensure that children receive effective support, protection and justice.

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

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

1.4. We recognise that our pupils are of primary age, and in most schools include children in the Early Years Foundation Stage. Younger children may be less able to recognise or describe harm, may have limited language, and are wholly dependent on the adults around them. Our procedures are written on that basis.

1.5. The aim of this policy is to:

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

2. Scope

2.1. This policy applies to all teaching, non-teaching, support, supply, peripatetic and contract staff, trainee teachers, governors, trustees and volunteers working in or on behalf of The Hawksmoor Learning Trust and its schools. All references in this document to 'staff' or 'members of staff' should be interpreted as relating to all of the above unless otherwise stated.

2.2. For the purposes of this policy, 'Headteacher' refers to substantive Headteachers and Heads of School, and to those in post as Acting or Interim Headteachers.

2.3. This is a trust-wide policy. It applies without variation across all schools in the trust. The county safeguarding context, each school's own contextual safeguarding profile, and each school's safeguarding team are set out in Appendices 6 and 7, and do not alter the requirements in the body of this policy.

3. Definitions

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

- providing help and support to meet the needs of children as soon as problems emerge;
- protecting children from maltreatment, whether that is within or outside the home, including online;
- preventing impairment of children's mental and physical health or development;

- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

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

- supporting pupils' health, safety and wellbeing, including their mental health;
- providing family help and early support to improve outcomes for children and families at the earliest possible opportunity;
- meeting the needs of children with special educational needs and disabilities;
- the use of reasonable force and positive handling;
- meeting the needs of children with medical conditions, including allergies;
- providing first aid;
- educational visits;
- intimate care and emotional wellbeing;
- online safety and associated issues, including filtering and monitoring;
- appropriate arrangements to ensure school security, including arrangements for the start and end of the school day, considering the local context;
- keeping children safe from risks, harm and exploitation; and
- child protection.

3.3 Child protection

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

3.4 Abuse

3.4.1. Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical, as well as the impact of witnessing the ill treatment of others. This is particularly relevant in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Abuse can be perpetrated by an adult or adults known or unknown to a child, or by a child or children known or unknown to the child. It can happen in person or online, or technology may be used to facilitate offline abuse. Where abuse is perpetrated by another child, it is known as child-on-child abuse.

3.5 Neglect

3.5.1. 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. See Appendix 2 for more information about abuse and neglect.

3.6 Child-on-child abuse

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

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

- bullying, including cyberbullying, prejudice-based and discriminatory bullying;
- prejudice-based harm, including racism, faith-targeted abuse, homophobic, biphobic and transphobic abuse, and abuse targeting disability;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm, which may include an online element which facilitates, threatens and/or encourages physical abuse;

- sexual violence, such as rape, assault by penetration and sexual assault, which may include an online element;
- 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 engage in sexual activity with a third party;
- the making or sharing of nudes or semi-nudes, including images that have been digitally altered or wholly generated using artificial intelligence (sometimes described as deepfakes), whether consensual or non-consensual;
- 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 to cause the victim humiliation, distress or alarm;
- serious physical assault and harm, or the threat of harm with a weapon;
- abuse in intimate personal relationships between peers; and
- initiation or hazing type violence and rituals, which could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group, and may also include an online element.

3.6.3. Some of the behaviours listed above are more commonly seen in secondary settings. They are retained here because KCSIE 2026 requires all staff to understand the full spectrum of child-on-child abuse, because our pupils have older siblings and online lives, and because primary-age children can and do experience and display these behaviours. Staff must never assume that a behaviour is impossible because of a child's age.

3.6.4. Children include everyone under the age of 18.

3.7 Within this policy

- **Parent** refers to birth parents and other adults in a parenting role, for example adoptive parents, stepparents, kinship carers and foster carers.
- **Staff** or **members of staff** refers to all those set out at Section 2.1.
- **Keeping Children Safe in Education (2026)** may be abbreviated to KCSIE.

3.8 Victim

3.8.1. Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

3.9 Alleged perpetrator(s) and perpetrator(s)

3.9.1. These are widely used and recognised terms. However, we will think carefully about what terminology we use, especially in front of children, as in some cases abusive behaviour can be harmful to the child displaying it too. We will decide what is appropriate and which terms to use on a case-by-case basis. In a primary context we will normally describe behaviour rather than label a child.

4. Statutory guidance and legislation

4.1 Statutory guidance

- Keeping Children Safe in Education (2026)
- Working Together to Safeguard Children (2026)
- Statutory framework for the Early Years Foundation Stage (2025)
- Working together to improve school attendance (2024)

- Children missing education (2016)
- Multi-agency statutory guidance on female genital mutilation (2020)
- Relationships education, relationships and sex education (RSE) and health education (applying from 1 September 2026)
- Supporting pupils at school with medical conditions, and the allergy safety requirements applying from September 2026

4.2 Legislation

- The Children Act 1989 and the Children Act 2004
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015
- The Rehabilitation of Offenders Act 1974
- The Safeguarding Vulnerable Groups Act 2006
- The Counter-Terrorism and Security Act 2015 and the Prevent duty guidance
- The Crime and Policing Act 2026, which removes the supervision exemption from the definition of regulated activity (see Appendix 3)
- The Data (Use and Access) Act 2025, which amends UK data protection law, its main data protection provisions having commenced on 5 February 2026
- The Children's Wellbeing and Schools Act 2026, which among other things strengthens the role of education within local safeguarding arrangements and introduces a duty to share information relevant to a child's welfare or safeguarding; the trust will update this policy as commencement dates and local arrangements are confirmed
- The Education Act 2002
- The School Staffing (England) Regulations 2009
- The Childcare Act 2006 and the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018
- The Education (Pupil Registration) (England) Regulations 2006, as amended
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights
- The Equality Act 2010, which makes it unlawful to discriminate against people in respect of protected characteristics including disability, sex, sexual orientation, gender reassignment, religion or belief and race. This means our trustees, governors and headteachers must carefully consider how they are supporting their pupils in respect of these characteristics. The Act allows our schools to take positive action to deal with disadvantages affecting pupils where we can show it is proportionate. This includes making reasonable adjustments for disabled pupils.
- The Public Sector Equality Duty, which requires us to have due regard to eliminating unlawful discrimination, harassment and victimisation. The duty helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence, homophobic, biphobic or transphobic bullying, faith-targeted abuse or racial discrimination.

4.3. Guidance from the Northamptonshire Safeguarding Children Partnership, including its thresholds and pathways guidance and its case and conflict resolution protocol, is available at northamptonshirescb.org.uk. Our schools adhere to it.

4.4. Our schools also have regard to relevant non-statutory guidance relating to safeguarding, including:

- What to do if you are worried a child is being abused (2015)
- Guidance for safer working practice for those working with children and young people in education settings (Safer Recruitment Consortium, February 2022)
- Meeting digital and technology standards in schools and colleges, including the filtering and monitoring standards and the cyber security standards (DfE)
- Sharing nudes and semi-nudes: advice for education settings (UK Council for Internet Safety)

- Generative artificial intelligence in education (DfE)

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

- Allergy Safety Policy
- Anti-Bullying Policy
- Attendance Policy
- Behaviour Policy
- Complaints Procedure
- Data Protection Policy and Privacy Notices
- Designated Teacher for Looked After and Previously Looked After Children Policy
- Equality Policy
- Medical and First Aid Policy
- Health and Safety Policy
- IT Acceptable Use Policy
- Supporting Pupils with Medical Needs Policy and Individual Healthcare Plans
- Mental Health and Wellbeing Policy
- Online Safety Policy
- Positive Handling Policy
- Relationships and Health Education Policy
- Safer Recruitment Policy
- SEND Policy
- Staff Code of Conduct
- Whistleblowing Policy

5. Equality statement

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

5.2. KCSIE 2026 is explicit that prejudice-based harm, including racism and faith-targeted abuse, is a safeguarding issue and not only a behaviour issue. Where such harm is identified we will respond both to the individual incident and to the culture that allowed it, and will record it on CPOMS.

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

6. Confidentiality and information sharing

6.1. Information sharing is vital in identifying and tackling all forms of abuse, neglect and exploitation, and in promoting children's welfare, including their educational outcomes. Schools have clear powers to share, hold and use information for these purposes. Data protection law does not prevent, or limit, the sharing of information for the purposes of keeping children safe. Lawful and secure information sharing between schools, children's social care and other local agencies is essential for keeping children safe and ensuring they get the support they need.

6.2. Our schools adhere to the Data Protection Act 2018, as amended by the Data (Use and Access) Act 2025, whose main data protection provisions commenced on 5 February 2026, and the UK General Data Protection Regulation. Please see the trust Data Protection Policy and school privacy notices for more information.

6.3 Sharing information with parents

6.3.1. THLT schools will ensure that this policy is available publicly via school websites.

6.3.2. Where appropriate, we will discuss any concerns about a child with the child's parents. The Designated Safeguarding Lead will normally do this in the event of a concern, suspicion or disclosure. Other staff will only talk to parents about any such concerns following consultation with the DSL.

6.3.3. If we believe that notifying the parents would increase the risk to the child, we will discuss this with children's social care 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.

6.4 Consent

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

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

6.4.3. When considering whether or not to share safeguarding information, especially with other agencies, our schools will record who they are sharing that information with and for what reason. If we have taken a decision not to seek consent from the data subject and/or parent, that will also be recorded within the safeguarding file.

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

- staff should never promise a child that they will not tell anyone about an allegation, as this may not be in the child's best interests;
- staff who receive information about children and their families in the course of their work should share that information only within appropriate professional contexts;
- timely information sharing is essential to effective safeguarding; and
- information must only be shared on a need-to-know basis, but consent is not required to share information if a child is suffering, or at risk of, serious harm.

6.5 The duty to share information

6.5.1. The Children's Wellbeing and Schools Act 2026 places education settings under a duty to share information that is relevant to a child's welfare or safeguarding with the relevant safeguarding partners. Working Together to Safeguard Children 2026 strengthens the expectation that education is represented in multi-agency arrangements at both operational and strategic level.

6.5.2. Where a child is removed from the admission register at a non-standard transition point, including for elective home education, we will notify the local authority and share all relevant safeguarding information held. See Section 10.14.

6.5.3. The trust will update this policy and its supporting procedures as commencement dates, the single unique identifier for children, and local multi-agency arrangements are confirmed.

7. Roles and responsibilities

7.1. Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers, governors and trustees and is consistent with the procedures of the Northamptonshire safeguarding partners. Our policy and procedures also apply to extended school provision, including breakfast and after-school clubs, and to off-site activities.

7.2 Trust Board and local governing bodies

7.2.1. The Trust Board and local governing bodies have a strategic leadership responsibility for safeguarding arrangements. Each governing body will appoint a senior board level, or equivalent, governor with lead responsibility for safeguarding to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL.

7.2.2. Trustees and governors will ensure that there are mechanisms in place to assist staff in understanding and discharging their statutory safeguarding roles and responsibilities. They will ensure that schools are working with local safeguarding partners and that schools contribute to multi-agency working, adhering to Working Together to Safeguard Children 2026. All trustees and governors will read KCSIE 2026 and a record will be kept of this.

7.2.3. Part 2 of KCSIE 2026 sets out the responsibilities of governing bodies and our trustees and governors will always adhere to this guidance. As part of these responsibilities they will:

- ensure that they comply with their duties under statutory guidance and legislation, including obligations under the Human Rights Act 1998, the Equality Act 2010 including the Public Sector Equality Duty, and local multi-agency safeguarding arrangements;
- work to facilitate a whole-school approach to safeguarding, by ensuring that safeguarding and child protection underpin all relevant aspects of policy and process;
- ensure that policies, procedures and training are effective, comply with the law at all times and allow concerns to be responded to in a timely manner;
- ensure that safeguarding training for staff, including online safety training and training on filtering and monitoring, is integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training and curriculum planning;
- ensure that schools consider local criteria for action and protocol for assessment and supply information as requested by safeguarding partners;
- ensure that schools have an effective child protection policy, published on school websites and reviewed annually;
- ensure that schools have systems in place to allow children to raise concerns, which are well promoted, well understood and easily accessible to primary-age children;
- ensure that schools take safeguarding concerns seriously and take the wishes and feelings of children into account;
- ensure that there are systems in place for children to safely express their views and give feedback on safeguarding practice;
- ensure that schools have suitable behaviour policies for pupils and staff behaviour policies or codes of conduct;
- ensure that all staff undergo safeguarding and child protection training on induction and regularly thereafter;
- consider a whole-school approach to online safety, including the use of mobile and smart technology in school;
- ensure that there are clear systems and processes in place for identifying when children may be experiencing mental health problems;
- ensure that children are taught about safeguarding, including online safety, in an age-appropriate way;
- ensure that appropriate safeguarding responses are in place for children who go missing from education and those absent from education, particularly on repeat occasions or for prolonged periods;
- appoint appropriate members of staff from senior leadership teams to the role of Designated Safeguarding Lead and ensure that DSLs have the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support;
- ensure that appropriate filters and monitoring systems are in place to keep children safe online and regularly review their effectiveness, ensuring that leadership teams and relevant staff are

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

- ensure that appropriate procedures are in place to manage safeguarding concerns or allegations against staff, including allegations that do not meet the harm threshold, about staff members including supply staff, trainee teachers, volunteers and contractors;
- ensure that safeguarding requirements are a condition of any letting or use of school premises by another body (see Section 20); and
- respond to allegations of abuse against headteachers. The Chair of Governors will act as the case manager if an allegation of abuse is made against the headteacher, where appropriate.

7.3 The Headteacher

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

- ensure that this policy is reviewed annually and ratified by the governing body;
- ensure that this policy and associated procedures are adhered to by all staff and take action as necessary if not;
- ensure that staff, including temporary staff, trainee teachers and volunteers, are informed of systems that support safeguarding, including this policy, as part of their induction;
- ensure that all staff are made aware of the named governor for safeguarding and the Designated Safeguarding Lead;
- ensure that the role of Designated Safeguarding Lead is explicit in the role-holder's job description, that they have appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent;
- decide whether to have one or more deputy safeguarding leads and ensure they are trained to the same standard as the Designated Safeguarding Lead;
- organise appropriate cover for the role of Designated Safeguarding Lead for any out-of-hours or out-of-term activities, including breakfast and after-school provision and residential visits;
- ensure robust cover arrangements are in place for periods when the DSL is unavailable due to illness, leave or other circumstances, for example a confidential shared mailbox or equivalent system, so that safeguarding concerns continue to be received, monitored and acted upon without delay;
- appoint a Designated Teacher for Looked After and Previously Looked After Children to promote the educational achievement of children looked after and previously looked after;
- appoint a lead for online safety, usually the DSL, and a senior leader with responsibility for filtering and monitoring;
- ensure that all recruitment follows the safer recruitment guidance in Part 3 of KCSIE 2026 and that a single central record is maintained;
- ensure the relevant staffing ratios are met in Early Years Foundation Stage provision and that all staff working in that provision meet the requirements of the statutory framework, including the disqualification requirements;
- ensure the school meets the allergy requirements set out at Section 10.8, including a published allergy policy, staff training, spare adrenaline auto-injectors and individual healthcare plans;
- respond to allegations of abuse against all other members of staff and act as the case manager in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate;
- make decisions regarding all low-level concerns;
- refer cases where a person is dismissed or left due to risk or harm to a child to the Disclosure and Barring Service as required;
- ensure that schools work with social care, the police, health services and other services to promote the welfare of children, provide a co-ordinated offer of family help when need is identified, contribute to inter-agency plans for children subject to child protection plans, and protect children from harm;

- safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties (Teachers' Standards 2012); and
- ensure that children's social care, from the host local authority or a placing authority, have access to schools to conduct, or to consider whether to conduct, a section 47 or section 17 assessment, as per KCSIE 2026.

7.4 The Designated Safeguarding Lead

7.4.1. The full responsibilities of the DSL are set out in Annex B of KCSIE 2026.

7.4.2. The DSL is a member of the senior leadership team in each school.

7.4.3. The DSL takes lead responsibility for child protection and wider safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place.

7.4.4. When the DSL is absent, a deputy DSL will act as cover. If the DSL and deputies are not available, the Headteacher will act as cover.

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

7.4.6. Whilst the activities of the Designated Safeguarding Lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection remains with the Designated Safeguarding Lead; this lead responsibility will not be delegated.

7.4.7. The Designated Safeguarding Lead will:

- act as a source of support and expertise on matters relating to safeguarding and child protection to ensure that other members of staff can carry out their safeguarding duty;
- advise on the response to safeguarding concerns;
- liaise with the local authority and work with other agencies in line with Working Together to Safeguard Children 2026;
- identify if children and families may benefit from family help or early support;
- refer suspected cases, as appropriate, to the relevant body — children's social care, the Channel programme, the Disclosure and Barring Service and/or the police — and support staff who make such referrals directly;
- make referrals to the Channel programme where there is a radicalisation concern, or support staff who make such a referral;
- support the school in respect of its responsibilities under the Prevent duty and provide advice and support on protecting children from radicalisation;
- refer cases to the police where a crime may have been committed;
- be available during school hours for staff to discuss any safeguarding concerns; if they are not available, a deputy will be made available;
- undertake training to equip them with the skills to carry out the role and update it at least every two years;
- ensure that all staff, whether or not they work directly with children, have read and understood Part 1 of KCSIE 2026 in full, and record that this has been done. KCSIE 2026 has withdrawn the condensed Annex A version used in previous years, so there is no longer an abridged version of Part 1 for staff who do not work directly with children;
- ensure that, in addition, the DSL and any deputy DSLs have read and understood Annex B, Role of the Designated Safeguarding Lead, of KCSIE 2026;
- update their knowledge and skills regularly and keep up with any developments relevant to their role;
- provide staff with the knowledge, skills and support required to safeguard children;
- take responsibility for the accurate and timely recording of safeguarding and child protection concerns on CPOMS, and take overall responsibility for safeguarding and child protection files;
- take responsibility for the transfer of safeguarding files when a child leaves the school, and for the prompt review of files received from other settings;

- attend, or ensure an appropriate representative attends, multi-agency safeguarding or child protection meetings;
- work closely with other relevant education professionals, for example the SENCO and the Virtual School Head, to ensure children with additional vulnerabilities are safeguarded;
- help to promote the educational outcomes of children who have experienced or are experiencing safeguarding or child protection issues by sharing relevant information with teachers and school leadership teams, ensuring staff know who these children are, understand their progress and attainment, and maintain a culture of high aspirations for this cohort;
- promote a culture of safeguarding, in which every member of the school community acts in the best interests of the child;
- regularly meet with the safeguarding link governor and/or Chair of Governors to review safeguarding at the school;
- liaise with the Headteacher regarding safeguarding cases and issues;
- have a good understanding of harmful sexual behaviour and of the continuum of children's sexual behaviour, from developmentally expected through to harmful;
- know what local specialist support is available to support all children involved, including victims and alleged perpetrators, in sexual violence and sexual harassment, and be confident as to how to access this support; and
- be aware that children must have an appropriate adult to support and help them in the case of a police investigation or search.

7.4.8. DSLs can also be contacted outside school hours via the contact details specified in each school's arrangements at Appendix 7.

7.5 All staff

7.5.1. Staff play a particularly important role because they can identify concerns and provide help for children.

7.5.2. All staff:

- have a responsibility to provide a safe environment, where children can learn;
- will be trained so that they know what to do if a child tells them that he or she is being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals;
- will be able to identify indicators of abuse, neglect and exploitation;
- will be made aware of systems in schools that support safeguarding and child protection;
- will be made aware of safeguarding issues that put children at risk of harm and behaviours associated with these risks;
- should ensure that they know what to do if a child makes a disclosure of abuse and never promise confidentiality when a child makes a disclosure;
- will be made aware of and should be clear on school policies and procedures with regard to child-on-child abuse and the important role they must play in preventing it and responding where they believe a child may be at risk from it;
- will be made aware of the family help and early support process and understand their role in it;
- should be prepared to identify children who may benefit from family help and will discuss this with the DSL in the first instance;
- may be required to support social workers and other agencies following a referral;
- will be made aware of the process for making referrals to children's social care through the MASH, understand statutory assessments and the role that they may be expected to play in such assessments;
- will receive regularly updated safeguarding and child protection training to cover all of the above, as well as online safety, including filtering and monitoring procedures and how to report related safeguarding or technical concerns;

- will receive safeguarding updates throughout the year as part of continuous professional development;
- will be encouraged to contribute to the development of safeguarding policy and practice;
- should always seek advice from the Designated Safeguarding Lead if they are unsure;
- should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties, where they are teachers (Teachers' Standards 2012);
- will reinforce the importance of online safety when communicating with parents, including making parents aware of what we ask children to do online; and
- will provide a safe space for children to speak out and share their concerns.

7.5.3. All staff will be aware of:

- the fact that children can be at risk of harm inside and outside of their home, at school and online;
- the fact that children who are, or who are perceived to be, lesbian, gay, bi or gender questioning can be targeted by other children;
- the fact that prejudice-based harm, including racism and faith-targeted abuse, is a safeguarding matter; and
- what to look for to identify children who need help or protection.

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

7.5.5. All staff, whether or not they work directly with children, will be provided with a copy of, and must read, Part 1 of KCSIE 2026 in full, annually, and will receive annually updated training on their safeguarding roles and responsibilities. The condensed Annex A previously available to staff who do not work directly with children has been withdrawn and may no longer be used.

7.5.6. The DSL and any deputy DSLs will also be provided with a copy of, and must read, Annex B, Role of the Designated Safeguarding Lead, of KCSIE 2026.

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

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

7.6 Supervision and staff support

7.6.1. All staff who have significant contact with children and families will have access to supervision, which provides them with support, coaching and reflective discussion, promotes the interests of children and allows for confidential discussion of sensitive issues.

7.6.2. Safeguarding work is emotionally demanding. The DSL and deputies will have access to supervision or reflective supervision arrangements, and the Headteacher will ensure that staff who have been affected by a safeguarding matter are offered appropriate support.

8. Recognising abuse: training

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

8.2 All staff

8.2.1. All staff members will undertake safeguarding and child protection training at induction, including online safety, filtering and monitoring, allergy awareness and whistleblowing procedures, to ensure they understand school safeguarding systems, their responsibilities, and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from local safeguarding partners.

8.2.2. 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.

8.2.3. 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.

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

8.2.5. Volunteers, including regular parent helpers, will receive appropriate training as applicable.

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

8.2.7. All staff, including supply staff, lunchtime supervisors, office staff and teaching assistants, will receive allergy awareness training covering the recognition of anaphylaxis, emergency response, the use of adrenaline auto-injectors and incident recording. See Section 10.8.

8.3 DSL and deputy DSLs

8.3.1. The DSL and deputy DSLs will undertake child protection and safeguarding training at least every two years.

8.3.2. 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.

8.3.3. They will also undertake Prevent awareness training and online safety training, including any training necessary to support their understanding of the filtering and monitoring systems and processes in place.

8.4 Trustees and governors

8.4.1. All trustees and governors receive safeguarding training appropriate to their role at induction, which is regularly updated, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities, including providing strategic challenge and ensuring there is a whole-school approach to safeguarding. This includes training on the Prevent duty, online safety, and the expectations, applicable roles and responsibilities in relation to filtering and monitoring.

8.4.2. As chairs of governors may be required to act as the case manager if an allegation of abuse is made against the headteacher, they should receive training in managing allegations for this purpose.

8.5 Recruitment and interview panels

8.5.1. At least one person conducting any interview for a post in our schools will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Part 3 of KCSIE 2026, and will be in line with local safeguarding procedures.

8.6 Specific safeguarding issues

8.6.1. Staff will also receive specific training on the following issues, and action will be taken if schools suspect that a child is at risk of, or is the victim of:

- physical abuse;
- sexual abuse;

- child sexual exploitation;
- emotional abuse;
- neglect;
- child criminal exploitation, including involvement in county lines;
- domestic abuse;
- fabricated or induced illness;
- faith-based abuse;
- female genital mutilation;
- forced marriage;
- gangs and youth violence;
- gender-based violence and violence against women and girls;
- prejudice-based harm, including racism, faith-targeted abuse and hate;
- online safety, including the sharing of nudes and semi-nudes and AI-generated imagery;
- child-on-child abuse;
- radicalisation;
- relationship abuse;
- serious violence;
- sexual violence and sexual harassment;
- so-called honour-based abuse; and
- trafficking and modern slavery.

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

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

- children in the court system;
- children missing education, and children absent from education on repeat occasions or for prolonged periods;
- children with family members in prison;
- children who are homeless or living in temporary accommodation;
- children who have or have had a social worker;
- children who are young carers;
- children looked after or previously looked after, including those in kinship care arrangements;
- children with special educational needs and disabilities;
- children with medical conditions, including severe allergies; and
- children with mental health needs.

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

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

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

9.3. All staff will be alert to indicators of abuse, including child-on-child abuse, and will report any of the following to the Designated Safeguarding Lead immediately:

- any concern or suspicion that a child has sustained an injury outside what is reasonably attributable to normal play;
- any concerning behaviours exhibited by children that may indicate that they have been harmed or are at risk of harm, including unusual changes in mood or behaviour, concerning use of language, regression, and concerning drawings, play or stories;
- any significant changes in attendance or punctuality;
- any significant changes in a child's presentation, including hygiene, clothing, hunger or tiredness;
- any indicators that a child may be experiencing child-on-child abuse;
- any concerns relating to people who may pose a risk of harm to a child, including at the school gate or on the school site; and
- any disclosures of abuse that children have made.

9.4. More information about our approach to child-on-child abuse, including sexual violence and sexual harassment, can be found at Appendix 1.

9.5. The following procedures are in line with statutory guidance and the Northamptonshire Safeguarding Children Partnership's thresholds and pathways guidance. Referral procedures are set out at Section 9.10.

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

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

- listen to what is being said without displaying shock or disbelief;
- accept what is being said;
- allow the child to talk freely;
- reassure the child, but not make promises which it might not be possible to keep;
- never promise a child that they will not tell anyone, as this may ultimately not be in the best interests of the child;
- reassure him or her that what has happened is not his or her fault;
- stress that it was the right thing to tell;
- listen, only asking questions when necessary to clarify, and use open questions such as "tell me", "explain" or "describe" rather than leading questions;
- not criticise the alleged perpetrator;
- explain what has to be done next and who must be told;
- make a written record using the child's own words (see Section 14); and
- pass the information to the Designated Safeguarding Lead without delay. Alternatively, if appropriate, make a referral to children's social care and/or the police directly, and tell the DSL as soon as possible that you have done so.

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

9.6.3. Bear in mind that some children may:

- not feel ready or know how to tell someone that they are being abused, exploited or neglected;
- not recognise their experiences as harmful;
- lack the vocabulary to describe what has happened to them; or

- feel embarrassed, humiliated or threatened.

9.6.4. This could be due to their age, vulnerability, disability, sexual orientation and/or language barriers.

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

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

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

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

9.8 If you have concerns about a child

9.8.1. Where you have concerns about a child, as opposed to believing that a child is suffering or likely to suffer harm or is in immediate danger, speak to the DSL first, where possible, to agree a course of action.

9.8.2. The DSL will decide on the most appropriate course of action and whether the concerns should be referred to children's social care, using the Northamptonshire thresholds and pathways guidance. If it is decided to make a referral to children's social care, the parent will be informed, unless to do so would place the child at further risk or undermine the collection of evidence.

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

9.8.4. The DSL will provide guidance on the appropriate action. Options will include:

- managing any support for the child internally via the school's own pastoral support processes;
- seeking advice from local family help co-ordinators;
- an early help or family help assessment; or
- a referral for statutory services where the child is or might be in need, or suffering or likely to suffer significant harm.

9.9 Family help and early support

9.9.1. Working Together to Safeguard Children 2026 brings targeted early help and section 17 support together into a single Family Help offer, delivered by a multi-disciplinary team with a lead practitioner. Universal services and community-based early help remain a separate tier. Local implementation varies; staff should follow the current Northamptonshire pathway and use the terminology in use locally. Where this policy refers to early help, it should be read as including family help.

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

9.9.3. All staff will be made aware of the family help process, and will understand their role in identifying emerging problems and sharing information with other professionals to support early identification and assessment of a child's needs. It is important for children to receive the

right help at the right time to address risks and prevent issues escalating. This also includes staff monitoring the situation and feeding back to the Designated Safeguarding Lead any ongoing or escalating concerns.

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

- is disabled, or has certain health conditions and specific additional needs;
- has special educational needs, whether or not they have an education, health and care plan;
- has a mental health need;
- is a young carer;
- is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing, or goes missing from education, home or care;
- has experienced multiple suspensions or is at risk of permanent exclusion;
- is at risk of modern slavery, trafficking, sexual or criminal exploitation;
- is at risk of being radicalised or exploited;
- has a family member in prison or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves;
- has returned home to their family from care;
- is at risk of so-called honour-based abuse such as female genital mutilation or forced marriage;
- is a privately fostered child;
- is homeless or living in temporary accommodation; and/or
- is persistently absent from education, including persistent absence for part of the school day.

9.10 Referrals

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

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

9.10.3. The local authority will make a decision within one 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 the person who made the referral, must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

9.10.4. If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow the Northamptonshire Safeguarding Children Partnership case and conflict resolution protocol to ensure their concerns have been addressed and that the child's situation improves.

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

- by telephone to the Northamptonshire Multi-Agency Safeguarding Hub on 0300 126 7000, option 1;
- by using the MASH online referral form;

- in an emergency outside office hours, by contacting the children's social care out-of-hours team on 0300 126 7000 or the police; and
- if a child is in immediate danger at any time, is left alone or is missing, by contacting the police directly and/or an ambulance using 999.

9.10.6. The DSL may make use of the National Police Chiefs' Council guidance 'When to call the police'.

10. Specific safeguarding issues

10.1. For more information relating to specific safeguarding issues, please see Appendix 2. For more information about child-on-child abuse, please see Appendix 1.

10.2 Female genital mutilation

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

10.2.2. The duty for teachers 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 must not examine pupils.

10.2.3. 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 local safeguarding procedures.

10.2.4. Girls of primary school age are within the age range at greatest risk of FGM. Staff will be alert to the risk indicators set out in Appendix 2, particularly ahead of school holidays.

10.3 Radicalisation and extremism

10.3.1. All schools are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism. If concerns are raised relating to radicalisation and extremism, the DSL should be informed immediately. Each school has a Prevent single point of contact, identified in Appendix 7.

10.3.2. We adhere to the Prevent duty statutory guidance and complete an annual Prevent risk assessment informed by the local counter-terrorism local profile.

10.3.3. We promote tolerance and cohesion through our relationships, health and wellbeing curriculum and our religious education curriculum, including units for every year group on tolerance, respect and relationships. We welcome visitors from a variety of faith groups to share their experiences, and check all visiting speakers and organisations in line with Appendix 3.

10.4 Children potentially at greater risk of harm

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

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

10.4.3. We will also take action to promote the educational outcomes of, and to protect, children missing education and children missing from home or care.

10.4.4. There are other familial issues that can have a detrimental impact on children. We work with other agencies in line with KCSIE 2026 to support children and families in the following circumstances:

- children facing court procedures or in the court system;
- children with family members in prison (see Section 10.13);
- children who are homeless or living in temporary accommodation;
- children who need a social worker; and
- children affected by domestic abuse, including through Operation Encompass notifications.

10.5 Mental health

10.5.1. Mental health problems can, in some cases, be an indicator that a child has suffered, or is at risk of suffering, abuse, neglect or exploitation. KCSIE 2026 significantly expands its expectations in this area, requiring early recognition and prompt escalation.

10.5.2. Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour and education. In a primary setting this often presents as changes in play, regression, withdrawal, or dysregulated behaviour rather than as a child describing how they feel.

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

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

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

10.5.6. Only appropriately trained professionals should attempt to make a diagnosis of a mental health concern. However, our schools will provide information and signposting services to children and parents, and will teach emotional health and wellbeing within the curriculum. Each school has an identified lead for mental health, named in Appendix 7. Please also see the trust Mental Health and Wellbeing Policy.

10.6 Child-on-child abuse

10.6.1. Our schools take all reports and concerns about child-on-child abuse, including child-on-child sexual violence and harassment and prejudice-based harm, very seriously. This includes any reports or concerns that have occurred outside school premises, or online.

10.6.2. We have a child-friendly leaflet explaining child-on-child abuse in age-appropriate language, which highlights the importance of keeping children safe, supports them if they are feeling worried about something, explains what will likely happen if they report or tell someone, and identifies who they can turn to.

10.6.3. To ensure that our approach to child-on-child abuse is well promoted, easily understood and accessible, information about how we minimise and respond to child-on-child abuse is set out at Appendix 1.

10.7 Young carers

10.7.1. We are alert to the needs of young carers, recognising that caring responsibilities at home can affect a pupil's attendance, attainment, behaviour and wellbeing. Primary-age young carers are frequently unidentified. We aim to identify young carers early so that support can be put in place at the right time, drawing on additional support from external partners, or local authority and health services, where appropriate.

10.8 Pupils with medical conditions, including allergies

10.8.1. An incident relating to the management of a pupil's medical condition, including allergies, does not in itself warrant a referral to local safeguarding partners. A safeguarding referral will only be considered where an incident raises concern that a pupil may be at increased risk of neglect, abuse or exploitation because of their medical condition — for example, where relevant medical information has not been shared with the school, or where a pupil is repeatedly sent to school without essential medication, putting them at risk.

10.8.2. From September 2026, under the allergy safety requirements set out in DfE statutory guidance and known from the family's campaign as Benedict's Law, each THLT school will:

- maintain and publish a school allergy policy, as a document distinct from its general medical conditions policy, and review it annually;
- ensure all staff, including supply staff, lunchtime supervisors, office staff and teaching assistants, receive allergy awareness training covering recognition of anaphylaxis, emergency response, use of adrenaline auto-injectors and incident recording;
- hold spare adrenaline auto-injectors on site, kept accessible and in date, with staff knowing where they are; and
- maintain an individual healthcare plan for every pupil with a diagnosed allergy, agreed with parents and reviewed at least annually.

10.8.3. Up to 30 per cent of severe allergic reactions occur in children with no prior diagnosis. Staff must therefore know how to recognise and respond to anaphylaxis in any child, not only those with a known allergy.

10.8.4. Allergy incidents will be recorded and reviewed. Where an incident indicates a wider failure of systems or supervision, the Headteacher will treat it as a safeguarding matter and report it to the DSL and to the trust.

10.9 Pupils questioning their gender

10.9.1. We recognise that some children question how they feel about being a boy or a girl. It is not for our schools to initiate discussion or action in this area; our approach is to respond sensitively where a pupil or their parent raises a question relating to social transition. In every case the DSL, or a deputy, will be involved and will consider the individual needs, wishes and feelings of the child, including the possibility of associated mental health needs, and will seek expert advice where there is any doubt.

10.9.2. Parents will be involved as a matter of course, other than in the exceptional circumstance where involving them would put the child at risk of significant harm. Decisions about facilities, including toilets and changing arrangements, and about residential visits, will be taken on a case-by-case basis with regard to the safety, privacy and dignity of all children.

10.10 Pupils who are lesbian, gay or bisexual

10.10.1. We recognise that a child being gay, lesbian or bisexual, or having a parent or family member who is, is not in itself an inherent risk factor for harm. However, we understand that these children can be targeted by other children. A child who is perceived by other children to be gay, lesbian or bisexual, whether they are or not, can be just as vulnerable.

10.10.2. We will create a culture where these children are able to speak out and share their concerns, support and safeguard children in line with guidance and legislation, and make reasonable adjustments as necessary so that all pupils can access a safe, comfortable and enabling learning environment.

10.11 Mobile phones and smart technology

10.11.1. In line with DfE guidance on mobile phones in schools, our schools operate a mobile phone-free environment. Pupils do not have access to a mobile phone during the school day, including lesson time, time between lessons, breaktime and lunchtime.

10.11.2. Where a pupil in Year 5 or Year 6 needs to bring a phone to school because they walk to and from school independently, it must be handed in at the start of the day and collected at the end. Responsibility for the device lies solely with the pupil and their parents.

10.11.3. Pupils are not permitted to wear or use smart watches, fitness trackers, GPS trackers or tracking tags such as AirTags in school or on off-site visits. Any such device being used in school will be confiscated and returned to parents.

10.11.4. Further detail on how this is implemented is set out in individual school behaviour policies. Staff use of mobile phones and smart technology is covered at Section 16.6.

10.12 Online safety

10.12.1. Our online safety arrangements are set out in the trust Online Safety Policy and at Appendix 5. We ensure that we have effective mechanisms to identify, intervene in and escalate any incident where appropriate. Online safety is included in our curriculum at all levels and information is also provided to parents and carers.

10.12.2. All staff are made aware of school policies on online safety, which set out our expectations relating to:

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

10.12.3. Staff must read the Online Safety Policy in conjunction with the Staff Code of Conduct and the IT Acceptable Use Policy in relation to personal online behaviour.

10.12.4. Any concerns related to children's safety online, whether safeguarding or technical, should be reported to the DSL immediately.

10.13 Children with a parent or relative in prison

10.13.1. A significant number of children in England and Wales have a parent in prison. A parent being sent to prison is often a traumatic experience for a child and can substantially affect their life, education, development and wellbeing. Children may be affected by having a parent or other relative in prison just as they are by any other challenging or traumatic event.

10.13.2. For children, having a relative in prison can lead to:

- poor physical and mental health;
- breakdown or loss of support networks, especially if the relative now in prison acted as a primary carer;
- significant trauma if they witnessed elements of criminal activity, or the arrest of their relative;
- feelings of loss or rejection;
- fear of being stigmatised and judged by the prisoner label;
- additional care responsibilities placed on the child; and
- an impact on school, including absence from education or lower attainment.

10.13.3. Signs that a child is being affected by a relative being in prison may include changes in behaviour, such as becoming more withdrawn than normal; changes in their mental health and wellbeing, and being less able to regulate their emotions; signs of loss and grief; and difficulty paying attention at school, losing interest in school or missing school.

10.13.4. In all THLT schools, children with a parent in prison are identified as vulnerable children under safeguarding. The DSL will hold a team meeting with the adults around the child and those responsible for their care to establish any support needed or particular vulnerabilities.

This must be recorded on CPOMS. The DSL will consider whether a family help assessment is appropriate.

10.13.5. Useful resources include Children Heard and Seen, Families Outside, Childline and Barnardo's.

10.14 Elective home education

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

10.14.2. We will notify the local authority of all deletions from the admission register, including when a child is removed from roll to be educated at home, and will share all relevant safeguarding information held within five days. Where a child is subject to a child protection enquiry or assessment, professionals should consult the local authority elective home education team as part of that process.

10.15 Intimate care and personal care

10.15.1. Our schools provide intimate and personal care to children who need it, including in the Early Years Foundation Stage, children with SEND and children who have had an accident. Intimate care is delivered in line with the trust Intimate Care Policy, by named and appropriately checked staff, with the arrangements agreed with parents, recorded, and reviewed.

10.15.2. Engaging in intimate or personal care is regulated activity, even where it happens only once and regardless of whether the person is supervised. See Appendix 3.

11. Pupils with special educational needs and disabilities

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

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- pupils being more prone to peer group isolation than other pupils;
- the potential for pupils with SEND to be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers, including for children who are non-verbal or pre-verbal.

11.2. We offer extra pastoral support for pupils with SEND. This may include:

- emotional support sessions and coaching;
- personalised reward systems or monitoring cards;
- adapted timetables;
- access to nurture provision;
- targeted intervention; and
- a range of support arranged through an education, health and care plan.

11.3. Where a child cannot easily communicate verbally, staff will be alert to changes in presentation, behaviour and play, and will use the child's established communication methods. The SENCO and DSL will work together to ensure these children can raise a concern.

11.4. More information about local support for children with SEND is available through the SEND Code of Practice and the West Northamptonshire local offer.

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

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

12.2. The role of the Virtual School Head includes a non-statutory responsibility for oversight of the attendance, attainment and progress of children with a social worker and children in kinship care.

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

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

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

12.5. We maintain contact plans for children with a social worker, and for other children about whom we have safeguarding concerns, covering circumstances in which they are not attending school. Each child has an individual plan setting out:

- how often the school will make contact — this will be at least once a week;
- which staff member or members will make contact — as far as possible, staff who know the family well; and
- how staff will make contact — by telephone, doorstep visit, or a combination of both.

12.6. We agree these plans with children's social care where relevant, and review them termly. If we cannot make contact, we will contact the child's social worker or the police.

13. Looked after and previously looked after children

13.1. We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe, including those in kinship care arrangements.

13.2. Appropriate staff will have relevant information about looked-after children's 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.

13.3. Each school has appointed a designated teacher 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. Designated teachers are named in Appendix 7.

13.4. 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; and
- 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 best be used to support looked-after children and meet the needs identified in their personal education plans.

14. Record-keeping

14.1. All safeguarding concerns, discussions and decisions made, and the reasons for those decisions, must be recorded in writing on CPOMS, the trust's safeguarding recording system. This includes

instances where referrals were, or were not, made to another agency. If in doubt about recording requirements, staff should discuss this with the DSL.

14.2. When a child has made a disclosure, the member of staff or volunteer should:

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

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

14.4. The Designated Safeguarding Lead will ensure that all safeguarding records are managed in accordance with the Education (Pupil Information) (England) Regulations 2005. Information will be kept confidential and stored securely.

14.5. Records will include:

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

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

14.7. If a child for whom a school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file.

14.8. To allow the new school to have support in place when the child arrives, this should be within five days for an in-year transfer, or within the first five days of the start of a new term.

14.9. In addition, if the concerns are significant or complex, or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to make any necessary preparations to ensure the safety of the child.

14.10. When transferring a child protection file, the DSL will include a clear, structured summary identifying current safeguarding concerns, relevant context and any ongoing support needs. Particular care will be taken to distinguish between current safeguarding concerns and historic information, so that past issues are presented with appropriate context rather than transferred as unstructured records. The transfer will be by secure means, separate from the main pupil file, and confirmation of receipt will be obtained.

14.11. When our schools receive a child protection file from another setting, the DSL, or an appropriately trained member of staff, will review it promptly so that current risks and needs are clearly understood, will seek clarification from the previous setting where information is unclear or incomplete, and will ensure that key staff such as the SENCO are made aware as required.

14.12. Appendix 3 sets out our approach to record-keeping in respect of recruitment and pre-employment checks. Appendix 4 sets out our approach to record-keeping in respect of allegations of abuse made against staff.

15. Relationships Education and Health Education

15.1. Relationships Education and Health Education are compulsory in primary schools. Sex education is not compulsory in primary schools beyond the elements contained in the national curriculum for science; where a school chooses to teach additional sex education, parents have the right to request that their child be withdrawn. Our approach is set out in each school's Relationships and

Health Education Policy and follows the DfE statutory guidance on relationships education, relationships and sex education and health education applying from 1 September 2026.

15.2. We acknowledge that there may be times during this teaching when children need an opportunity to talk to a trusted adult. Children may want to talk about experiences at home or in the community, which may trigger discussions with the Designated Safeguarding Lead, who will then decide on next steps. Staff will be prepared for this and will not discourage a child from speaking.

15.3. Our schools play a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny and misandry, racism, faith-targeted abuse, homophobia, biphobia and sexual violence and harassment. This is underpinned by our behaviour policies, our pastoral support systems, and a planned, inclusive programme of relationships and health education tackling issues such as:

- healthy and respectful relationships, including friendships and family relationships;
- boundaries, privacy and consent, taught in an age-appropriate way;
- stereotyping, prejudice and equality;
- body confidence and self-esteem;
- how to recognise unkind, controlling or abusive behaviour;
- the importance of telling a trusted adult, and identifying who those adults are; and
- online safety, including what to do if something online makes them uncomfortable.

16. Safer working practice

16.1. We work to create and embed a culture of openness, trust and transparency, in which our schools' values and expected behaviour, as set out in the Staff Code of Conduct, are constantly lived, monitored and reinforced by all staff.

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

16.3. Trustees, governors and senior leaders will ensure that this policy is adhered to by:

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

16.4. Trustees and governors will help to identify any weakness in school safeguarding systems.

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

16.6 Staff use of mobile phones and smart technology

16.6.1. Staff may bring personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present. Staff members' personal phones will remain in bags or lockable storage during contact time with pupils.

16.6.2. Staff must not use personal devices to photograph or record pupils, other than where a school has explicitly authorised this for a defined educational purpose on a school-approved platform. Where this is authorised, images must be uploaded via school systems and then immediately deleted from the personal device. School-issued devices should be used wherever possible.

16.6.3. Staff must not use personal devices, personal email accounts or personal social media to communicate with pupils or parents. All communication must take place through school-approved channels.

16.6.4. We will follow UK GDPR and the Data Protection Act 2018 when taking and storing photographs and recordings, in line with the trust IT Acceptable Use Policy.

17. Safe recruitment

17.1. We adhere to Part 3 of KCSIE 2026 at all times. Our detailed procedures are set out at Appendix 3 and in the trust Safer Recruitment Policy. This section summarises the position on regulated activity, which changed from 1 September 2026.

17.2. This section applies to all recruitment, volunteering and DBS vetting decisions across the trust's settings, including for paid staff, volunteers, trainee teachers, students on placement and casual helpers.

17.3. Activity meets the threshold for regulated activity — described in guidance as the period condition — where it occurs:

- on more than three days in any 30-day period; or
- once overnight, between 2am and 6am.

17.4. Where either threshold is met, the person is in regulated activity and, where they are not barred, will be asked to undergo an enhanced DBS check with children's barred list information.

17.5. The Crime and Policing Act 2026 removed the supervision exemption from the definition of regulated activity. Being supervised by another appropriately checked adult no longer prevents a role from being regulated activity. All paid staff with contact with children are already in regulated activity and this position is unchanged. The change principally affects volunteers, including:

- regular parent or community volunteers, for example reading helpers, forest school helpers, or PTA members who help frequently;
- students on placement;
- assistant coaches, club helpers, and outdoor activity or trip staff who were previously exempted through supervision by a qualified colleague; and
- anyone accompanying an overnight trip or residential, where a single overnight stay is sufficient to trigger the requirement regardless of frequency.

17.6. Parents or carers who help out only occasionally — for example at a one-off PTA event or a single day trip — are not affected and can continue on an enhanced DBS check without barred list information, where one is requested following a risk assessment.

17.7. Where a person volunteers in more than one setting, each occasion of teaching, training, instructing, caring for or supervising a child counts towards the three-days-in-30 threshold, even where the settings are different. Where this applies across more than one THLT school, the schools involved will agree between them which will lead on obtaining the DBS check, with the volunteer able to share the outcome with each setting involved.

17.8. Where a person's role changes, or the way it is carried out changes, DBS eligibility will be reassessed.

17.9. In Early Years Foundation Stage provision, a volunteer may not begin work until the enhanced DBS certificate, including children's barred list information, has been received.

18. Safeguarding concerns about and allegations against members of staff

18.1 Allegations that may meet the harms threshold

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

18.1.2. Allegations that may indicate that a person will pose a risk of harm if they continue to work in their present position, or in any capacity with children, include:

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

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

18.2 Allegations against the Headteacher

18.2.1. If an allegation is made against a Headteacher, it must be reported to the CEO or, in their absence, to the Chair of Governors or Chair of Trustees.

18.3 Allegations against staff

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

18.3.2. The Headteacher or Chair of Governors should consider if the concern or allegation meets the threshold for Designated Officer intervention.

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

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

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

18.4.1. In the event that there is a safeguarding concern about a member of staff, we will adhere to guidance outlined in Part 4, Section 2 of KCSIE 2026 and Northamptonshire Safeguarding Children Partnership guidance. The term low-level concern does not mean that it is insignificant; it means that the behaviour towards a child does not meet the harms threshold. A low-level concern is any concern — no matter how small, and even if no more than causing a sense of unease or a nagging doubt — that an adult working in or on behalf of a school may have acted in a way that:

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

18.4.2. It is essential that low-level concerns are reported. Such behaviours can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate

but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

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

- being overly friendly with children;
- having favourites;
- taking photographs of children on a personal mobile phone outside the permitted use set out at Section 16.6;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, outside a planned and authorised activity; and
- humiliating pupils.

18.4.4. We will act quickly, proportionately and appropriately in the event of a low-level concern, to prevent abuse or harm of a child and to promote a culture of safeguarding. Dealing with low-level concerns also protects those working in or on behalf of schools from potential false allegations or misunderstandings.

18.4.5. Staff will receive training about what may constitute a low-level concern.

18.4.6. More information can be found in Part 4 of KCSIE 2026.

18.5 Reporting low-level concerns

18.5.1. Low-level concerns should be reported to the Headteacher.

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

18.5.3. The Headteacher may speak directly to the person who raised the concern, unless it has been raised anonymously, and may speak to the individual involved and any witnesses.

18.5.4. The Headteacher will then categorise the type of behaviour and decide on an appropriate course of action. This will be recorded, along with the rationale for any decisions made and details of action taken. Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where patterns or wider cultural issues within a school are identified, the school will either:

- take action through disciplinary procedures;
- refer behaviour to the Local Authority Designated Officer where a pattern of behaviour moves from a concern to meeting the harms threshold; and/or
- revise policies or implement extra training as appropriate, to minimise the risk of the behaviour happening again.

18.5.5. We will retain low-level concerns information for the duration of the individual's employment and for six months after it ends. The records of any allegation that is found to be malicious and proven false will be deleted from the individual's record.

18.6 Supply staff and contracted staff

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

18.6.2. The Headteacher will liaise with the supply agency to determine whether to suspend or redeploy the supply teacher whilst the investigation is carried out.

18.6.3. Schools will inform supply agencies of their process for managing allegations and will take account of the agency's policies and their duty to refer to the DBS as personnel suppliers.

This includes inviting the agency's human resources manager, or equivalent, to meetings and regularly updating agencies on relevant school policies.

19. Complaints and concerns about school safeguarding policies

19.1 Complaints against staff

19.1.1. Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with low-level concerns or allegations of abuse made against staff, as set out at Section 18 and Appendix 4.

19.2 Other complaints

19.2.1. Any pupil reporting a safeguarding concern will be listened to, and a member of staff will support them to record it. Other complaints should be made in line with the trust Complaints Procedure.

19.3 Whistleblowing

19.3.1. Staff who have concerns about safeguarding practice within a school, or about the conduct of colleagues or leaders, should raise them under the trust Whistleblowing Policy. Staff may also contact the NSPCC whistleblowing advice line.

20. Use of school premises for non-school activities

20.1. Where another body is providing services or activities on a school site, whether or not the children attending are on the school roll, the school will:

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

20.2. If a school receives an allegation relating to an incident that happened when an individual or organisation was using school premises for the purposes of running activities for children, we will follow our safeguarding policies and procedures, including informing the Local Authority Designated Officer.

20.3. This applies to lettings, holiday clubs, sports coaching, faith groups, community groups and any similar use of our sites.

21. How we safeguard pupils attending alternative provision

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

21.2. In accordance with KCSIE 2026 we will obtain, in writing, confirmation directly from the provider that safeguarding checks have been carried out on individuals working at the provision. These checks will be in line with those used to update our single central record for all members of staff, including an enhanced DBS check with barred list information for those conducting regulated activity at the provision. Written confirmation must be received before any pupil begins attending, and will be saved in a location accessible to relevant members of staff. We will not allow anyone on the barred list to work, in any capacity, with our pupils at an alternative provision setting.

21.3. We will ensure that key staff have visited the provision and conducted their own safeguarding quality assurance, which may include checking its registration status and whether it needs to be registered,

and reviewing its child protection policy and risk assessments for any hazardous activity in which the pupil may be involved.

21.4. We will agree an attendance policy with the provider, ensure we know the location of our pupils every day, and have an established procedure to follow if a pupil does not attend as expected.

21.5. We will establish a contact plan setting out when we will visit the pupil at the provision, how we will keep in touch with the provider, and who will oversee contact with the child's parents or carers. Placement reviews will be held at least half-termly, and where safeguarding concerns arise the placement will be reviewed without delay.

22. Policy implementation, monitoring and review

22.1. This policy will be reviewed annually by the Trust Board, and by governing bodies. It will be implemented through school induction and training programmes, and as part of day-to-day practice. Compliance with the policy will be monitored by Designated Safeguarding Leads, through the trust's safeguarding audit cycle, and through staff performance management.

22.2. The policy will also be reviewed and reissued out of cycle where there is a significant change in statutory guidance, legislation or local safeguarding arrangements, or following a serious safeguarding incident, where a review of this policy would be appropriate.

22.3. The Trust Board will receive a termly safeguarding report from the Trust Safeguarding Lead, covering referral activity, training compliance, single central record compliance, filtering and monitoring reviews, and any patterns arising from low-level concerns.

Appendix 1: Child-on-child abuse

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

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

Child-on-child abuse is most likely to include, but may not be limited to, the behaviours set out at Section 3.6 of this policy.

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

Prejudice-based harm

KCSIE 2026 is explicit that racism, faith-targeted abuse and other forms of discriminatory harm between children are safeguarding matters and not simply behaviour matters. Where a child is targeted because of their race, faith, ethnicity, disability, sex, sexual orientation or perceived gender identity, we will respond to the incident, support the child targeted, work with the child who caused the harm, record it on CPOMS, and consider what the incident tells us about the culture of the school. Reports will be monitored for patterns and reported to governors.

Harmful sexual behaviour

We recognise that children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected, through inappropriate, to problematic, abusive and violent. We refer to problematic, abusive and violent sexual behaviour as harmful sexual behaviour. KCSIE 2026 strengthens the expectation that schools use a continuum approach.

In a primary setting, distinguishing developmentally expected behaviour from harmful sexual behaviour requires particular care. Staff should not dismiss a behaviour as age-appropriate curiosity without reference to the DSL, nor treat a young child as a perpetrator.

When responding to harmful sexual behaviour, we will:

- consider the behaviours in a child protection context;
- consider the ages and developmental stages of the children involved;
- use a recognised continuum tool, such as the Brook traffic light tool, to inform, but not replace, professional judgement;
- take action in line with local thresholds and pathways guidance and relevant statutory guidance; and
- seek specialist support as required.

We will take action at the earliest possible point, to safeguard children and to prevent problematic, abusive or violent behaviour in the future. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and we will offer support as required.

Staff training

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

Procedures for minimising opportunities for child-on-child abuse

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

- have robust behaviour policies, which make it clear that we have a zero-tolerance approach to any kind of child-on-child abuse;
- ensure staff understand what is meant by child-on-child abuse and school policies on child-on-child abuse, through specific staff training;
- train staff thoroughly so that they challenge inappropriate behaviour, even if it appears to be relatively innocuous;
- train staff thoroughly so that they are confident to challenge inappropriate behaviours between peers that are abusive in nature;
- never downplay certain behaviours, for example dismissing sexual harassment as just banter, just having a laugh, part of growing up, or boys being boys, as this can lead to a culture of unacceptable behaviours, an unsafe environment for children and, in the worst case, a culture that normalises abuse;
- supervise all areas of the site actively, including toilets, cloakrooms, corridors and less visible areas of the playground; and
- recognise that sexual harassment and sexual violence, as well as other forms of child-on-child abuse, may be happening even if they are not reported.

How we address child-on-child abuse within the curriculum and across our schools

Elements of child-on-child abuse are covered through assemblies on subjects such as anti-bullying, kindness and online safety, and through visits from the local policing team. This runs alongside year-group specific units within our relationships, health and wellbeing curriculum, which address friendship, boundaries, privacy, consent in an age-appropriate form, and the sharing of images.

We ensure that our systems for reporting all safeguarding concerns are well promoted, easily understood and easily accessible for children, so that they can confidently report abuse knowing their concerns will be treated seriously. We ensure that children are aware of our safeguarding and child protection procedures through worry boxes, protective behaviours work, and direct teaching about identifying trusted adults.

Additional vulnerabilities

We recognise that some children may be more vulnerable to child-on-child abuse than others. For example, children who have already experienced abuse, children with special educational needs or disabilities, children living in care, and children who are, or are perceived to be, lesbian, gay, bisexual or gender questioning may be more likely to face child-on-child abuse than other children. Some children may face additional barriers to telling anyone about abuse because of their vulnerability, disability, sex, ethnicity, faith or sexual orientation.

We work to protect children with additional vulnerabilities by, where appropriate:

- individual mentoring arrangements;
- drawing and talking interventions;
- emotional charts and other tools that prompt discussion;
- communication-adapted reporting routes for children who are non-verbal or pre-verbal; and
- liaising with parents.

How to report concerns

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

All victims will be taken seriously, regardless of how long it has taken them to come forward, and they will be supported and kept safe. Abuse that occurs online or outside of school will be treated equally seriously. A child will never be given the impression that they are creating a problem by reporting child-on-child abuse,

including sexual violence or sexual harassment. A child will never be made to feel ashamed for making a report or have their experience minimised.

In school, pupils can:

- use classroom worry boxes;
- speak to a trusted adult in school;
- speak to a trusted adult outside of school, who should then report it to school; and
- speak to a peer — all children are taught about protective behaviours, which includes encouraging them to identify five trusted people.

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

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

Our staff. Any member of staff that has concerns about child-on-child abuse should follow the procedure set out in Section 9 and must report concerns immediately, ensuring that they are recorded on CPOMS.

Others. We encourage everyone to report any form of abuse or harm perpetrated by or against our pupils. Any concerns should be reported to the Designated Safeguarding Lead, using the details in Appendix 7.

Wider concerns

We strive to create safe and welcoming environments for all children. If you have any concerns about our culture of safeguarding, or about this policy or our procedures, please direct these to the Designated Safeguarding Lead immediately, or follow the trust Complaints Procedure.

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

We will adhere to KCSIE 2026 when responding to incidents of child-on-child abuse. Our schools take child-on-child abuse seriously and will respond to all concerns or disclosures immediately, including those that have occurred outside of school and online.

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

Our starting point regarding any report of child-on-child sexual harassment or violence is always a zero-tolerance approach: it is never acceptable and it will not be tolerated.

The subsequent action taken will vary depending on the type of child-on-child abuse and the severity of the incidents disclosed. The Designated Safeguarding Lead will take contextual factors into account when managing the report, and will always consider:

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

Depending on the nature of the incidents, the Designated Safeguarding Lead may:

- seek further information from those involved and from witnesses;
- undertake a risk assessment and needs assessment to ascertain steps necessary to safeguard the victim, the child who caused the harm, adults and other children;
- decide to manage the concern internally;
- organise a meeting with relevant staff and agencies to assess risk and agree a safety plan;
- refer the children involved to local services for family help;
- refer the case to children's services via a MASH referral;
- liaise with social workers working with the children involved, if applicable;
- make a report to the police; and
- liaise with specialist services.

In the event of a disclosure of child-on-child sexual violence, we will make an immediate risk and needs assessment. The risk and needs assessment will consider the victim, especially their protection and support, including considering school transport as a potentially vulnerable place; whether there may have been other victims; the child alleged to have caused the harm; and all the other children at the school, especially any actions that are appropriate to protect them from future harm.

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

Recording procedures

All child-on-child abuse incidents are categorised as such on CPOMS. Where they involve bullying, prejudicial behaviour, racism, faith-targeted abuse or sexual harassment, they are also tagged as a safeguarding cause for concern. This ensures electronic notification to, and review by, the DSL. Members of staff will follow the procedures for recording a disclosure as outlined in Section 14 of this policy.

How we support victims of child-on-child abuse

Our schools recognise that child-on-child abuse has a significant impact on children and that victims are likely to need ongoing support. Appropriate support will be put in place whilst investigation is taking place and following the initial response. Support will continue for as long as it is needed and will be reviewed regularly. Schools will do everything they can to maintain the victim's normal routine and to protect the victim from further bullying, harassment or abuse because of their disclosure. This may include:

- designating a member of staff to support the child;
- meeting with parents to agree strategies for support;
- provision of time to talk;
- protective behaviours work; and
- lunchtime nurture support.

If a victim of child-on-child abuse moves to a new setting, the Designated Safeguarding Lead will share the necessary information to ensure that support for the child continues in their new placement, with details of actions that have been taken to help and support the child.

How we support children who have caused harm

We have a responsibility to safeguard and support all children. We will adhere to KCSIE 2026 when managing reports of child-on-child abuse and decide on action and support on a case-by-case basis. Schools have a responsibility to ensure that a child who is alleged to have caused harm continues to receive a suitable education, and will consider a range of options if they are unable to attend school. Options may include providing home learning through the school's online platform, off-site specialist provision in line with identified special needs, regular school contact via a designated member of staff, and lunchtime nurture support.

We recognise that children who abuse their peers may be being abused themselves. Schools will continue to safeguard them and provide them with support.

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

Schools may choose to impose a sanction following an incident of child-on-child abuse. In this case, we will follow school behaviour policies in determining the level and severity of sanction. Where a child is cautioned or receives a conviction related to an incident of child-on-child abuse, the school will liaise with parents to develop an individual support plan, conduct an individual risk assessment, and use external services in response to identified needs.

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

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

How we support other children who may have been affected

Our schools will provide support via pastoral support, mentoring, counselling or other methods that suit the individual child on a case-by-case basis.

Local safeguarding arrangements, parents and whole-school response

Our schools adhere to local safeguarding arrangements as outlined by the Northamptonshire Safeguarding Children Partnership. Parents will be informed of incidents unless sharing information puts a child at greater risk of harm. Children will always be encouraged to speak to parents about child-on-child abuse unless it puts them at greater risk of harm.

We will keep detailed records of any incidents of child-on-child abuse and will look out for potential patterns of concerning, problematic or inappropriate behaviour. Where a pattern is identified, we will take appropriate action and consider whether there are wider cultural issues that enabled the behaviour. In response, we may dedicate more teaching time to a particular issue or topic, deliver additional staff training, or change supervision arrangements.

Appendix 2: Types of abuse

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

Physical abuse

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

Emotional abuse

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

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

Sexual abuse

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 or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing; or non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse, including online.

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

Neglect

Neglect is the persistent failure to meet a child's basic physical and psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy because of maternal substance misuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter, including exclusion from home or abandonment;
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision, including the use of inadequate caregivers; or
- ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. In a primary setting, neglect is frequently the concern staff see most often and may present as persistent hunger, poor hygiene, unsuitable clothing for the weather, untreated medical or dental needs, repeated lateness, or a child not being collected.

Children missing from education

A child going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child

criminal exploitation, or issues such as mental health problems, substance misuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who are at risk of harm or neglect; are at risk of forced marriage or FGM; come from Gypsy, Roma or Traveller families; come from the families of service personnel; go missing or run away from home or care; are supervised by the youth justice system; cease to attend a school; or 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 and to help prevent the risks of going missing in future.

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

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

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

Missing and uncollected children

Our procedures are designed to ensure that a child missing on site is found and returned to effective supervision as soon as possible. Each school holds a missing child procedure which is practised and reviewed.

If a child is not collected at the end of the session or day, we will try all contacts held on our systems, including other family members. The child will remain in school, supervised, until the matter is resolved. Where we cannot make contact within a reasonable period, we will contact children's social care and, if appropriate, the police. The incident will be recorded on CPOMS and repeated non-collection will be treated as a potential neglect concern.

Child criminal exploitation

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

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. Some specific forms can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing.

Children can become trapped by this type of exploitation as perpetrators can threaten victims and their families with violence, or entrap and coerce them into debt. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals. The experience of girls who are criminally exploited can be very different to that of boys, and the indicators may not be the same.

Indicators of child criminal exploitation can include a child appearing with unexplained gifts or new possessions; associating with other children involved in exploitation; suffering changes in emotional wellbeing; misusing drugs and alcohol; going missing for periods of time or regularly coming home late; regularly missing school; or not taking part in education.

Primary-age children are targeted for criminal exploitation, and in some cases are recruited through older siblings. Staff must not assume that a child is too young.

If a member of staff suspects child criminal exploitation, they will discuss this with the DSL, who will trigger local safeguarding procedures, including a referral to children's social care and the police, if appropriate.

County lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other forms of deal line. Exploitation is an integral part of the county lines offending model, with children and vulnerable adults exploited to move and store drugs and money. Offenders will often use coercion, intimidation, violence including sexual violence, and weapons to ensure compliance of victims. Children can easily become trapped, as county lines gangs create drug debts and can threaten serious violence and kidnap.

Serious violence

Signs that a child is at risk from, or involved with, serious violent crime include increased absence from school; a change in friendships or relationships with older individuals or groups; a significant decline in performance; signs of self-harm or a significant change in wellbeing; signs of assault or unexplained injuries; and unexplained gifts or new possessions.

Risk factors which increase the likelihood of involvement in serious violence include being male; having been frequently absent or permanently excluded from school; and having experienced child maltreatment and been involved in offending.

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

Child sexual exploitation

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

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time. Some children may not realise they are being exploited, for example because they believe they are in a genuine relationship. Children and young people often trust their abuser.

Child sexual exploitation can include both physical contact and non-contact sexual activity. It can also happen online, for example where children are persuaded or forced to share sexually explicit images of themselves or take part in sexual activity using a webcam. It may also occur without the victim's immediate knowledge, for example through others copying videos or images.

If a member of staff suspects child sexual exploitation, they will discuss this with the DSL, who will trigger local safeguarding procedures.

Child abduction and community safety incidents

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

In the event that anyone has concerns about child abduction or community safety incidents, they should speak to the Designated Safeguarding Lead immediately. Schools will also consider what information to share with parents and whether arrangements for the start and end of the school day need to change.

Online harms and cybercrime

Cybercrime is criminal activity committed using computers and the internet. It is broadly categorised as either cyber-enabled, meaning crimes that can happen offline but are enabled at scale and speed online, or cyber-dependent, meaning crimes that can be committed only by using a computer.

Children with skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If we have concerns about a child and possible risk of being drawn into cybercrime, the Designated Safeguarding Lead will consider referring into the Cyber Choices programme. We may also refer to children's social care if we think a child is suffering or is at risk of suffering harm.

Domestic abuse

Domestic abuse is any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse, and child or adolescent to parent violence and abuse. The abuse can encompass, but is not limited to, psychological, physical, sexual, financial and emotional abuse.

All children can witness and be adversely affected by domestic abuse in the context of their home life. Domestic abuse can impact on children through seeing, hearing or experiencing its effects. Exposure can have a serious, long-lasting emotional and psychological impact. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Children who witness domestic abuse are victims in their own right.

Our schools work in partnership with the local authority and Northamptonshire Police through Operation Encompass. Where a domestic incident has affected one of our pupils, the Designated Safeguarding Lead receives a notification before the start of the school day and decides on the appropriate support the child requires; this could be silent or overt. All information sharing and resulting actions will be undertaken in accordance with local protocols. We will record this information on CPOMS and store it in line with Section 14.

Homelessness and temporary accommodation

Being homeless, being at risk of becoming homeless, or living in temporary accommodation presents a real risk to a child's welfare. Designated Safeguarding Leads will be aware of contact details and referral routes to the local housing authority so they can raise and progress concerns at the earliest opportunity. Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care. Schools will be alert to the practical impact on a child of living in temporary accommodation, including travel, equipment, uniform and space to play and learn.

So-called honour-based abuse, including FGM and forced marriage

So-called honour-based abuse encompasses incidents or crimes committed to protect or defend the honour of the family 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 so-called honour-based abuse 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 it, or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

Female genital mutilation

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM. Section 10.2 sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk.

Indicators that FGM has already occurred include a pupil confiding in a professional that FGM has taken place; a family member disclosing that FGM has been carried out; a family or pupil already being known to social services in relation to other safeguarding issues; or a girl having difficulty walking, sitting or standing, or looking uncomfortable; finding it hard to sit still for long periods where this was not a problem previously; spending longer than normal in the toilet due to difficulties urinating; having frequent urinary 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 significant change in behaviour; being reluctant to undergo any medical examination; asking for help but not being explicit about the problem; or talking about pain or discomfort between her legs.

Potential signs that a pupil may be at risk of FGM include the family having a history of practising FGM, which 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; a girl having a mother, older sibling or cousin who has undergone FGM; a girl confiding that she is to have a special procedure or attend a special occasion to become a woman; talking about a long holiday to a country where the practice is prevalent; requesting help because she suspects that

she is at immediate risk; talking about FGM in conversation; being unexpectedly absent from school; or having sections missing from her child health record.

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

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties, and where violence, threats, or any other form of coercion is used. Threats can be physical, emotional or psychological. Staff will receive training on forced marriage and the presenting symptoms. We are aware of the one chance rule: we may have only one chance to speak to a potential victim and only one chance to help 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, and then report this to the DSL. The DSL will speak to the pupil in a secure and private place, activate local safeguarding procedures and refer the case to the Local Authority Designated Officer, seek advice from the Forced Marriage Unit, and refer the pupil to appropriate pastoral support.

Private fostering

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

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

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

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

Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. School staff should notify the Designated Safeguarding Lead when they become aware of private fostering arrangements. The DSL will speak to the family of the child involved to check that they are aware of their duty to inform the local authority. The school itself has a duty to inform the local authority. On admission to schools, we will take steps to verify the relationship of the adults to the child being registered.

Preventing radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Terrorism is an action that endangers or causes serious violence to a person or people; causes serious damage to property; or seriously interferes with or disrupts an electronic system. The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk. We will assess the risk of children in our schools being drawn into terrorism, based on an understanding of the potential risk in local areas, in collaboration with local safeguarding partners and police. 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. In a primary context, concerns more often relate to the influence of the family or wider household, or to material a child has encountered online, than to the child

holding settled views of their own. Staff will be alert to changes in children's behaviour, and should have confidence in their instincts and seek advice if something feels wrong.

Where staff are concerned about a pupil, they will follow the procedures set out in Section 9, including discussing their concerns with the DSL. Staff should always take action if they are worried.

Appendix 3: Safer recruitment

We adhere to Part 3 of Keeping Children Safe in Education 2026 at all times. We consider safeguarding throughout the recruitment process, including when defining and advertising roles.

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

Pre-appointment safer recruitment

We will include the following in all job advertisements:

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

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

All applicants will be provided with a copy of this policy.

Applicants

We require applicants to provide personal details, current and former names, current address and their National Insurance number; details of their present or last employment and reason for leaving; full employment history since leaving school, including education, employment and voluntary work, with reasons for any gaps; qualifications, the awarding body and date of award; details of referees; and a statement of the personal qualities and experience relevant to their suitability for the post. We will not accept a curriculum vitae in place of an application form.

Shortlisting and selection

Shortlisted candidates will be asked to complete a self-declaration of their criminal record or information that would make them unsuitable to work with children. At least two people will carry out shortlisting and they will explore any potential concerns, including inconsistencies and gaps in employment.

We will seek references on all shortlisted candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments. The references requested will ask specific questions about the suitability of the applicant to work with children. When asked to provide references, we will confirm whether we are satisfied with the applicant's suitability to work with children and provide the facts of any substantiated safeguarding allegations.

We will carry out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online.

New staff

When appointing new staff, we will:

- verify a candidate's identity, including demonstrating an awareness of the potential for individuals changing their name; best practice is checking the name on their birth certificate, where this is available;
- obtain, via the applicant, an enhanced DBS check including children's barred list information for those who will be engaging in regulated activity with children;
- obtain a separate children's barred list check if an individual will start work in regulated activity with children before the DBS certificate is available, other than in EYFS provision where work may not begin until the full certificate has been received;
- verify the candidate's mental and physical fitness to carry out their work responsibilities;

- verify the person's right to work in the UK;
- make any further checks the school considers appropriate where the person has lived or worked outside the UK, including a criminal records check for overseas applicants and, for teaching positions, a letter from the professional regulating authority in the country where the applicant has worked;
- verify professional qualifications as appropriate, using the DfE 'Check a teacher's record' service to confirm qualified teacher status and completion of induction;
- obtain the DBS check ourselves, or ask to see their own certificate at the level our post requires, where an individual is self-employed;
- obtain the DBS certificate from the candidate before, or as soon as practicable after, their appointment, or within 30 calendar days of the issue date on the certificate where the DBS Update Service is used;
- ensure that an applicant to be employed to carry out teaching work is not subject to a prohibition order;
- check that candidates taking up a management position are not subject to a section 128 direction; and
- check, for staff working in Early Years Foundation Stage provision, that the person is not disqualified under the Childcare (Disqualification) Regulations.

Regulated activity

Regulated activity means a person who will be:

- responsible, on a frequent basis — more than three days in a 30-day period — for teaching, training, instructing, caring for or supervising children, or providing advice or guidance on their physical, emotional or educational wellbeing;
- carrying out paid or unpaid work regularly in a school where that work provides an opportunity for contact with children; or
- engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not.

Important change from 1 September 2026: the Crime and Policing Act 2026 removes the previous supervision exemption from the definition of regulated activity. This means that being supervised by another appropriately checked adult no longer prevents a role from being regulated activity. Any volunteer whose role involves teaching, training, instructing or supervising children frequently — on more than three days in a 30-day period — or overnight, is now in regulated activity, whether or not they are supervised, and must have an enhanced DBS check with children's barred list information. Schools will check the barred list status of any existing volunteer who becomes newly in scope of regulated activity as a result of this change.

Existing staff

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

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where we believe the individual has engaged in relevant conduct; or the individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence; or the harm test is satisfied in respect of the individual; 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 our schools has had the appropriate level of DBS check, including contractors provided through a private finance initiative or

similar contract. This will be an enhanced DBS check with barred list information for contractors engaging in regulated activity, and an enhanced DBS check without barred list information for all other contractors 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 six 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.

Trainee and student teachers

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

Volunteers

We will:

- never leave an unchecked volunteer unsupervised or allow them to work in regulated activity;
- obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity;
- carry out and record a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteer not engaging in regulated activity;
- where a volunteer meets the frequency threshold for regulated activity by volunteering across more than one setting, work with the other settings to agree who applies for the enhanced DBS check with barred list information, and share that check with each setting; volunteers may also join the DBS Update Service, which is free for volunteers, to allow their check to be ported between settings;
- check the barred list status of any existing volunteer who becomes newly in scope of regulated activity as a result of the Crime and Policing Act 2026, by obtaining an enhanced DBS check with children's barred list information, or a standalone barred list check where the volunteer is to continue in the role while the full check is obtained; and
- in Early Years Foundation Stage provision, not permit a volunteer to begin until the enhanced DBS certificate with children's barred list information has been received.

Trustees and governors

All trustees and governors will have an enhanced DBS check without barred list information, or with barred list information if working in regulated activity; a section 128 check; identity verification; right to work in the UK verification; and other checks deemed necessary if they have lived or worked outside the UK. For academy trusts, the chair of the board will have their DBS check countersigned by the Secretary of State.

Staff working in alternative provision settings

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

Checking the identity and suitability of visitors

All visitors will be required to verify their identity. If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter. Visitors should be ready to produce identification, and are expected to sign in and be given appropriate identification to indicate whether they are DBS checked or not.

Visitors attending for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photographic identification, and the organisation sending the professional will provide annual written confirmation that an enhanced DBS check with barred list information has been carried out.

All other visitors, including visiting speakers, will always be accompanied by a member of staff. We will not invite into schools 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.

Appendix 4: How schools respond to allegations that may meet the harms threshold

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

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

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

If we are in any doubt as to whether a concern meets the harm threshold, we will consult the Local Authority Designated Officer.

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

For information about how schools respond to concerns that do not meet the harms threshold, see Section 18.4 of this policy.

Suspension of the accused until the case is resolved

Suspension will not be the default position and will only be considered in cases where there is reason to suspect that a child or other children are at risk of harm, or the case is so serious that it might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative. We will seek views from the Local Authority Designated Officer, the police and/or children's social care as appropriate.

Based on an assessment of risk, we will consider alternatives such as redeployment within the school so that the individual does not have direct contact with the child or children concerned; providing an assistant to be present when the individual has contact with children; redeploying the individual to alternative work 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 after consulting parents; or temporarily redeploying the individual to another role in a different location.

Definitions for outcomes of allegation investigations

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

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the Headteacher — or the CEO or Chair of Governors where the Headteacher is the subject of the allegation — acting as the case manager, will take the following steps:

- immediately discuss the allegation with the Local Authority Designated Officer, to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary and whether it is necessary to involve the police and/or children's social care. 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 — and in such cases will notify the designated officer as soon as practicably possible;

- inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer. Where the police and/or children's social care are involved, the case manager will only share such information as has been agreed with those agencies;
- carefully consider whether suspension from contact with children at the school is justified, or whether alternative arrangements can be put in place, seeking advice from the designated officer, police and/or children's social care as appropriate;
- if immediate suspension is considered necessary, agree and record the rationale with the designated officer, including the alternatives considered and why they were rejected. Written confirmation of the suspension will be provided within one 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, 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 liaise with the police and/or children's social care as appropriate;
- provide effective support for the individual facing the allegation, including appointing a named representative to keep them informed of progress and considering what other support is appropriate;
- inform the parents or carers of the child or children involved about the allegation as soon as possible if they do not already know, following agreement with children's social care and/or the police if applicable, and inform them of the requirement to maintain confidentiality about any allegation made against a teacher while investigations are ongoing;
- keep the parents or carers 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 has engaged in conduct that harmed or is likely to harm a child, or otherwise poses a risk of harm to a child;
- immediately suspend an individual from teaching, pending the findings of an investigation by the Teaching Regulation Agency, if the school is made aware that the Secretary of State has made an interim prohibition order; and
- where the police are involved, wherever possible 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.

Additional considerations for supply staff and contracted staff

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

We will never cease to use a supply teacher for safeguarding reasons without first finding out the facts and liaising with the Local Authority Designated Officer to reach a suitable outcome. The governing board will discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, while the school carries out the investigation.

We will involve the agency fully, but schools will take the lead in collecting the necessary information and providing it to the Local Authority Designated Officer as required. We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are considered. When using an agency, we will inform them of our process for managing allegations, keep them updated about our policies as necessary, and invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

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

Specific actions

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

Conclusion of a case where the allegation is substantiated. If the allegation is substantiated and the individual is dismissed, the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the trust's HR adviser will discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required. If they think that the individual has engaged in conduct that has harmed, or is likely to harm, a child, or otherwise poses a risk of harm to a child, they must make a referral to the DBS. If the individual concerned is a member of teaching staff, they will also discuss whether to refer the matter to the Teaching Regulation Agency.

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, and 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 or pupils who made it, or whether the police should be asked to consider whether action might be appropriate against those who made the allegation, even if they are not a pupil. In a primary context, the age and understanding of the child will be central to that consideration.

Confidentiality

Schools 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 Designated Officer, police and children's social care, 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 aware of their obligations with respect to confidentiality; what, if any, information can reasonably be given to the wider community to reduce speculation; and how to manage press interest if and when it arises.

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. Such records will include a clear and comprehensive summary of the allegation; details of how the allegation was followed up and resolved; and notes of any action taken and decisions reached, with justification.

If an allegation or concern is not found to have been malicious, schools will retain the records of the case on the individual's confidential personnel file and provide a copy to the individual. We will retain 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. Where records contain information about allegations of sexual abuse, we will retain them in line with national requirements relating to child sexual abuse inquiries and any subsequent statutory inquiry. The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

References

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

Learning lessons

After any case where the allegations are substantiated, we will review the circumstances of the case with the Local Authority Designated Officer to determine whether there are any improvements we can make to school procedures or practice to help prevent similar events in the future. This will include consideration of any issues arising from the decision to suspend, the duration of the suspension, whether the suspension was justified, and how future investigations of a similar nature could be carried out without suspending the individual.

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

Appendix 5: Online safety

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

Our approach to online safety runs through every aspect of our work with children, including but not limited to curriculum planning and relationships and health education; teacher training; the role and responsibilities of the Designated Safeguarding Lead; and parental engagement.

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

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

Risks to children

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

- **Content:** being exposed to illegal, inappropriate or harmful content, for example pornography, fake news, racism, misogyny and misandry, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, and misinformation, disinformation and conspiracy theories.
- **Contact:** being subjected to harmful online interaction with other users, for example peer pressure, commercial advertising, and adults — or generative AI applications simulating adults or children — posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm, for example making, sending and receiving explicit images, including nudes and semi-nudes and those generated or altered using artificial intelligence, sharing other explicit images, and online bullying.
- **Commerce:** risks such as online gambling, inappropriate advertising, phishing and financial scams, including in-game purchasing and loot boxes.

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

Artificial intelligence

KCSIE 2026 makes clear that images may be digitally altered or wholly generated using artificial intelligence, including deepfakes, and that all incidents involving the sharing of indecent or semi-indecent images require a safeguarding response, regardless of how the image was produced. Our online safety curriculum and staff training address generative AI, including chatbots that simulate a person, and our approach follows DfE guidance on the use of generative AI in education.

Filtering and monitoring

Our filtering and monitoring procedures, including our review process, are informed by the DfE guidance ‘Meeting digital and technology standards in schools and colleges’ and the filtering and monitoring standards.

In line with KCSIE 2026, our schools ensure that a review of the effectiveness of filtering and monitoring systems is carried out at least once every academic year. This review is carried out by the senior leader responsible for filtering and monitoring, with support from the DSL and IT support, and includes checks that

filtering is working appropriately on all internet-connected devices in all relevant locations. A record of these checks is kept and reported to governors.

To keep children safe when using school IT equipment, we use a filtering system that prevents access to illegal and inappropriate sites, with access to a local control list allowing websites to be added to a restricted list. Changes to filtering will be agreed by the Headteacher and online safety lead, and implemented by the school's IT support provider. Reports can be produced from the filtering system showing what websites and search queries have been blocked. Anti-virus and anti-malware software is used on all network and stand-alone devices and updated regularly, a firewall is in place, and wireless systems are encrypted. Details of each school's filtering and monitoring provider are set out in Appendix 7.

We are mindful that over-blocking can lead to unreasonable restrictions on what children can be taught in relation to online teaching and safeguarding. The appropriateness of any filters and monitoring systems will be informed in part by the risk assessment required by the Prevent duty.

Mobile phones and smart technology

Our approach to pupil mobile phones and smart technology is set out at Section 10.11, and staff use at Section 16.6.

Cyber security

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

How to report online safety concerns

If pupils, parents or staff have any concerns about online safety, or need to make a disclosure, they should speak to the Designated Safeguarding Lead or a deputy without delay. Contact details are in Appendix 7. Children are encouraged to report concerns to a member of staff or a trusted adult at home. Where this is not possible, additional support can be accessed online via Childline, the UK Safer Internet Centre's Report Harmful Content service, and the National Crime Agency's CEOP Safety Centre.

Regular review of our approach to online safety

We recognise that technology, and the risks and harms related to it, evolve and change rapidly. We carry out annual reviews of our approach to online safety, supported by annual risk assessments that consider and reflect the risks children face. This is informed by local and national training and regular updates.

For more information about online safety, please see the online safety section of Part 2 of Keeping Children Safe in Education 2026.

Appendix 6: Northamptonshire Safeguarding Context 2026

This appendix has two parts. **Part 1** is the county safeguarding picture, which applies to every school in the trust and forms part of annual safeguarding training for all staff. **Part 2** is the profile each school maintains for its own immediate community.

Part 1: County picture

Source. The Police, Fire and Crime Commissioner's Annual Report 2025-26 for Northamptonshire, published by the Office of the Police, Fire and Crime Commissioner. The Commissioner is Danielle Stone. Reviewed annually by the Trust Safeguarding Lead when the next report is published.

Scope. The report covers Northamptonshire as a whole, with no West Northamptonshire breakdown, and it is an accountability report on policing and fire and rescue rather than a children's safeguarding needs assessment. It is silent on county lines, knife crime, online harm, children who go missing and children's mental health. None of that should be read as absent from our area. For child-specific data and thresholds, use the Northamptonshire Safeguarding Children Partnership.

Scale. In the year to March 2026 the force recorded 48,275 victim-based crimes, up 0.8 per cent, and received 408 emergency calls a day.

Prevalent issue	What the county picture shows	What this means for our schools
Violence against women and girls, and domestic abuse	Countywide ambition to halve violence against women and girls. 341 domestic violence protection orders secured, 65% success rate. Raneem's Law places Independent Domestic Violence Advisers in the police control room, extending to seven days a week from 2026-27. Women's Charter signed by 80+ organisations. Sunflower Centre supports the highest-risk victims of domestic abuse and stalking.	The harm our pupils are most likely to be exposed to. Children who see, hear or experience its effects are victims in their own right. Expect Operation Encompass notifications to rise, not fall, as the adviser service extends. Plan the morning so a notification is acted on before the child reaches class. See Section 10.4 and Appendix 2.
Child criminal exploitation, and girls in particular	The Girls' Pathway ran June to December 2025 for vulnerable girls at early risk of criminal exploitation, deliberately targeting those assessed as low to medium risk, including girls linked to males involved in criminality.	Exploitation of girls presents differently and is identified later. Do not treat exploitation as a boys' issue or a secondary-age issue. A primary-age girl may be at risk through an older sibling or a mother's partner long before her own behaviour changes. See Appendix 2.
Anti-social behaviour and early help	New dedicated anti-social behaviour team providing specialist support to children aged 10 to 17. A youth specialist sits in each of the seven Neighbourhood Policing Teams: Northampton, Daventry, South Northamptonshire, Wellingborough, Rushden, Corby and Kettering.	Three of the seven teams cover West Northamptonshire. Each DSL should know their Neighbourhood Policing Team youth specialist by name and use that route for a Year 5 or 6 child on the edge of trouble, rather than waiting for a statutory threshold.
Serious violence and preventative education	Northamptonshire Serious Violence Prevention Partnership prioritises early intervention. 72% of Northamptonshire schools have signed up to Pol Ed, which teaches children about the law, safeguarding, risk and citizenship.	Each school should confirm whether it is among the 72%, and if not, whether Pol Ed would strengthen the programme at Section 15.
Children with a parent in prison	The Prison Intervention Project launched in September 2025 and is supporting 33 young people affected by parental crime.	Section 10.13 identifies these children as vulnerable. This is a named local route for them; DSLs should establish how to access it.
Parental substance misuse	Combating Drugs Partnership joins health, criminal justice, local government and the voluntary sector. A Family Drug and Alcohol Court integrates courts, social care and adult treatment, explicitly to improve outcomes for children.	Where parental substance misuse features in care proceedings, this court model may be in use and the school's contribution sought. Parental drug and alcohol misuse is a family help trigger at Section 9.9.

Prevalent issue	What the county picture shows	What this means for our schools
Transport corridors	Security improvements at Watford Gap Services on the M1, including fencing, lighting, monitored CCTV and upgraded number plate recognition.	Watford Gap is in West Northamptonshire. Motorway service areas are recognised transit points for moving children and drugs. The county's position on the M1 and M40, with fast links to London, Birmingham and Milton Keynes, is a standing feature of its exploitation risk.
Home conditions and fire safety	5,636 Home Fire Safety Visits completed, 62.2% of them to vulnerable or high-risk households.	Where home conditions raise concern — hoarding, unsafe heating, no working smoke alarm — a Home Fire Safety Visit is a practical, non-stigmatising referral alongside, not instead of, a neglect referral. See Appendix 2.
Families who are victims of crime	VOICE is the Commissioner's independent service for victims and witnesses. 34,330 referrals into the Adult Victim Support Service in the year to March 2026.	Many of our parents will at some point be victims of crime. VOICE is a route schools can offer directly, and supporting a parent through it often stabilises things for the child.

Reviewing Part 1

The Trust Safeguarding Lead reviews and reissues this section each autumn, when the next Police, Fire and Crime Commissioner's Annual Report is published.

It supplements, and does not replace, the Northamptonshire Safeguarding Children Partnership's data and thresholds, the counter-terrorism local profile used for the annual Prevent risk assessment at Section 10.3, or each school's own knowledge of its community.

Part 2: School profiles

Each school maintains a contextual safeguarding profile for its own immediate community, reviewed annually by the Designated Safeguarding Lead using current data from Northamptonshire Police, the local authority, the Northamptonshire Safeguarding Children Partnership and the school's own records. Profiles are held with each school's copy of this policy and shared with all staff. County-wide material is covered at Part 1 and need not be repeated.

Each school profile covers, as a minimum:

- the community the school serves, including population, deprivation, housing growth and transport links;
- current local crime data, including violence and sexual offences, anti-social behaviour and theft;
- domestic abuse, including Operation Encompass notification volumes and the school's response;
- the name and contact details of the youth specialist in the school's Neighbourhood Policing Team;
- radicalisation and extremism risk drawn from the counter-terrorism local profile;
- drug and substance misuse, including county lines and child criminal exploitation risk;
- cultural context and how the school develops children's awareness and appreciation of difference; and
- the curriculum and pastoral response to each of the above.

Marie Weller Primary School

This profile was written in October 2026 using police.uk crime data for September 2025 to August 2026, Census 2021, the English Indices of Deprivation 2025 and our own records. The Designated Safeguarding Lead reviews it each autumn.

Marie Weller Primary School opened on 1 September 2021 on Redcar Road, Towcester, to serve the new housing to the south of the town. This year we have children from Reception to Year 5, and we will grow to Year 6.

Area	What we know locally	What we do at Marie Weller
Our community	Towcester had 11,542 residents at Census 2021, up from 9,252 in 2011. Around 2,750 to 3,000 more homes are planned or being built in the urban extension south of the town, where most of our families live. The neighbourhood around the school is in the least deprived 10% in England (IMD 2025, rank 31,897 of 33,755). Low deprivation overall does not mean no need, and new estates can leave families without the local networks they would otherwise rely on. The town sits on the A5 and the A43, about 10 miles from Northampton and 11 miles from Milton Keynes.	Staff do not assume a family is coping because the area is affluent. Concerns are logged on CPOMS whatever the family's circumstances.
Local crime	Within one mile of the school, 562 crimes were recorded from September 2025 to August 2026. The largest groups were violence and sexual offences (218), anti-social behaviour (162), public order (33), other theft (32), criminal damage and arson (29) and vehicle crime (27). There were 19 drug offences and 9 for possession of weapons.	Our Pol-Ed health and wellbeing curriculum teaches children about keeping safe, healthy relationships and who to tell. The DSL reviews these figures each autumn and raises anything new with staff at safeguarding training.
Roads and building sites	Redcar Road carries construction traffic and cut-through traffic, with active building sites, no crossing at drop-off and pick-up, and uneven paths and manhole covers. The DSL raised this as a contextual safeguarding risk at the Designated Safeguarding Network on 30 September 2026, and it was passed to Highways and the local police sergeant.	Road safety is taught in class and through the neighbourhood police team's visits to Reception. The DSL is following up the response from Highways.
Domestic abuse	Domestic abuse is the harm our children are most likely to be affected by, as Part 1 sets out for the county. Operation Encompass notifications come to the DSL before the start of the school day. We do not publish how many we receive, because with a roll our size the number could identify families.	The DSL records each notification on CPOMS, tells the adults who need to know that day, and makes sure the child has a trusted adult to go to. Healthy relationships are taught through Pol-Ed from Reception upwards.
Neighbourhood policing	Towcester Neighbourhood Policing Team: NeighbourhoodTeamSouthNorthants-Towcester@northants.police.uk. In an emergency, call 999. PCSO Charlotte Morris is the team's contact for visits to schools in the town.	We raise concerns outside school with the team, such as the roads around the site. PCSO visits cover road safety, Blue Butterfly and people who help us.
Radicalisation and extremism	Locally, extreme right-wing ideology is the main concern raised through Prevent in Northamptonshire, with cases clustering in towns that include South Northamptonshire. Much of the influence comes through online activity. (North Northamptonshire Council, Prevent local priorities, June 2024.)	The DSL is the Prevent single point of contact and completes the annual Prevent risk assessment at Section 10.3. Securly filters and monitors use of school devices, and reports go to the DSL and Headteacher each week. We teach respect for difference through Pol-Ed, RE and resources such as Show Racism the Red Card.
Drugs, county lines and exploitation	Nineteen drug offences and nine weapons offences were recorded within a mile of the school in the last year. The town's position on	Staff are trained to recognise the signs of child criminal exploitation set out in Appendix 2, including in younger children used to carry or hold items.

Area	What we know locally	What we do at Marie Weller
	the A5, close to the M1, puts it on routes used for county lines.	Pol-Ed covers medicines, drugs and saying no to pressure, and how to ask for help.
Cultural context	In the neighbourhood around the school, 90% of residents described themselves as White British at Census 2021, against 74% across England and Wales. Many of our children will meet a wider range of cultures and faiths as they grow up than they see locally.	RE follows the Northamptonshire Agreed Syllabus 2025 to 2030. Pol-Ed and our assemblies teach children to value difference, and we mark Wear Red Day with Show Racism the Red Card. Racist or prejudice-related incidents are recorded on CPOMS and followed up by the DSL or Headteacher.

Appendix 7: School safeguarding teams

Each school's named safeguarding personnel are set out below. These details are reviewed at the start of each academic year and whenever a postholder changes, and are displayed prominently in each school. Trust-level roles are set out at the front of this policy, by role title rather than by organisation, so that they remain accurate if the trust's governance arrangements change.

Marie Weller Primary School

Role	Postholder	Contact
Designated Safeguarding Lead	Caroline Lewis, Deputy Headteacher	dsl@mwps.thlt.academy
Deputy Designated Safeguarding Leads	Dan Cox, Headteacher Nicki Wilson, SENDCo Jess Bloxham, EYFS Teacher Andrea Curtis, CEO	head@mwps.thlt.academy sendco@mwps.thlt.academy jbloxham@mwps.thlt.academy ceo@thlt.academy
Headteacher	Dan Cox	head@mwps.thlt.academy
Safeguarding Governor	Carys Burke	cburke@mwps.thlt.academy
Chair of Governors (allegations against the Headteacher)	John Allen	jallen@nhps.thlt.academy
Vice-Chair of Governors	Andrew Lawrie	alawrie@blps.thlt.academy
Designated Teacher for looked after and previously looked after children	Caroline Lewis	dsl@mwps.thlt.academy
Prevent single point of contact	Caroline Lewis	dsl@mwps.thlt.academy
Senior leader responsible for filtering and monitoring	Caroline Lewis	dsl@mwps.thlt.academy
Lead for mental health	Nicki Wilson	sendco@mwps.thlt.academy
Filtering and monitoring	Securly, supported by EasiPC	servicedesk@easipc.co.uk