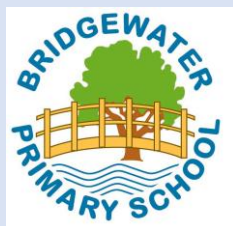


Safeguarding and Child Protection Policy

Bridgewater Primary School



2023-24

PERSON RESPONSIBLE FOR POLICY:	FRANCES TROOP
APPROVED:	SEPTEMBER 2023 UPDATED JANUARY 2024
SIGNED:	SIMON MITCHELL -CHAIR
TO BE REVIEWED:	SEPTEMBER 2024

Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child.
Keeping Children Safe in Education DfE, September 2023

"There is no trust more sacred than the one the world holds with children. There is no duty more important than ensuring that their rights are respected, that their welfare is protected, that their lives are free from fear and want and that they can grow up in peace." **Kofi Annan –
-Secretary General of the United Nations 1997-2006**

At Bridgewater Primary School, the named personnel with designated responsibility for safeguarding are:

Designated Safeguarding Lead	Deputy Designated Safeguarding Lead(s)	Safeguarding Governor and Chair of Governors
Frances Troop- Deputy Head Teacher	Alison Harvey – Head Teacher Nicola Redden – SENDCo and Online Safety Lead	Angela Watson – Safeguarding Governor/Vice Chair Simon Mitchell -Chair of Governors

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

Designated Senior Manager (normally the Head Teacher)	Deputy Designated Senior Manager	Chair of Governors (in the event of an allegation against the Head Teacher)
Alison Harvey	Frances Troop	Simon Mitchell

Our Data Protection Officer is:	Our Lead for Mental Health is:	Our Prevent SPOC is:
Plumsun	Jessica Wise	Frances Troop

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1. Aim of policy

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

Safeguarding is everyone's responsibility. We recognise that our 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

The aim of this policy is to;

- promote safeguarding and child protection and to provide information about how we work to keep children safe;
- ensure that all staff are aware of and clearly understand their statutory safeguarding responsibilities;
- provide all members of staff with the information required to meet their

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

- safeguarding duty and protect children from harm;
- provide stakeholders with clear information relating to the school's safeguarding and child protection procedures; and to
- ensure that we are protecting children from maltreatment or harm.

2. Scope

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

3. Definitions

Safeguarding and promoting the welfare of children is defined in Keeping Children Safe in Education (KCSIE) 2023 as;

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

For the purposes of this policy, the term 'safeguarding' refers to everything that the 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.
- Meeting the needs of children with special educational needs and/or disabilities.
- The use of reasonable force.
- Meeting the needs of children with medical conditions.
- Providing first aid.
- Educational visits.
- Intimate care and emotional wellbeing.
- Online safety and associated issues, including IT filtering and monitoring procedures.
- Appropriate arrangements to ensure school security, taking into account the local context.
- Keeping children safe from risks, harm and exploitation.
- Child protection.

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

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

Neglect is a form of abuse and is the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development².

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

Children includes everyone under the age of 18.

Within this policy:

- **‘Parent’** refers to birth parents and other adults in a parenting role for example adoptive parents, step parents and foster carers.
- **‘Staff’** or **‘members of staff’** refers to all teaching, non-teaching, support, supply, peripatetic, contract staff, governors and volunteers working in or on behalf of the school.
- Keeping Children Safe in Education (2023) may be abbreviated to ‘KCSIE’.

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

³ Keeping Children Safe in Education (2023)

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

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

4. Legislation and statutory guidance

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

Statutory Guidance

- Keeping Children Safe in Education (2023)
- Working Together to Safeguard Children (2023)
- Multi-agency statutory guidance on female genital mutilation (July 2020)
- Early Years Foundation Stage (4th September 2023)

Legislation

- The Children Act 1989 and The Children Act 2004
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015
- The Rehabilitation of Offenders Act 1974
- Safeguarding Vulnerable Groups Act 2006
- Counter-Terrorism and Security Act 2015 (and the Prevent Duty guidance)
- The Education Act 2002
- The School Staffing (England) Regulations 2009
- The Childcare (Disqualification) Regulations 2009 (and 2018 amendment)
- The Childcare Act 2006
- **The Human Rights Act 1998**, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- **The Equality Act 2010**, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it is proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there is evidence that they are being disproportionately subjected to sexual violence or harassment.

- **The Public Sector Equality Duty (PSED)**, which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination. Further information is found in KCSIE, para 82.

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

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 (2022)
- Meeting digital and technology standards in schools and colleges (DfE)

This Safeguarding and Child Protection Policy forms part of a suite of documents and policies, which relate to the safeguarding responsibilities of our school. In particular, this policy should be read in conjunction with:

- Safer Recruitment Policy,
- Behaviour Policy, including our searching, screening and confiscation policy.
- Whistle Blowing Policy,
- Health and Safety policy
- Attendance Policy
- Complaints Policy
- Looked After and Previously Looked After Children Policy
- Equality Duty and policy
- Special Educational Needs and Inclusion Policy
- PHSE and Relationships Policy
- Safeguarding response to children who go missing in education
- Anti-Bullying Policy,
- Adult Code of Conduct Policy,
- Online Safety Policy,
- Acceptable Usage Policy,
- Mentally Healthy School Policy
- Policy for Looked After Children and Previously Looked After Children
- First Aid Policy
- Privacy notices.

5. Equality Statement

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

barriers can exist for some children with respect to recognising or disclosing it. We ensure that all children have the same protection, regardless of any barriers they may face.

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

6. Confidentiality and Information Sharing

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

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

6.1 Sharing information with parents

Bridgewater Primary School will ensure the Safeguarding and Child Protection Policy is available publicly via the school website and if internet access is not available, by requesting a copy via the School Office.

Where appropriate, we will discuss any concerns about a child with the child's parents. The Designated Safeguarding Lead (DSL) or a Deputy 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 DSLs.

If we believe that notifying the parents would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so (see Section 6.2 for more details). In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved.

6.2 Consent

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

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

When considering whether, or not, to share safeguarding information (especially with other agencies), Bridgewater Primary 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 notes.

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

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

7. Roles and responsibilities

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

7.1 Governing bodies and proprietors

Governing bodies 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 **Angela Watson**.

Governors/proprietors will ensure that there are mechanisms in place to assist staff in understanding and discharging their statutory safeguarding roles and responsibilities. Governors will ensure that the school is working with local safeguarding partners and that the school contributes to multi-agency working, adhering to Working Together to Safeguard Children (2023). All governors will read KCSIE (2023) and a record will be kept of this.

Part 2 of KCSIE (2023) sets out the responsibilities of governing bodies and our school governors will adhere to this guidance at all times. As part of these responsibilities the governors will;

- ensure that they comply with their duties under statutory guidance and legislation including its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's

⁴ See Working Together to Safeguard Children (2023), pages 18-21 for more information.

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 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 and wearable technology in school;
- ensure that there are clear systems and processes in place for identifying when children may be experiencing mental health problems;
- ensure that children are taught about safeguarding, including online safety. See section 10.6 and Appendix E of this policy for further information;
- ensure that appropriate safeguarding arrangements are in place to respond to children missing from education and those who are absent from education, particularly on repeat occasions and/or for prolonged periods;
- appoint an appropriate member of staff from the senior leadership team to the role of Designated Safeguarding Lead to take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place) and ensure that the DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support. In our school, the role of online safety and filtering and monitoring is taken by Nicola Redden as a senior leader and DDSL, alongside Frances Troop, DSL.
- 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) ensure that there are appropriate procedures in place to manage and
- respond to allegations of abuse against the Head Teacher. The Chair of Governors will act as the 'case manager' in the event that an allegation of abuse is made against the Head Teacher, where appropriate (see Appendix D).

7.2 The Head Teacher

The Head Teacher is responsible for the implementation of this policy. The Head Teacher 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 (this is also a DSL- see KCSIE 2023 Paragraph 103);
- ensure that all recruitment follows the safer recruitment guidance (see Part 3 of KCSIE) and a single, central record is maintained with details of all members of staff who are in contact with children;
- respond to allegations of abuse against all other members of staff and act as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate;
- make decisions regarding all low-level concerns,
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required;
- ensure that the school works with social care, the police, health services and other services to; promote the welfare of children; provide a co-ordinated offer of early help when need is identified; contribute to inter-agency plans for children subject to children protection plans and to protect children from harm;
- safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties (Teaching Standards, 2012);
- ensure that children's social care (from the host local authority or placing authority) have access to the school to conduct, or to consider whether to conduct a section 47 or section 17 assessment, as per Keeping Children Safe

in Education (September 2023);

- ensure the relevant staffing ratios are met, where applicable and
- ensure each child in the Early Years Foundation Stage is assigned a key person (Reception and Nursery)

7.3 The Designated Safeguarding Lead (DSL)

The full responsibilities of the DSL are set out in Annex C, KCSIE (2023).

The DSL is a member of the Senior Leadership Team. Our DSL is Frances Troop – Deputy Head Teacher. The DSL takes lead responsibility for child protection and wider safeguarding.

When the DSL is absent, the deputies will act as cover. Our deputies are Alison Harvey, Headteacher, Nicola Redden – Upper Phase Leader/SENDCo and Online Safety Lead/ Filtering and Monitoring (alongside the DSL), Emma Ottaway, Parent Link Worker. If the DSL and deputies are not available, Jessica Wise (Early Phase Leader) will act as cover.

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

Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate **lead responsibility** for 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) updated in December 2023, which identified the importance of strong multi-agency working and shared responsibility.
- Identify if children may benefit from early help, ensuring that assessments for early help consider how the needs of different family members impact each other and being alert to the needs of families with disabilities, those whose first language is not English, fathers and male carers and parents who identify as LGBTQ. (Working Together To Safeguard Children, 2023.)
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- Make referrals to the Channel programme where there is a radicalisation concern and/or support staff that make a referral to Channel;
- Support the school with regards to their responsibilities under the Prevent duty and provide advice and support on protecting children from radicalisation;
- Refer cases to the police where a crime may have been committed;
- Be available during school hours for staff to discuss any safeguarding concerns. In the event that they are not available, a deputy will be made available;

- Undertake training to equip them with the skills to carry out the role and update this every two years;
- Ensure all staff that work directly with children have read and understood Part 1 and Annex B of Keeping Children Safe in Education (September 2023);
- Ensure all staff that do not work directly with children have read either Part 1 or Annex A (as appropriate) of Keeping Children Safe in Education (2023);
- 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;
- 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;
- Support children who have experienced or are experiencing safeguarding or child protection, supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children;
- Promote a 'culture of safeguarding', in which every member of the school community acts in the best interests of the child;
- Ensure that staff are aware of the school's or college's unauthorised absence procedures and children missing education procedures;
- Regularly meet with the safeguarding link governor and/or Chair of Governors to review safeguarding at the school and
- Liaise with the Head Teacher 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;
- Use the Hackett Continuum (NSPCC) to assess the level of response needed to children who display sexualised behaviour.
- 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.

The DSL and deputies can be contacted via email or mobile phone out-of-hours and these numbers have been shared with staff in the summer holidays (including new-to Bridgewater staff) and again at the start of September and are stored on Teams and provided in Induction handouts.

7.4 All staff

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

- have a responsibility to provide a safe environment, where children can learn;
- will be trained so that they know what to do if a child tells them that he/she is being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals;
- will be able to identify indicators of abuse and neglect;
- will be made aware of systems in our 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 peer on peer abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it;
- will be made aware of the early help process and understand their role in it;
- should be prepared to identify children who may benefit from early help and will discuss early help requirements with the safeguarding lead in the first instance;
- may be required to support social workers and other agencies following a referral;
- will be made aware of the process for making referrals to Children's Social Care (though the MASH), understand statutory assessments and the role that they may be expected to play in such assessments;
- should be prepared to make referrals to the MASH if they have concerns about a child's welfare and understand the role that they may be expected to play in such assessments;
- will receive regularly updated safeguarding and child protection training to cover all of the above, as well as online safety; safety (including IT filtering and monitoring procedures and how to report related safeguarding or technical concerns);
- reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online);
- will receive safeguarding updates throughout the year as part of continuous professional development;
- will be encouraged to contribute to the development of safeguarding policy and practice;
- should always seek advice from the Designated Safeguarding Lead if they are unsure;
- provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns;
- all teachers should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties (Teaching Standards, 2012, updated July 2021).

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

All staff that work directly with children will be provided with a copy of, and must read, Part 1 and Annex B of Keeping Children Safe in Education (September 2023) annually and will receive annually updated training on their safeguarding roles and responsibilities.

Staff that do not work directly with children will be provided with a copy of either Part 1 or Annex A of Keeping Children Safe in Education (2023) and must read this document. At Bridgewater, members of the school kitchen will be asked to read Annex A instead of Part 1.

All staff will sign a declaration at the beginning of the 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.

At the conclusion of the September Safeguarding training, setting out the school's priorities, staff complete a feedback form and this is collated and indicates which staff need additional training. This is then followed up and support put in place. This will be documented on the feedback overview and is regularly reviewed to ensure staff are supported and able to effectively carry out their safeguarding duty. Staff joining later in the year also complete the form and the information is added to the feedback form.

8. Recognising Abuse: Training

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

8.1 All staff

- All staff members will undertake safeguarding and child protection training at induction (including online safety, filtering and monitoring and whistle-blowing procedures) to ensure they understand the school's safeguarding systems, their responsibilities and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from the three safeguarding partners.
- All staff will have training on the government's anti-radicalisation strategy Prevent, to enable them to identify children at risk of being drawn into terrorism

and to challenge extremist ideas.

- Staff will also receive regular safeguarding and child protection updates (for example, through emails, e-bulletins and staff meetings) as required, but at least annually.
- Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training through their firm.
- Volunteers will receive appropriate training, as applicable.

Teachers will receive training to ensure that they can manage behaviour effectively to ensure a good and safe educational environment and have a clear understanding of the needs of all pupils. As a school, we use Restorative Approaches to support understanding and as a method of resolving conflict and preventing harm.

8.2 The DSL and Deputy DSLs

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

8.3 Governors

- All governors receive safeguarding training appropriate to their role at induction which is regularly updated, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities, including providing strategic challenge and ensuring there is a whole school approach to safeguarding.
- This includes training on:
 - the Prevent duty.
 - Online safety.
 - The expectations, applicable roles and responsibilities in relation to filtering and monitoring.
- As the chair of governors or proprietor may be required to act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, they should receive training in managing allegations for this purpose.

8.4 Recruitment – interview panels

As a maintained school, 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 (2023), and will be in line with local safeguarding procedures.

8.5 Supervision

- In Early Years, 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.
- At Bridgewater, we also offer this to staff who are working with children with complex safeguarding needs to ensure they are supported.
- The Supervision Agreement is available on request.

8.6 Specific safeguarding issues

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

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

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

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

- children in the court system;
- children missing from education;
- children with family members in prison;
- children who are homeless;
- child who have or have had a social worker;
- children who are young carers;

- children looked after or previously looked after; and
- children with mental health problems.

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

If a member of staff, parent or member of the public is concerned about a pupil's welfare, they should report it to the DSL as soon as possible. They can record it as a concern on 'My Concern' alongside any verbal conversation. When the DSL is not available, it should be reported to the deputy safeguarding leads 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 child on child abuse;
- any concerns relating to people who may pose a risk of harm to a child; and/or
- any disclosures of abuse that children have made.

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

The following procedures are in line with statutory guidance (see Section 4) and the Northamptonshire Safeguarding Children Partnership's Threshold Guidance (2022)⁵. Referral procedures can be found in section 9.5.

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

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

- listen to what is being said without displaying shock or disbelief;
- accept what is being said;
- allow the child to talk freely;

⁵ <https://www.nctrust.co.uk/protecting-children-information-for-professionals/Documents/NSCP%20Thresholds%20Guidance%20review%20FINAL%2011-4-2022.pdf>

- reassure the child, but do not make promises which it might not be possible to keep;
- never promise a child that they will not tell anyone - as this may ultimately not be in the best interests of the child;
- reassure him or her that what has happened is not his or her fault;
- stress that it was the right thing to tell;
- listen, only asking questions when necessary to clarify; we use the acronym TED (Tell me, Explain, Describe)
- not criticise the alleged perpetrator;
- explain what has to be done next and who has to be told;
- make a written record on My Concern as soon as possible (see Record Keeping); 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 9.2), and tell the DSL as soon as possible that you have done so.

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

We recognise that some children may:

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

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

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

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

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

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

Figure 1 on page 21 illustrates the procedure to follow if you have any concerns about a child's welfare. Where possible, speak to the DSL first to agree a course of action (see 9.2).

The DSL will decide on the most appropriate course of action and whether the concerns should be referred to children's social care, using the [Northamptonshire Thresholds Guidance](#)⁶. If it is decided to make a referral to children's social care the parent will be informed, unless to do so would place the child at further risk or undermine the collection of evidence. See Section 6.1 for more details.

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

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

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

9.4 Early help

All staff should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.⁷ If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases should be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services if the child's situation does not appear to be improving or is getting worse. Timelines of interventions will be monitored and reviewed.

Early Help assessments will focus on improving how families function and developing the family's capacity to establish positive routines and solve problems, considering how the needs of family members impact upon each other.

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

⁶ <https://www.nctrust.co.uk/protecting-children-information-for-professionals/Documents/NSCP%20Thresholds%20Guidance%20review%20FINAL%2011-4-2022.pdf>

⁷ <https://www.nctrust.co.uk/protecting-children-information-for-professionals/Documents/NSCP%20Thresholds%20Guidance%20review%20FINAL%2011-4-2022.pdf>

⁷ For more information about Early Help, please see: <https://www.nctrust.co.uk/protecting-children-information-for-professionals/Pages/early-help.aspx>

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

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

9.5 Referrals

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

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

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

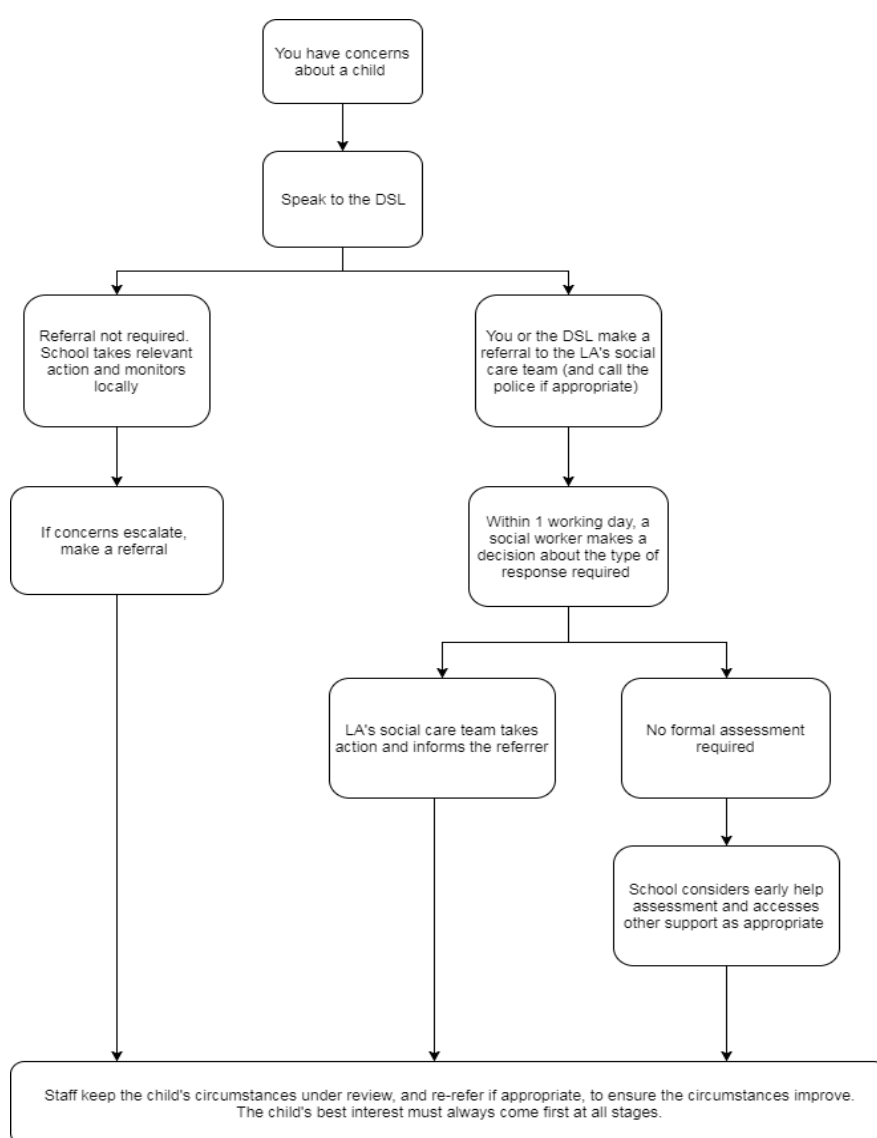
If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.⁸

⁸ The NSCP Case and Conflict Resolution Protocol can be found here: <http://www.northamptonshirescb.org.uk/schools/case-conflict-resolution-protocol/>

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 on 01604 626938 or the Police¹⁰
- If a child is in immediate danger at any time, left alone or missing, you should contact the police directly and/or an ambulance using 999.

9.6 Figure 1: Reporting and responding to concerns flowchart



⁹ <https://www.nctrust.co.uk/Pages/home.aspx>

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

10. Specific safeguarding issues

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

10.1 Female Genital Mutilation (FGM)

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

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

Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out must speak to the DSL immediately, follow our safeguarding procedures on My Concern and refer personally to the Police.

10.2 Radicalisation and extremism

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

Our British Values Statement and commitment to the Public Sector Equality Duty shows specific examples of how we promote tolerance and cohesion. Our school values of Respect, Responsibility and Resilience are used to support pupil understanding of these important principles.

10.3 Children potentially at greater risk of harm

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

The DSL will hold information relating to social workers working with children at the school/college. 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 (2023) to support children and families in the following circumstances:

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

10.4 Mental health

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

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

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

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

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

Only appropriately trained professionals should attempt to make a diagnosis of a mental health concern. However, the 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. Our mental health lead is Jessica Wise and the Mentally Healthy School Policy details the routes for referral and support.

Refer to the Department for Education guidance on [mental health and behaviour in schools¹¹](https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2) for more information.

10.5 Child on Child abuse

The school 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

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

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 can be found at Appendix A.

The Child-on-Child Abuse Policy details how pupils can feel safe and get support, this includes a child-friendly version, developed with children in KS2.

10.6 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.

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

- creating a safer online environment – including training requirements, including updated training on filters and monitoring;
- being alert to the appropriate content online and how to report any concerns around filtering and monitoring
- what filtering systems we use and how these are monitored (see Online Safety Policy.)
- ensuring staff model safe and responsible behaviour in their own use of technology during lessons.
- giving everyone the skills, knowledge and understanding to help children and young people stay safe online;
- reminding pupils about their responsibilities through an Acceptable Use Agreement which is displayed throughout the school.
- the 4 C's which are: content, contact, conduct and commerce;
- ensuring that staff and pupils understand the issues around aspects of the commercial use of the Internet such as age-appropriate internet use. This may include risks in pop-ups, buying online, online gaming or gambling.
- inspiring safe and responsible use and behaviour;
- safe use of mobile phones and wearable electronic devices with imaging and image sharing capabilities both within school and on school trips/outings;
- safe use of camera equipment, including camera phones; and
- understanding 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 Adult Code of Conduct in relation to personal online behaviour. The Designated Safeguarding Lead (DSL)/ the Senior Leadership Team ensure that staff read and understand all policies, such as the Adult Code of Conduct and the Acceptable Use Policy, which set out clear procedures in relation to the use of mobile phones, cameras and other electronic devices with imaging and image sharing capabilities and social networks, as well as online conduct.

Staff are made aware of what constitutes misuse of mobile phones, cameras and other electronic devices with imaging and image sharing capabilities and know how to minimise the risk. Our staff are vigilant and alert to any potential warning signs of the misuse of mobile phones and cameras and report any concerns.

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

Pupil mobile phones

Pupils are only allowed to bring a mobile phone to school in Years 5 and 6. These are not accessed during the school day and are kept securely. Phones are returned at the end of the day and can only be switched on when the pupils are off the school premises.

10.7 Children who identify as LGBTQ+

We recognise the fact that a child or a young person may be LGBTQ+ is not in itself an inherent risk factor for harm. However, we understand that children who are LGBTQ+ can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

We will:

- Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns.
- Include LGBTQ+ understanding in training for staff so that they understand that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBT) can be targeted by other children.
- Continue to welcome and supported those with protected characteristics through our school culture and values and the focus of our Diversity Team.
- Seek to provide support for families, welcoming co-operation, providing the child is not at risk.

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

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

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- pupils being more prone to peer group isolation than other pupils;
- the potential for pupils with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and/or
- communication barriers and difficulties in overcoming these barriers.
- reluctance to challenge carers, (professionals may over empathise with carers because of the perceived stress of caring for a disabled child)
- children with disabilities often rely on a wide network of carers to meet their basic needs and therefore the potential risk of exposure to abusive behaviour can be increased;
- A disabled child's understanding of abuse;
- Lack of choice/participation;
- Isolation.

We offer extra pastoral support for pupils with SEN and disabilities. This includes an Inclusion Team with a wide range of experience and specialism, including trauma and loss, emotional literacy, speech and language, social and emotional communication and mental health.

Alongside our team of dedicated teachers and non-teaching staff, we aim to:

Support all children in feeling that they belong whilst meeting their individual needs

- Reduce barriers to learning and ensure participation, thus reducing possible isolation.
- Recognise strengths and identify areas of difficulty to plan carefully-matched, personalised provision.
- Offer additional social and emotional support through our nurture and pastoral care programmes at the Bridge and within year groups.
- Signpost families to additional services and outside agencies when appropriate to support the whole family.

Mental Health and Nurture Support

We have a dedicated Healthy School Team that promotes children's physical and mental health. This especially includes those who are vulnerable to mental health difficulties, as well as those who already experience difficulties with mental health.

The Bridge (our dedicated Nurture area) supports children across the school with nurturing and therapeutic activities, in groups and 1:1 sessions.

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

- [Directory of Services for Children with Disabilities: Specialist support for SEND¹²](https://www.northamptonshire.gov.uk/councilservices/children-families-education/SEND/specialist-support-for-send/Pages/default.aspx)
- [Northamptonshire's Local Offer: SEND Local Offer¹³](https://www.northamptonshire.gov.uk/councilservices/children-families-education/SEND/local-offer)

12. 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.

¹² <https://www.northamptonshire.gov.uk/councilservices/children-families-education/SEND/specialist-support-for-send/Pages/default.aspx>

¹³ <https://www.northamptonshire.gov.uk/councilservices/children-families-education/SEND/local-offer>

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 situations where they won't be attending school (for example in a local lockdown previously during Covid) or they would usually attend, but circumstances prevent this, for example, transport issues. Where practical and possible we will aim to ensure children can be brought to school, if they are well and there are external barriers, which we can address.

If not at school, each child has at least a weekly check-ins by person and if not seen, a phone call is made. Follow-up visits are scheduled if needed. Check-ins include wellbeing and welfare of children and family, including checking the family have adequate provisions for making meals, providing information about services, sharing resources and signposting to local services.

These visits are usually conducted by the Learning Mentor and Parent Link Worker, but sometimes class teachers or other members of the staff may visit to support. Visiting children in their homes is covered in our Adult Code of Conduct.

We share these details with social care. If we can't make contact, we call again, but if we have concerns about immediate danger, we call 999, if we have concerns about the child more generally the social worker will be called.

Review of plans is twice an academic year or when a child no longer has a social worker. If they remain vulnerable, the contact plan can remain in place.

13. Looked after and previously looked after children

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

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

- We have appointed two designated teachers, Frances Troop (Deputy Head Teacher/DSL) and Nicola Redden (SENDCo/Deputy DSL) who are responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](https://www.gov.uk/government/publications/designated-teacher-for-looked-after-children).¹⁴
- The designated teachers are appropriately trained and have the relevant qualifications and experience to perform the role. Both of our designated

¹⁴ <https://www.gov.uk/government/publications/designated-teacher-for-looked-after-children>

teachers are trained SENDCos, who have knowledge and experience in addressing barriers to educational attainment and progress.

As part of their role, the designated teacher will:

- Work closely with the other DSLs 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.

14. Record-keeping

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

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

- record as soon as possible after the conversation on the online tracking system, My Concern.
- not destroy the original notes in case they are needed by a court, but hand these to a DSL;
- record the date, time, place and any noticeable non-verbal behaviour and the words used by the child;
- draw the body map on My Concern to indicate the position of any injuries if relevant; and
- record statements and observations rather than interpretations or assumptions
- check spelling and grammar and re-read for accuracy before submitting as 'concerns' cannot be edited once uploaded to the system.

All concerns will trigger an email to the DSL and Deputy DSLs when submitted. If any are deemed to be urgent, or potentially may require immediate attention, staff are asked to follow up the recording with a phone call to the DSL or a deputy.

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 on My Concern. Information which precedes the online safeguarding system is confidentially filed and locked away securely in a dedicated cupboard.

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.

Confidential information on My Concern is only available to those who have a right or professional need to see it. 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. If the receiving school uses 'My Concern' the records will be electronically transferred through a secure portal.

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.

15. Relationships, sex and health education (RSHE)

Promoting safeguarding and welfare in the curriculum

At Bridgewater we prioritise the welfare of children, creating a culture where staff are confident in their responsibilities and help support Safeguarding through the curriculum as well as their professional behaviour. This is reflected in our Adult Code of Conduct, our Online Safety Policy, PSHE and Relationships policy and through the personal development of the children.

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:

- Behaviour policy
- Pastoral support
- 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

This ensures that children are taught about safeguarding in an age-appropriate way including online safety, through teaching and learning opportunities, as part of providing a broad and balanced curriculum. This may include covering relevant issues through personal, social, health and economic education (PSHE), and through Relationships Education. We have a strong and positive PHSE curriculum that tackles a wide range of safeguarding and welfare issues and gives children an opportunity to talk things through and gain support.

Online Safety is regularly taught and children can ask any questions regarding this or any concerns through the Ask-It Boxes in the classrooms, making it both pro-active and reactive to our children's needs. We ensure that appropriate filters and appropriate monitoring systems are in place to safeguard children from potentially harmful and inappropriate online material.

We believe the work we have done to provide the children with a safe and nurturing school environment will be helpful in ensuring that they take the lessons and ethos with them after school hours.

16. Safer working practice

We work to create and embed a culture of openness, trust and transparency, in which our school's values and expected behaviour (as set out in the Adult 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 receive training on safer working practice as part of their Safeguarding training and should be familiar with the guidance contained in the staff handbook, the Adult Code of Conduct and the Safer Recruitment Consortium document **Guidance for safer working practice for those working with children and young people in education settings (September 2022)**.¹⁵

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

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

¹⁵ <https://www.saferrecruitmentconsortium.org/>

when they are raised.

Governors will help to identify any weakness in the school's safeguarding system.

Staff are expected to adhere to the Adult Code of Conduct for staff 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 (2023).

16.1 Staff use of mobile phones

Staff are allowed to bring their personal phones to school for their own use but will limit such use to non-contact time when 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, cameras and other electronic devices with imaging and image sharing capabilities. In our reception and nursery, phones are placed in a locked cupboard. The use of phones is covered in an Acceptable Use agreement, which all staff sign annually and via training.

Cameras: pictures are taken on school devices and no images are stored on personal devices of any kind. Photographs should have a clear educational/school purpose and can be accessed, when requested, by other staff. Staff are reminded to ensure that only children with permission have photographs taken and this is reviewed annually.

Smart devices, including watches, are not allowed to be worn by pupils within school.

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

17. Safeguarding concerns about and allegations against members of staff

17.1 Allegations that may meet the harms threshold

In the event that there is an allegation of abuse against a member of staff, we will adhere to Part 4, Section 1 of KCSIE (2023) and Northamptonshire Safeguarding Children Partnership guidance. See Appendix D for more details.

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

Allegations against the Head Teacher

Where there are concerns about the Head Teacher, this should be referred to the Chair of Governors. The Chair of Governors in this school is Simon Mitchell. He can be contacted through the school office.

In the event of allegations of abuse being made against the Head Teacher, where a staff member feels unable to raise an issue with the Chair of Governors or feels that their genuine concerns are not being addressed, or there is a concern about a possible conflict of interest allegations should be reported directly to the Designated Officer.

Allegations against staff

If a concern or allegation of abuse arises against any member of staff, supply teacher or volunteer other than the Head Teacher, it must be reported to the Head Teacher 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 Head Teacher or Chair of Governors as appropriate and not discussed directly with the person involved.

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

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

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

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

In the event that there is a safeguarding concern about a member of staff, we will adhere to guidance outlined in Part 4, Section 2 of *KCSIE (2023)* and Northamptonshire Safeguarding Children Partnership guidance.

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

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and

- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

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

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 phones, cameras and other electronic devices with imaging and image sharing capabilities
- 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 and colleges from potential false allegations or misunderstandings.

Staff will receive training about what may constitute a low-level concern. More information can be found in Part 4 of KCSIE (2023).

Reporting low level concerns

Low level concerns should be reported to the Head Teacher.

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 in the HR office in a confidential filing cabinet. From 2023, we use Confide (online Safeguarding recording tool) to record and monitor any concerns raised about members of staff.

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

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

- take action through our disciplinary procedures;

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

We will retain low level concerns information for a period of 7 years, or at least until the person is no longer employed at the school.

17.3 Supply staff

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

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

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

18. Complaints and concerns about school safeguarding policies

18.1 Complaints against staff

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

18.2 Other complaints

The school's complaints policy is on the website. Once a complaint is received the appropriate person will be allocated to investigate and oversee this process.

In Early Years, we take account of requirements related to complaints set out in the safeguarding and welfare section of the statutory framework for the Early Years Foundation Stage (paragraph 3.75). There is a written procedure for dealing with concerns and complaints from parents and/or carers, and we keep a written record of any complaints, and their outcome. We will investigate written complaints relating to their fulfilment of the EYFS requirements and notify complainants of the outcome of the investigation within 28 days of having received the complaint. The record of complaints must be made available to Ofsted or the relevant childminder agency on request.

18.3 Whistle-blowing

The school has a separate Whistle-Blowing Policy that covers concerns regarding the way the school safeguards pupils – including poor or unsafe practice, or potential failures. General guidance on whistleblowing can be found via:

<https://www.gov.uk/whistleblowing>

NSPCC whistle blowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally.

<https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/whistleblowing-advice-line/>

Staff can call: 0808 800 5000 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk

The Whistleblowing Advice Line was commissioned by the Home Office. It is a direct response to the recommendation for "a new whistleblowing national portal for child abuse related reports" set out in the Government's Tackling child sexual exploitation report (HM Government, 2015).

The Whistleblowing Advice Line isn't intended to replace any current practices or responsibilities of organisations working with children. At school, we would encourage professionals to raise any concerns to the school in the first instance.

As set out in the requirements in paragraph 3.75 of the statutory framework for the Early Years Foundation Stage we will make available to parents and carers details about how to contact Ofsted and if we become aware that we are to be inspected by Ofsted, we will notify parents and/or carers. A copy of this report will be available via the website.

19. Use of the school premises for non-school activities

Where another body is providing services or activities (regardless of whether or not our children who attend these services/activities are 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.

We will share safeguarding arrangements with the other bodies, including sending them a copy of our Safeguarding Policy.

We share 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.

These processes are carried out by the School Business Manager and shared with the DSL.

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

Further information can be found here:

20. How we safeguard pupils attending alternative provision

When we commission an alternative provision, we will endeavour to ensure that this will provide a safe environment in which a child can learn. We will ensure that providers are compliant with the statutory guidance Keeping Children Safe in Education 2023.

We will:

- Check that staff at the registered alternative provision had appropriate checks, for example Disclosure and Barring Service (DBS) Checks.
- Share our Safeguarding Policy with them about the school's expectations for child protection and procedures they should follow if they have a concern about a pupil and ask for a copy of their policy.
- Undertake good quality risk assessments jointly as needed.
- Request assurance about health and safety procedures
- Ensure that all other relevant information is shared with providers, including any information on special educational needs, learning, challenging behaviours, strategies that have worked in the past, aptitudes and interests.
- Ensure arrangements are in place for working with other relevant services such as social care
- When a learner has an EHC plan, liaise with the Local Authority regarding these arrangements.

21. Policy implementation, monitoring and review

The policy will be reviewed annually by the governing body. It will be implemented through the both the school training and induction g 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.

Appendix A: Child on Child abuse

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

We know that even if we do not receive any reports relating to peer-on-peer abuse, it does not mean that it is not happening. We support and encourage anyone – especially our 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 peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as sexting or youth produced sexual imagery);
- ‘upskirting’, which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).¹⁶

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:

¹⁶ Keeping Children Safe in Education (2023)

- 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;
- Use the Hackett Continuum to distinguish developmentally typical sexual behaviours from those that could be problematic or harmful 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. We will use risk assessments and discuss actions with parents/carers to keep other children safe, whilst trying to ensure we address issues for the child exhibiting them and seeking additional advice from the MASH or Educational Psychology Service, as appropriate.

Staff training

All staff are made aware that children can abuse other children and 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 procedures with regards to child-on-child abuse and the crucial role that they play in preventing it and responding to it as necessary. It will be made clear that addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

Procedures for minimising opportunities for child on child abuse

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 behaviour policy, which makes it clear that we have a zero tolerance approach to any kind of child on child abuse;
- ensure staff understand what is meant by child-on-child abuse and the school policy on child on child abuse by; training as a whole school, sharing these messages with Phase leaders and having a policy of following up any behaviour incidents swiftly, fairly and appropriately through the following:
 - Restorative conversation/ approach
 - Reflection and actions to repair the situation
 - Consultation with parents
 - Record and report
- 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 within the curriculum and across the school

Clear expectations of behaviour are set by all stakeholders and clear rules and consequences are in place. Online safety lessons and training explicitly teach the children how to deal with the issues of sexting. Parents/carers are involved to support the school to resolve the issue.

Consent is taught in an age-appropriate way through the PSHE curriculum and regular online safety messages are given to develop understanding of critical thinking, keeping safe online, our digital footprint and an understanding of the guidance around sharing photographs.

We ensure that our systems for reporting all safeguarding concerns are well promoted, easily understood and easily accessible for children 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 sharing this through PHSE, Reflection and Circle Times, through assemblies and our rigorous work on Anti-Bullying, including a Child Friendly policy for both Anti-Bullying and Child-on-Child abuse. We endeavour to build trusting relationships, where pupils know they can speak to any adult when they have a concern.

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 supporting all children and their families. We ensure resources and curriculum content is inclusive and diverse and we have a dedicated Diversity Team, which focuses on ensuring all children have equal opportunities.

As an inclusive school, we believe that diversity needs to be embraced, celebrated and highlighted, both within the curriculum and through the culture of the school. As a result, children and stakeholders are represented fairly and accurately, with a focus on equity. Learners will have the opportunity have access to a deep, enriching curriculum, which supports community cohesion and enables all pupils to develop and understand themselves as interconnected, global citizens. This promotes the values of our school and ensures that all children feel equally valued and respected.

Our nurturing and caring environment means that all staff support children, but in addition to this we have a dedicated Inclusion Team, which supports the special

educational provision, social and emotional wellbeing and additional needs of our children. We have a dedicated area, 'The Bridge', where children can receive tailored support and nurture as needed.

How to report concerns

Our pupils

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

In school, pupils can:

- Speak to a member of staff
- Use their 'Hand of 5' to identify members of staff they feel confident in speaking to
- Identify the Designated Safeguarding Leads by their green lanyards
- Talk to a member of the Inclusion Team – available at non-structured times/ Nurture Lunch
- Leave a post-it note to initiate a conversation (some named children)
- Use a pass-in card to find an adult (some named children)
- There is a child friendly Child-on-Child Abuse Policy, which is shared with pupils and available on our website.

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

In the event that a pupil reports or discloses child on child abuse, we will take their report seriously, take prompt action to respond and to safeguard the child or children involved and we will ensure that we are listening to the voice of the child when deciding on the best course of action to take. We will always act in the best interests of children.

Following any disclosures or reports of child-on-child abuse, we will review our school systems, training and policies to determine if any learning can be derived from the situation to further strengthen our approach to this issue. We will always encourage our pupils to safely express their views and give feedback on how they have been supported following a safeguarding concern.

Our staff

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

Others

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

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 is made?

We will adhere to Keeping Children Safe in Education (2023) 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 even when there is a friendship/ relationship;
- if the alleged incident is a one-off or a sustained pattern of abuse;
- if there are 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; although we do not have school buses/school transport, we will consider the journey to and from the school,
- whether there may have been other victims,
- the alleged perpetrator(s); and
- all the other children and staff (if appropriate), 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 (2023)

Recording procedures

Reports of child-on child abuse will be recorded via our school tracking system, My Concern. Safeguarding is a standing agenda point on each governing body meeting and the DSL is also a governor and can report directly and work closely with the Governing Body as a whole and the Safeguarding Governor.

We will write risk assessments, in which each section/question on the risk assessment will be considered from the perspective of both pupils. Considerations will be given for the impact on, and needs of, the wider school community. All concerns and proposed actions will be recorded.

The school will work with the local multi-agency safeguarding teams in each local authority and other agencies as necessary.

This document will be reviewed frequently to ensure it is fit for purpose.

The risk assessment will be completed with reference to KCSIE, 2023.

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

The school recognises that child on child abuse has a significant impact on young people and victims are likely to need ongoing support. Children who are victims of sexual violence and sexual harassment wherever it happens, will likely find the experience stressful and distressing. Appropriate support will be put in place for

victims of child-on-child abuse whilst investigation is taking place and following the initial response. Support will continue for as long as it is needed and will be reviewed regularly to ensure the victim is receiving appropriate care. The school will do everything we can to maintain the victim's normal routine. We will do everything we can to protect the victim from further bullying, harassment or abuse as a result of their disclosure.

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

Preventative Strategies for Child-on-Child Abuse at Bridgewater

As a school we believe that it is important to develop appropriate strategies in order to prevent the issue of child-on-child abuse rather than manage the issues in a reactive way.

Firstly, and most importantly is our recognition that child on child abuse can and will occur on any site even with the most stringent of policies and support mechanisms. As a result, it is important to continue to recognise and manage such risks and learn how to improve and move forward with strategies in supporting pupils to talk about any issues and through sharing information with all staff.

This can be supported by ensuring we maintain an open and nurturing environment in which our children feel safe to share information about anything that is upsetting or worrying them. This is strengthened through a strong and positive PHSE curriculum that tackles such issues as prejudiced behaviour and gives children an opportunity to talk things through rather than seek one on one opportunities to be harmful to one another.

To enable such an open and honest environment it is necessary to ensure all stakeholders feel confident and enabled to talk about issues and challenge perceptions of children, including the use of inappropriate language and behaviour towards one another. We ensure this through training, professional discussion and talking to children in a way that creates an open and honest environment without prejudice.

We understand that it is vital that our school staff do not dismiss issues as 'growing up' or compare these to their own experiences of childhood. It is necessary that staff consider each issue and each individual in their own right before taking action. If staff minimise the concerns raised it may result in a child deciding not to seek help or advice.

It is important that children have a wide range of staff whom they can confide in. Our nurture provision ensures that children can access an adult every lunchtime, as well as a senior member of staff. We have an Inclusion Team who can provide additional and personalised support for any child who experiences worries and difficulties. This can include the child whose behaviour is unacceptable towards their peers, as well as those experiencing the unacceptable behaviour.

It is vital to ensure that our pupils are part of changing their circumstances and that of the procedures within schools. Having a school council and pupil voice and

encouraging young people to support changes and develop 'rules of acceptable behaviour' support to create a positive ethos in school and one where all young people understand the boundaries of behaviour before it becomes abusive.

In order to minimise the risk of child on child abuse our school:

- Provides a developmentally appropriate PSHE curriculum, which develops pupils understanding of acceptable behaviour and keeping themselves safe.
- Has systems in place for any pupil to raise concerns with staff, through our PSHE curriculum, monitoring of break times, time with teaching and non-teaching staff, availability of the Inclusion Team/ Pastoral Care to support, developing confidence for children in knowing that they will be listened to, believed and valued.
- Has robust behaviour monitoring with follow-up actions, including Restorative Approaches.
- Writes clear and specific risk assessments where appropriate.
- Has relevant policies in place (e.g. behaviour policy/anti-bullying policy).

Please see our Anti-Bullying Policy for more information.

How we will support alleged perpetrators and perpetrators of child-on-child abuse

We have a responsibility to safeguard and support all children. We will adhere to KCSIE (2023) 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:

- Referral to relevant agencies for support
- Education being sourced off-site
- Online learning
- Educational and Inclusion Partnership Team (EIPT) /
- School Attendance Support Service & School Effectiveness

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.

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 Behaviour Policy in determining the level and severity of sanction.

Where a child is cautioned or receives a conviction related to an incident of child-on-child abuse, the school will refer to KCSIE Part 5 for guidance and update the risk

assessment, ensuring relevant protections are in place for all the children at the school and, if it has not already, consider any suitable action in line with our behaviour policy. This process will include a review of the necessary actions to keep all parties safe and meet their needs.

If the perpetrator(s) remains at our school with the victim, as a school, we will be very clear as to their expectations regarding the perpetrator(s.) This could include expectations regarding their behaviour and any restrictions the school thinks are reasonable and proportionate with regard to the perpetrator(s)' timetable.

It will be important that the school ensures all parties remain protected, especially from any bullying or harassment (including online).

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, the school will continue to offer support to the victim and the alleged perpetrator(s) for as long as is necessary. 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.

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 children who may have been affected by child-on-child abuse

Pupils that have been more widely affected will be supported through having opportunities to talk to trusted adults, regular check-ins, dedicated nurture support and if needed, we will attempt to provide counselling for them via Service Six/ The Lowdown or through contacts at Early Help.

Local Safeguarding Arrangements and making referrals

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

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

Parents

Parents will 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;
- Increased Circle Times
- Nurture drop-ins for children
- Deliver additional staff training
- Drop-in sessions for staff who may need further support
- Offer further HR support as needed for staff

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

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

Children who are absent from education and children missing from education

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

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

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

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

We will always follow up with parents/carers when pupils are not at school. This means we need to have **at least two**, up to date, contacts for parents/carers. These are updated and checked every year, as well as when any changes to the family are known. Parents/carers should remember to update the school as soon as possible where their contact details change.

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

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

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

Child criminal exploitation

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

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

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

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

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

Indicators of CCE can include a child:

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

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 MASH/ West Northants 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. This has been identified as a growing threat to the children and young people in Northamptonshire, as the county is well situated for providing supply lines throughout the country.

Serious violence

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

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

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

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

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

Child sexual exploitation

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

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

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

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

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

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

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

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

Child abduction and community safety incidents

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

In order to keep children safe on the way to and from school we:

- ensure that children know they can come back into school at any point if they are scared or worried on the way home
- allow mobile phones to be kept safely in school so that children have them for their journeys to and from school
- share safety information with parents (and other schools)
- Check permissions to walk and ensure passwords are in place at OSC when collecting children
- Teachers/staff members check at the door if there is an unexpected person collecting a child and this is verified before the child is released
- have members of staff outside at places where the children may gather as they leave the school site, so they can come back to them if parents haven't arrived
- have a one-way system, so unknown adults cannot move freely around the school site

- have an entry system
- position of the School Office at the point of entry allows a good view of adults coming into the school

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 suggest engagement in Early Help, meetings with the Online Safety Lead and gathering information from the county Online Safety Officer. We will refer to children's social care if we think a child is suffering or is at risk of suffering harm.

Domestic abuse

Domestic Abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass but is not limited to: psychological; physical; sexual; financial; and emotional.

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.

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. Children affected may find themselves more likely to be involved in an abusive or coercive relationship at a later stage.

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.

At Bridgewater Primary School, we are working in partnership with the 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, the 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 on My concern, as 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). Our deputy DSL is also the Parent Link Worker and helps support any family with housing issues. Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

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

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

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

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

Female Genital Mutilation

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

Section 10 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a 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 fmufco.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 WNC, particularly when the child has come from another country. In some cases, privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.

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

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

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

Preventing radicalisation

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

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

Terrorism is an action that:

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

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

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

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

We will ensure that suitable internet filtering is in place, and equip our 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**¹⁷ and charity **NSPCC**¹⁸ 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

¹⁷ <https://educateagainsthate.com/signs-of-radicalisation/>

¹⁸ <https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/protecting-children-from-radicalisation/>

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

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

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

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures, including our Prevent risk assessment and the Online Safety policy.

Children Missing Education

Bridgewater Primary School aims to achieve excellent levels of attendance and punctuality to enable all pupils to take advantage of the educational opportunities available to them. We will aim to do this by:

- Raising awareness of attendance and punctuality issues among all staff, parents and pupils.
- Ensuring that parents understand the responsibility placed on them for making sure their child attends regularly and punctually.
- Equipping children with the life skills needed to take responsibility for good school attendance and punctuality appropriate to the child's age and development.
- Maintaining effective means of communication with parents, pupils, staff and governors on school attendance matters.
- Developing and implementing procedures for identifying, reporting and reviewing cases of poor attendance and persistent lateness.
- Supporting pupils who have been experiencing any difficulties at home or at school which are preventing good attendance.
- Developing and implementing procedures to follow up non-attendance at school.

Procedures

Our school will undertake the following procedures to support good attendance, these are contained within our Attendance Policy and will include:

- Timely registration processes on a daily basis, which includes following up absences and persistent lateness if parents/carers have not communicated with the school. A home visit may be instigated if there are concerns for the child, parents have not communicated or the absence is ongoing, without sufficient assurance as to a medical or other reason why the child is not at school.
- Consistent and systematic daily records which give detail of any absence and lateness.
- Working with parents to improve individual pupils' attendance and punctuality. This could include home visits and checks to ensure the child's wellbeing and help support any barriers to attendance.
- Supporting children's improved attendance with a Parenting Contract, which sets out short-term targets and seeks to address the difficulties preventing regular attendance.
- Referring to the Educational Inclusion and Partnership Service (EIP) any child whose attendance causes concern and where parents/carers have not responded to school initiatives to improve.

All staff should be aware that they must raise any attendance or punctuality concerns to the Office Manager and Senior Leadership Team members with responsibility for monitoring attendance.

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 follow our Missing Child policy.

[See link to NNC/WNC procedures for Children Missing Education](#)¹⁹

Non-collection of children

If a child is not collected at the end of the session/day, we will follow the procedures in our policy. Parents will be called and the child/ren will be cared for at school until an identified adult collects. If a child is still uncollected at the time the school closes, the Police will be called for advice on 101. This would be recorded on My Concern and actions discussed with the DSL/DDSL as to any further actions.

¹⁹ <https://www.northamptonshire.gov.uk/councilservices/children-families-education/schools-and-education/information-for-school-staff/pupil-support-and-inclusion/attendance-and-behaviour/Pages/children.aspx>

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 copy of the school's child protection policy and practices and policy on employment of ex-offenders in the application pack or we will refer to a link on our website.

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 (2023).

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

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

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

As part of due diligence checks, we will also 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. These are undertaken by the HR administrator.

Online searches need to comply with data protection laws. The data will be processed lawfully, fairly and transparently. It will be collected for the specific and legitimate reason of determining a candidate's suitability for positions involving children's safety.

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
 - 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.

Schools with pupils aged under 8:

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

Regulated activity means a person who will be:

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

Existing staff

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

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

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

Agency and third-party staff

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

Contractors

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

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

Schools with pupils aged under 8:

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

Trainee/student teachers

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

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

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

Volunteers

We will:

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

control measures put in place, and any advice sought.

Governors

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

All local governors will also have the following checks:

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

All governors will also have the following checks:

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

Staff working in alternative provision settings

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

Checking the identity and suitability of visitors

Professionals or visitors to the school will be required to verify their identity to the satisfaction of the office staff and to leave their belongings in a safe place during their visit. If this is not practical (for example, a parent tour or parents' evening) they may retain them during their visit but are notified that phone use is not permitted in areas where children are present. Posters also publicise this rule.

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 using the In-Ventry system, which provides a name and photograph, which also serves as a visitor's badge. A red lanyard denotes that a visitor does not have a DBS or has not had it checked by school. They will not be left unattended to work with or alongside any children.

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.

The DSL and DDSLs wear green lanyards, so they are easily identifiable by visitors and a copy of our Safeguarding leaflet is given, so all visitors are aware of our culture and commitment to Safeguarding.

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

This section of this policy applies to all cases in which it is alleged that a current member of staff, including a supply teacher 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 are in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

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

For more information about how the school responds to low-level concerns (concerns do not meet the harms threshold) please see Section 17 of this policy and the information contained in KCSIE, 2023.)

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 HR/personnel adviser, EPM, the local authority designated officer/s, the police and/or Children's Social Care (as appropriate).

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

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

Definitions for outcomes of allegation investigations

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

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the headteacher (or chair of governors where the headteacher is the subject of the allegation) – the ‘case manager’ – will take the following steps:

- Immediately discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children’s social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as 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. Routes of advice such as a trade union, a trusted colleague or wellbeing advice/counselling will be available to the individual facing the allegation.
- 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

As an Early Years provider:

- We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.
- If the school is made aware that the Secretary of State has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.
- Where the police are involved, wherever possible the governing board will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Additional considerations for supply staff 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 Head Teacher, or other appropriate person in the case of an allegation against the Head Teacher, will consider whether any disciplinary action is appropriate against the pupil(s) who made

it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a pupil.

Confidentiality

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

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

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

Record-keeping

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

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

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

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

References

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

Learning lessons

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

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified

- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual.

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

The Chair of Governors in this school is:

NAME: Simon Mitchell CONTACT NUMBER: contact via the school office

In the absence of the Chair of Governors, the Vice Chair should be contacted.

The Vice Chair in this school is:

NAME: Angela Watson - CONTACT NUMBER: contact via the school office

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

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

Appendix E: Online Safety

Teaching pupils to stay safe online and keeping children safe online in school is a crucial part of safeguarding. At Bridgewater Primary and Nursery School, we understand the responsibility to educate our pupils regarding Online Safety issues; teaching them the appropriate behaviours and critical thinking skills to enable them to remain both safe and legal when using the internet and related technologies, both in and beyond the context of the classroom. 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. Staff recognise and are aware of online safety issues and the Designated Safeguarding Lead (DSL) and Leader for Online Safety in conjunction with the Head Teacher make Online Safety and developing critical thinking a priority.

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

- Curriculum planning
- PSHE and relationships
- Healthy School Team
- Staff training
- Initial teacher training;
- the role and responsibilities of the designated safeguarding lead;
- parental engagement through newsletters, workshops
- child workshops
- live performance with a SG message
- approach to online learning - The children have their own character 'Netiquette' that supports appropriate and safe online behaviour.

Pupil Online Safety Curriculum

This school has a clear, progressive online safety education programme as part of the Computing curriculum and PSHE learning. It is built on the 'Rising Stars' scheme of work, The Knowsley City Learning Centre Computing scheme of Work, Jigsaw PSHE scheme of work and Education for a Connected World framework as advised in Teaching Online Safety in School (2019).

Online safety is delivered from EYFS to Y6, which is adapted according to the needs of our pupils and the ever-changing world and being threaded through the PSHE curriculum. This covers a range of skills and behaviours appropriate to their age and experience, including:

- To STOP and THINK before they CLICK.

- To develop a range of strategies to evaluate and verify information before accepting its accuracy.
- To be aware that the author of a website page may have a particular bias or purpose and to develop skills to recognise what that may be.
- To know how to narrow down or refine a search.
- For older pupils, to understand how search engines work and to understand that this affects the results they see at the top of the listings.
- To understand acceptable behaviour when using an online environment or email, i.e. be polite, no bad or abusive language or other inappropriate behaviour; keep personal information private.
- To understand how photographs can be manipulated and how web content can attract the wrong sort of attention.
- To understand why online 'friends' may not be who they say they are and to understand why they should be careful in online environments.
- To understand why they should not post or share detailed accounts of their personal lives, contact information, daily routines, location, photographs and videos and to know how to ensure they have turned-on privacy settings.
- To understand why they must not post pictures or videos of others without their permission.
- To know not to download any files such as music files without permission.
- To have strategies for dealing with receipt of inappropriate materials.
- In partnership with parents we will support pupils of an appropriate age to understand why and how some people will 'groom' young people for sexual reasons.
- To understand the impact of online bullying, sexting, extremism and trolling and know how to seek help if they are affected by any form of online bullying.
- To know how to report any abuse including online bullying; and how to seek help if they experience problems when using the Internet and related technologies, i.e. parent or carer, teacher or trusted staff member, or an organisation such as ChildLine.

This appendix complements and should be read alongside our Online Safety policy. Staff must read the Online Safety Policy in conjunction with our Adult 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 responsibility for online safety and understanding the filtering and monitoring systems and processes in place, along with the senior lead, Nicola Redden (DSSL) and the Computing Leader, Scott Lagdon. The DSLs 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. The online safety governor is Gary Palmer.

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.
- **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 non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams.

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

Filtering and monitoring

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](https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges)’²⁰. For more information about the filtering and monitoring standards we adhere to, see ‘[Filtering and monitoring standards for schools and colleges](https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/filtering-and-monitoring-standards-for-schools-and-colleges)’ (March 2023).²¹

In order to keep children safe when using school IT equipment, we have a robust approach to filtering and monitoring, which is detailed below:

Managing the IT and computing infrastructure

Internet access, security, virus protection, filtering and monitoring

This school:

- Has the educational filtered secure broadband connectivity through Securly.
- Uses the Securly filtering system which blocks sites that fall into categories such as pornography, race hatred, gaming, sites of an illegal nature, etc. All changes to the filtering policy are logged and only available to staff with the approved ‘web filtering management’ status.
- Uses Securly user-level filtering for all devices through both extension and DNS based filtering.
- The school use Securly Aware as its monitoring systems
- Ensures network healthy through use of Webroot anti-virus software from IT Support Provider etc. and network set-up so staff and pupils cannot download executable files.
- Uses a DfE, LA approved system, Microsoft SharePoint using encrypted password protected links. All devices are encrypted using Bitlocker to protect data whilst offsite.

²⁰ <https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges>

²¹ <https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/filtering-and-monitoring-standards-for-schools-and-colleges>

- Blocks all chat rooms and social networking sites except those that are part of an educational network or approved Learning Platform.
- Only unblocks other external social networking sites for specific purposes such as Internet Literacy lessons.
- Has blocked pupil access to music download or shopping sites, except those approved for educational purposes at a regional or national level.
- Uses security time-outs on internet access where practicable and useful.
- Works in partnership with IT support provider and Securly to ensure any concerns about the system are communicated so that systems remain robust and protect students.
- Is vigilant in its supervision of pupils' use at all times, as far as is reasonable, and uses common-sense strategies in learning resource areas where older pupils have more flexible access.
- Ensures all staff and students have signed an acceptable use agreement form and understands that they must report any concerns.
- Ensures pupils only publish within an appropriately secure environment the school's learning environment.
- Requires staff to preview websites before use and direct students to subject and age appropriate web sites and uses child-friendly search engines where more open internet searching is required; e.g. [Yahoo for kids](#) or [Ask for kids](#) , Google Safe Search and Bing.
- Is vigilant when conducting 'raw' image search with pupils e.g. Google image search.
- Informs all users that internet use is monitored.
- Informs staff and students that that they must report any failure of the filtering systems directly to the online safety officer so they can be logged or escalated by our system administrator to the Technical service provider or EXA Helpdesk as necessary.
- Makes clear all users know and understand what the 'rules of appropriate use' are and what sanctions result from misuse through staff meetings and teaching programme.
- Provides advice and information on reporting offensive materials, abuse/ bullying etc. available for pupils, staff and parents.
- Immediately refers any material we suspect is illegal to the appropriate authorities - Police and the LA.

School Procedures

- If a child or adult searches for something that triggers an alert, this alert is relayed to the DSL, the DDSs, the Computing Lead and the Computing HLTA by email immediately.
- These are recorded, the Computing HLTA then logs and takes appropriate action after speaking with the DSL/DDSs.

- Actions are recorded, which could include uploading any concerns to My Concern.
- Monitoring is discussed in the weekly Safeguarding meeting and reviewed.
- Staff are trained to be vigilant around monitoring through regular training. This occurs within the main Safeguarding training and via specific Online Safety training.

Pupil mobile phones

The school accepts that there may be particular circumstances in which a parent wishes their child to have a mobile phone for their own safety, but the school strongly advises that student mobile phones should not be brought into school. We state that this is restricted until Years Five and Six when children are allowed to walk home. Phones must be turned off (not placed on silent) and stored in a designated area out of children's reach until the end of the day.

If a pupil breaches the school policy then the phone or device will be confiscated and will be held in a secure place in the school office. Mobile phones and devices will be released to parents or carers in accordance with the school procedure.

If a child needs to contact his or her parents or carers, they will be allowed to use a school phone. Parents are advised not to contact their child via their mobile phone during the school day, but to contact the school office.

Phones and devices must not be taken into statutory assessments.

We are aware of the risks of unsupervised access to the internet and the availability of 3G, 4G and 5G networks and the potential risk this creates for bullying online or using the technology for the sharing of indecent images and this is covered within the curriculum, workshops and within class discussions.

Regular newsletters home are also designed to support parents/carers with understanding the potential risks for their children online, as well as expected behaviour.

No smart watches or smart technology are allowed within school.

See Section 16 of this policy for more details about staff use of mobile phones and smart technology, as well as the Online Safety Policy.

Digital images and video

In this school:

- We gain parental / carer permission for use of digital photographs or video involving their child as part of the school agreement form when their daughter or son joins the school.

- We do not identify pupils in online photographic materials or include the full names of pupils in the credits of any published school produced video materials / DVDs.
- We ask parents to ensure that any photographs taken at productions are kept purely for personal use and not uploaded to social media or sent on to others. Parents are reminded of this at the start of any production or event.
- We encourage parents to be mindful of their own use of mobile phones around school at events such as Termly Learning Conferences and Sports Days to act as good role models to their children and be 'present' in their learning.
- The school blocks/filters access to social networking sites or newsgroups unless there is a specific approved educational purpose.
- Pupils are taught about how images can be manipulated in their Online Safety education programme and also taught to consider how to publish for a wide range of audiences which might include governors, parents or younger children as part of their ICT scheme of work.
- Pupils are taught that they should not post images or videos of others without their permission. We teach them about the risks associated with providing information with images (including the name of the file), that reveals the identity of others and their location, such as house number, street name or school. We teach them about the need to keep their data secure and what to do if they are subject to bullying or abuse.
- Pupils are taught about personal responsibility, their digital footprint, critical thinking and the images that must not be taken or shared and personal responsibility, in line with the Acceptable User agreement and the law around indecent images.
- Pupils are not permitted to use personal digital equipment, including mobile phones, cameras or wearable technology e.g. smart watches to record images of others; this includes when on field trips. However, with the express permission of the Head Teacher, images can be taken by staff for the means of sharing for Twitter and the School Blogs provided they are transferred immediately and solely to the school's network and deleted from the staff member's device.

Further information can be found in the Online Safety Policy.

Section 16 of this policy for more details about staff use of mobile phones.

Remote learning and Safely Teaching Online

We use Seesaw for our online learning and ensure that our use of online learning tools and systems is in line with privacy and data protection/GDPR requirements.

Online learning follows the same principles as set out in the school's Adult Code of Conduct. This policy includes acceptable use of technologies, staff/ relationships and communication including the use of social media. This Code of Conduct applies equally to the online learning arrangements currently in use.

We have developed our own Code of Conduct, using an icon called Netiquette, this is used throughout the school, so that children learn in an age-appropriate way at each stage about keeping safe online and how they need to behave.

We feel that it is vitally important for parents and carers to be aware of what their children are being asked to do online, including the sites they may be asked to access and be clear who from the school their child is going to be interacting with

online. To support this all parents/carers have parental access to their child's learning. They are able to view the content and monitor the responses between children and staff.

Our school will be doing all we can to keep our children safe online. As staff interact with children online via Seesaw, they will continue to look out for signs a child may be at risk. Any such concerns are dealt with following our usual safeguarding protocol. If appropriate, referrals will continue to be made to children's social care and as required the Police.

An essential part of the online learning provision will be ensuring our children have clear reporting routes in place, so they can raise any concerns whilst online. As well as reporting routes back to the school, we have signposted children to age-appropriate practical support from through an online safety document. This will be scheduled to be uploaded to Seesaw regular intervals:

- Childline - for support at: <https://www.childline.org.uk/info-advice>
- UK Safer Internet Centre - to report and remove harmful online content <https://www.saferinternet.org.uk/advice-centre/young-people> These resources were used as part of Safer Internet Day and,

<https://www.saferinternet.org.uk/advice-centre/parents-and-carers>

- CEOP - for advice on making a report about online abuse. The CEOP button is mentioned in our Online Acceptable Use agreement and our Child Friendly Online Safety Policy. Children have been taught explicitly how to use this.

This means that children will be easily able to locate support and information each week should they need it. They will be able to contact their teacher or support staff with an online safety concern or use this information to seek help from alternative safe sources if their adults are not available.

Since the school closure, the Online Safety lead has also been active in sharing:

- Parent mails with information from Simon Aston (NCC Online Safety Officer)
- Highlighted the recently updated resources and links been sent to the NCC website
- Information on TikTok – regarding safety settings and parental restrictions
- General information on gaming and sensible usage for gaming
- A document about Online well-being and resources to support this

Those communications reinforce to parents and carers the importance of children being safe online.

A document with websites that can support online safety has been uploaded for parent's information and reference.

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](https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/cyber-security-standards-for-schools-and-colleges)',²²

Regular review of our approach to online safety

We recognise that technology, and risks and harms related to it evolve and changes rapidly.

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

More information

For more information about online safety, please see Part 1 of Keeping Children Safe in Education (2023).

²² <https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/cyber-security-standards-for-schools-and-colleges>