**Creating Tomorrow Trust**

# Child Protection and Safeguarding Policy and Procedures September 2026

**About this document:**

**Purpose**

This policy is written to ensure all students, staff, parents, Governors, Trustees, Inspectors, the LA and other relevant stakeholders are fully aware of the purpose, nature of the Child Protection and Safeguarding Policy to ensure that everyone is aware of how we safeguard children to identify possible signs of abuse and to help keep themselves safe.

| | |
|---|---|
| **Complied by:** Kevin Latham & Mike Tebbutt & Daniel Mulchrone | **Date:** Jul 26 |
| **Date agreed by Full Board Trustees:** Jul 26 | **Date agreed by LGB:** Oct 26 |
| **Review Cycle:** Annually | **Review Date:** Jul 27 |

## Wellbeing in our Trust

At Creating Tomorrow Trust, we believe that when our people thrive, our learners and communities thrive too.

Physical, emotional and mental wellbeing are essential to a thriving, collaborative and values-driven organisation, and we are committed to creating an environment where every colleague feels supported, respected and able to flourish.

We recognise that wellbeing needs can change over time, and anyone may experience challenges. We work together with openness, compassion and trust, ensuring that help is accessible when it is needed.

Health and wellbeing are everyone's responsibility, and we encourage a positive culture where concerns can be raised without judgement. The Trustees take their duty of care seriously and are committed to ensuring that support for all employees is available through:

- Effective and supportive line management
- A fair and manageable workload
- A professional, safe and inclusive working environment
- Access to wellbeing and employee support services through our Employee Assistance Programme:
    - *08000 856 148*
    - *educationsupport.org.uk*

We are committed to continuous improvement. All Trust policies are reviewed for their impact on staff wellbeing, ensuring our values are reflected not only in what we say, but in what we do.

Together, we create tomorrow by caring for one another today.

**Creating Tomorrow Trust**

# Child Protection and Safeguarding Policy and Procedures September 2026

## Policy Review

Our Child Protection and Safeguarding Policy is always reviewed and written with due regard to the latest statutory guidance and KCSIE. KCSIE is updated annually, coming into force from 1st September each year. Our Trustees ensure that our schools and college are aware of the proposed guidance changes (as highlighted in the draft KCSIE documentation), and plan annual safeguarding updates accordingly.
The trustees have sight of our draft documentation, and the policy will be ratified annually, at the earliest meeting of the trustees following the final publication version of KCSIE for the coming academic year.

## 1. Key Safeguarding Contacts

**At Wren Spinney School the named personnel with designated responsibility for safeguarding are:**

| Name | Contact Details<br>Wren Spinney Tel: 01536 481 939 |
|---|---|
| Daniel Mulchrone (DSL) | dmulchrone@wrenspinney.co.uk<br>07485 303133 |
| Mike Tebbutt (DDSL) | mtebbutt@wrenspinney.co.uk<br>07485 303122 |
| Toby Widdicombe (DDSL) | twiddicombe@wrenspinney.co.uk |
| Sarah Lambert (DDSL) | slambert@wrenspinney.co.uk |
| Mihaela Shoebridge (DDSL) | mshoebridge@wrenspinney.co.uk |
| Kevin Latham Deputy DSL<br>CEO | KLatham@creatingtomorrowtrust.co.uk<br>01536 856467 / 07825 915272 |

**The named personnel with Designated Responsibility regarding allegations against staff are:** (Please see the whistleblowing policy for full details and list of appropriate persons to raise a concern with if appropriate)

| Designated Senior Manager (normally the Head teacher) | Deputy Designated Senior Manager | Chair of Trustees (in the event of an allegation against the head teacher or Trust Leadership Team) |
|---|---|---|
| Mike Tebbutt (Headteacher)<br>mtebbutt@wrenspinney.co.uk | Daniel Mulchrone (DSL)<br>dmulchrone@Wrenspinney.co.uk | Janet Duggan (interim)<br>jduggan@creatingtomorrow.org.uk<br>**Numbers can be obtained from Ellie Edwards* |

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# Child Protection and Safeguarding Policy and Procedures September 2026

**Name and contact details of the link governor/s for safeguarding**

| Name | Contact Details |
|---|---|
| *Chair of Governors* | Jeanette Payne jpayne@creatingtomorrowtrust.co.uk |
| *Safeguarding Governor* | Jeanette Payne jpayne@creatingtomorrowtrust.co.uk |
| *Janet Duggan*<br>*Safeguarding Trustee* | JDuggan@creatingtomorrowtrust.co.uk<br>* |
| Janet Duggan<br>*Chair of Trustees (interim)* | JDuggan@creatingtomorrowtrust.co.uk<br>***Numbers can be obtained from Ellie Edwards** |

| Our Data Protection Officer is: | Our Lead for Mental Health is: | Our Prevent SPOC is: | Our designated teacher for looked after children is: |
|---|---|---|---|
| Ali Jones<br>(IT Infrastructure Manager / GDPR Info Manager)<br>ajones@creatingtomorrowtrust.co.uk | Toby Widdicombe<br>twiddicombe@wrenspinney.co.uk | Daniel Mulchrone (DSL)<br>DMulchrone@wrenspinney.co.uk 07485 303133 | Anna Kirkland |

**Name and contact details of the Designated Officer (DO)**

| Name | Contact Details |
|---|---|
| Andy Smith<br>*Designated Officer* | 07850 854309<br>LADOConsultations@nctrust.co.uk |
| Francesca Hamilton<br>*Designated Officer* | 07712 718701<br>LADOConsultations@nctrust.co.uk |
| Sian Edwards<br>*Designated Officer* | 07738 636449<br>LADOConsultations@nctrust.co.uk |

**Other contact Numbers**

| Name | Contact Details |
|---|---|
| Northants - MASH Multi Agency Safeguarding Hub<br>(option 1, option 1) | North 0300 126 3000<br>West 0300 126 7000 |
| Prevent Engagement Officers at Northamptonshire Police | prevent@northants.pnn.police.uk |
| Prevent - Action Counters Terrorism (ACT) | https://actearly.uk/<br>0800 0113 764 |
| Channel Helpline | 020 7340 7264 |

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# Child Protection and Safeguarding Policy and Procedures September 2026

## Contents


1. Key Safeguarding Contacts ..... 3
2. Core Principles and Rights of the Child ..... 6
3. Scope ..... 7
4. Definitions ..... 8
5. Legislation and statutory guidance ..... 10
6. Equality Statement ..... 11
7. Confidentiality and Information Sharing ..... 12
8. Roles and responsibilities ..... 13
9. Recognising Abuse: Training ..... 20
10. Recognising and responding to abuse: How to take action ..... 22
11. Specific safeguarding issues ..... 28
11.7 Children who are gay, lesbian, bisexual, or gender questioning ..... 30
12. Pupils with special educational needs and disabilities (SEND) ..... 31
13. Pupils with a social worker and those that have previously needed a social worker ..... 32
14. Looked after and previously looked after children ..... 33
15. Record-keeping ..... 33
16. Relationships, sex and health education (RSHE) ..... 34
17. Safer working practice ..... 36
18. Safeguarding concerns about and allegations against members of staff ..... 36
19. Complaints and concerns about safeguarding policies ..... 39
20. Use of school or college premises for non-school activities ..... 40
21. How we safeguard pupils attending alternative provision ..... 41
22 Policy implementation, monitoring and review ..... 41
Appendix A: Child on child abuse (including harassment and violence) ..... 42
Harmful sexual behaviour (HSB) ..... 43
Appendix B: Types of abuse ..... 50
Appendix C: Safer recruitment ..... 62
Appendix D: How the school/college responds to allegations that may meet the harm threshold67
Appendix E: Online Safety ..... 71
**Risks to children** ..... 72

**Filtering and monitoring** ..... 72
**Pupil mobile phones** ..... 74
**Remote learning** ..... 74
**How to report online safety concerns** ..... 74
**Cybersecurity** ..... 74
**Regular review of our approach to online safety** ..... 74
**More information** ..... 75

## 2. Core Principles and Rights of the Child

Wren Spinney School recognises our statutory responsibility to safeguard and promote the welfare of all pupils. We will endeavour to provide a safe and welcoming environment where children are respected and valued. All support for children and young people will be based on their individual needs and rights, this is a child-centred approach to safeguarding (authentic safeguarding), with the child at the heart. When working to safeguard children and young people, a child-centred approach will be used which means that any procedures consider the rights, feelings and experience of the individual child.

We will be alert to the signs of abuse, neglect, and exploitation, and follow our procedures to ensure that children receive effective support, protection and justice.

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

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

Creating Tomorrow and all its schools align with the Northamptonshire Safeguarding Children Partnership's strengths-based and relational practice. We use the four-level "windscreen" to determine the appropriate response:

- **Level 1:** Universal Support: Needs are met by universal services.
- **Level 2:** Vulnerable Family Help Support: Children with unmet needs requiring focussed single-agency or coordinated support.

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

- **Level 3:** Complex Targeted Support: Families with multiple unmet needs requiring a coordinated whole-family response.
- **Level 4:** Acute Protective Support: Children at risk of significant harm requiring an immediate referral to the Multi-Agency Safeguarding Hub (MASH).

At Creating Tomorrow we recognise that adversity and trauma have a lasting impact on development, mental health, and behaviour. Our response is relational, meaning:

- Safety and Trust: Relationships occur in a context of safety, transparency, and "no surprises" for families.
- Professional Curiosity: We look beyond behaviour, listening with curiosity and without judgement to understand the "why" behind a child's presentation.
- Support for All: We recognise that children who perpetrate harm often have experienced their own trauma and require a welfare-led, supportive response alongside any disciplinary sanctions.

Therefore, aim of this policy is to;

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

This policy is underpinned by the **UN Convention on the Rights of the Child (UNCRC)** and a child-centred approach. We prioritise:

- **The Best Interests of the Child (Article 3):** All systems, processes, and policies operate with the child's best interests as the primary consideration.
- **The Right to Protection (Article 19):** We fulfil our duty to protect children from all forms of maltreatment, whether within or outside the home, including online.
- **The Right to be Heard (Article 12):** We listen to the "voice of the child," focusing on their lived experiences and ensuring they can safely express views and give feedback on safeguarding practice.
- **The Right to Education (Article 28):** We promote educational outcomes for all, particularly those with a social worker or in kinship care, recognising that stability is a protective factor.

## 3. Scope

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

## 4. Definitions

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

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

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

- Supporting pupils' health, safety and well-being, including their mental health.
- Providing Family Help, a collaborative system providing support as soon as a problem emerges at any point in a child's life (from foundation years to adulthood), to improve outcomes for children and families at the earliest possible opportunity;
- Promoting the upbringing of children with their birth parents or within their family network through kinship care wherever possible;
- Meeting the needs of children with special educational needs and/or disabilities.
- The use of reasonable force.
- Meeting the needs of children with medical conditions.
- Providing first aid.
- Educational visits.
- Intimate care and emotional wellbeing.
- Online safety and associated issues.
- Appropriate arrangements to ensure school security, taking into account the local context.
- Keeping children safe from risks, harm and exploitation.
- Child protection.

**Child protection** is part of safeguarding and refers to activities undertaken to prevent children experiencing, or being likely to experience, significant harm. We will use the term 'experiencing' harm as not all children recognise they are 'suffering' harm.

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

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

**Child on child abuse (including harassment and violence)** refers to the abuse of a child or children perpetrated by another child or children, which includes harmful sexual behaviour (HSB), misogyny and sexual violence both online and offline,. Child on child abuse is most likely to include, but may not be limited to:

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

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

**Within this policy:**

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

[2] See Appendix B for more information about abuse and neglect.
[3] Keeping Children Safe in Education (2026)

use on a case-by-case basis.
- Keeping Children Safe in Education (2026) may be abbreviated to 'KCSIE'.

## 5. Legislation and statutory guidance

Creating Tomorrow Trust adheres to all relevant safeguarding legislation, statutory guidance and guidance from the local Safeguarding Children and Adult Boards.

Our Child Protection and Safeguarding Policy is always written with due regard to the latest statutory guidance and KCSIE. KCSIE is updated annually, coming into force from 1st September each year. Our Trustees ensure that our schools and college are aware of the proposed guidance changes (as highlighted in the draft KCSIE documentation), and plan annual safeguarding updates accordingly.
The trustees have sight of our draft documentation, and the policy will be ratified annually, at the earliest meeting of the trustees following the final publication version of KCSIE for the coming academic year.

Documentation used to support our policy includes (but is not limited to):

**Statutory Guidance:**
- Keeping Children Safe in Education (2026)
- Working together to Safeguard Children (2026)
- Working Together to Improve School Attendance (2024)
- Children Missing Education (2016)

**Legislation**
- The Children Act 1989 and The Children Act 2004
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015
- The Rehabilitation of Offenders Act 1974
- Safeguarding Vulnerable Groups Act 2006
- Counter-Terrorism and Security Act 2015 (and the Prevent Duty guidance, updated 2023)
- The Education Act 2002
- The School Staffing (England) Regulations 2009
- Part 1 of the schedule to the Non-Maintained Special Schools (England) Regulations 2015
- The Human Rights Act (1998)
- The Equality Act (2010)
- The Public Sector Equality Duty (PSED)

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

Guidance from the Northamptonshire Safeguarding Adults Board can be found here:
https://www.northamptonshiresab.org.uk/Pages/default.aspx

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

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

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

- Relationship (Behaviour) Policy, including our procedures for searching, screening and confiscation
- Staff Code of Conduct and Low-Level Concerns Policy
- Complaints policy
- Health and safety policy including fire evacuation and lockdown procedures
- Attendance policy
- IT and Online safety policies
- SEND policy
- Equality policy
- Sex and relationship education policy
- First aid policy
- Curriculum policy
- Designated teacher for looked-after and previously looked-after children policy
- Privacy notices
- Missing/Lost Child Policy
- Manual Handling
- Intimate care
- Safer Recruitment Policy
- Use of Physical Intervention Policy
- Whistleblowing Policy

For further information please see https://www.creatingtomorrow.org.uk/about-us/policies

This policy also complies with our funding agreement and articles of association.

## 6. Equality Statement

We are committed to anti-discriminatory practice and recognise children's diverse circumstances. Some children are at an increased risk of abuse, both offline and online, 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.

All of our children have special educational need and disabilities (SEND), and we are fully aware that our children, due to their additional vulnerabilities are particularly at risk of abuse. Please see Section 12 for further details about how we work to support children with special educational needs and disabilities (SEND).

We give special consideration to children who:

- Are young carers ensuring they receive support under section 17ZA of the Children Act 1989.
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 14)
- Are missing or absent from education for prolonged periods and/or repeat occasions
- Whose parent/carer has expressed an intention to remove them from school to be home educated

## 7. Confidentiality and Information Sharing

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

The Trust adheres to the data protection laws (DPA 2018, UK GDPR, and the Data (Use and Access) Act 2025, as defined in KCSIE 2026). Please see the Data Protection Policy and Privacy Notice for more information.

**7.1 Sharing information with parents**

Wren Spinney School will ensure the Safeguarding and Child Protection Policy is available publicly via the school website and paper copies can be made available on request to the school.

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

If we believe that notifying the parents would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so (see Section 7.2 for more details). In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved.

**7.2 Consent**

The Data Protection Act 2018 introduced 'safeguarding' as a reason to be able to process sensitive, personal information, even without consent (DPA, Part 2, 18; Schedule 8, 4). All relevant information can be shared without

consent if to gain consent would place a child at risk. Fears about sharing information **must not be allowed** to stand in the way of promoting the welfare and protecting the safety of children. All professionals responsible for children should not assume that someone else will pass on information that they think may be critical to keeping a child safe.

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

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

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

- Staff should never promise a child that they will not tell anyone about an allegation, as this may not be in the child's best interests.
- Staff who receive information about children and their families in the course of their work should share that information only within appropriate professional contexts.
- Timely information sharing is essential to effective safeguarding.
- Information must only be shared on a 'need-to-know' basis, but consent is not required to share information if a child is experiencing, or at risk of, serious harm.[4]

## 8. Roles and responsibilities

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

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by our:

- Relationship (Behaviour) policy
- Pastoral support system
- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
    - Healthy and respectful relationships
    - Boundaries and consent
    - Stereotyping, prejudice and equality
    - Body confidence and self-esteem
    - How to recognise an abusive relationship (including coercive and controlling behaviour)

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

- The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support
- What constitutes sexual harassment and sexual violence and why they're always unacceptable

**8.1 Governing bodies and Trustees**

Governing bodies and Trustees have a strategic leadership responsibility for the school's safeguarding arrangements. The governing body will appoint a senior board level (or equivalent) Governor Safeguarding Lead to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL. The Governor Safeguarding Lead is Jeannette Payne. The Trustees will appoint a Safeguarding Trustee (at Creating Tomorrow this is Janet Duggan, JDuggan@creatingtomorrowtrust.co.uk)

Governors/Trustees will ensure that there are mechanisms in place to assist staff in understanding and discharging their statutory safeguarding roles and responsibilities. Governors will ensure that the school is working with local safeguarding partners and that the school contributes to multi-agency working, adhering to Working Together to Safeguard Children (2026). All governors will read KCSIE (2026) and a record will be kept of this.

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

- ensure that they comply with their duties under statutory guidance and legislation; including its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements;
- work to facilitate a whole school approach to safeguarding, by ensuring that safeguarding and child protection underpin all relevant aspects of policy and process;
- ensure that policies, procedure and training at the school are effective and comply with the law at all times and that they allow concerns to be responded to in a timely manner;
- ensure that safeguarding training for staff, including online safety training, is integrated, aligned and considered as part of the whole school or college safeguarding approach and wider staff training and curriculum planning;
- ensure that the school takes into account local criteria for action and protocol for assessment and supply information as requested by the three safeguarding partners;
- ensure that the school has an effective child protection policy, which is published on the school website and/or available by other means and review this annually;
- ensure that the school has systems in place to allow children to raise concerns, which are well-promoted, well-understood and easily accessible;
- ensure that the school takes safeguarding concerns seriously and takes the wishes and feelings of children into account;
- ensure that there are systems in place for young people to safely express their views and give feedback on safeguarding practice;
- ensure that the school has a suitable behaviour policy for pupils and a staff behaviour policy or Code of Conduct;
- ensure that all staff undergo safeguarding and child protection training (including online safety which, amongst other things, will include an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) on induction and regularly thereafter;
- consider a whole-school approach to online safety, including the use of mobile technology in school;
- ensure that there are clear systems and processes in place for identifying when children may be experiencing

mental health problems;

- ensure that children are taught about safeguarding, including online safety. See section 11.6 and Appendix E of this policy for further information;
- ensure that appropriate safeguarding arrangements are in place to respond to children missing education and those who are absent from education, particularly on repeat occasions and/or for prolonged periods;
- appoint an appropriate member of staff from the senior leadership team to the role of Designated Safeguarding Lead and ensure that the DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support;
- ensure that appropriate filters and monitoring systems are in place to keep children safe online
- regularly review the effectiveness of school filters and monitoring systems. They should ensure that the leadership team and relevant staff are:
    - aware of and understand the systems in place
    - manage them effectively
    - know how to escalate concerns when identified
- ensure that there are appropriate procedures in place to manage both allegations against staff (including supply staff, volunteers and contractors, and concerns that do not meet the harm threshold (low-level concerns) [5] , and
- respond to allegations of abuse against the Headteacher or the Trust Leadership Team. The Chair of Trustees will act as the 'case manager' in the event that an allegation of abuse is made against the head teacher or the Trust Leadership Team, where appropriate (see section Appendix D).

**8.2 The headteacher**

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

- ensure that this policy is reviewed annually and ratified by the governing body;
- ensure that this policy and associated procedures are adhered to by all staff and take action as necessary if not;
- ensure that staff (including temporary staff) and volunteers are informed of our systems that support safeguarding, including this policy, as part of their induction.
- ensure that all staff are made aware of the named governor for safeguarding and the Designated Safeguarding Lead;
- ensure that the role of 'Designated Safeguarding Lead' is explicit in the role-holder's job description, that they have appropriate time, funding, training and resources and that there is always adequate cover if the DSL is absent;
- decide whether to have one or more deputy safeguarding leads and ensure they are trained to the same standard as the Designated Safeguarding Lead;
- organise appropriate cover for the role of Designated Safeguarding Lead for any out of hours/out of term activities;
- appoint a 'Designated Teacher for Looked After and Previously Looked After Children' to promote the educational achievement of children looked after and previously looked after;
- appoint a lead for online safety – at Wren Spinney School this is Daniel Mulchrone (DSL)
- ensure that all recruitment follows the safer recruitment guidance (see Part 3 of KCSIE) and a single, central record is maintained with details of all members of staff who are in contact with children;
- respond to allegations of abuse against all other members of staff and act as the 'case manager' in the event

[5] See Appendix D for more details.

of an allegation of abuse made against another member of staff or volunteer, where appropriate;

- make decisions regarding all low-level concerns,
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required;
- ensure that the school works with social care, the police, health services and other services to; promote the welfare of children; provide a co-ordinated offer of early help when need is identified; contribute to inter-agency plans for children subject to children protection plans and to protect children from harm;
- safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties (Teaching Standards, 2012);
- following a serious incident, where there has been a risk to life, or a death, to liaise with the local authority Education Safeguarding Team;
- ensure that children's social care (from the host local authority or placing authority) have access to the school to conduct, or to consider whether to conduct a section 47 or section 17 assessment, as per Keeping Children Safe in Education (2026);

**8.3 The Designated Safeguarding Lead (DSL)**

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

The DSL is a senior member of staff on the leadership team. Our DSL is Daniel Mulchrone (DSL). The DSL takes lead responsibility for child protection and wider safeguarding.

When the DSL is absent, the Deputy Designated Leads will act as cover.
Any deputies will be trained to the same standard as the designated safeguarding lead.

# Designated Safeguarding Leads at Wren Spinney School

All DSL's have a school email and work phone as shown in the table below and are contactable both in and outside of school hours.

| Name | Contact Details |
|---|---|
| Daniel Mulchrone (DSL) | dmulchrone@wrenspinney.co.uk<br>07485 303133 |
| Mike Tebbutt (Headteacher, DDSL) | mtebbutt@wrenspinney.co.uk<br>07485 303122 |
| Toby Widdicombe (AHT, DDSL) | twiddicombe@wrenspinney.co.uk |
| Sarah Lambert (AHT, DDSL) | slambert@wrenspinney.co.uk |
| Mihaela Shoebridge (AHT, DDSL) | mshoebridge@wrenspinney.co.uk |
| Kevin Latham Deputy DSL<br>CEO | KLatham@creatingtomorrowtrust.co.uk<br>01536 856467 / 07825 915272 |

There will always be at least one DSL / Deputy on site at all times.

To ensure continuity, out of school hours we will use robust cover arrangements such as:

- confidential shared mailbox safeguarding@wrenspinney.co.uk
- During out-of-term activities there will be a DSL rota made available to all staff so that staff can access a DSL at any time.

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

The Designated Safeguarding Lead will;

- Act as a source of support and expertise on matters relating to safeguarding and child protection to ensure that other members of staff can carry out their safeguarding duty;
- Advise on the response to safeguarding concerns;
- Liaise with the Local Authority and work with other agencies in line with 'Working Together to Safeguard Children (2023);
- Identify if children may benefit from early help;
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- Make referrals to the Channel programme where there is a radicalisation concern and/or support staff that make a referral to Channel;
- Support the school with regards to their responsibilities under the Prevent duty and provide advice and support on protecting children from radicalisation;
- Refer cases to the police where a crime may have been committed;
- Be available during school or college hours for staff to discuss any safeguarding concerns. In the event that they are not available, a deputy will be made available;
- Undertake training to equip them with the skills to carry out the role and update this every two years;
- Ensure all staff, whether they work directly with children or not, have read and understood Part 1 and Annex A of Keeping Children Safe in Education (September 2026);
- Update their knowledge and skills regularly and keep up with any developments relevant to their role;
- Provide staff in school with the knowledge, skills and support required to safeguard children;
- Take responsibility for the accurate and timely recording of safeguarding and child protection concerns and take overall responsibility for safeguarding and child protection files;
- Take responsibility for the transfer of safeguarding files when a child leaves the school;
- Attend or ensure an appropriate representative attends multi-agency safeguarding or child protection meetings;
- Work closely with other relevant education professionals (e.g. SENCO, Virtual School Head) to ensure children with additional vulnerabilities are safeguarded;
- Unless delegated to member of the leadership team, take responsibility for online safety and understanding the filtering and monitoring systems and processes in place;
- Support children who have experienced or are experiencing safeguarding or child protection issues by using information they hold about children with a social worker to make decisions in the best interests of the child's safety, welfare and to help promote educational outcomes. This will include ensuring that staff know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children;
- Promote a 'culture of safeguarding', in which every member of the school community acts in the best interests of the child;
- Regularly meet with the safeguarding link governor and/or Chair of Governors to review safeguarding at the

school; and
- Liaise with the headteacher regarding safeguarding cases and issues.
- Have a good understanding of harmful sexual behaviour and how to support children in the event that this issue arises;
- Know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search.

**8.4 All staff**

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

- have a responsibility to provide a safe environment, where children can learn;
- will be trained so that they know what to do if a child tells them that he/she is being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals;
- will be able to identify indicators of abuse, neglect and exploitation;
- will be made aware of systems in the school that support safeguarding and child protection;
- will be made aware of safeguarding issues that put children at risk of harm and behaviours associated with these risks;
- should ensure that they know what to do if a child makes a disclosure of abuse and never promise confidentiality when a child makes a disclosure;
- will be made aware of and should be clear on the school's or college's policy and procedures with regards to child on child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it;
- will be made aware of the early help process and understand their role in it;
- should be prepared to identify children who may benefit from early help and will discuss early help requirements with the safeguarding lead in the first instance;
- may be required to support social workers and other agencies following a referral;
- will be made aware of the process for making referrals to Children's Social Care (though the MASH), understand statutory assessments and the role that they may be expected to play in such assessments;
- should be prepared to make referrals to the MASH if they have concerns about a child's welfare and understand the role that they may be expected to play in such assessments;
- will receive regularly updated safeguarding and child protection training to cover all of the above, as well as online safety (including IT filtering and monitoring procedures and how to report related safeguarding or technical concerns);
- Reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- will receive safeguarding updates throughout the year as part of continuous professional development;
- will be encouraged to contribute to the development of safeguarding policy and practice;
- should always seek advice from the Designated Safeguarding Lead if they are unsure; and
- all teachers should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties (Teaching Standards, 2012).

All staff will be made aware of our systems and documents that support safeguarding, including this policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and any deputies, the behaviour policy and the safeguarding response to children who are absent from education, particularly on repeat occasions and / or for prolonged periods.

All staff that are employed to work within Creating Tomorrow Trust, Governors and Trustees will be provided with a copy of, and must read, Part 1 and Annex A of Keeping Children Safe in Education (2026) annually and will receive annually updated training on their safeguarding roles and responsibilities.

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

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

**8.5 Virtual School Heads**

Virtual school heads now hold non-statutory responsibility for oversight of the attendance and attainment of all children with a social worker and those in kinship care.

## 9. Recognising Abuse: Training

The school is committed to continuous professional development and all staff, including trainees, 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.

**9.1 All staff**

- All staff members will undertake safeguarding and child protection training at induction (including whistle-blowing procedures) to ensure they understand the school's safeguarding systems, their responsibilities and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from the three safeguarding partners.
- All staff, including trainees, will receive annual safeguarding updates and specific training on filtering, monitoring, and the risks of Generative AI.
- All staff will have training on the government's anti-radicalisation strategy Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.
- Staff will also receive regular safeguarding and child protection updates (for example, through emails, e-bulletins and staff meetings) as required, but at least annually.
- Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.
- Volunteers will receive appropriate training, as applicable.

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

**9.2 The DSL and Deputy DSLs**

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

**9.3 Governors and Trustees**

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

  This includes training on:
  - the Prevent duty.
  - Online safety.
  - The expectations, applicable roles and responsibilities in relation to filtering and monitoring.
- As the Chair of Trustees may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Headteacher or a member of the Trust Leadership Team, they will receive training in managing allegations for this purpose.

**9.4 Recruitment – interview panels**

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

**9.5 Supervision**

- All staff who have contact with children and families will have supervision which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.
- Staff at Creating Tomorrow Trust will be offered supervision depending upon their role and needs. Some staff will be offered regular individual supervision to manage their workload, whereas others may be offered supervision as a group or when particular issues may arise.

**9.6 Specific safeguarding issues**

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

- physical abuse;
- sexual abuse;
- child sexual exploitation;
- emotional abuse;
- neglect;
- child criminal exploitation (including involvement in county lines);
- domestic abuse;
- fabricated or induced illness;
- faith-based abuse;
- female genital mutilation;

- forced marriage;
- gangs or youth violence;
- gender-based violence;
- hate;
- online safety;
- child on child abuse (including harassment and violence);
- radicalisation;
- relationship abuse;
- serious violence;
- sexual violence or sexual harassment (including child on child abuse);
- making or sharing of nudes or semi-nudes (previously known as sexting or sharing of youth produced sexual imagery);
- so-called 'honour-based' abuse;
- trafficking and modern slavery.

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

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

- children in the court system;
- children missing education;
- children with family members in prison;
- children who are homeless;
- child who have or have had a social worker;
- children who are young carers;
- children looked after or previously looked after (including those living in kinship care arrangements); and
- children with mental health problems.

## 10. Recognising and responding to abuse: How to take action

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

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

All staff will be alert to indicators of abuse (including child on child abuse) and will report any of the following to the Designated Safeguarding Lead immediately;

- any concern or suspicion that a child has sustained an injury outside what is reasonably attributable to normal play;

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

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

The following procedures are in line with statutory guidance (see Section 5) and the Local Safeguarding Children Partnership's Threshold Guidance [6]. Referral procedures can be found in section 10.5.

**10.1 Reporting systems for our pupils**

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback
- Pupils can record concerns through MyVoice (part of MyConcern)
- Pupils can talk to members of staff (who will contact a DSL)
- Pupils can talk directly to DSLs
- Pupils are made aware of Pastoral support available (all are DSLs)
- Pupils receive support through the RSE curriculum on who are OKHelpers and Community Helpers and access to a SoSafe Help Page

**10.2 If a child discloses that they are experiencing or at risk of experiencing abuse**

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

- listen to what is being said without displaying shock or disbelief;
- accept what is being said;
- allow the child to talk freely;
- reassure the child, but do not make promises which it might not be possible to keep;
- never promise a child that they will not tell anyone - as this may ultimately not be in the best interests of the child;
- reassure them that what has happened is not their fault;
- stress that it was the right thing to tell;

[6] http://www.northamptonshirescb.org.uk/schools/toolkits-docs-schools/thresholds-and-pathways/

- listen, only asking questions when necessary to clarify;
- not criticise the alleged perpetrator;
- explain what has to be done next and who has to be told;
- make a written record (see Record Keeping) using My Concern, or if not able to access a computer make a written note and transfer to My Concern as soon as possible; 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 (see 10.5), and tell the DSL as soon as possible that you have done so.

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

Bear in mind that some children may:

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

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

**10.3 If a child is experiencing or likely to experience harm, or in immediate danger**

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

Where possible, there should be a conversation with the Designated Safeguarding Lead but a referral must be made if a child may be experiencing or at risk of experience 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.

**10.4 If you have concerns about a child (as opposed to believing a child is experiencing or likely to experience from harm, or is in immediate danger)**

Figure 1 on page 24 illustrates the procedure to follow if you have any concerns about a child's welfare. Where possible, speak to the DSL first to agree a course of action (see 10.2).

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 Thresholds document 2025[7] If it is decided to make a referral to children's social care the parent will be informed, unless to do so would place the child at further risk or undermine the collection of evidence. See Section 7.2 for more details.

[7] https://nctrust.co.uk/wp-content/uploads/2025/10/Thresholds-Document-Oct-2025.pdf

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

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

- managing any support for the child internally via the school's own pastoral support processes;
- seeking advice from the local early help co-ordinator/s;
- a Family Help Assessment; or
- a referral for statutory services where the child is or might be in need or experiencing or likely to experience significant harm.

**10.5 Family Help (replacing Early Help)**

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

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

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

- is disabled or has certain health conditions and has specific additional needs;
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- has a mental health need;
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from education, home or care;
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil referral unit
- is at risk of modern slavery, trafficking, sexual and/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;
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage, and;
- is a privately fostered child;

**10.6 Referrals**

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so. If you make a referral directly you must tell the DSL as soon as possible. Children's social care assessments should consider where children are being harmed in contexts outside the home, so the school will provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm.

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

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.[8]

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

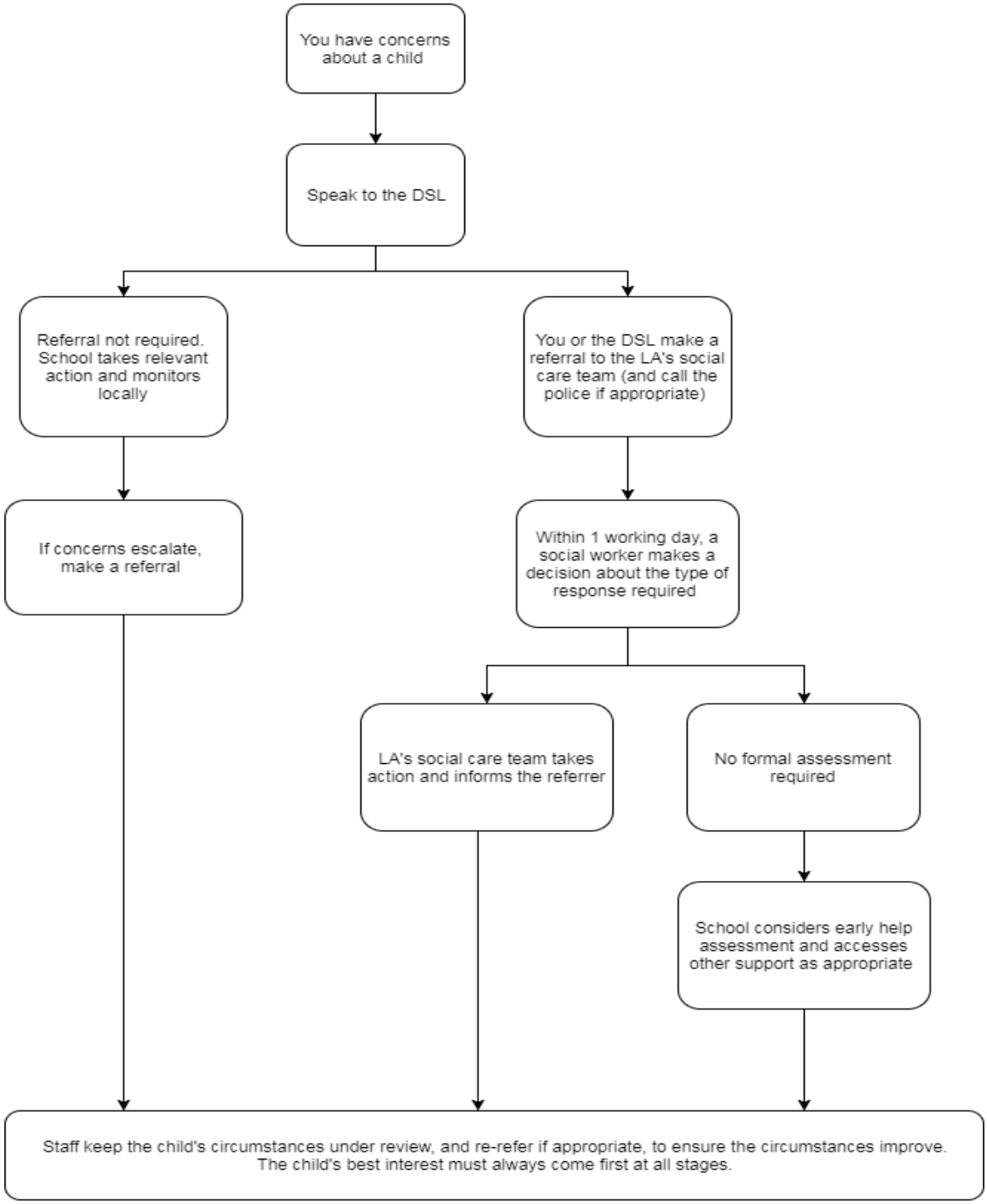
- By telephone contact to the Multi-Agency Safeguarding Hub (MASH):
  - 0300 126 7000 (option 1)
- By using the online referral form found at:
  - MASH ONLINE REFERRAL[9]
- In an emergency outside office hours, contact children's social care out of hours team (0300 126 7000) or the Police[10]
- If a child is in immediate danger at any time, left alone or missing, or has been harmed / injured you should contact the police directly and/or an ambulance using 999.

[8] The NSCP Case and Conflict Resolution Protocol can be found here: http://www.northamptonshirescb.org.uk/schools/case-conflict-resolution-protocol/
https://northamptonshire-self.achieveservice.com/en/service/Make_a_children_s_referral_to_Northamptonshire_s_MASH
https://m.luton.gov.uk/Page/Show/Health_and_social_care/safeguarding/safeguarding_children/Pages/default.aspx

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

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

**Figure 1: Reporting and responding to concerns flowchart**



## 11. Specific safeguarding issues

For more information relating to specific safeguarding issues, please see Appendix B. For more information child on child abuse (including harassment and violence) please see Appendix A.

**11.1 Female Genital Mutilation (FGM)**

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

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

Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out, or discovers that a pupil age 18 or over appears to have been a victim of FGM, must speak to the DSL and follow our local safeguarding procedures.

**11.2 Radicalisation and extremism**

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

We adhere to the Prevent Duty statutory guidance (2023)

Creating Tomorrow Partnership has 3 clear values of Respect, Inclusion and Community, and we take our responsibilities creating a tolerant and cohesive society very seriously. At school we promote tolerance and cohesion by following our Behaviour Curriculum and using Pupil Voice (Rights Respecting Schools) and learning via appropriate PSHE/SMSC/British Values and Cultural Capital.

**11.3 Children potentially at greater risk of harm**

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

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

We will also take action to promote the educational outcomes of and to protect;

- Children missing education;
- Children missing from home or care.

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

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

**11.4 Mental health**

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

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

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

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in Section 10.

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

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

Refer to the Department for Education guidance on mental health and behaviour in schools[11] for more information.

**11.5 Child on child abuse (including harassment and violence)**

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

In order to ensure that our policy on child on child abuse is well-promoted, easily understood and accessible, we have included information about our approach to minimising and responding to child on child abuse as an appendix. Full details of how the school prevents, responds to and supports victims of child on child abuse (including harassment and violence) can be found at Appendix A.

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

**11.6 Online safety, including filtering and monitoring**

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

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

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

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

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

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

**Pupil mobile phones**

Pupils are not allowed mobile phones on site.
Please refer to Wren Spinney Mobile phone policy

**11.7 Children who are gay, lesbian, bisexual, or gender questioning**

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

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

We take a very careful approach to requests for social transition, viewing it as an active intervention. We prioritise involving parents (Article 5 & 18) unless this poses a direct risk to the child.

**11.8 Elective home education**

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

From September 2016 the Education (Pupil Registration) (England) Regulations 2006 were amended. A parents' right to educate their child at home applies equally where a child has SEN. This right is irrespective of whether the child has an Education Health and Care Plan (EHC Plan), however as the child is registered at a special school, under arrangements made by the local authority as detailed in the DfE Pupil Registration Regulations, the parent cannot de-register for home education without the agreement of the local authority:

- Parents will need to write to the headteacher of the school informing them of their wish to home educate their child and therefore their child's name to be removed from the school. (This process is called de-registering)
- The school will notify the LA;
    - North Northamptonshire – EHC Plan coordinator Julie Rolph (EHCP caseworker or EHCP co-ordinator)
- The LA will contact the parents about the arrangements they are making for their child's education.
- The parent will be allocated an elective home education support worker who will arrange a home visit to discuss plans and arrangements.
- After being notified, the local authority, in most cases will give consent to the school to remove the student from their roll.
- During the period between notifying the school and the LA agreeing for the student to be EHE, the student does not need to attend school, however the school will offer reasonable support to the parent.

Where a student has an EHC Plan and is home educated, certain duties will remain the responsibility of the local authority. Further information and guidance may be found in the SEN Code of Practice.

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

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

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

We offer extra pastoral support for pupils with SEN and disabilities. This includes:

- Term time support from Pastoral Team
- Access to a trained ELSA
- Support from Occupational Therapist
- Any referrals to outside services, including but not limited to social care, CTPLD or CAMHs
- Ongoing support

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

- SEND Code of Practice[12]
- Specialist SEND support services in West Northants[13]
- Specialist SEND support services in North Northants[14]

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

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

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

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

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

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

We have contact plans for children with a social worker, and other children who we have safeguarding concerns about, for circumstances where they won't be attending school.

Each child has an individual plan, which sets out:

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

[12] https://www.gov.uk/government/publications/send-code-of-practice-0-to-25
[13] https://www.westnorthants.gov.uk/specialist-send-support-services
[14] https://www.northnorthants.gov.uk/specialist-send-support-services

We have agreed these plans with children's social care where relevant, and will review them as appropriate. If we can't make contact, we will follow up via social care or the police, as appropriate.

## 14. Looked after and previously looked after children

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:
Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements. The DSL has details of children's social workers and relevant virtual school heads.

- We have appointed a designated teacher, Anna Kirkland (Designated Teacher), who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.[15]
- The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

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

## 15. Record-keeping

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

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

- record as soon as possible after the conversation, using My Concern;
- Do not destroy the original notes in case they are needed by a court, hand to the DSL who will ensure they are uploaded to the as a file to the concern;
- record the date, time, place, and any noticeable non-verbal behaviour and the words used by the child;
- Use a body map to indicate the position of any injuries if relevant and attach as a file;
- record statements and observations rather than interpretations or assumptions

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

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

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

Records will include:

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

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

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file.
To allow the new school/college to have support in place when the child arrives, this should be within:

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

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

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

## 16. Relationships, sex and health education (RSHE)

**Promoting safeguarding and welfare in the curriculum**

Safety is at the heart of the curriculum for all learners in our Trust.
To be successful our learners need to feel safe and build trusting relationships. Only when we enable this will our learners be able to engage in learning activities and develop the skills necessary.
Our curriculum is based around 3 themes of safety:

- Of self – the ability to self-regulate and manage own emotions and so engage in learning experiences
- For self – the ability to be independent and autonomous (do things not only by yourself but for yourself)
- With others – the ability to manage and develop positive relationships

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment. This will be underpinned by our:

- Relationship (Behaviour) policy
- Pastoral support system

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

Wren Spinney uses SoSafe (RSE) and Equals PSHE where appropriate (dependent on pupils' cognitive ability). Please see PSHE policy on school website.

**Rights Respecting Schools**

Promotes children's understanding of their rights and the rights of others, based on the United Nations Convention on the Rights of the Child (UNCRC). Key points include:

• Understanding rights: teaching students about their own rights, responsibilities, and the rights of others
• Promoting respect and fairness: encouraging a culture of respect, equality, and inclusion
• Developing responsibility: helping students make informed choices and take responsibility for their actions
• Embedding values in practice: integrating respect, fairness, and rights into everyday school life and the wider community Supports students to:
• Understand and respect their own rights and the rights of others
• Make informed choices and take responsibility for their actions
•Contribute positively to a safe and inclusive school community

**SoSAFE!** – Social Safety, Personal Boundaries, and Protective Behaviours A visual teaching program developed by Pyramid Educational Consultants, providing students with tools to understand social safety, personal boundaries, and protective behaviours. Key points include:

• Private body parts: learning which parts of the body are private and should be covered
• Consent: understanding that permission must always be asked and given before actions or touch
• The right to say no: knowing they can refuse help if uncomfortable, while staff maintain duty of care
• Seeking help: identifying trusted adults and asking for support in unsafe or uncomfortable situations

## 17. Safer working practice

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

We expect all staff to act with professionalism at all times. To reduce the risk of unsafe or harmful practice, all staff should receive training on safer working practice and should be familiar with the guidance contained in the staff code of conduct and Safer Recruitment Consortium document Guidance for safer working practice for those working with children and young people in education settings (September 2022).[16]

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

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

Governors/Trustees will help to identify any weakness in the school safeguarding system.
Staff are expected to adhere to the staff Code of Conduct at all times. In the event of any concerns or allegations, the school will deal with them promptly, in line with local guidance and KCSIE (2026).

### 17.1 Staff use of mobile phones

Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present. Staff members' personal phones will remain in their bags or cupboards during contact time with pupils. Staff will not take pictures or recordings of pupils on their personal phones or cameras.

We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the school.

Please refer to the Trust's Acceptable Use of ICT Policy and Mobile Device Policy

## 18. Safeguarding concerns about and allegations against members of staff

All concerns, no matter how small, must be shared. We use the following outcome definitions for investigations: Substantiated, Malicious, False, Unsubstantiated, or Unfounded. In line with the Data (Use and Access) Act 2025, individuals may request the erasure of personal data resulting from unfounded, malicious allegations.

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

In the event that there is an allegation of abuse against a member of staff, we will adhere to Part 4, Section 1 (Allegations that may meet the harm threshold) and Section 2 (Concerns that do not meet the harm threshold) of KCSIE (2026) and Northamptonshire Safeguarding Children Partnership guidance. See Appendix D for more details.

**18.1 Allegations that may meet the harm threshold**

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

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

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

**Allegations against the headteacher, Chief Executive Officer, Chief Operating Officer or Chief Finance Officer**

If an allegation is made against the Headteacher, CEO, COO or CFO (Trust Executive Team), it must be reported to the Chair of Trustees who would be the case manager. The Chair of Trustees can be contacted via email jduggan@creatingtomorrowtrust.co.uk.

**Allegations against staff**

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

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

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

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

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

In the event that there is a safeguarding concern about a member of staff, we will adhere to guidance outlined in Part 4, Section 2 of KCSIE (2026) and local 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 harm threshold. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

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

It is essential that low level concerns are reported. Such behaviours can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

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

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

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

Staff will receive training about what may constitute a low-level concern. More information can be found in Part 4 of KCSIE (2026).

**Reporting low level concerns**

Low level concerns should be reported to Mike Tebbutt (Headteacher) via Confide.

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

The headteacher may:

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

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

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

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

We will retain low level concerns information for a period of until the person is no longer employed by the school / college (this is recommended)

**18.3 Supply staff**

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

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

The school will inform supply agencies of its process for managing allegations and will take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. Informing supply agencies of our process for managing allegations includes inviting the agency's human resource manager (or equivalent) to meetings and regularly updating agencies on relevant school policies.

## 19. Complaints and concerns about safeguarding policies

**19.1 Complaints against staff**

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with low level concerns or allegations of abuse made against staff (see Section 18).

**19.2 Other complaints**

When responding to complaints, we aim to:

- Be impartial and non-adversarial
- Facilitate a full and fair investigation by an independent person or panel, where necessary
- Address all the points at issue and provide an effective and prompt response
- Respect complainants' desire for confidentiality
- Treat complainants with respect and courtesy
- Ensure that any decisions we make are lawful, rational, reasonable, fair and proportionate, in line with the principles of administrative law
- Keep complainants informed of the progress of the complaints process

- Consider how the complaint can feed into school improvement evaluation processes
- We will try to resolve concerns or complaints by informal means wherever possible. Where this is not possible, formal procedures will be followed.
- Creating Tomorrow academies trust will aim to give the complainant the opportunity to complete the complaints procedure in full.
- Throughout the process we will be sensitive to the needs of all parties involved, and make any reasonable adjustments needed to accommodate individuals.

For more information please see Creating Tomorrow Complaints Procedures, these can be found on our website, or by contacting the school / college.

**19.3 Whistle-blowing**
Creating Tomorrow Trust has a whistleblowing policy and this is to support all workers to be confident that their concerns will be taken seriously and that they will be protected from unfair treatment if they raise a concern.

The trust is committed to the highest standards of openness, probity and accountability. It encourages an open dialogue between staff, leaders, governors and trustees to ensure concerns are resolved at the earliest opportunity. It is important to the school that any wrongdoing within the school is reported and properly dealt with. The school recognises that staff are valuable eyes and ears within the school and therefore encourages all individuals with concerns to come forward and voice these.

If an individual has concerns about anything happening within the school they should read the policy, which sets out the way in which individuals may raise concerns and how they will be dealt with.

## 20. Use of school or college premises for non-school activities

Creating Tomorrow Trust is committed to working with the local community and this may include local groups / organisations using school facilities.

Use of facilities will be limited to communal areas, for example the school hall or sports gym, and no access will be given to areas where there may be access to more sensitive information, for example classrooms or the staffroom.

The school will ensure that the organisation is aware of all safety procedures, for example fire exits, and a point of contact will be given in case of emergency.

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

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

In the event that the school receives an allegation relating to an incident that happened when an individual or organisation was using their premises for the purposes of running activities for children, we will follow our safeguarding policies and procedures, including informing the LADO.[17]

## 21. How we safeguard pupils attending alternative provision

Some of our learners may access learning off-site with other providers through alternative provision (AP), however we still retain a responsibility to ensure safeguarding of that pupil and we will satisfy ourselves that the placement meets the pupil's needs.

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

The School will have processes in place to know where a child is based during school hours. This includes having records of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend. We will regularly review the alternative provision placements and review them at a minimum of half termly to ensure that the child is regularly attending and the placement continues to be safe and meets the child's needs. Where safeguarding concerns arise, the placement will be immediately ended if any concerns are not addressed.

Please see our Alternative Policy and checklist which sets how we aim to ensure all learners are safeguarded, including

- Pre-placement checks
- Day-to-day safeguarding responsibilities
- Monitoring of attendance

The statutory guidance relevant to this area is:

• Alternative Provision DFE statutory guidance and

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

## 22 Policy implementation, monitoring and review

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

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

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

- Relationship (Behaviour) Policy
- Staff Code of Conduct
- Whistleblowing Policy
- Anti-bullying Policy
- Complaints Policy
- Health and Safety Policy
- Attendance Policy
- E-Safety Safety Policy
- SEND Policy
- Single Equality Duty (Equality) Policy
- Relationship and Sex Education Policy
- First Aid Policy
- Learning and Teaching Policy
- IT Acceptable Use Policy
- Privacy notices

## Appendix A: Child on child abuse (including harassment and violence)

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

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

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse');
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);

- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual making or sharing of nudes and semi-nude images and or videos (also known as sexting or youth produced sexual imagery);
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).[18]

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

**Harmful sexual behaviour (HSB)**

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

When responding to HSB, we will:
Consider the behaviours in a child protection context;

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

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

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

**Staff training**

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

[18] Keeping Children Safe in Education (2026)

**Procedures for minimising opportunities for child on child abuse (including harassment and violence)**

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

- have a robust Relationship (behaviour) policy, which makes it clear that we have a zero tolerance approach to any kind of child on child abuse;
- Have communication and safety at the heart of everything we do:
    - ensuring our children and young people have a voice
    - teaching Protective Behaviours
    - Teaching SoSAFE! based RSE curriculum
- ensure staff understand what is meant by child on child abuse and the school policy on child on child abuse by ensuring part of annual staff safeguarding training, and regular safeguarding updates through the year;
- train staff thoroughly so that they challenge inappropriate behaviour (even if it appears to be relatively innocuous);
- train staff thoroughly so that they are confident to challenge inappropriate behaviours between peers, that are actually abusive in nature;
- never downplay certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys”, as this can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it; 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 (including harassment and violence) within the curriculum and across the school**

Safety is at the heart of the curriculum for all learners in our Trust.
To be successful our learners need to feel safe and build trusting relationships. Only when we enable this will our learners be able to engage in learning activities and develop the skills necessary.
Our curriculum is based around 3 themes of safety:

- Of self – the ability to self-regulate and manage own emotions and so engage in learning experiences
- For self – the ability to be independent and autonomous (do things not only by yourself but for yourself)
- With others – the ability to manage and develop positive relationships

PSHE and RSE are integral elements of the school curriculum aiming to give our learners the skills to develop and maintain positive relationships. Please refer to school website for further information on SoSafe and the PSHE policy.
Where appropriate, sessions on Protective Behaviours are delivered to all students with the 2 key messages:

- We all have the right to feel safe all of the time
- We can talk with someone about anything, even if it feels awful or small

Elements of child on child abuse will be covered in an age and developmentally appropriate way such as online safety, ‘mate crime’, financial abuse, cuckooing etc.

We ensure that our systems for reporting all safeguarding concerns are well promoted, easily understood and easily accessible for learners to confidently report abuse, knowing their concerns will be treated seriously. We ensure that children are aware of our safeguarding and child protection procedures, including how to raise concerns about child on child abuse, by:

- speaking to a Trusted Adult
- having a pastoral team
- highlighting who the safeguarding leads are

**Additional Vulnerabilities**

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

- Having a respectful, inclusive and open culture where discrimination is not tolerated and challenged at all levels
- Developing a Total Communication environment so those with communication difficulties have a way to be heard
- Delivering Protective Behaviours as a core theme to all learners
- Training staff to recognise signs and indicators and heighten awareness of the vulnerabilities faced by our learners

**How to report concerns**

**Our learners**

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

**If a child discloses to an adult outside of school, the adult should contact the Designated Safeguarding Lead without delay to report the issue.**

All victims will be taken seriously, regardless of how long it has taken them to come forward and they will be supported and kept safe. Abuse that occurs online or outside of the school will be treated equally seriously. A victim will never be given the impression that they are creating a problem by reporting peer on peer abuse, including sexual violence or sexual harassment. A victim will never be made to feel ashamed for making a report or have their experience minimised.

In school, learners can:

- Speak to a trusted adult
- Speak to a designated safeguarding lead
- Speak to a member of the Pastoral Team
- Report a concern via MyVoice (part of MyConcern)
- Utilise the help page from their SoSAFE! Book

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

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

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

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

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

**What happens when an allegation of child on child abuse (including harassment and violence) is made?**
We will adhere to Keeping Children Safe in Education (2026) when responding to incidents of child on child abuse. The school takes child on child abuse seriously and will respond to all concerns or disclosures of child on child abuse, including those that have occurred outside of school and online, immediately.

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

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

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

The Designated Safeguarding Lead will always consider the following;

- the wishes of the victim in terms of how they want to proceed. The victims will be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered;
- the nature of the alleged incident(s), including: the level of coercion or threat, whether a crime may have been committed and consideration of harmful sexual behaviour;

- both the chronological ages and developmental stages of the children involved;
- any power imbalance between the children, including consideration of the age of children and whether children have special educational needs or disabilities;
- the impact on the victim;
- that sexual violence and sexual harassment can take place in intimate personal relationships between children;
- if the alleged incident is a one-off or a sustained pattern of abuse;
- if are there ongoing risks to the victim, other children, adult students or school or college staff; and
- Other related issues and wider context, such as links to child criminal or child sexual exploitation.

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

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

In the event of a disclosure of 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;
- whether there may have been other victims,
- the alleged perpetrator(s); and
- all the other children, (and, if appropriate, adult students and staff) at the school, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

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

**Recording procedures**

- Child on child abuse (including harassment and violence) is recorded through My Concern and categorised as child on child abuse.
- Schools / college present a Key Performance Indicator document to governors which includes specific information and analysis of safeguarding concerns and categories

Where a case of child on child abuse has been identified the lead DSL, with another senior member of staff, will assess risk and put in place appropriate measures.
The risk assessment will be carefully monitored and formally reviewed monthly.
Members of staff will follow the procedures for recording a disclosure as outlined in Section 9 of this policy.

**How we support victims of child on child abuse (including harassment and violence)**

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

School / college will adhere to the following principles when support a victim of child on child abuse:

- The needs and wishes of the victim are paramount
- Consideration of the developmental stage of the victim, the nature of the allegations and risk of further abuse
- The victim should never be made to feel they are the problem for making a report or made to feel ashamed for making a report

Support that may be offered:

- In-school counselling / support
- Referral to Early Help and Social Care
- Referral to Children and Young People's Independent Sexual Violence Advisors
- Referral to Child / Teenage Adolescent Mental Health Service
- Access to NHS services
- Access / referral to Rape and Sexual Assault Centres (support to access GP or through 111)
- Childline / Internet Watch Foundation (to remove child sexual abuse online images and videos)

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

**How we will support alleged perpetrators and perpetrators of child on child abuse (including harassment and violence)**

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

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

- Access to alternative provision
- Tutoring
- Access to remote education with appropriate face to face activities

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

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

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

There are always consequences to actions, and the school may choose to impose a sanction on the alleged perpetrator following an incident of child on child abuse. In this case, we will follow the school Relationship (Behaviour) Policy in determining the level and severity of sanction.

Where a child is cautioned or receives a conviction related to an incident of child on child abuse, the school will:

- update the risk assessment to ensure relevant protections are in place for all the learner at the school
- if not done already, consider any suitable action in line with the Relationship Policy
- If the perpetrator(s) remains in the same school as the victim, the school will be very clear as to the expectations regarding the perpetrator(s) now they have been convicted or cautioned. This could include expectations regarding their behaviour and any restrictions the school thinks are reasonable and proportionate with regard to the perpetrator(s)' timetable.
- ensure both the victim and perpetrator(s) remain protected, especially from any bullying or harassment (including online).
- Continue to offer support to the victim and the alleged perpetrator(s) for as long as is necessary where cases are classified as "no further action" (NFA'd) by the police or Crown Prosecution Service, or where there is a not guilty verdict,

A not guilty verdict or a decision not to progress with their case will likely be traumatic for the victim. The fact that an allegation cannot be substantiated or was withdrawn does not necessarily mean that it was unfounded. Schools and colleges should discuss any decisions with the victim in this light and continue to offer support. The alleged perpetrator(s) is also likely to require ongoing support for what will have likely been a difficult experience.

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

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

**How we will support other learners who may have been affected by child on child abuse (including harassment and violence)**

Even though all allegations of child on child abuse will be managed confidentially, we are aware that other learners, and staff, may be affected, especially if the outcome is a conviction and therefore in the public domain.

The school will offer any affected learners access to:

- Learning mentors
- Counselling, as appropriate
- Referral to external partners

The school will offer any affected staff access to:

- Supervision
- Counselling

**Local Safeguarding Arrangements and making referrals**

The school / college adheres to local safeguarding arrangements, as outlined by the Northamptonshire Safeguarding Children Partnership / Northamptonshire Safeguarding Adults Board (as applicable).
For further details of how the school works with partner agencies in responding to safeguarding incidents (including incidents of child on child abuse), please see the main body of this policy.

**Parents / Carers**
Parents / carers 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.

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

- Dedicate more teaching time to a particular issue or topic;
- Deliver additional staff training

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

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

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

## Appendix B: Types of abuse

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

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

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

Emotional abuse may involve:

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

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

The activities may involve:

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

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

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

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

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment
- Provide a suitable education (updated Working together to Safeguard children 2023)

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

**Children who are absent from education**

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

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

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

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

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

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

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage.
If a staff member suspects that a child is experiencing from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is experiencing or likely to experience harm, or in immediate danger.

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

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

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. Some specific forms of CCE can include children being forced or manipulated into

transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

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

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

Indicators of CCE can include a child:

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

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

**County Lines**

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

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

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

**Serious violence**

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

- include increased absence from school;
- a change in friendships or relationships with older individuals or groups;
- a significant decline in performance;
- signs of self-harm or a significant change in wellbeing;

- signs of assault or unexplained injuries; and/or
- unexplained gifts or new possessions, which could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

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

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

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

**Child sexual exploitation**

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

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

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

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

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

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

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

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

**Child abduction and community safety incidents**

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. Other community safety incidents in

the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

In order to keep children safe on the way to and from school we (include safety education, information for parents)

- Have a register for students accessing local authority transport / parent transportation / independent travel
- Register students into / out of school
- High level of staffing at the beginning / end of the day
- Incorporate travel training into the curriculum

In order to keep learners safe at school we:

- Electronic entry to school car park
- Swipe controlled entry points into buildings / premises
- High ratio of staff : learners
- Ability to 'lockdown' the site

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

**Cybercrime**

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

Cyber-dependent crimes include;

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

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

**Domestic abuse**

Domestic Abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse.

The abuse can encompass, but is not limited to: psychological; physical; sexual; financial; and emotional.
All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Domestic abuse can impact on children through seeing, hearing or experiencing the effects of domestic abuse and/or experiencing it through their own intimate relationships. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.
We are alert to the statutory duty for police to notify schools of domestic abuse incidents where a child is a victim in their own right.

Older learners may also experience domestic abuse and/or violence in their own personal relationships.
See Appendix A: Child on child abuse (including harassment and violence) for more details.

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

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

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

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

**So-called 'honour-based' abuse (including FGM and forced marriage)**
So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.
Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.
All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having undergone 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 11.1 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

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

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

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

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

**Forced marriage**
Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. Forced marriage legislation applies to non-binding, unofficial 'marriages' as well as legal marriages.

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

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

The DSL will:

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

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

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

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

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

School staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the child involved to check that they are

aware of their duty to inform the LA. The school itself has a duty to inform the local authority of the private fostering arrangements.

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

**Preventing radicalisation**
Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. Children may be susceptible to radicalisation into terrorism.
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.

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

**Radicalisation** is the process of a person legitimising support for, or use of, terrorist violence.

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

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

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

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

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

Staff will be alert to changes in pupils' behaviour. The government website Educate Against Hate[19] and the charity NSPCC[20] say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends

[19] https://educateagainsthate.com/signs-of-radicalisation/
[20] https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/protecting-children-from-radicalisation/

- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

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

- Relationship Policy
- Online Safety Policy
- Learning and Teaching Policy

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

If missing from school site:

- Contact police with full details of individual including description and clothing
- Contact parents / carers
- Staff members to make a sweep of local area in a vehicle

If missing from school care when on an off-site trip:

- Contact main school / site who will:
    - Contact police with full details of individual including description and clothing
    - Contact parents / carers
- Staff to reassure students in the group

If missing from home:

- Support parents / carers to contact police
- Follow-up conversation

All incidents will be recorded online either via My Concern or Arbor depending upon the context

- Children missing education in West Northants.[21]
- Children missing education in North Northants.[22]

**Non-collection of children**

If a child is not collected at the end of the session/day (this may be local authority or parent pick-up), we will:

- Attempt to contact parents 1st and 2nd contacts
- Use all emergency contact phone numbers
- If no contact with parents / emergency contact notify social services:
  - Named social worker,
  - If no named social worker MASH
- Continue to try and contact parents

Once made contact negotiate time / mechanism for ensuring child gets home safely

[21] https://www.westnorthants.gov.uk/attendance-and-behaviour-support-schools/tracking-children-and-their-families-who-have-gone-missing
[22] https://www.northnorthants.gov.uk/attendance-behaviour-and-home-schooling/tracking-children-and-their-families-who-have-gone-missing

## Appendix C: Safer recruitment

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

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

**Pre-appointment safer recruitment**
We will include the following in all job advertisements:

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

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

All applicants will be provided with a link to the Trust website and the:

- school Safeguarding and Child Protection Policy, and
- statement on the recruitment of ex-offenders

**Applicants**
We require applicants to provide:

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

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

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

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

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

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

We will also inform candidates that we will carry out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online that we may wish to explore with candidates at interview. (Specific guidance can be obtained from the Trust HR team)

**New staff**

When appointing new staff, we will:

- verify a candidate's identity. This includes demonstrating an awareness for the potential for individuals changing their name. Best practice is checking the name on their birth certificate, where this is available;
- obtain (via the applicant) an enhanced DBS check (including children's barred list information, for those who will be engaging in regulated activity with children);
- obtain a separate children's barred list check if an individual will start work in regulated activity with children before the DBS certificate is available;
- verify the candidate's mental and physical fitness to carry out their work responsibilities;
- verify the person's right to work in the UK, including EU nationals;
- If the person has lived or worked outside the UK, make any further checks the school or college consider appropriate;
- verify professional qualifications, as appropriate; and
- ensure that an applicant to be employed to carry out teaching work is not subject to a prohibition order.
- Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the Secretary of State.
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
    - For all staff, including teaching positions: criminal records checks for overseas applicants[23]
    - For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach

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

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or

[23] https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants

- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

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

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

- We believe the individual has engaged in relevant conduct[24];
  or
- The individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009[25]; or
- The 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

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

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

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

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

[24] https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs#relevant-conduct-in-relation-to-children
[25] http://www.legislation.gov.uk/uksi/2009/37/contents/made

**Volunteers**

We will:

- Never leave an unchecked volunteer unsupervised.
    - Following the Crime and Policing Act 2026, the "supervision exemption" has been removed. Any volunteer teaching, training, or supervising children frequently (more than 3 days in a 30-day period) is now in regulated activity regardless of whether they are supervised.
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity.
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment.

**Governance**

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

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

- A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008[26]). [Section 128 checks are only required for local governors if they have retained or been delegated any management responsibilities.]
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK
- The Chair of Trustees 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 to the site will be required to sign in (across our trust we use Entry Sign) and wear a lanyard with an authorized visitor badge. Across our trust we operate a coloured lanyard system:

- Blue Creating Tomorrow Lanyard - staff, Trustees, Governors – all of whom will have been DBS cleared
- Green - visitors (supply staff, contractors etc) DBS cleared
- Red - visitors, no DBS certificate - will be supervised at all times

All visitors will be required to verify their identity to the satisfaction of staff and either leave their belongings in a safe place. If keeping them with them then to ensure items such as mobile phone(s), are kept away from use.

[26] https://www.legislation.gov.uk/ukpga/2008/25/section/128

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

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

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

**Adults who supervise pupils on work experience**
When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

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

## Appendix D: How the school/college responds to allegations that may meet the harm threshold

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

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

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

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

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

For more information about how the school responds to low-level concerns (concerns do not meet the harm threshold) please see Section 18 of this policy, please also see our Trust Complaints Procedures.

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

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

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

**Definitions for outcomes of allegation investigations**

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- **False:** there is sufficient evidence to disprove the allegation

- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded**: to reflect cases where there is no evidence or proper basis which supports the allegation being made

**Procedure for dealing with allegations**

In the event of an allegation that meets the criteria above, the Headteacher (or Chair of Trustees where the Headteacher or Trust Leadership Team is the subject of the allegation) – the 'case manager' – will take the following steps:

- Immediately discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police).
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies.
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate.
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details.
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation.
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or Children's Social Care services as appropriate.
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. Further support is available through:
    - Trade Union representation
    - Employee support programs
        - Health Assure (confidential counselling support available through Perkbox account).
        - Education Support: telephone number 08000 562561 or website www.educationsupport.org.uk
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable).

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

- Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child
- If the school is made aware that the Secretary of State has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.
- Where the police are involved, wherever possible the Trust will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

**Additional considerations for supply staff and all contracted staff**

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

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

We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the local authority designated officer as required.

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

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

**Timescales**

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

**Specific actions**

**Action following a criminal investigation or prosecution**

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

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

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

**Individuals returning to work after suspension**
If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.
The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

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

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

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

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

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

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

- Records of substantiated, unsubstantiated, and unfounded accusations should be retained until the individual reaches their pension age or for 10 years from the date of the allegation, whichever is longer.
- The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.
- Some records related to investigations or institutional failures may need to be kept for up to 75 years (this will be recommended within a formal outcome)

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

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

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

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

**The Interim Chair of Trustees is:**
NAME: CONTACT:
__Janet Duggan_____ via Ellie Edwards eedwards@creatingtomorrowtrust.co.uk

**In the absence of the Chair of Governors, the Vice Chair should be contacted. The Vice Chair of trustees is:**
NAME: CONTACT NUMBER:
_tbc – contact Ellie Edwards_____ via Ellie Edwards eedwards@creatingtomorrowtrust.co.uk

Multi-Agency Safeguarding Hub: *Northants 0300 126 7000 (option 1)*
If it is decided that the allegation does not meet the threshold for safeguarding, it will be handed back to the employer for consideration via the school's internal procedures.

## Appendix E: Online Safety

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

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

- having robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors
- protecting and educating the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones'), including items such as 'smart glasses' and watches
- setting clear guidelines for the use of mobile phones for the whole school community
- establishing clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate.
- curriculum planning and RSHE;
- teacher training;
- the role and responsibilities of the designated safeguarding lead; and
- parental engagement;

This appendix complements, and should be read alongside our Online Safety policy. Staff must read the Online Safety Policy in conjunction with our Code of Conduct in relation to personal online behaviour. All staff receive online safety training at induction, with regular updates and formal annual training thereafter.
The Designated Safeguarding Lead (DSL) takes lead responsibility for online safety and understanding the filtering and monitoring systems and processes in place. The DSL attends training regularly to ensure that they understand the unique risks associated with online safety and to ensure that they are confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online **at school.**

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

- **content**: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism, misinformation, disinformation (including fake news) and conspiracy theories.
- **contact**: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes'.
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and nonconsensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams.

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

**Filtering and monitoring**
Our filtering and monitoring procedures, including our review process, are informed by the DfE guidance manual 'Meeting digital and technology standards in schools and colleges'[27]. For more information about the filtering and

[27] https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges

monitoring standards we adhere to, see 'Filtering and monitoring standards for schools and colleges' (March 2022).[28] Schools can use the DFE 'Plan technology for your school service' to self-assess against the filtering and monitoring standards.

In order to keep children safe when using school IT equipment, we

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

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

- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

This section summarises our approach to online safety and mobile phone use. For full details about our Trust's policies in these areas, please refer to our online safety policy and mobile phone policies which can be found on our website https://www.creatingtomorrow.org.uk/about-us/policies

We are aware that "over-blocking" can lead to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding and mitigate against this by using age appropriate settings within our monitoring software. The appropriateness of any filters and monitoring systems will be informed in part, by the risk assessment required by the Prevent Duty.

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

**Pupil mobile phones**
Pupils are not allowed mobile phones on site.
Please refer to Wren Spinney Mobile phone policy
See Section 17 of this policy for more details about staff use of mobile phones and smart technology.

**Remote learning**
Any remote learning is overseen by SLT and planned in conjunction with the school SENCo; Safeguarding contacts made as appropriate.
Any safeguarding concerns that arise while remote learning is in effect should follow the same referral procedures. This is most likely to arise from key worker contact (such as with class teacher or a member of the Pastoral Team), this should be reported through MyConcern. If parents have concerns while students are engaged with remote learning the Pastoral Team continues to be available for support and will follow up on any safeguarding concerns that arise.

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

**Cybersecurity**
We ensure that we have the appropriate level of security protection procedures in place in order to safeguard systems, staff and children and we review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies. This is informed by the DfE document 'Cyber security standards for schools and colleges'.[29]

**Regular review of our approach to online safety**
We recognise that technology, and risks and harms related to it evolve and changes rapidly.

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

We carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks their children face. This is informed by local and national training, regular updates and the DfE guidance 'Meeting digital and technology standards in schools and colleges'.[30]

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

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