HATTON
ACADEMIES TRUST

Child Protection Policy & Procedures

September 2026

Key Personnel
Designated Senior Lead (DSL):

Hatton Academies Trust: **Claire Byron** – Director of Education

Sir Christopher Hatton Academy: **Luke Shackleton** – Vice Principal

Victoria Primary Academy: **Ian Pearson** - Principal

Oakway Academy: **Rebecca Owen** – Assistant Principal

Ecton Village Primary Academy: **Michelle Gould** – Head of School

Earls Barton Primary School: **Marie Lally** - Co-Headteacher

Additional trained Deputy Designated Senior Leads (DDSL):

Sir Christopher Hatton Academy:	Nick Salisbury – Co Principal Alastair Mitchell – Co Principal Tracey Pereira - Deputy DSL Iona Andrews - Welfare & Wellbeing Support Officer Ellie Richmond - Welfare & Wellbeing Support Officer
Victoria Primary Academy:	Liz Meredith – Vice Principal Linda Embling – Vice Principal Rachel Spruce - Inclusion Officer Natasha Thomas - Pastoral Officer Hope Preston - Pastoral Officer Fiona Morin – Office Manager Carole Westrep – Attendance Office
Oakway Academy:	James Hollingsworth – Principal Angie Aitken – Head of School Rebecca Owen – Assistant Principal Jacinta Gordon - SENCO Terri Needs - Welfare & Attendance Officer Sally Retter – Welfare Officer Kelly Underwood – Welfare Lead
Earls Barton Primary School:	Ben Morris – Designated Senior Lead Michelle Gould - Deputy Head Teacher Cath McManus - Inclusion Lead Rosie Brennan – Family Support Worker Ruth Alexander – School Business Manager
Ecton Village Primary Academy:	Kara Laundon – Deputy DSL
Child Protection Director:	Helen Carville

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Section A: Child Protection Procedures

A1. Policy Statement and Principles

This policy is one of a series in Hatton Academies Trust's safeguarding portfolio. Our core safeguarding principles are:

- Hatton Academies Trust's responsibility to safeguard and promote the welfare of children is of paramount importance.
- Decision making in all Trust academies surrounding safeguarding matters will always centre around the need to maximise the safety and wellbeing of the child.
- Safer children and young people make more successful learners.
- Policies will be reviewed regularly (annually) unless on-going evaluation in the Trust, an incident, new legislation or guidance suggests the need for an interim review.

Child Protection Statement

At the academies of Hatton Academies Trust, we recognise our moral and statutory responsibility to safeguard and promote the welfare of all children, whether this is inside of our academies or outside of them, including when online. We endeavour to provide a safe and welcoming environment where our children and young people are respected and valued. We aim to provide help and support to meet the needs of children as soon as problems emerge. We are alert to the signs of abuse and neglect and take effective action to ensure that children and young people receive effective support, protection and justice.

The procedures contained in this policy apply to all staff, directors, governors, academy representatives, trainee teachers, volunteers and visitors and are consistent with statutory requirements and procedures of the Northamptonshire Safeguarding Children Partnership.
Schools & Educational Staff - Northamptonshire Safeguarding Children Board (northamptonshirescb.org.uk)

The Trust is committed to working closely with the LCSP and other agencies to protect and support our children.

Policy Statement of Principles

- Staff working with children are advised to **maintain an attitude of 'it could happen here'** where safeguarding is concerned.
- The welfare and **best** interests of the child are paramount and always come first.
- Safeguarding and promoting the welfare of children is **everyone's** responsibility.
- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
- **All staff** have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm.
- Children and staff involved in child protection issues will receive appropriate support.

- 'Children' includes everyone under the age of 18. However, these principles are applied to all students in the Trust.

Policy Aims

- To set out procedures ensuring that the Trust meets its responsibilities for safeguarding children from abuse.
- To raise awareness in all our staff of the need for child protection and of their responsibilities in identifying and reporting possible cases of abuse.
- To enable staff to feel more confident in recognising signs and symptoms of abuse and to share with appropriate staff any concerns they may have regarding the protection of children.
- To identify the role of the Trust, the Designated Senior Person (DSP) and senior staff in matters relating to child protection.
- To explain the roles and responsibilities of all agencies and to emphasise the importance of working together efficiently.
- To provide a systematic means of monitoring children known or thought to be at risk.
- To clearly identify support structures and procedures within the Trust in cases of suspected child abuse.
- To ensure appropriate training for staff within the Trust, including induction for those who are new to the Trust, and to emphasise the need for high levels of communication between members of staff.

Terminology

Safeguarding and promoting the welfare of children refers to:

- protecting children from maltreatment, abuse or neglect,
- preventing the impairment of children's mental or physical health or development,
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care,
- preventing extremism & radicalisation,
- taking action to enable all children to have the best outcomes, and
- undertaking that role so as to enable those children to have optimum life chances and to enter adulthood successfully.

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.
Staff refers to all those working for or on behalf of Hatton Academies Trust, full time or part time, in either a paid or voluntary capacity.
Parent/carer refers to birth parents and other adults who are in a parenting role, for example step-parents, carers and adoptive parents.
Principal refers to the staff member with lead responsibility for the Academy.
Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Section B4 explains the different types of abuse.
Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Section B4 defines neglect in more detail.
Sharing of nudes and semi-nudes (also known as sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.
Children includes everyone under the age of 18.

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

- The local authority (LA)
- An Integrated Care Board for an area within the LA
- The chief officer of police for a police area in the LA area

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 is appropriate and which terms to use on a case-by-case basis.

A2. Legislation & Statutory Guidance

This policy is based on the Department for Education's statutory guidance **Working Together to Safeguard Children (2026)**, and the Academies Trusts: Governance Guide. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- Part 3 of the schedule to the **Education (Independent School Standards) Regulations 2014**, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- **The Children Act 1989** (and **2004 amendment**), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the **Serious Crime Act 2015**, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- **Statutory guidance on FGM**, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- **The Rehabilitation of Offenders Act 1974**, which outlines when people with criminal convictions can work with children
- Schedule 4 of the **Safeguarding Vulnerable Groups Act 2006**, which defines what 'regulated activity' is in relation to children
- **Statutory guidance on the Prevent duty**, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- **The Human Rights Act 1998**, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the **European Convention on Human Rights** (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 Directors and Principals should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our Trust 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
- The **Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018** (referred to in this policy as the "2018 Childcare Disqualification Regulations") and **Childcare Act 2006**, which set out who is disqualified from working with children
- This policy also meets requirements relating to safeguarding and welfare in the **statutory framework for the Early Years Foundation Stage**
- This policy also complies with our funding agreement and articles of association
- **DfE Behaviour in Schools** guidance

The Trust's policies and procedures have been updated to meet the statutory requirements and the policy was last reviewed in September 2026.

Research suggests that more than 10% of children will suffer from some form of abuse. In a MAT the size of HAT, that would represent at least 300 children. Due to their day to day contact with children, Hatton Academies Trust staff are uniquely placed to observe changes in children's behaviour and the outward signs of abuse. Children may also turn to a trusted adult in their Academy when they are in distress or at risk. It is vital that all Trust staff, trainee teachers and volunteers are alert to the signs of maltreatment, abuse & radicalisation and understand the procedures for reporting their concerns.

A3. Requirements of all staff

Information for staff

The safeguarding pages on the Trust website has all the key policies and information documents relevant to safeguarding that can be referred to as required. It is important that you read and show that you understand these key documents. In addition, ask your line manager or Academy reception for a printed copy of any document.

The **key documents** available on the website are:

- Staff Code of Conduct
- Child Protection Policy
- Guidance on Safer Working Practices (February 2022)
- Children Missing in Education Policy
- Behaviour Policy
- Role of the Senior Designated Person (designated senior lead).
- The safeguarding response to children who go missing from education
- Part 1 of "Keeping Children Safe in Education" September 2026
- Annex A of "Keeping Children Safe in Education September 2026"

- Working Together to Safeguard Children (2026)

The front of the Child Protection Policy names the DSP in each Academy and additional staff who have been trained to help as well in the absence of the DSP.

Our procedures follow the Northamptonshire Safeguarding Partnership Inter-Agency Child Protection Procedures which are consistent with 'Working Together to Safeguard Children' and 'What to Do If You're Worried a Child is Being Abused' and "Keeping Children Safe in Education September 2026".

All Hatton Academies Trust staff are required to:

- Be aware of the systems in place to support safeguarding and the key documents on the staff portal/website.
- Know that extra information about safeguarding and the associated policies are on the Academy and/or Trust website. Staff may also refer to the NSPCC website.
- Act in the best interests of the child. The child's wishes and feelings can be considered but staff act in the role of the adult and should ensure the best interests are served which may not always be in line with the child's wishes and feelings.
- Ensure that they have read and understood safeguarding policies and understood the training given and updates.
- Know what to look for in the early identification of abuse and neglect and seek advice from the DSP or other senior staff if needed. See 'Recognising Abuse' in Section B4 and "What to do if you are worried a child is being abused-Advice for practitioners" on the Trust website. The NSPCC website provides further information.
- Be aware of the Academy and Trust procedures for child safeguarding, recognise concerns and maintain an open mind.
- All concerns regarding the welfare of students should be recorded using CPOMs or MyConcern system or in writing using the agreed form (Appendix 3) and discussed with the Designated Senior Person with responsibility for child protection (or another senior member of staff in the absence of the designated person) prior to any discussion with parents. If there has been no response to a concern within one working day this should be followed up urgently with the DSP or the Principal.
- Ensure they are familiar with what to do if a child discloses to them or they have a concern.
- Be clear about the Early Help Process and their role in it (see section A5 below)
- Be clear what they need to do if they have a concern about a child, including making a referral to local authority children's social care.
- Ensure they are aware of whistleblowing procedures if concerned about the actions of a member of staff or a visitor.
- Inform the DSP or Principal of any concerns about poor or unsafe practice and potential failures in the Academy or Trust's safeguarding regime.
- Refer to the Principal or another senior member of staff in the Academy or the Trust if they are not satisfied that sufficient action has been taken or that any concern has not been taken seriously enough. This may include the designated Director by the Board responsible for safeguarding. The NSPCC has a whistleblowing helpline for staff who do not feel able to raise concerns internally. Maintain appropriate confidentiality and share relevant information in a timely manner

- Report any concerns they have about a pupil and FGM and Forced Marriage (see section B7), Child Sexual Exploitation (see section B8) and Radicalisation (see section B11)
- Be aware of indicators which might signal that children are at risk from or are involved in serious violent crime.
- Have read and understood their Academy Behaviour policy.

All staff will receive a copy of this "Child Protection Policy". To confirm their receipt and understanding of the contents of the policy and other key documents, including the 'Code of Ethical Practice' **Appendix A1**, and 'Keeping Children Safe in Education' issued by the DfE in September 2026, staff will be asked to sign a **"Confirmation of Receipt" form as shown in Appendix A2.**

In line with Keeping Children Safe in Education 2026, all staff, including those who do not work directly with children, must read Part One of KCSIE in full. The Trust will ensure this is completed during induction and revisited through safeguarding updates.

It is ***not*** the responsibility of staff to investigate welfare concerns or determine the truth of any disclosure or allegation. The DSP in each academy will have the most up to date information and background and is best placed to deal with concerns, unless they are urgent and the child is in danger and the DSP cannot be contacted.

Staff should contact their DSP and follow the flow chart shown in Appendix A4.
Appendix A5 is a list of essential contacts and definitions.

A4. Immediate Danger

If you consider a child is in any immediate danger you must contact the DSP immediately. If this is not possible, contact another senior member of staff or you must refer the matter to the MASH team by phoning on 0300 126 7000 and choose Option 1 then Option 2 or using the new online referral form **Report a concern - Help and protection for children (nctrust.co.uk)**. If you need to contact the MASH team during the evening, at night or at the weekend, please phone the out-of-hours team on 01604 626 938.

Staff will immediately report:

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

Key points to remember for taking action are:

- in an emergency take the action necessary to help the child e.g. call 999 for either medical or police support
- report your concern to the DSP or Principal/senior member of staff as soon as possible and at the latest by the end of the school day
- do not start your own investigation
- share information on a need to know basis only
- ***Enter the incident/information on CPOMS OR MYCONCERN or complete a paper copy of the Welfare Concern Form (Appendix A3 and available from your Academy) and a Body Map (Appendix A6) if appropriate.***
- seek support for yourself if you are distressed by contacting the DSP, Principal or another senior member of staff.

Further information is available in Section B1 and B2.

A5. What Academy staff should look out for and Targeted Early Help

Providing early help is more effective in promoting the welfare of children than reacting later. Early help means support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. It can also prevent any further problems from arising. To be effective, early help relies upon staff working together in the Trust and with local agencies to:

- identify children and families who would benefit from early help,
- undertake an assessment of the need for early help, and
- provide targeted early help services to address the needs of the child and their family.

The actions regarding early help are the role of the pastoral teams in each Academy. However, all staff have a role in helping to identify issues that start to arise. Teachers and support staff have day to day contact with children and so are in a unique position to identify concerns early on.

The role of all staff is to be aware of the signs of abuse and emerging issues and report these to the DSP, or any other changes in behaviour that cause concern. It is best to be safe and report concerns however small these may seem. Staff are reminded that actions are to be taken in the best interest of the child. The Academy DSP and pastoral team will then act upon these concerns following inter-agency guidelines.

Staff should be alert to the potential need for early help for a child who:

- 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,
- has a complex medical need,
- is a young carer,
- is pregnant and/or is a parent themselves,
- has exhibited early signs of abusive, violent and/or harmful behaviours,
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines,
- is frequently missing/goes missing from education, home or care,

- has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from school and Alternative Provision or a Pupil Referral Unit,
- is at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation,
- is at risk of being radicalised into terrorism,
- has a parent or carer in custody, 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 alcohol and other drugs themselves,
- is at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage, and
- is a privately fostered child.

Sexual Violence and Sexual Harassment between Children/Child on child abuse

All staff should be aware that safeguarding issues can manifest themselves via child on child abuse. This is most likely to include, but may not be limited to:

- bullying (including cyberbullying),
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm,
- harmful sexual behaviour, sexual violence and sexual harassment – which may include misogyny/misandry,
- consensual and non-consensual making or sharing of nudes and semi nudes, including those generated using AI(also known as sexting or youth produced sexual imagery),
- physical assault and harm, or the threat of harm with a weapon,
- 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,
- upskirting (which is a criminal offence44), 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.

All staff should be clear as to the Trust's policy and procedures with regards to child on child abuse. Refer ***any*** concerns to the DSP or a senior leader.
See section B5 and B6 for further information.

A6. If you suspect a pupil is at risk

If you have any concerns about a child's welfare you should act on them immediately.

There will be occasions when you suspect that a pupil may be at risk, but you have no 'real' evidence. The pupil's behaviour may have changed, their artwork could be bizarre, they may write stories or poetry that reveal confusion or distress, or you may have noticed physical but inconclusive signs. In these circumstances, you should try to give the pupil the opportunity to talk. The signs you have noticed may be due to a variety of factors, for example, a parent/carer has moved out, a pet has died, a grandparent is very ill. It is fine to ask the pupil if they are okay or if you can help in any way.

Complete a CPOMS OR MYCONCERN report or a paper copy of the Welfare Concern Form (Appendix A3) to record these early concerns. A copy of this form can be obtained from the safeguarding area of the Trust website.

If the pupil does begin to reveal that they are being harmed, you should follow the advice in the section **"Responding to Disclosure" (Section A10).**

If you are a witness to events related to a child protection concern, please record your information on **CPOMs or MyConcern** in the first instance or you can use the Trust's **Witness Statement Form (Appendix A7). A copy of this is available from the Trust website.**

A7. Female Genital Mutilation mandatory reporting duty for teachers

Whilst all staff should speak to the DSP (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific **legal** duty on **teachers.** If a **teacher**, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher **must** report this to the police. **See the Trust FGM policy and Section B7 for further details**.

A8. If you have low-level concerns about a colleague

This section applies to all concerns (including allegations) about members of staff, including supply teachers, trainee teachers, volunteers and contractors, which do not meet the harm threshold set out in **section A9 below**.
Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

There is the HAT Low Level Concerns Policy which Principals are referred to.

We recognise the importance of responding to and dealing with any low-level concerns regarding the actions of colleagues in a timely manner to safeguard the welfare of children. Colleagues includes all staff, volunteers, directors, governors, supply staff, trainee teachers, external visitors and contractors.

All staff must remember that the welfare of the child is paramount. All low-level concerns must be passed on to the Principal in a timely manner. Do not wait to pass on a concern. All concerns raised will be investigated and recorded by the Principal.

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the HAT 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 designated officer at the local authority
- feels inappropriate, unprofessional, or concerning

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

- being overly familiar with pupils
- inappropriate language
- showing favouritism
- one-to-one situations outside agreed protocols
- minor boundary breaches
- poor judgement in online conduct
- failure to follow safeguarding procedures

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

We will create this culture 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.
- Empowering staff to share any low-level concerns with the Principal or CEO (If the concern is against the Principal) as soon as possible.
- Empowering staff to self-refer.
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage.
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised.
- Helping to identify any weakness in the school's safeguarding system.

Once a low-level concern is raised the Principal will take the following steps:

- Directly to the person who raised the concern, unless it has been raised anonymously, and
- To the individual involved and any witnesses.

Step 1: Record it
Record the concern clearly using the Trust format which is set out in the HAT Low Level Concern Policy in Appendix A:

- what happened (facts only)
- who reported it
- when it happened

Step 2: Consider the threshold
Consider whether the concern may meet the harm threshold.
If YES or POSSIBLY → Follow Managing Allegations Against Staff Policy (contact LADO)
If NO → Continue to step 3
A concern meets the harm threshold where a person has:

- harmed or may have harmed a child
- committed or may have committed a criminal offence
- behaved in a way that suggests they pose a risk of harm
- behaved in a way that indicates they may be unsuitable to work with children

If you are unsure whether the threshold is met, always consult the LADO.

Step 3: Take appropriate action
This may include:

- speaking to the staff member
- clarifying expectations
- providing guidance or training
- informal management action

Step 4: Record the outcome
Ensure that secure records are kept, including the action taken, the rationale for this and any follow-up that will be required.

We keep records of low-level concerns securely and only for as long as necessary.
As a minimum:

- Records will be kept for the duration of the staff member's employment
- Records may be retained for up to 6 years after employment ends, where appropriate

We will:

- review records regularly
- retain information longer where there is a safeguarding justification
- ensure records are not kept longer than necessary.

Where a low-level concern relates to a supply teacher, trainee teacher or contractor, we will notify the individual's employer or teacher training provider, so any potential patterns of inappropriate behaviour can be identified.

All Trust staff must notify the Academy Principal in writing if you are charged with any offence or if you are convicted of any offence (including motoring offences). If you are charged with an offence, the notice must be given immediately after you are charged (i.e. next working day). If you are convicted of any offence, the notification must be given immediately after you are convicted (i.e. next working day).

It should be noted that the term "conviction" includes a finding of guilt, regardless of whether or not a conviction is recorded. You must also declare cautions, bind-overs, pending prosecution and police investigations. Failure to notify the Academy will constitute grounds for disciplinary action.

A9. Allegations against staff

Allegations concerning staff, volunteers, supply staff, trainee teachers, contractors, the Principal or the CEO that may meet the harm threshold must be reported immediately and managed in accordance with the Trust's Managing Allegations of Abuse Policy.

Concerns should be reported to the Principal. Allegations concerning the Principal should be reported to the CEO. Allegations concerning the CEO should be reported to the Chair of the Board of Directors.

A10. Managing a Report- how to respond to a Disclosure

All staff should be aware of the indicators of abuse, neglect, exploitation and modern slavery, understanding that children can be at risk of harm inside and outside of the

school, inside and outside of home, and online. Exercising professional curiosity and knowing what to look and listen for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.

Disclosures or reports may be received from students, parents/carers, or other members of the public. Hatton Academies Trust recognises that those who disclose such information may do so with difficulty, having chosen carefully to whom they will speak.

If a pupil discloses abuse of any kind

It takes a lot of courage for a child to disclose that they are being abused by an adult or suffering from child on child abuse. They may feel ashamed, particularly if the abuse is sexual, their abuser may have threatened what will happen if they tell, they may have lost all trust in adults, or they may believe, or have been told, that the abuse is their own fault. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

A child is likely to disclose to someone they trust, this could be anyone within the school staff. Staff should recognise the significance of being chosen as a confidant and respond with empathy, recognising that an initial disclosure may not reflect the full extent of abuse, and that trauma can impact memory meaning details may be affected, keeping in mind that certain children may face additional barriers to disclosure especially for children with vulnerabilities related to disability, sex, ethnicity, or sexual orientation.

In some cases, the victim may not make a direct report. Children may struggle to verbally disclose abuse. Instead, they may show signs or behave in ways that signal distress, hoping that adults will notice and react. Disclosures may come indirectly, for example, through a friend, an overheard conversation that suggests a child has been harmed, or noticeable changes to a child's own behaviour which may indicate that something is wrong. If staff have any concerns about a child's welfare, they should act on them immediately rather than wait to be told.

If a pupil talks to you about any risks to their safety or wellbeing you will need to let them know that you must pass the information on – you are not allowed to keep secrets. The point at which you do this is a matter for professional judgement. If you jump in immediately, the pupil may think that you do not want to listen, if you leave it till the very end of the conversation, the pupil may feel that you have misled them into revealing more than they would have otherwise.

Immediate response to the child

It is vital that any staff actions do not abuse the child further or prejudice further enquiries, for example:

- listen to the pupil, if you are shocked by what is being said try not to show it; it is acceptable to observe bruises but not to ask a child to remove or adjust their clothing to observe them,

- if a disclosure is made, the pace should be dictated by the pupil **without their being pressed** for detail by being asked such questions as "what did they do next?" or "where did they touch you?". The staff role is to listen not to investigate. **Staff must use open questions such as "is there anything else you want to tell me?" or "do you need to explain anymore?" or "are you able to describe what has happened?" (TED, tell me more, explain more or give more details if you can),**
- accept what the pupil says. Be careful not to burden them with guilt by asking questions such as "why didn't you tell me before?"
- do acknowledge how hard it was for them to tell you this,
- don't criticise the perpetrator, this may be someone they love, and
- ***don't promise confidentiality***, reassure the pupil that they have done the right thing, explain whom you will have to tell (the DSP) and why. It is important that you don't make promises that you cannot keep such as "I'll stay with you all the time" or "it will be alright now".

During your conversation with the pupil:

- allow them to speak freely,
- remain calm and do not over react – the pupil may stop talking if they feel they are upsetting you,
- give reassuring nods or words of comfort – 'I'm so sorry this has happened', 'I want to help', 'You are doing the right thing in talking to me',
- do not be afraid of silences – remember how hard this must be for the pupil,
- under no circumstances ask investigative questions – such as how many times this has happened, whether it happens to siblings too, or what does the pupil's mother think about all this,
- at an appropriate time tell the pupil that in order to help them you must pass the information on,
- do not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused,
- avoid admonishing the child for not disclosing earlier. Saying 'I do wish you had told me about this when it started' or 'I can't believe what I'm hearing' may be your way of being supportive but the child may interpret it that they have done something wrong,
- tell the pupil what will happen next. The pupil may agree to go with you to see the designated person. Otherwise let them know that someone will come to see them before the end of the day,
- report verbally to the DSP immediately,
- complete a report on CPOMs or MyConcern or write up your conversation as soon as possible on the Academy Welfare form and hand it to the DSP, and
- seek support if you feel distressed.

The Trust Welfare Concern Form is shown in Appendix A3 and can be obtained from the Trust website, or use CPOMs or MyConcern.

Notifying parents/carers

The Academy will normally seek to discuss any concerns about a pupil with their parents/carers. This must be handled sensitively and the DSP will make contact with the parent/carer in the event of a concern, suspicion or disclosure**. *Staff should not make contact with parents/carers unless this has been agreed with the DSP.***

If the DSP believes that notifying parents/carers could increase the risk to the child or exacerbate the problem, then advice will first be sought from Children's Social Care.

A11. Recording Information

Staff should:

- make some brief notes at the time or immediately afterwards on CPOMS OR MYCONCERN or using the Trust pro-forma (Appendix A3): record the date, time, place and context of the disclosure or concern, recording facts and not assumption and interpretation. Notes must be signed and dated and handed to the Designated Senior Person (DSP) or the Principal immediately,
- observed injuries and bruises are to be recorded on the Body Map (Appendix A6),
- note the non-verbal behaviour and the **key words in the language used by the pupil** (do not translate into "proper terms"), and
- keep these original notes.

All referrals to Social Care will be made using the online MASH referral system or via telephone. Records should be kept on CPOMs or MyConcern of all referrals made.

A12. Equal Opportunities

All staff and directors/Academy representatives with responsibilities under this policy must take into account the equal opportunities policies when discharging their duties.

A13. Reporting directly to child protection agencies

Staff should follow the reporting procedures outlined in this policy. However, they may also share information directly with Children's Social Care, police or the NSPCC if:

- the situation is an emergency and the Designated Senior Person, their deputy, the Principal and the CEO are all unavailable, and
- they are convinced that a direct report is the only way to ensure the pupil's safety.

A14. Related safeguarding portfolio of policies and guidance

The Child Protection Policy is available on the Trust and Academy websites. In addition, the Trust has a range of policies relating to its commitment and statutory responsibility to safeguard our children. Staff are referred to a portfolio of policies that give detail for each area of our work. These policies and further information are provided for staff on the Trust Safeguarding page on its website.

Appendix A1 - Code of ethical practice for Hatton Academies Trust staff

All Hatton Academies Trust staff are valued members of the Trust community. Everyone is expected to set and maintain the highest standards for their own performance, to work as part of a team and to be an excellent role model for our children.

All Trust staff should:

- place the safety and welfare of children above all other considerations,
- treat all members of the Trust community, including children, parents and carers, colleagues and directors with consideration and respect,
- adhere to the principles and procedures contained in the policies in our safeguarding portfolio, the behaviour policy, teaching and learning policies as well as the HAT Staff Code of Conduct,
- treat each pupil as individuals and make adjustments to meet individual needs,
- demonstrate a clear understanding of and commitment to non-discriminatory practice,
- recognise the power imbalances between children and staff, and different levels of seniority of staff and ensure that power and authority are never misused,
- understand that Hatton Academies Trust staff are in a position of trust and that sexual relationships with a pupil, even over the age of 16, is not acceptable and may be a criminal offence. Children are considered as children; under the age of 18,
- be alert to, and report appropriately, any behaviour that may indicate that a pupil is at risk of harm,
- encourage all children to reach their full potential,
- never condone inappropriate behaviour by children or staff,
- take responsibility for their own continuing professional development,
- refrain from any action that would bring the Trust into disrepute, and
- value themselves and seek appropriate support for any issue that may have an adverse effect on their professional practice.

Appendix A2 - Staff Declaration – Confirmation of Receipt of the Trust's Key Safeguarding Documents

Name: _____

Academy: _____

Post: _____

- I confirm that I have received, read and understood the Trust's Key Safeguarding Documents, including:

➢ HAT Child Protection Policy	September 2026
➢ DFE Keeping Children Safe in Education – statutory guidance for schools and colleges (Part 1&5) Including Annex A. Further information in Keeping Children Safe in Education September 2026 provided for all staff working directly with children under 18.	September 2026
➢ Guidance for safer working practice for those working with children and young people in education settings	February 2022
➢ HAT Children Who Are Absent from Education Policy	September 2025
➢ HAT Staff Code of Conduct	September 2026
➢ HAT Code of Ethical Practice (Appendix A1)	September 2026
➢ HAT Designated Senior Person Job Description (Appendix C1)	September 2026
➢ The Behaviour Policy for your Academy	Current

- I have been made aware of my duty to safeguard and promote children's welfare
- The procedure for reporting concerns about a pupil has been explained to me
- I have read and will conform with the HAT Code of Ethical Practice and HAT Staff Code of Conduct
- I have read and understood my Academy behaviour policy

Signature: _____

Date: _____

Appendix A3 - Hatton Academies Trust Welfare/Child Protection Concern Form

Use this form to record any concern about a pupil's welfare or a possible child protection issue and give it to the Designated Senior Person for child protection or the Principal/Vice Principal as soon as possible.

<table>
<tr><td>Pupil's full name</td><td>Year group/tutor group</td></tr>
<tr><td>Your name and designation</td><td>Date of this record</td></tr>
<tr><td colspan="2">Why are you concerned about this pupil?</td></tr>
<tr><td colspan="2">What have you observed and when? If there is sign of injury, please complete a Body Map</td></tr>
<tr><td colspan="2">What have you heard or been told and when?</td></tr>
<tr><td colspan="2">Have you spoken to the pupil? Yes No

What did they say? Use the pupil's own words</td></tr>
<tr><td>Date and time you handed this form to the Designated Senior Person</td><td>Have you spoken to anyone else about your concern?

Yes No

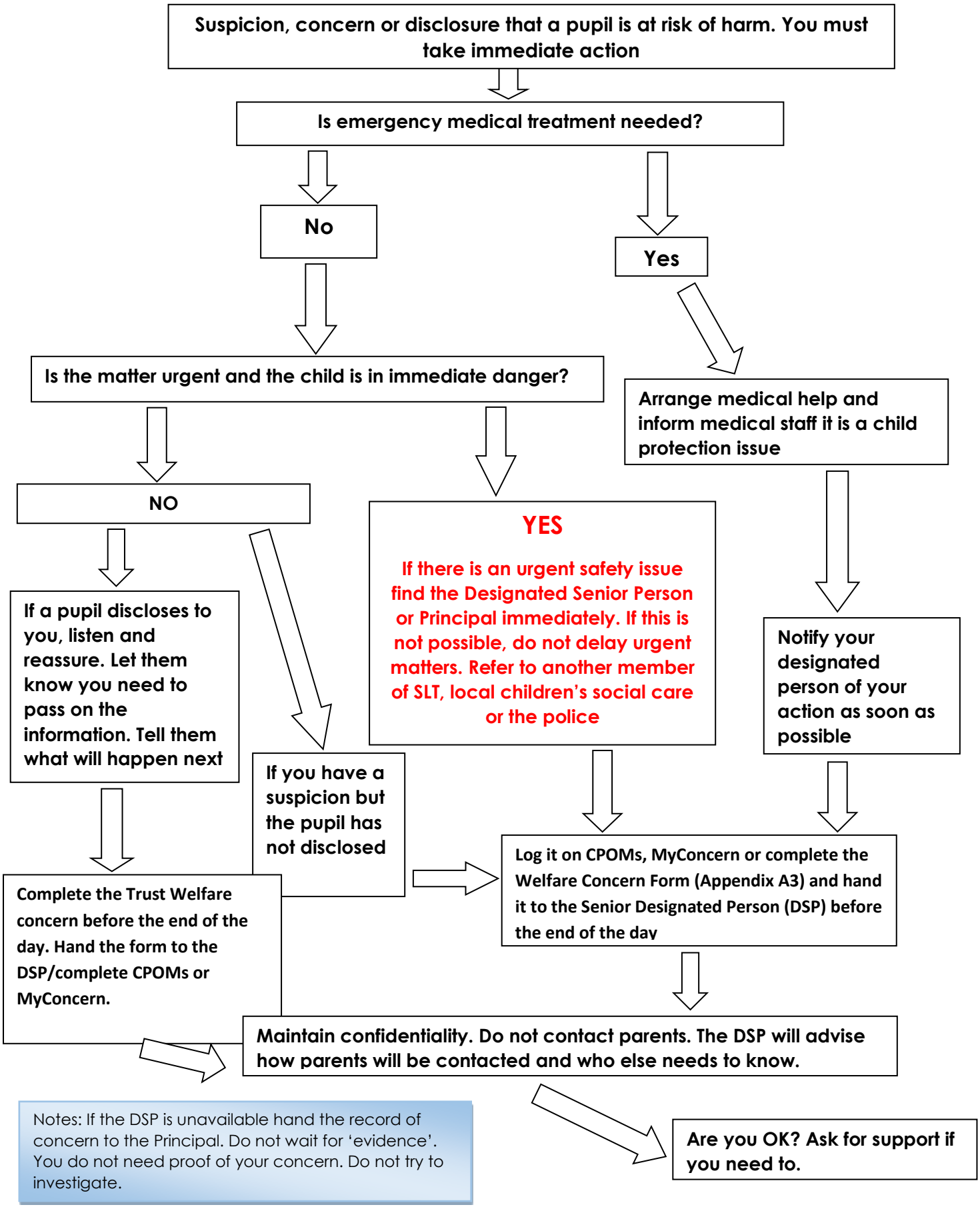
Who?</td></tr>
<tr><td>Are the parents/carers aware of your concern

Yes No</td><td>Is this the first time you have been concerned about this pupil?

Yes No</td></tr>
</table>

Add further details on the reverse of this form if necessary

Appendix A4 - Reporting a concern flowchart



Appendix A5 - Essential Contacts & Definitions

Initial contact is normally with the Academy DSP

Role	Name	Telephone
Sir Christopher Hatton Academy DSP	Luke Shackleton	01933 231224
Victoria Primary Academy DSP	Ian Pearson	01933 223323
Oakway Academy DSP	Rebecca Owen	01933 678714
Ecton Village Primary Academy	Michelle Gould	01604 409213
Earls Barton Primary School	Marie Lally/Ben Morris	01604 810371
Chief Executive Officer	Rob Hardcastle	01933 231263
Nominated Directors	Helen Carville	01933 231263
Channel	Duty Officer	020 7340 7264
NCC Designation Officer	C. Edwards	01604 367677
Northamptonshire Children's Trust (Social Care)	Duty Officer	0300 1267000 – ask for Northamptonshire Children's Trust
Out of hours duty team	As Duty Officer (above)	01604 626938
Health Authority	Academy Nurse	01933 235360
CAMHS	Duty Worker	0800 170 7055
NSPCC helpline	Duty Officer	08088005000
Childline	Duty Officer	08001111
LAC- Virtual School	Duty Officer	01604 368528
Youth offending	Duty	01536533800
Strengthening families		**www.signsofsafety.net**

Definitions

Child protection conference – initially called to make a decision on whether a child should be placed on a plan. Conferences are where all professionals are involved e.g. education, health, social workers, education entitlement service (EES) once a child is on a plan regular conferences are held with all professionals

Child protection plan - an initial conference of professionals is called regarding a young person to make a decision on whether they need to be placed on a child protection plan.

A reason (e.g. emotional abuse) is given and then a plan put into place to support the child and family. A social worker is named and then there are regular follow up meetings to discuss the situation.

Child in need plan - A child in need is a child who is thought to need extra support or services to help them to achieve or maintain, 'a reasonable standard of health or development'. All disabled children are classed as children in need.

Core group meetings – professionals from the conference are named to be part of a core group who meet to support the child and family at regular intervals

Social Care referral team – Social Services with a duty worker who would be first port of call for initial referral

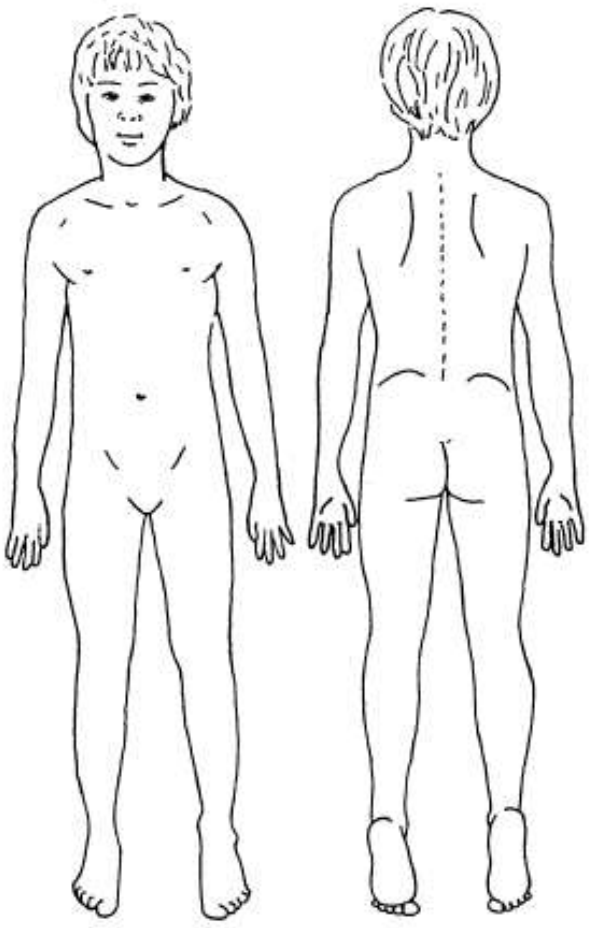
Strategy discussion – discussion with social worker regarding follow up to the referral made

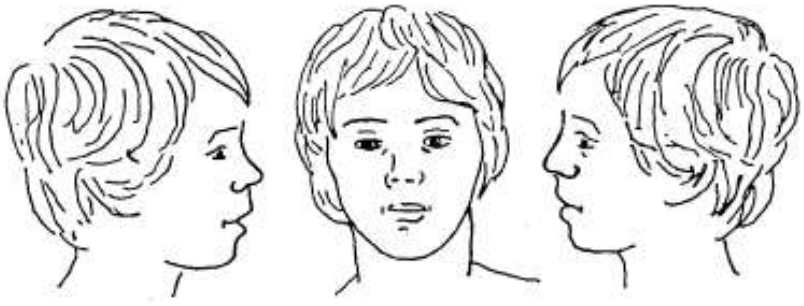
MARAC – Multi Agency Risk Assessment Conference - a local meeting where different groups share information about high-risk domestic abuse cases to create safety plans. Key participating organizations include: Police and probation services; health and child protection agencies; Independent Domestic Violence Advisors (IDVAs); Schools

Appendix A6 - Child Protection Procedures Body Map

In the first instance there is a body map function on CPOMs or MyConcern that should be used. If this is not possible then this body map is included to assist staff in identifying potential non-accidental injury sites. Attach to the report form sent to the Senior Designated Person.

Name of Child
Date





Appendix A7 - Child protection procedures Witness statement regarding a child protection or child welfare issue

Name of Child _____ Class/Form _____

Name of staff member completing this form_____

Form handed to _____ Date _____

Please write your account below and continue onto additional sheets if needed:

Appendix A8 - Child Protection Procedures Record of actions

This should only be used in the event of not being able to access **CPOMs or MyConcern**. CPOMs or MyConcern is the first source of this information and should be used in the first instance.

Name of Child _____

This form is to be completed by the Designated Senior Person

Date	Action	Meeting/Persons present/contact made

Section B - Types of Abuse & Child Vulnerability

B1. Pupils needs and those who are most vulnerable

Children in need

A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health (physical or mental) and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local Authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. As outlined in Working Together to Safeguard Children, local authorities, with their safeguarding partners and any relevant agencies, should develop, agree and publish local protocols for assessments and support. This should set out who can act as lead practitioner in supporting children and their families under section 17 (which is not limited to social workers).

Children suffering or likely to suffer significant harm

Local authorities, with the help of other organisations as appropriate, have a duty to make enquires under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation or other so-called honour based abuse, and extra-familial threats like radicalisation and sexual exploitation.

Children will be made aware of the Trust's safeguarding and child protection procedures through a range of measures. These will be constantly reviewed to improve our provision but will include: assemblies, RSHE and PSHE programme; group tutor/class teacher work; the curriculum; and information provision e.g. through the Academy's website. The key information for older children will be available on Edulink. The views of children will be sought through their group tutors and class teachers; meetings with senior staff; the Academy Councils and questionnaires.

The curriculum will be reviewed in terms of the opportunities for our students to be taught about safeguarding, including online safety. This will include an audit of the curriculum to show such opportunities.

B2. Children who may be particularly vulnerable

Some groups of children are potentially more at risk of abuse. Evidence shows that girls, LAC, children with SEN and/or disabilities, those who are young carers and lesbian, gay, bisexual, transgender, queer/questioning, asexual and many other terms such as non-binary (LGBTQIA+) children are at greater risk. It is important to understand that this increase in risk is due more to societal attitudes and assumptions and child protection procedures that fail to acknowledge children's diverse circumstances, rather than the individual child's personality, impairment or circumstances. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion,

communication issues and reluctance on the part of some adults to accept that abuse can occur.

Staff should remain aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs, for example relating to relationships with family, peers or their broader social environment, including discriminatory bullying. It is not for schools to initiate any action in this area and should keep in mind that it is common for children to engage in activities that are less typically associated with their sex.

To ensure that all of our children receive equal protection, we will give special consideration to children who are:

Disabled or have Special Educational Needs (SEND)

Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury related to the child's disability without further exploration,
- being more prone to peer group isolation or bullying than other children,
- the potential for children with SEN and disabilities being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs,
- communication barriers and difficulties in overcoming these barriers,
- the need for intimate care or that these children are isolated from others,
- that these children are more likely to be dependent on adults for care, and
- these children may have issues over cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school or the consequences of doing so.

To address these additional challenges, each Academy should consider extra pastoral support for children with SEN and disabilities. Further information can be found through the DfE's document:

SEND Code of Practice 0 to 25 years,

Medical Conditions

The fact that there has been an incident relating to the management of a child's medical condition (including allergies) would not in and of itself warrant a referral to local safeguarding partners. A safeguarding referral would only be needed where an incident highlighted concern that the child or young person might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family unit because of their medical condition. This might occur where relevant information about a child or young person's medical condition is not provided to a school or where they are repeatedly sent without essential medication, thereby putting the individual at risk. Further information can be found in the following documents:

Supporting Pupils at School with Medical Conditions and Allergy safety in schools.

Young Carers
Staff should be alert to the needs of young carers, recognising that caring responsibilities can impact on their attendance, attainment, behaviour and wellbeing. Early identification is essential to ensure young carers receive support at the right time and by the appropriate services including additional support from external partners, or local authority and health services.

Looked after Children (LACs) and Previously Looked After Children

Each Academy has a designated senior lead for LACs.

The most common reason for children becoming looked after is as a result of abuse and/or neglect. The Trust will ensure that staff have the skills, knowledge and understanding to keep looked after children safe.

Each Academy in the Trust should ensure that appropriate staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility.

Each Academy lead should also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her.

The DSP should have details of the child's social worker and the name of the virtual school head in the authority that looks after the child.

A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe.

When dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.

Risks can be compounded where children who are vulnerable lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced, and create a culture for them to speak out or share their concerns with members of staff. Other vulnerable groups:

- Living in a domestic abuse situation
- Affected by parental substance abuse
- Affected by mental health issues
- Asylum seekers
- Living away from home
- Vulnerable to being bullied, or engaging in bullying
- Living in temporary accommodation
- Young carers
- Live in transient lifestyles
- Living in chaotic and unsupportive home situations
- Vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion or sexuality
- Involved directly or indirectly in prostitution or child trafficking

- Do not have English as a first language

Mental Health and Self-Harm

All staff should be aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, signs of an eating disorder, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. However, school staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Staff can specifically support children to achieve strong or better mental health outcomes by fulfilling four key roles:

- promoting good mental wellbeing and preventing the onset of mental illness,
- observing pupils and identifying early those who may be experiencing mental health problems or being at risk of developing one,
- ensuring early targeted support is provided, and
- liaison with/referral to specialist services where needed.

If a child is struggling with their mental health, self-harming, has or shows signs of an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which education staff are well placed to recognise. These could include:

- significant changes in behaviour,
- ongoing difficulty sleeping,
- withdrawing from social situations,
- not wanting to do things they usually like, and
- physical signs of self-harm or neglecting themselves.

If staff have a concern about a child's mental health that is also a safeguarding concern, they should speak to their designated safeguarding lead or deputy and the school's mental health lead. They should make use of support from their respective Mental Health Support Team (MHST).

Promoting children's mental health and wellbeing guidance sets out how schools can help prevent mental health problems by promoting wellbeing and resilience. The NHS Every Mind Matters website also contains helpful information and advice about Looking after a child's mental health. In addition, the Hub of Hope is the UK's leading mental health support database.

Self-harm is common. Research suggests that of young people aged 15-16 years, more than 10% of girls and more than 3% of boys had self-harmed in the previous year. Self-harm doubles the likelihood that the person will eventually die by suicide as compared to the rest of the population.

In most cases of deliberate self-harm the young person should be offered help via the school counselling service, the GP, child and adolescent mental health service (CAMHS) or other therapeutic services e.g. paediatric or psychiatric services.

The possibility that self-harm, including a serious eating disorder, has been caused or triggered by any form of abuse or chronic neglect should not be overlooked.

The above possibility may justify a referral to Children's Social Care for consideration and assessment of whether the child is in need of services and/or protection.

It is good practice, whenever a child or young person is known to have made a suicide attempt, to undertake a multi-disciplinary risk assessment, along with an assessment of need. This will involve a referral to MASH.

Any child aged under 10 reported to be self-harming must be the subject of a comprehensive mental health assessment and a referral to CAMHS. A paediatric assessment may be needed as part of this process. The mental health assessment is the priority.

Examples of self-harm include:

- cutting or burning their skin,
- punching or hitting themselves,
- poisoning themselves with tablets or toxic chemicals,
- misusing alcohol or drugs,
- deliberately starving themselves or binge eating, and
- exercising too much.

This is not an exhaustive list.

Attendance and Missing from Education

Separate procedures are in place for children who have attendance that is below our expectation of at least 96% attendance. These are monitored by an Attendance Officer. Following the statutory guidance Working Together to Improve School Attendance – July 2026, each academy must work with the pupil, family and the relevant children's services where absence from school indicates a possible safeguarding concern.

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage.

Missing episodes can be an indicator of exploitation, including child sexual exploitation, child criminal exploitation, trafficking or county lines activity.

Staff are referred to the HAT "Children Missing from Education Policy and Procedures" and HAT "Attendance for Learning Policy."

B3. Supporting the Child and Partnership with Parents

- Each Academy should hold more than one emergency contact number for each pupil or students where reasonably possible.

- Hatton Academies Trust recognises that the child's welfare is paramount, however good child protection practice and outcomes rely on a positive, open and honest working partnership with parents/carers.

- Whilst we may, on occasion, need to make referrals without consultation with parents/carers, we will make every effort to maintain a positive working relationship with them whilst fulfilling our duties to protect any child.

- We will provide a secure, caring, supportive and protective relationship for the child.

- Children will be given a proper explanation (appropriate to age & understanding) of what action is being taken on their behalf and why.

- We will endeavour always to preserve the privacy, dignity and right to confidentiality of the child and parents/carers. The DSP will determine which members of staff "need to know" personal information and what they "need to know" for the purpose of supporting and protecting the child.

B4. Recognising abuse and types of abuse

This section is for staff guidance.

It is recognised that high levels of self-esteem and confidence, together with supportive friends and easy access to trusted adults, can help to prevent abuse.

The lists below may indicate that a child is being abused. However, in themselves they are not evidence of abuse, but they may suggest abuse if a child exhibits several of them or if a pattern emerges. Remember that there can be other explanations for a child showing such signs or behaving in such ways.

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

Children may also direct abuse towards parents, carers or other family members. This is sometimes referred to as Child-to-Parent or Child-to-Carer Abuse (CAPA) and should be treated as a safeguarding concern.

Abuse is rarely a standalone event. There will often be other signs that matters are not as they should be. For example, drug use, alcohol, truanting, and making or sharing of semi-nudes or nudes put children in danger. Child on child abuse (see below) can also be a sign or a manifestation of abuse e.g. bullying, violence, sexting, and sexual assaults.

All staff should also have an awareness of safeguarding issues that often overlap and can put children at risk of harm (including but not limited to those listed below). The following behaviours and indicators can be signs that children are at risk:

- drug taking and/or alcohol misuse,
- unexplainable and/or persistent absences from education,
- serious violence, criminal exploitation (including that linked to county lines), radicalisation, and
- consensual and non-consensual making or sharing of nudes or semi nudes.

All staff should also be aware that 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.

There are four categories of abuse:

- physical abuse
- emotional abuse
- sexual abuse
- neglect.

Physical Abuse

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

Possible signs of Physical Abuse

- Unexplained injuries or burns – refusal to discuss injuries
- Untreated injuries or lingering illness left unattended
- Admission of punishment which appears to be excessive
- Shrinking from physical contact
- Fear of undressing
- Aggressive behaviour/bullying
- Deterioration in work/behaviour
- Unexplained pattern of absence which may serve to hide physical injuries
- Improbable explanation of injuries
- Bruises and finger marks
- Fear of returning home or of parents being contacted by the Academy
- Fear of medical help
- Over compliant behaviour
- Significant changes in behaviour without explanation

Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child, such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate or valued only for meeting the needs of another person. It may include verbal abuse, such as persistent criticism, belittling, or name-calling, as well as not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as over-protection and limitation

of exploration and learning, or preventing the child participating in normal social interaction. It may involve the hearing or seeing the ill treatment of another.
It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Possible signs of Emotional Abuse

- Fear of new situations
- Self-harm or mutilation
- Drug/solvent abuse
- Air of detachment – "couldn't care less attitude"
- Social isolation – does not join in and has few friends
- Desperate attention seeking behaviour
- Eating problems
- Inappropriate, emotional responses
- Compulsive stealing or "scrounging"
- "Neurotic" behaviour – obsessive rocking, thumb sucking
- Depression or withdrawal

Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening.

The activities may involve physical contact, including penetrative (for example, rape, buggery, or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may include non-contact activities, such as involving children in looking at, or watching sexual activities, or encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as child on child abuse) in education and all staff should be aware of it and understand the Trust procedures for dealing with it.

Possible signs of Sexual Abuse

- Bruises, scratches or bite marks on the body
- Scratches, abrasions or persistent infections in the anal or genital regions
- Pregnancy
- Sexual awareness inappropriate to the child's age – possibly shown in drawings, vocabulary, games, etc.
- Public masturbation
- Attempts to teach other children about sexual activity
- Refusing to stay with certain people or go to certain places
- Aggressiveness, anger, anxiety, tearfulness
- Withdrawal from friends

Possible signs in older children

- Promiscuity, prostitution, provocative sexual behaviour
- Self-injury, self-destructive behaviour, suicide attempts
- Eating disorders
- Over-compliant behaviour

- Unexplained gifts of money
- Changes in behaviour
- Tiredness, lethargy, listlessness
- Sleep disturbances
- Depression

Neglect

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/carer failing to provide adequate food or clothing or shelter, including exclusion from home or abandonment; failing to protect a child from physical and emotional harm or danger; failure to ensure adequate supervision, including the use of inadequate carers; or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's emotional needs.

Possible signs of neglect

- Constant hunger
- Inappropriate clothing
- Poor social relationships
- Constant tiredness
- Poor personal hygiene
- Untreated medical problems
- Frequent lateness or non-attendance at school
- Low self-esteem
- Compulsive stealing or "scrounging"

While bullying between children is not a separate category of abuse and neglect, it is a very serious issue. All incidences of bullying should be reported to the relevant pastoral lead and be managed through the process set out in the HAT Anti-Bullying Policy.

Staff are referred to each Academy's Behaviour Policy and the Trust's "Online Safety Policy".

B5. Child on child abuse (including harassment and violence)

All staff should be aware that children can abuse other children (often referred to as child on child abuse) and that it can happen both inside and outside of school and online. It is important that all staff recognise the indicators and signs of child on child abuse and know how to identify it and respond to reports.

Child on child abuse is a safeguarding issue for both victim and alleged perpetrator, it is preventable and it may involve serious physical harm or threats involving weapons.

All staff should understand, that even if there are no reports in their schools it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding child on child abuse they should speak to their DSP (or Deputy DSL). All staff working with children are advised to maintain an attitude of '**it could happen here**', and this is especially important when considering child-on-child abuse.

It is more likely that girls will be victims and boys will be perpetrators, but that all child on child abuse is unacceptable and will be taken seriously and acted upon.

It is essential that all staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, misogyny/misandry, an unsafe environment and, in a worst case, a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it.
Staff should be alert to harmful attitudes linked to misogyny, misandry, incel ideology and online extremist communities which may increase risks of violence, exploitation or harmful sexual behaviour.

Exploitation can occur between children. Concerns regarding peer-on-peer exploitation should be managed under both child protection and child-on-child abuse procedures.

If one child or young person causes harm to another, this should not necessarily be seen as a child protection issue. However, any concern must be referred to the DSP if:

- There is a large difference in power, for example, age, size, ability, development between the young people; or
- The perpetrator has repeatedly tried to harm one or more other children; or
- There are concerns about the intention of the alleged perpetrator.

If the evidence suggests that there was an intention to cause severe harm to the victim, this should be regarded as abusive whether or not severe harm was actually caused. ".

There are many forms of abuse between children. This section will identify the majority of abusive behaviours but is not exhaustive.

Physical Abuse
Physical abuse may involve hitting, kicking, nipping, shaking, biting, hair pulling or otherwise causing physical harm to another person. There may be underlying reasons why a child harms another and it is important to understand why a young person has engaged in such behaviour, including the possibility of the harm being accidental, before considering the next action or sanction to be taken. This may include an online element which facilitates, threatens and/or encourages physical abuse.

Harmful Sexual Behaviours (HSB)
HSB can occur between two or more children of any age and sex, from primary through to secondary stage and into college. It can occur also through a group of children towards a single child or towards another group of children. Children's sexual behaviours exists on a continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive or violent. Behaviour that is problematic, abusive or violent is developmentally inappropriate, may cause developmental damage and is never acceptable. Advice on stages of typical sexual development and behaviour for different age groups can be found in Sexual development and behaviour in children | NSPCC Learning.

Sexually harmful behaviour includes incidents of inappropriate sexual language, touching, sexual assault, sexual violence and sexual harassment and inappropriate role play. This form of behaviour is not always contrived or with the intent to harm others.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.

Sexual harassment can include sexual comments (e.g. telling sexual stories, making lewd comments, making sexual remarks about clothes or appearance or calling someone sexualised names), sexual jokes or taunting, physical behaviour (e.g. brushing up against someone, displaying pictures photos or drawings of a sexual nature), displaying pictures, photos or drawings of a sexual nature and upskirting (this is a criminal offence)

Online sexual harassment may occur independently, or as a broader pattern of sexual harassment and/or sexual violence. This may include:

- consensual and non-consensual making or sharing of nudes or semi-nudes, including those generated using AI. – see UKCIS Sharing nudes and semi-nudes: advice for education settings working with children for further support
- sharing of unwanted explicit content
- sexualised online bullying
- unwanted sexual comments and messages, including, on social media
- sexual exploitation; coercion and threats, and
- coercing others into sharing images of themselves or performing acts they're not comfortable with online.

Child-on-child sexual violence can and does occur, both inside and outside of a setting. Sexual violence refers to specific sexual offences under the Sexual Offences Act 2003145 as described below:

- Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration, and A does not reasonably believe that B consents.
- Assault by penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
- Sexual assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents.

Staff should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault

- Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents.

Staff should note this could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity, and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice:

- a child under the age of 13 can never consent to any sexual activity
- the age of consent is 16
- sexual intercourse without consent is rape.

For further guidance refer to Rape Crisis England & Wales - Sexual consent

Children with SEND and deaf children are 3 times more likely to be abused than their peers and their vulnerability should be protected and supported to the fullest extent.

Making of semi-nudes or nudes ()

This occurs when someone sends or receives a sexually explicit text, image or video. **All incidents involving the sharing of nude or semi-nude images require a safeguarding response, whether they are consensual or non-consensual.** This includes sending nude or semi nudes pictures, rude pictures or nude selfies. Pressuring someone into sending a nude picture can happen in any relationship and to anyone, whatever their age, gender or sexual preference. Once the image is taken and sent, the sender loses all control of the image and these images could end up anywhere. By having in their possession or distributing indecent images of a person under 18, young people may be committing offences under the Sexual Offences Act 2003.

Initiation / Hazing

Hazing is a form of initiation ceremony which may be used to induct newcomers into a sports team, group or gang. Forms of initiation/hazing can vary from relatively mild rituals to severe and violent ceremonies. This practice is intended to create a bond between the newcomer and the existing members and is often deemed a rite of passage. Rituals often involve some form of humiliation, embarrassment, abuse or harassment.

Prejudiced Behaviour

The term prejudice-related bullying refers to a range of hurtful behaviour, both physically and emotionally, which causes the victim to feel powerless, worthless, excluded or marginalised, and which is connected with prejudices around belonging, identity and equality in wider society. Specifically, prejudices surrounding disability, special educational needs, ethnic, cultural or religious backgrounds, gender, home life (e.g. in relation to issues of care, parental occupation, poverty and social class) and sexual identity (homosexual, bisexual, transsexual, queer, asexual).

Teenage Relationship Abuse

Teenage relationship abuse is defined as a pattern of actual or threatened acts of physical, sexual and/or emotional abuse, perpetrated by an adolescent (between the ages of 13 and 18) against a current or former partner. Abuse may include insults, coercion, social sabotage, sexual harassment, threats and/or acts of physical or sexual abuse. The abusive teen uses this pattern of violent and coercive behaviour, in a

heterosexual or same gender relationship, in order to gain power and maintain control over a partner.

Upskirting
Upskirting generally involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence.

Where allegations of child on child abuse occur within their Academy, the Principal should:

- Work closely with the DSP and pastoral team.
- Keep the involved children separate throughout the school day to avoid collusion or intimidation.
- Not talk to the children about the incident to avoid distorting the evidence, other than initially establishing what is alleged to have taken place.
- Keep a log of actions, discussions and decisions.
- Contact parents/carers of involved children in light of the information sharing protocol and request that, pending the interview with Children's social care, they should not discuss the allegation in depth with the child.
- If the situation warrants it (for example possible press coverage), sending a letter to all parents/carers of children in the Academy, giving appropriate information about the situation. Seek advice from CYPS on the letter content.

If the assessment concludes that the allegations made can be substantiated, the children should not necessarily be expected to continue their education in contact with each other. The children responsible for the abuse should be moved if necessary.
The views and wishes of the children who have been abused and their parents should be appropriately considered in the decision-making.

Victims of child on child abuse will be supported by the Academy pastoral system and external agencies as required.

In order to minimise the risk of child on child abuse each academy should:

- Provide a developmentally appropriate PSHE and RSHE curriculum which develops students understanding of acceptable behaviour and keeping themselves safe.
- Have systems in place for any child to raise concerns with staff, knowing that they will be listened to, believed and valued.
- Develop robust risk assessments where appropriate.
- Have relevant policies in place (e.g. Behaviour Policy, Online Safety Policy).

Systems should be in place, and they should be well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

B6. Bullying (including cyber-bullying)

Bullying is unwarranted, aggressive and inappropriate behaviour among children that involves either a real or perceived power imbalance. The behaviour is repeated, or has

the potential to be repeated over time. Both young people who are bullied and who bully others may have serious, lasting problems.

Bullying includes actions such as making threats, spreading rumours, attacking someone physically or verbally or based on their appearance or other characteristics, e.g. size, hair colour, gender, sexual orientation, religion, appearance and deliberately excluding someone from a group. This may include an online element which facilitates, threatens and/or encourages bullying.

Staff should also be alert to signs that a child may be at risk of or involved in serious violence. These risks are higher for children with disrupted education (e.g. suspensions, permanent exclusions, time in alternative provision) or a history of offending. Staff should also try to be alert to when children might be at highest risk around the school day (for example, immediately after or before school).

Staff are referred to each the Behaviour Policy of each academy and the HAT Anti-Bullying Policy

Cyber-bullying
Cyberbullying is the use of phones, instant messaging, e-mail, chat-rooms or social networking sites such as Tik Tok, Instagram, Facebook and Twitter to harass, threaten or intimidate.

Staff should understand that cyber-bullying is a criminal act under the Malicious Communications Act 1988 which states that electronic communications that are indecent or grossly offensive, convey a threat or false information or demonstrate that there is an intention to cause distress or anxiety to a victim would be a criminal offence.

This is also supported by the Communications Act 2003, section 127, which states that electronic communications which are grossly offensive or indecent, obscene or menacing, or false, used for the purpose of causing annoyance, inconvenience, or needless anxiety to another could be deemed to be criminal behaviour.

If the behaviour involves the use of, taking or distributing indecent images of young people under the age of 18, this is also a criminal offence under the Sexual offences Act 2003. Over and above the immediate support that young people may require in these instances, the Academy must involve the Police to investigate these situations.

While bullying between children is not a separate category of abuse and neglect it is a very serious issue. All incidences of bullying should be reported to the relevant pastoral lead and be managed through the HAT anti-bullying procedures.

Staff are referred to each the Behaviour Policy for each academy and HAT Anti-Bullying Policy.

B7. Female Genital Mutilation (FGM) and Forced Marriage

FGM is a collective term for all procedures involving partial or total removal of external female genitalia for cultural or other non-therapeutic reasons. Typically, it is performed on girls aged between 4 – 15 years of age or on older girls before marriage or pregnancy. It is illegal in the UK and it is also illegal to take a child abroad to undertake FGM. There is a maximum prison sentence of 14 years for anyone found to have aided

this procedure in any way. It is considered to be child abuse as it causes physical, psychological and sexual harm.

FGM is more common than many people realise, both across the world and in the UK. It is practised in 28 African countries and in parts of the Middle and Far East and increasingly in developed countries amongst the immigrant and refugee communities. In the UK it has been estimate that 24,000 girls under the age of 15 are at risk of FGM.

Signs and Indicators to be aware of

- The family comes from a community that is known to practice FGM, especially if there are elderly women present in the extended family.
- A girl/young woman may spend time out of the classroom or from other activities, with bladder or menstrual problems.
- A long absence from school or in the school holidays could be an indication that a girl/young woman has recently undergone an FGM procedure, particularly if there are behavioural changes on her return – this may also be due to a forced marriage.
- A girl/young woman requiring to be excused from physical exercise lessons without the support of her GP.
- A girl/young woman may ask for help, either directly or indirectly.
- A girl/young woman who is suffering emotional/psychological effects of undergoing FGM, for example withdrawal or depression.
- Midwives and obstetricians may become aware that FGM has taken place when treating a pregnant woman/young woman.

Some indications that FGM may be about to take place include:

- a conversation with a girl/young woman where they may refer to FGM, either in relation to themselves or another female family member or friend,
- a girl/young woman requesting help to prevent it happening,
- a girl/young woman expressing anxiety about a 'special procedure' or a 'special occasion' which may include discussion of a holiday to their country of origin, and
- a boy may also indicate some concern about his sister or other female relative.

If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

Teaching staff should be aware that it is a *statutory requirement* for teachers to report any FGM concerns to the DSP.

Staff are referred to the Hatton Academies Trust FGM Policy.

Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use

perceived cultural practices to coerce a person into marriage. All Trust colleagues can play an important role in safeguarding children from forced marriage.

In addition, 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. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (pages 75-80 of which focus on the role of schools) and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at **The right to choose: government guidance on forced marriage - GOV.UK (www.gov.uk)** Trust staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fcdo.gov.uk.

B8. Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE) and Wider Forms of Exploitation

Child sexual exploitation, child criminal exploitation, modern slavery, trafficking and other forms of exploitation are serious safeguarding concerns. Children may be exploited in person, online or through a combination of both. Exploitation can occur even where there appears to be consent and victims may not recognise themselves as being exploited.

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity. It may involve an exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. This can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group.

CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. This may constitute modern slavery, and further information is available in the Modern Slavery statutory guidance. Child Sexual Exploitation and Child Criminal Exploitation may constitute forms of modern slavery. Staff should be aware of the National Referral Mechanism and should ensure suspected victims are referred through appropriate safeguarding channels. Staff should be aware that exploited children may not view themselves as victims and may appear to be making choices when in reality they are being controlled or manipulated.

For both CCE and CSE, victims are not always recognised and can be criminalised for actions they take whilst under coercion. This remains a significant concern, as professionals continue to encounter cases where children are manipulated, groomed, and exploited without fully understanding the abuse they are experiencing.

Potential Indicators of Exploitation

Indicators may include:

- missing episodes
- unexplained gifts, money or possessions

- association with older individuals or groups
- decline in attendance
- changes in presentation or behaviour
- drug or alcohol misuse
- possession of multiple mobile devices
- online secrecy
- sexualised behaviour inappropriate for age
- unexplained injuries
- involvement in anti-social or criminal behaviour

CSE

Children may be harmed by other children or young people or by an organised gang or organised network. Staff will be aware of the harm caused by bullying and will use the Academy's anti-bullying procedures where necessary. However, there will be occasions when a pupil's behaviour warrants a response under child protection rather than anti-bullying procedures. In particular, research suggests that up to 30 per cent of child sexual abuse is committed by someone under the age of 18 and most sexual abuse is committed by individuals known to the victim.

The management of children and young people with sexually harmful behaviour is complex and the Trust will work with other relevant agencies to maintain the safety of the whole Trust community. Young people who display such behaviour may be victims of abuse themselves and the child protection procedures will be followed for both victim and perpetrator.

CSE is a form of child sexual abuse. Sexual abuse 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 clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

Grooming within CSE is the process of preparing a boy or girl for a sexual purpose. Grooming is often slow and subtle, continuing for several weeks or months and lulling the child into a false sense of security. It always involves manipulation and deceit.

CSE can occur over time, as set out above, or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.

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.

Child Sexual Exploitation can occur through the use of technology, social media, online gaming platforms, messaging services, livestreaming and emerging technologies. Exploitation may involve coercion, manipulation, deception, intimidation, violence or the exchange of goods, money, accommodation, status, affection or protection.

Child Sexual Exploitation may involve individuals, groups, gangs or organised criminal networks.

Online Sexual Exploitation

Staff should be alert to:

- online grooming
- coercion to share sexual images
- sextortion
- sharing of self-generated intimate images
- AI-generated intimate images
- deepfakes
- nudification applications
- exploitation via gaming platforms and social media

CCE

CCE is a form of abuse and occurs where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into committing a criminal activity.

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 items 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 and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

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 staff 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.

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator.

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

enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Some of the following can be indicators of CSE and/or CCE:

- children who appear with unexplained gifts or new possessions,
- children who associate with other young people involved in exploitation,
- children who suffer from changes in emotional well-being or show signs of self-harm,
- children who misuse drugs and alcohol,
- children who go missing for periods of time or regularly come home late,
- children who have older boyfriends or girlfriends,
- children who suffer from sexually transmitted infections or become pregnant,
- a change in friendships or relationships with older individuals or groups,
- display signs of assault or unexplained injuries,
- suffer a significant decline in performance,
- have been involved in offending, such as theft or robbery, and
- children who regularly miss school or education or do not take part in education.

Advice for Academy staff is provided in the Home Office's **Preventing youth violence and gang involvement** and its **Criminal exploitation of children and vulnerable adults: county lines** guidance.

B9. Domestic Abuse

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse.

Domestic abuse is defined as 'behaviour which is abusive by one person towards another person'. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act). **Statutory definition of domestic abuse factsheet - GOV.UK (www.gov.uk)**

The government has issued statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children. Domestic Abuse: Statutory Guidance – GOV.UK (www.gov.uk)

Behaviour is "abusive" if it consists of any of the following— (a) physical or sexual abuse; (b) violent or threatening behaviour; (c) controlling or coercive behaviour; (d) economic abuse; (e) psychological, emotional or other abuse; and it does not matter whether the behaviour consists of a single incident or a course of conduct.

The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-

economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

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. Seeing, hearing or experiencing 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.

Operation Encompass operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs.

Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to children's social care if they are concerned about a child's welfare. More information about the scheme and how schools can become involved is available on the Operation Encompass website.

National Domestic Abuse Helpline Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- **NSPCC - UK domestic-abuse Signs Symptoms Effects**
- **Safelives: young people and domestic abuse**
- **Refuge –** What is domestic abuse**?**

B10. Online Safety (including filtering and monitoring requirements)

It is essential that children are safeguarded from potentially harmful and inappropriate online material. The Trust ensure that children in all of its academies are taught about safeguarding, including online safety. This is part of providing a broad and balanced curriculum.

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, racism, misogyny/misandry, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories, AI-generated intimate imagery, deepfake content and online material designed to normalise or facilitate sexual or criminal exploitation.

- **contact**: being subjected to harmful online interaction with other users or generative AI applications that simulate this; 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 including online grooming, coercion, sextortion and exploitation through social media, gaming platforms or messaging applications.
- **conduct**: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, including those generated using AI and online bullying, and sharing AI-generated intimate images, creating or distributing deepfakes, image-based abuse, and behaviour associated with sexual or criminal exploitation.
- **commerce**: risks such as online gambling, inappropriate advertising, phishing and or financial scams including financial exploitation, online coercion for money or goods, and scams targeting children and young people.. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (https:/apwg.org/).

Each Academy uses a Smoothwall or Securly filtering and monitoring system to flag websites that are deemed as unsafe to further support this, as well as motoring the actions and entries children and staff take part in when using technology on or off site. Please see KCSIE 2026 paragraphs 171 to 175 for further details.

The Department has published Generative AI: product safety expectations to support schools to use generative artificial intelligence safely, and explains how filtering and monitoring requirements apply to the use of generative AI in education. This should be seen as part of the training package that staff undertake.

To complement this, the DfE has published online resources to help staff to use AI safely and effectively. Module 3 provides important information on identifying and mitigating key risks associated with safeguarding, ethics, data protection, and intellectual property.

All academies meet or are working towards meeting the DfE Digital and Technology standards and NCSC Cyber Essentials criteria.

The DfE has produced guidance for schools in this area. DfE advice for schools: **teaching online safety in schools**; Keeping Children Safe in Education 2026 includes other resources available to all schools to aid the teaching of online safety. For example, it references Education Against Hate who highlight approaches that can be taken in each academy and harmful online challenges and online hoaxes - this includes advice on preparing for any online challenges and hoaxes, sharing information with parents and carers and where to get help and support.

Principals must reinforce the importance of children being safe online and parents and carers are likely to find it helpful to understand what systems are used to filter and monitor online use. It will be especially important for parents and carers to be aware of what their children are being asked to do online, including the sites they will asked to access and be clear who from the school (if anyone) their child is going to be interacting with online.

The trust should ensure each academy has appropriate filtering and monitoring systems in place and ensure that a review of their effectiveness is carried out at least once every academic year. This must include:

- identifying and assign roles and responsibilities to manage filtering and monitoring systems
- the ability to block harmful and inappropriate content without unreasonably impacting teaching and learning, and
- having effective monitoring strategies in place that meet safeguarding requirements.

This review will be led by the Trust and include the DSL, a member of SLT and members of the Trust's IT Team.

For further details please see the HAT Online Safety Policy.

B11. Impact of abuse

The impact of child abuse should not be underestimated. Many children do recover and go on to lead healthy, happy and productive lives, although most adult survivors agree that the emotional scars remain and long term mental health can suffer.

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.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

The Department for Education has published advice and guidance on **Preventing and Tackling Bullying**, and **Mental Health and Behaviour in Schools**. In addition, Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among young people including its guidance **Promoting children and young people's emotional health and wellbeing**. Its resources include social media, forming positive relationships, smoking and alcohol. See **Rise Above** for links to all materials and lesson plans.

The Department for Education is providing funding to support costs of a significant training programme for senior mental health leads and the national rollout of the **Link Programme**.

Public Health England has produced resources to support secondary schools to promote positive health, wellbeing and resilience among children including its guidance: Promoting children and young people's emotional health and wellbeing. Its resources include social media, forming positive relationships, smoking and alcohol. The Department has also published, '**Every interaction matters'**, a pre-recorded webinar which provides staff with a simple framework for promoting wellbeing, resilience, and mental health. This sits alongside the **Wellbeing for education recovery** program content, which covers issues such as bereavement, loss, anxiety, stress and trauma.

B11. The Prevent Duty

All schools and academies have a duty to protect children from Radicalisation and Extremism. This duty is therefore applicable to all staff and falls within the Trust and individual Academy safeguarding procedures. Concerns regarding radicalisation should be treated in the same way initially as any other safeguarding issues and referred to the DSP.

Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:
1. negate or destroy the fundamental rights and freedoms of others, or
2. undermine, overturn or replace the UK's system of liberal parliamentary Democracy and democratic rights, or
3. intentionally create a permissive environment for others to achieve the results in (1) or (2).

Staff should be aware that this covers all aspects of extreme views and behaviours e.g. extreme right wing ideology; misogyny/misandry; anti-semitism; Islamist issues.

The Trust "Preventing Extremism and Radicalisation" Safeguarding Policy gives further information and advice.

B12. Good Practice Guidelines

To meet and maintain our responsibilities towards children we need to agree standards of good practice.

Good practice includes:

- Treating all children with respect.
- Setting a good example by conducting ourselves appropriately.
- Involving children in decisions that affect them.
- Encouraging positive and safe behaviour among children.
- Being a good listener.
- Being alert to changes in children's behaviour.
- Recognising that challenging behaviour may be an indicator of abuse.
- Reading and understanding the Trust's child protection policy and guidance documents on wider safeguarding issues, for example bullying, physical contact and information-sharing.
- Asking pupil's permission before doing anything for them of a physical nature, such as assisting with dressing, physical support during PE or administering first aid.
- Maintaining appropriate standards of conversation and interaction with and between children and avoiding the use of sexualised or derogatory language.
- Being aware that the personal and family circumstances and lifestyles of some children lead to an increased risk of abuse.

B13. Abuse of Trust

All Trust staff are aware that inappropriate behaviour towards children is unacceptable and that their conduct towards children must be beyond reproach. All Trust staff recognise they are in a position of authority and trust relating to all students. This includes a student of any age (under or over 18) if they are studying in education.

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

The Hatton Academies Trust's Code of Ethical Conduct sets out our expectations of all staff (see Appendix A1).

B14. Fabricated or Induced Illness

Fabricated or induced illness (FII) is a rare form of child abuse. It happens when a parent or carer exaggerates or deliberately causes symptoms of illness in the child.

The parent or carer tries to convince doctors that the child is ill, or that their condition is worse than it really is.

The parent or carer does not necessarily intend to deceive doctors, but their behaviour is likely to harm the child. For example the child may have unnecessary treatment or tests, be made to believe they're ill, or have their education disrupted.

FII used to be known as "Munchausen's syndrome by proxy" (not to be confused with Munchausen's syndrome, where a person pretends to be ill or causes illness or injury to themselves).

For further details regarding Fabricated Illness please see the NHS website - Overview - Fabricated or induced illness - NHS

Section C: Information & Further Guidance

C1. Roles and Responsibilities

The Board of Directors, Chief Executive Officer (CEO) and Local Governing Body (LGB)

The Trust and the Board of Directors are the proprietors and have overall responsibility for ensuring the implementation of this policy across the whole Trust. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart.

The Board of Directors are aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements. Safeguarding systems should be in place, and they should be well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

The Board of Directors should require that an external review of safeguarding processes at each academy is completed regularly (no less than every four years). This must include a full review of online safety procedures. The Board should also review the filtering and monitoring provision at the Trust annually, ensuring that systems are working effectively and meeting safeguarding obligations.

The CEO has overall leadership of child protection and safeguarding on behalf of the Board of Directors. The CEO will act on behalf of the Directors for procedures against staff. The Chair of the Board of Directors will act on behalf of the Board of Directors in the event of allegations against the CEO.

On behalf of the Board of Directors, Helen Carville will act as Trust Lead Director for child protection matters and monitor the effectiveness of this policy in conjunction with the full Board of Directors.

If the academy has a Local Governing Body, they will share responsibility with the CEO to ensure the first six bullet points are effectively implemented. The CEO will ensure that Hatton Academies Trust meets all of the following responsibilities:

- Has appointed a Designated Senior Person (DSP) in each Academy for safeguarding children and ensure that he/she is trained in child protection and inter-agency working and receives further updating at least every two years.
- Has a training strategy that ensures all staff, Directors and Academy representatives receive child protection training and that this is appropriate to their role regarding child protection.
- Has made arrangements to ensure that all temporary staff and volunteers, and staff and Academy representatives new to the Trust, are made aware of the Trust and individual Academy arrangements for child protection.
- Has a child protection policy and procedures that are consistent with statutory and best practice requirements, reviewed annually, and made available to parents on request.
- Ensures each Academy has an up to date and suitable policy for behaviour, staff conduct, online safety and for children who are absent from education.
- Has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, trainee teachers, volunteers and contractors).
- Has safer recruitment procedures that include appropriate checks, including online checks.
- Ensures that the Trust Academies contribute to inter-agency working in line with statutory guidance "Working together to Safeguard Children 2026" and "Keeping Children Safe in Education September 2026".
- Has a system for reviewing and amending policies and procedures.
- Academies performance and compliance are audited.
- Ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.
- Ensures that the filtering and monitoring systems across all Trust places of work are effective, in line with the **DfE's filtering and monitoring standards for schools and colleges**.

Ensures that relevant staff are aware of and understand the IT filters and monitoring systems in place, manage them effectively and know how to escalate concerns.

The Principal

In this policy the Principal refers to the member of staff with overall responsibility for the Academy.

- Ensures that the child protection policy and procedures are implemented and followed by all staff (including trainee teachers and temporary staff) and volunteers.
- Allocates sufficient time and resources to enable the DSP and other staff to carry out their roles.
- Ensure continuity of safeguarding responsibilities when the designated safeguarding lead is unavailable due to illness, leave, or other circumstances, including access to shared email or equivalent system to ensure that safeguarding concerns are received, monitored, and acted upon without delay.
- Ensures that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the HAT whistle-blowing procedures.
- Ensures that pupil safety and welfare is addressed through the curriculum
- Is responsible for the implementation of the policy and ensuring that the outcomes are monitored.
- Ensures all staff are informed of our systems which support safeguarding including this policy, particularly aspects relating to online safety and an understanding of the academy on-line filtering and monitoring system, as part of their induction.
- Communicates this policy to parents/carers when their child joins the school and via the school website.
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this.
- Ensures the relevant staffing ratios are met, where applicable.
- Must not allow children into toilets designated for the opposite biological sex, with no exceptions.
- Must provide separate toilets for boys and girls aged 8 and over (apart from where individual toilets are in a room that can be locked from the inside, intended for use by one pupil at a time).
- Must provide suitable changing accommodation and showers for pupils who are aged 11 years or over at the start of the school year.
- Must not allow a child, aged 11 years or older at the start of the school year, to undress in front of a child of the opposite biological sex.

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

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

The Designated Senior Person (DSP)

The Academy DSP is the ***main point of contact for all staff*** if there are any concerns about the safety and welfare of a child. If they are not available, each Academy has additional trained staff or contact the Academy Principal.

The DSP in each Academy is a member of their Senior Leadership Team.
The main responsibilities of the designated senior person are:

- Managing referrals from staff or others.
- Consider next steps, if any, following a referral including:
    1. managing any support for the child internally via the pastoral support processes, including considering where doing so does not place the child at additional risk and whether the designated safeguarding lead (or a deputy) should inform parents or carers to further support the child's wellbeing
    2. undertaking a family help assessment, or
    3. making a referral to statutory services, for example as the child could be in need, is in need or is suffering, or likely to suffer harm.
- Working with other staff (especially pastoral support staff, school nurses, IT Technicians, and SENCOs and, where applicable, Mental Health First Aiders) on matters of safety and safeguarding (including online and digital safety e.g. technical aspects of the filtering and monitoring system) and when deciding whether to make a referral by liaising with relevant agencies.
- Training of staff.
- Raising awareness.

The DSP will also:

- keep the Principal informed of any issues,
- liaise with local authority case managers and designated officers for child protection concerns as appropriate,
- discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies,
- have a good understanding of harmful sexual behaviours,
- be confident that they 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, and
- understand the online filtering and monitoring systems used in their academy, monitoring it and training others to understand it as part of the academy induction process.

The job description for the DSP giving detail of the role and responsibilities is provided in **Appendix C1.**

Other Key Personnel

Each Trust Academy has more than one trained person so that procedures continue and children are supported in the absence of the DSP. These are named as Deputy Designated Senior Leads on the front of this policy document.

The Staff

Everyone who comes into contact with children and their families has a role to play in safeguarding children.

The Teacher Standards state that teachers should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

All staff, including supply teachers and other visiting staff (e.g. school nurses) and those supporting Academy trips, will be informed of the DSP and other trained staff and the Academy's policy for the protection of children:

- during their first induction to the Trust,
- through receiving a copy of this policy and ensuring it has been understood,
- through the staff portal/Academy & Trust websites, and
- whole staff training or briefing meetings.

All staff are expected to be committed to promoting an ethos where children can talk freely and where staff can share their concerns, in the belief that they will be listened to and their concerns taken seriously, and appropriate action taken. All staff need to be alert to the signs of harm and abuse. Form tutors, class teachers and support staff have a key role in overseeing the care of children in their groups as they have daily contact with them. Physical Education and Performing Arts teachers are in roles that may provide increased opportunity to be alert to changes in pupil's behaviour or physical signs of abuse. They should report any concerns if not immediately, as soon as possible, that day to the Designated Senior Person. If in any doubt they should consult with the DSP.

C2. Communications and Accountability

Actions by the DSP or other responsible person

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

- Provide advice and support to other staff on child welfare and child protection matters.
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so.
- Contribute to the assessment of children.
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly.
- The DSL will also keep the Principal informed of any issues and liaise with Local Authority case managers and Designated Officers for child protection concerns as appropriate.

Following any information raising concern, the DSP will consider:

- any urgent medical needs of the child,
- discussing the matter with other agencies involved with the family and gathering all information from other members of staff etc. This include the police – reference can be made to **NPCC – When to call the police** guidance,

- consulting with appropriate persons e.g. Social Care, and
- the child's wishes.

Then decide

- wherever possible, to talk to parents/carers, unless to do so may place a child at risk of significant harm, impede any police investigation and/or place the member of staff or others at risk, and
- whether to make a child protection referral to Social Care because a child is suffering or is likely to suffer significant harm and if this needs to be undertaken immediately using the online Referral Form (action by DSP).

Report a concern - Help and protection for children (nctrust.co.uk)
By completing the online referral form - Make a children's referral to Northamptonshire's MASH - Online form

OR

- not to make a referral at this stage if further monitoring is necessary, or
- if it would be appropriate to undertake an assessment (e.g. EHA) and/or make a referral for other services.

All information and actions taken, including the reasons for any decisions made, will be fully documented. All referrals to Social Care will be made using the online referral systemor via telephone . Records should be kept on CPOMs or MyConcern of all referrals made.

The DSP should

- ensure that all staff involved have completed the appropriate documentation/CPOMs or MyConcern entry.
- complete a **CPOMs or MyConcern entry or Child Protection Record of Concern form (Appendix A3**).
- ensure actions taken, referrals made and further actions should be recorded on the **Record of Action (Appendix A8 or CPOMs or MyConcern).**
- Ensure that once a referral has been made it is actioned by the appropriate team.

Further notes and guidance on record keeping can be found on the Data Protection pages of the Trust website.

C3. Action following a Child Protection Referral

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

- make regular contact with Social Care Referral Team.
- Wherever possible, contribute to the Strategy Discussion.
- Provide a report for, attend and contribute to any subsequent Child Protection Conference.
- If the child or children become subject to a Child Protection Plan contribute to the Plan and attend Core Group Meetings and Review Child Protection Conferences.
- Where possible, share all reports with parents/carers prior to meetings.
- Where in disagreement with a decision made e.g. not to apply child protection procedures or not to convene a Child Protection conference, attempts should

be made to address issues via line management. Advice can also be sought from Strategic Managers at NNC Social Care or by following the escalation policy set of on the NCSP website.

- Where a child on the child protection register moves from the Academy or goes missing, immediately inform the key worker in Social Care.

Accurate records using the Trust's pro-forma or CPOMs or MyConcern will be made as soon as practicable and will clearly distinguish between observation, fact, opinion and hypothesis. All records will be signed and dated, any information given will be recorded verbatim where possible and a note made of the location and description of any injuries seen.

All Child Protection documents will be retained on CPOMs or MyConcern or in a Child Protection' file, separate to the child's main file. This will be locked away and only accessible to the CEO, Principal, and Designated Senior Person. These records will be copied and transferred to any Academy or school setting the child moves to, clearly marked 'Child Protection, Confidential, for attention of Designated Person Child Protection.'

Information sharing

Information sharing is vital in identifying and tackling all forms of abuse. As part of meeting a child's needs, it is important we recognise the importance of information sharing between professionals and local agencies. This should include ensuring arrangements are in place that set out clearly the process and principles for sharing information. **See Appendix C2 Flow Chart.**

Further details on information sharing can be found in Chapter 1 of Working *together to safeguard children 2026* and at *Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers*.

The seven golden rules for sharing information are:

1. Remember that data protection legislation and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from other practitioners if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. Share with informed consent where appropriate and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, there is good reason to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be certain of the basis upon which you are doing so. Where you have consent, be mindful that an individual might not expect information to be shared.

5. Consider safety and well-being: Base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. Information shared must be necessary, proportionate, relevant, adequate, accurate, timely and secure: Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely (see principles).
7. Keep a signed and dated record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

If you are in any doubt about whether to disclose information then seek advice from the DSP or the Trust's Data Protection Officer and reference to the Data Protection in Schools toolkit.

Whilst, among other obligations, the Data Protection Act 2018 places duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure, this is **not** a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm.
Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

The DSP should ensure a child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained.

The DSP should ensure key staff such as Deputy DSP or SENCo are aware of new files that have arrived as a lack of information about their circumstances can impact on the child's safety, welfare and educational outcomes.

The DSP should consider if it would be appropriate to share any additional information with the new setting in advance of a child leaving, to help them put in place the right support to safeguard this child and to help the child thrive in the school. For example, information that would allow the new setting to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives. It is good practice in serious cases for the DSP in both settings to talk together.

Children suffering or likely to suffer significant harm

Local authorities, with the help of other organisations as appropriate, have a duty to make enquires under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation or other so-called honour based abuse, and extra familial harm like radicalisation and sexual exploitation.

What will the local authority do?

The local authority should make a decision, within one working day of a referral being made, about the type of response that is required and should let the referrer know the outcome. This will include determining whether:

- the child requires immediate protection and urgent action is required,
- whether the child is in need, and should be assessed under section 17,
- there is reasonable cause to suspect the child is suffering, or likely to suffer, significant harm, and whether enquiries must be made and the child assessed under section 47,
- any services are required by the child and family and what type of services, and
- further specialist assessments are required in order to help the local authority to decide what further action to take.

The referrer should follow up if this information is not forthcoming. If social workers decide to carry out a statutory assessment, staff should do everything they can to support that assessment (supported by the designated safeguarding lead (or deputy) as required).

If, after a referral, the child's situation does not appear to be improving, the referrer should consider following local escalation procedures to ensure their concerns have been addressed and, most importantly, that the child's situation improves.

Children staying with host families (homestay)

Schools and academies quite often make arrangements for their children to have learning experiences where, for short periods, the children may be provided with care and accommodation by a host family to whom they are not related. This might happen, for example, as part of a foreign exchange visit or sports tour, often described as 'homestay' arrangements (see KCSIE September 2026 paragraphs 408 to 413 for further details). In some circumstances the arrangement where children stay with UK families could amount to "private fostering" under the Children Act 1989 see KCSIE 2026 paragraphs 414-417 for further information about action that should be taken to alert the local authority in those circumstances.

Private fostering- LA notification when identified

Private fostering occurs when a child under the age of 16 (under 18, if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home.

A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Such arrangements may come to the attention of school staff through the normal course of their interaction, and promotion of learning activities, with children.

The academy should then notify the local authority to allow the local authority to check the arrangement is suitable and safe for the child. A link to comprehensive guidance on the circumstances in which private fostering may arise can be found in paragraphs 340-343 of KCSIE 2026.

The **Children (Private Arrangements for Fostering) Regulations 2005** replaced the *Children (Private Arrangements for Fostering) Regulations 1991* and the National Minimum Standards for Private Fostering (NMS) issued under **section 7 of the Local Authority Social Services Act 1970** are key pieces of legislation governing the area of private fostering. A comprehensive guide can be found at **https://www.gov.uk/government/publications/children-act-1989-private-fostering**

Contextual safeguarding (also referred to as extra familial harm)

Safeguarding incidents and/or behaviours can be associated with factors outside the Academy and/or can occur between children outside the Academy. All staff, but especially the DSP (or deputy) should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

Extra familial harm of children take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse - including physical, sexual, emotional abuse, and stalking), criminal exploitation (including financial exploitation), serious youth violence, county lines and radicalisation.

The Trust recognises that exploitation frequently occurs outside the family home and may arise within peer groups, local communities, online environments or organised criminal networks.

Children's social care assessments should consider such factors so it is important that schools provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

Additional information regarding contextual safeguarding is available in the Trust website.

Record keeping

All academies must be able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc.

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. If in doubt about recording requirements, staff should discuss with the DSP (or deputy).

Records should include:
- a front page or pinned chronology with 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.

It is important for children to receive the right help at the right time to address risks and prevent issues escalating. Research and serious case reviews have repeatedly shown the dangers of failing to take effective action. Examples of this poor practice include:

- failing to act on and refer the early signs of abuse and neglect,
- poor record keeping,
- failing to listen to the views of the child,
- not recording the exact words of the child but translating these into professional language,
- failing to re-assess concerns when situations do not improve,
- not sharing information,
- sharing information too slowly, and
- a lack of challenge to those who appear not to be taking action.

The Principal and DSP will meet regularly to exchange information and for the DSPs to keep the CEO informed of Child Protection issues within the Trust academies. Other staff will be informed of issues on a 'need to know' basis but usual practice is that information will be kept confidential between the CEO, Principal, and DSP.

The Principal will use the regular meeting time to check procedures with the DSP and their performance in role. The Principal is accountable to the CEO. The CEO is accountable to the Board of Directors.

The DSP in each academy has a senior post in the Academy and the designated time and authority to carry out the duties required of the post.

C4. Virtual School Heads (VSH)

VSH manage pupil premium plus for looked after children and promotes the education of children with a social worker and children in kinship care. For pupil premium plus children they receive this funding based on the latest published number of children looked after by the local authority. The DSP should work with the designated teacher for LAC or VSH to discuss how funding can be best used to support the progress of looked after children in the Academy and meet the needs identified in the child's personal education plan.

The DSP should also work with the VSH to promote the educational achievement of previously looked after children.

As with designated teachers, on commencement of sections 4 to 6 of the Children and Social Work Act 2017, VSH have responsibilities towards children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England or Wales. Their primary role for this group will be the provision of information and advice to relevant parties.

Statutory guidance on "**Promoting the education of looked after children**" contains further information on the roles and responsibilities of virtual school heads.

VSH have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils in kinship care and with a social worker. Recognising attendance as a key factor in safeguarding, VSH should work with local authorities to set and report on ambitious targets to improve their attendance.

Non-statutory guidance on promoting the education of children with a social worker contains further information on the roles and responsibilities of VSH.

C5. Actions by the DSP or other senior person following a report of sexual violence or harassment between children

Sexual violence and sexual harassment can occur between two children of any age and sex, from primary through to secondary stage. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. All staff working with children are advised to maintain an attitude of 'it could happen here'.

The initial response to a report from a child is incredibly important. How a member of staff responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward.

It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward and that they will be supported and kept safe. Abuse that occurs online or outside of the school should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report or their experience minimised. Staff should explain that the law exists to protect children and young people, not criminalise them, and should do so in such a way that is reassuring and avoids alarming or distressing them.

If a victim asks the DSL or other safeguarding staff not to tell anyone about the sexual violence or sexual harassment:

- There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies.
- The DSL will have to balance the victim's wishes against their duty to protect the victim and other children.

The DSL should consider that:

- Parents or carers should normally be informed (unless this would put the victim at greater risk).
- The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care.
- Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains in place.

Regarding anonymity, all staff will:

- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system.

- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved.
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.

Steps to take
The following steps must be undertaken by a DSP who has undertaken designated person safeguarding training.

Step 1: Investigate the Facts
If possible, managing reports with two members of staff present, (preferably one of them being the DSP or a deputy). However, this might not always be possible.

Speak to all children involved separately, gain a statement of the facts from them individually and use consistent language and open questions for each account (e.g. ask the young person to tell you what happened). Do not interrupt them unless to gain clarity with open questions e.g. when, why where, who.

Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made. The record must contain the exact words said by the child and these should not be altered in any way.

Where the report includes an online element, being aware of searching screening and confiscation advice (for schools) and UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people. **The key consideration is for staff not to view or forward illegal images of a child.** The highlighted advice provides more details on what to do when viewing an image is unavoidable. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection.

Step 2: Consider the intent (begin to risk assess)
Consider whether the evidence suggests that this has been a deliberate or contrived situation for one young person to harm another.

Step 3: Deciding on a course of action (Designated Safeguarding Person only)
If from the information gathered the Designated Safeguarding Person believes that any young person is at risk of significant harm, a safeguarding referral to social services must be made immediately. Furthermore, where you believe that a crime has been committed, the Police must be contacted. It is essential to retain and preserve all evidence gathered in a secure place.

Social Services and the Police will then advise on next steps, which may include the interviewing of young people in school or they may wish to meet with parents.

In circumstances where social services feel that it does not meet their threshold criteria, then the DSP should consider whether that decision should be challenged with that individual or their line manager. If you agree with their view, then it will be left to the Academy to inform the parents.

Step 4: Informing parents/carers
If, once appropriate advice has been sought from Police/Social services, there is agreement to inform parents/carers, then the DSP / Senior Leader must inform the parents as soon as possible, if the Police and Social Services have not already done so. If other agencies or services are not going to be involved, then you should share this information with the parents. Advice should be sought from relevant Trust or LA professionals as necessary.

In all circumstances where the risk of harm to the child is evident, then the Academy should encourage the young person to share the information. Where the child still does not wish to share this information with parents/carers, and where the Academy can evidence that it is acting in the best interests of the young person, then parents should be informed.

It is advised that parents/carers are informed face to face. Whilst more time consuming, the nature of abusive incidents can cause fear and anxiety for parents/carers and a face to face meeting will provide more reassurance.

Step 5: Recording the Whole Incident
The DSP or Senior Leader should record all details of the incident on CPOMs or MyConcern and **the pro-forma in Appendix C3 and C4.**

Other points to consider
a) What is the age of children involved
Consider how old the children are and any age difference between them. In relation to sexual exploitation, children under the age of five who may be learning toileting skills may show a particular interest in exploration. This should not be overlooked if other issues arise.

b) Where did the incident(s) take place?
Was the incident in an open, visible space to others? Were there witnesses or CCTV cameras in the vicinity? If not, is this an area where more supervision is required on the Academy premises.

c) What was the explanation by all children involved of what occurred?
Did all children involved give the same explanation? Do their stories corroborate? What is the effect on the young people involved? Is/are the incident(s) considered to be bullying (regular and repetitive). If their stories differ, what might the reasons for this be?

d) What is each of the children's understanding of what occurred?
Consider whether the young people know and understand what they are doing e.g. do they have knowledge of body parts, of privacy and that it is inappropriate to touch? Is the young person's explanation in relation to something they may have seen or heard that has prompted this behaviour? Is the behaviour deliberate and contrived? If there is an age difference, is one child's understanding more mature than the other? Does the young person understand the impact of their behaviour on the other person?

Answers to the above questions are rarely clear cut. It is advised to seek support and advice from Children's Service Social Care if you are concerned or unsure as to whether or not there is any risk involved.

e) Repetition
Has the school had previous reports of similar/repeated behaviours for the young person. It must also be monitored whether the behaviour persists after the issue has been discussed and resolved.

Risk Assessment

When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. A HAT risk assessment for incidents of sexual harassment, violence and abuse is available via your academy DSP.

The risk and needs assessment should consider:

- the victim, especially their protection and support,
- where there may have been other victims,
- the alleged perpetrator, and
- all the other children (and, if appropriate, adult students and staff) at the Academy, especially any actions that are appropriate to protect them.

Risk assessments should be recorded (written or electronic) and should be kept under review. At all times, the Academy should be actively considering the risks posed to all their children and students and putting adequate measures in place to protect them and keep them safe.

The DSP (or a deputy) should ensure they are engaging with children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required. The risk assessment is not intended to replace the detailed assessments of expert professionals. Any such professional assessments should be used to inform the approach taken by the academy to supporting and protecting their children and students and updating their own risk assessment.

Options for the DSP to manage a child on child abuse report

It is important that you consider every report on a case-by-case basis. When to inform the alleged perpetrator will be a decision that should be carefully considered. Where a report is going to be made to children's social care and/or the police, then, as a general rule, the Academy should speak to the relevant agency and discuss next steps and how the alleged perpetrator will be informed of the allegations. However, as per general safeguarding principles, this does not and should not stop the Academy taking immediate action to safeguard their children, where required.

Whilst any report of sexual violence or sexual harassment should be taken seriously, staff should be aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys.

There are four likely scenarios for staff to consider when managing any reports of sexual violence and/or sexual harassment. It will be important in all scenarios that decisions and actions are regularly reviewed and that relevant policies are updated to reflect lessons learnt. It is particularly important to look out for potential patterns of concerning, problematic or inappropriate behaviour. Where a pattern is identified, the Academy (DSP and Senior Leader) should decide on a course of action. Consideration should be given to whether there are wider cultural issues within the Academy that enabled the inappropriate behaviour to occur and where appropriate extra teaching time and/or staff training could be delivered to minimise the risk of it happening again.

Whatever the response, it should be under-pinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated. All staff working with children are advised to maintain an attitude of 'it could happen here'.

• All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

1. Manage internally

- In some cases of sexual harassment, for example, one-off incidents, the Academy may take the view that the children concerned are not in need of early help or statutory intervention and that it would be appropriate to handle the incident internally, perhaps through utilising their behaviour and bullying policies and by providing pastoral support.

2. Early help

- The Academy may decide that the children involved do not require statutory interventions, but may benefit from early help. Early help means support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse.
  Providing early help is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address non-violent harmful sexual behaviour and may prevent escalation of sexual violence.
- Multi-agency early help will work best when placed alongside strong policies, preventative education and **engagement with parents and carers.**
- Early help and the option to manage a report internally do not need to be mutually exclusive. They could be managed internally and seek early help for both the victim and perpetrator(s).

3. Referrals to children's social care

- Where a child has been harmed, is at risk of harm, or is in immediate risk of harm, academies should make a referral to local children's social care.
- At the referral to children's social care stage, the Academy will generally inform parents or carers, unless there are compelling reasons not to (if informing a parent or carer is going to put the child at additional risk). Any such decision should be made with the support of children's social care.
- If a referral is made, children's social care will then make enquiries to determine whether any of the children involved are in need of protection or other services.
- Where statutory assessments are appropriate, the Academy should be working alongside, and cooperating with, the relevant lead social worker. Collaborative working will help ensure the best possible package of coordinated support is

implemented for the victim and, where appropriate, the alleged perpetrator and any other children that require support.

- Do not wait for the outcome (or even the start) of a children's social care investigation before protecting the victim and other children in the Academy. It will be important for the DSP (or a deputy) to work closely with children's social care (and other agencies as required) to ensure any actions the Academy takes do not jeopardise a statutory investigation. The risk assessment will help inform any decision. Consideration of safeguarding the victim, alleged perpetrator, any other children directly involved in the safeguarding report and all children at the Academy should be immediate.
- In some cases, children's social care will review the evidence and decide a statutory intervention is not appropriate. The Academy (generally led by the DSP or a deputy) should be prepared to refer again if they believe the child remains in immediate danger or at risk of harm. If a statutory assessment is not appropriate, the DSP (or a deputy) should consider other support mechanisms such as early help, specialist support and pastoral support.

4. Reporting to the Police

- Any report to the police will generally be in parallel with a referral to children's social care (as above).
- It is important that the DSP (and their deputies) is clear about the process for referrals and follow that process.
- Where a report of rape, assault by penetration or sexual assault is made, the starting point is that this must be passed on to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of reporting to the police remains. The police will take a welfare, rather than a criminal justice, approach.
- Where a report has been made to the police, the school should consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator and their parents or carers. They should also discuss the best way to protect the victim and their anonymity.
- At this stage, the Academy will generally inform parents or carers unless there are compelling reasons not to, for example, if informing a parent or carer is likely to put a child at additional risk. In circumstances where parents or carers have not been informed, it will be especially important that the school supporting the child in any decision they take. This should be with the support of children's social care and any appropriate specialist agencies.
- All police forces in England have specialist units that investigate child abuse. The names and structures of these units are matters for local forces. It will be important that the DSP (and their deputies) is aware of their local arrangements.
- In some cases, it may become clear very quickly, that the police (for whatever reason) will not take further action. In such circumstances, it is important that the Academy continues to engage with specialist support for the victim as required.
- Whilst protecting children and/or taking any disciplinary measures against the alleged perpetrator(s), it will be important for the DSP (or a deputy) to work closely with the police (and other agencies as required), to ensure any actions the Academy take do not jeopardise the police investigation.
- If the Academy has questions about the investigation, they should ask the police. The police will help and support the school
- as much as they can (within the constraints of any legal restrictions)

Considering bail conditions

- From April 2017, the use of police bail has been dramatically reduced and will only be used when deemed necessary and proportionate in exceptional circumstances. Consideration will be given to less invasive options to safeguard victims and witnesses and the administration of justice. Therefore, it is less likely that a child attending school will be on police bail with conditions attached if there are alternative measures to mitigate any risk.
- In the absence of bail conditions, when there is a criminal investigation, early engagement and joined up working between the school, children's social care and the police will be critical to support the victim, alleged perpetrator and other children involved (especially potential witnesses). Where required, advice from the police should be sought in order to help the Academy manage their safeguarding responsibilities.
- The term 'Released Under Investigation' or 'RUI' will replace those previously on bail for offences in circumstances that do not warrant the application of bail to either re-attend on a particular date or to include conditions preventing activity or in some cases ensuring compliance with an administrative process.
- Where bail is deemed proportionate and necessary, the school should work with children's social care and the police to manage any implications and safeguard their children. An important consideration will be to ensure that the victim can continue in their normal routine, including continuing to receive a suitable education.

Managing any delays in the criminal process

- There may be delays in any case that is being progressed through the criminal justice system. Do not wait for the outcome (or even the start) of a police investigation before protecting the victim, alleged perpetrator and other children in the Academy. The risk assessment will help.
- Whilst protecting children and/or taking any disciplinary measures against the alleged perpetrator, it will be important for the DSP (or a deputy) to work closely with the police (and other agencies as required), to ensure any actions the Academy takes do not jeopardise the police investigation.

The end of the criminal process

- If a child is convicted or receives a caution for a sexual offence, the Academy should update its risk assessment, ensure relevant protections are in place for all the children at the Academy and, if it has not already, consider any suitable action in light of their behaviour policy. If the perpetrator remains in the Academy as the victim, the Academy should be very clear as to their expectations regarding the perpetrator now they have been convicted or cautioned. This could include expectations regarding their behaviour and any restrictions the Academy thinks are reasonable and proportionate with regard to the perpetrator's timetable.
- Any conviction (even with legal anonymity reporting restrictions) is potentially going to generate interest among other children. It will be important that the Academy ensures both the victim and alleged perpetrator remain protected, especially from any bullying or harassment (including online).

- Where cases are classified as "No Further Action" (NFA) by the police or Crown Prosecution Service, or where there is a not guilty verdict, the Academy should continue to offer support to the victim and the alleged perpetrator 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 does not necessarily mean that it was unfounded. The Academy should discuss any decisions with the victim in this light and continue to offer support. The alleged perpetrator is also likely to require ongoing support for what will have likely been a difficult experience.

5. Ongoing response

Safeguarding and supporting the victim

The following principles are based on effective safeguarding practice and should help shape any decisions regarding safeguarding and supporting the victim.

- Consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse. Be aware that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator.
- The needs and wishes of the victim should be paramount (along with protecting the child) in any response. It is important they feel in as much control of the process as is reasonably possible. Wherever possible, the victim, if they wish, should be able to continue in their normal routine. Overall, the priority should be to make the victim's daily experience as normal as possible, so that the Academy is creating a culture of safety for them.
- The victim should never be made to feel they are the problem for making a report or made to feel ashamed for making a report.
- Consider the proportionality of the response. Support should be tailored on a case-by-case basis. The support required regarding a one-off incident of sexualised name-calling is likely to be vastly different from that for a report of rape.
- The Academy should be aware that sexual assault can result in a range of health needs, including physical, mental, and sexual health problems and unwanted pregnancy. Children and young people that have a health need arising from sexual assault or abuse can access specialist NHS support from a Sexual Assault Referral Centre113 (SARC). SARCs offer confidential and non-judgemental support to victims and survivors of sexual assault and abuse. They provide medical, practical, and emotional care and advice to all children and adults, regardless of when the incident occurred.

Support can include:

- Children and Young People's Independent Sexual Violence Advisors (ChISVAs) provide emotional and practical support for victims of sexual violence. They are based within the specialist sexual violence sector and will help the victim understand what their options are and how the criminal justice process works if they have reported or are considering reporting to the police. ChISVAs will work in partnership with academies to ensure the best possible outcomes for the victim.
- Police and social care agencies can signpost to ChISVA services (where available) or referrals can be made directly to the ChISVA service by the young

person or Academy. Contact details for ChISVAs can be found at Rape Crisis and The Survivors Trust.

- The Lucy Faithfull Foundation in collaboration with the Home Office, has developed 'Shore Space', an online resource which works to prevent harmful sexual behaviour. Shore Space offers a confidential chat service supporting young people who are concerned about their own or someone else's sexual thoughts and behaviour.
- Child and adolescent mental health services (CAMHS)
- Rape Crisis Centre's can provide therapeutic support for children who have experienced sexual violence.
- Internet Watch Foundation (to potentially remove illegal images).
- The NHS.
- The specialist sexual violence sector can provide therapeutic support for children who have experienced sexual violence. Contact Rape Crisis (England & Wales) or The Survivors Trust for details of local specialist organisations. The Male Survivors Partnership can provide details of services which specialise in supporting men and boys.
- Childline / IWF: Remove a nude image shared online Report Remove is a free tool that allows children to report nude or sexual images and videos of themselves that they think might have been shared online, to see if they can be removed from the internet.
- Childline provides free and confidential advice for children and young people.

Victims may not disclose the whole picture immediately. They may be more comfortable providing information on a piecemeal basis. It is essential that dialogue is kept open and encouraged. When it is clear that ongoing support will be required, academies should ask the victim if they would find it helpful to have a designated trusted adult (for example, their form tutor or designated safeguarding lead) to talk to about their needs.

The choice of any such adult should be the victim's. You should respect and support this choice.

A victim of sexual violence is likely to be traumatised and, in some cases, may struggle in a normal classroom environment. While the school should avoid any action that would have the effect of isolating the victim, in particular from supportive peer groups, there may be times when the victim finds it difficult to maintain a full-time timetable and may express a wish to withdraw from lessons and activities. This should be because the victim wants to, not because it makes it easier to manage the situation. If required, provide a physical space for victims to withdraw.

It may be necessary to maintain arrangements to protect and support the victim for a long time. Academies should be prepared for this and should work with children's social care and other agencies as required.

It is important that the Academy do everything they reasonably can to protect the victim from bullying and harassment as a result of any report they have made.

Whilst they should be given all the necessary support to remain in their Academy, if the trauma results in the victim being unable to do this, alternative provision or a move to another school should be considered to enable them to continue to receive suitable education. This should only be at the request of the victim (and following discussion with

their parents or carers). Appendix C3 provides a framework for consideration of how to manage the situation within the Academy.

It is important that if the victim does move to another educational institution (for any reason), that the new educational institution is made aware of any ongoing support needs. The DSP should take responsibility to ensure this happens (and should discuss with the victim and, where appropriate their parents or carers as to the most suitable way of doing this) as well as transferring the child protection file. Information sharing advice will help support this process.

Once the DSP (or a deputy) has decided what the next steps will be in terms of progressing the report, they should consider again the question of the victim and alleged perpetrator sharing classes and sharing space at the Academy. This will inevitably involve complex and difficult professional decisions, including considering their duty to safeguard children and their duty to educate them. It is important each report is considered on a case-by-case basis and risk assessments are updated as appropriate.

As always, when concerned about the welfare of a child, the best interests of the child should come first. In all cases, academies should follow general safeguarding principles as per this policy.

Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator should be removed from any classes they share with the victim. The Academy should also consider how best to keep the victim and alleged perpetrator a reasonable distance apart on school premises and on transport to and from school where appropriate. This is in the best interests of both children and should not be perceived to be a judgement on the guilt of the alleged perpetrator. Close liaison with the police is essential.

Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, the Academy should take suitable action, if they have not already done so. In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and lead to the view that allowing the perpetrator to remain in the same Academy would seriously harm the education or welfare of the victim (and potentially other children or students).

Where a criminal investigation into sexual assault leads to a conviction or caution, the Academy should, if it has not already, consider any suitable sanctions in light of their behaviour policy, including consideration of permanent exclusion.

Where the perpetrator is going to remain at the Academy, the principle would be to continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on Academy premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases. In all cases, the school should record and be able to justify their decision making. Reports of sexual assault and sexual harassment will, in some cases, not lead to a report to the police (for a variety of reasons). In some cases, rape, assault by penetration, sexual assault or sexual harassment are reported to the police and the case is not progressed or are reported to the police and ultimately result in a not guilty verdict. None of this means the offence did not happen or that the victim lied. The process will have affected both victim and alleged perpetrator. Appropriate support should be provided to both as required and

consideration given to sharing classes and potential contact as required on a case-by-case basis. In all cases, the Academy should record and be able to justify their decision-making.

All of the above should be considered with the needs and wishes of the victim at the heart of the process (supported by parents and carers as required). Any arrangements should be kept under review.

The DSL should also recognise the importance of understanding intra familial harms and any necessary support for siblings following incidents of sexual violence or sexual harassment.

Safeguarding and supporting the alleged perpetrator

The following principles are based on effective safeguarding practice and should help shape any decisions regarding safeguarding and supporting the alleged perpetrator.

The Academy will have a difficult balancing act to consider. On one hand they need to safeguard the victim(s) (and the wider pupil/student body) and on the other hand provide the alleged perpetrator with an education, safeguarding support as appropriate and implement any disciplinary sanctions.

Consider the age and the developmental stage of the alleged perpetrator and nature of the allegations. Any child will likely experience stress as a result of being the subject of allegations and/or negative reactions by their peers to the allegations against them.

Consider the proportionality of the response. Support (and sanctions) should be considered on a case-by-case basis. An alleged perpetrator may potentially have unmet needs (in some cases these may be considerable) as well as potentially posing a risk of harm to other children. Harmful sexual behaviours in young children may be (and often are) a symptom of either their own abuse or exposure to abusive practices and or materials. Advice should be taken, as appropriate, from children's social care, specialist sexual violence services and the police.

It is important that if the alleged perpetrator does move to another educational institution (for any reason), that the new educational institution is made aware of any ongoing support needs and where appropriate, potential risks to other children and staff.

Unsubstantiated, unfounded, false or malicious reports

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing.

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified, and addressed.

If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSP should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate.

If a report is shown to be deliberately invented or malicious, the Academy, should consider whether any disciplinary action is appropriate against the individual who made it as per the Behaviour Policy of each academy.

C6. Action by the DSP, Principal or CEO on receiving concerns or allegations against staff

Concerns or allegations concerning adults working for or on behalf of the Trust will be managed in accordance with the Trust's Managing Allegations Against Staff Policy. Any concern that may meet the harm threshold must be reported immediately to the Principal (or CEO/Chair as appropriate). Staff must not investigate allegations themselves.

It is essential that all allegations are taken seriously and investigated properly and in line with agreed procedures set out in the HAT Managing Allegations Against Staff Policy.

Initial Action

- The person who has received a concern or an allegation or witnessed an event will immediately inform the Principal and make a record.
- In the event that a concern or an allegation is made against the CEO the matter will be reported to the Chair of the Board of Directors.
- The Principal and CEO will take steps, where necessary, to secure the immediate safety of children and any urgent medical needs.
- The member of staff will not be approached at this stage unless it is necessary to address the **immediate** safety of children.
- The Principal/ CEO may need to clarify any information regarding the concern or allegation, however no person will be interviewed at this stage.
- The DSP or Principal will consult with the Local Authority Designated Officer (see Contacts List) in order to determine if it is appropriate for the concern or allegation to be dealt with by the Academy or if there needs to be a referral to Social Care and/or the police for investigation.
- Consideration will be given throughout to the support and information needs of students, parents/carers and staff.
- The CEO will inform the Chair of Board of Directors of any allegation made.

C7. Confidentiality and Information Sharing

Staff are referred to the Trust's separate document 'Information Sharing guidance'

All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the pupil and staff involved but also to ensure that being released into the public domain does not compromise evidence.

Staff should only discuss concerns with the DSP, the CEO, Principal, or the Chair of the Board of Directors (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

Child protection information will be stored and handled in line with the General Data Protection Regulation (GDPR) and Data Protection Act 2018 principles. Information is:

- processed for limited purposes,
- adequate, relevant and not excessive,
- accurate,
- kept no longer than necessary,
- processed in accordance with the data subject's rights, and
- secure.

Record of concern forms and other written information will be stored in a locked facility and any electronic information will be password protected and only made available to relevant individuals.

Every effort should be made to prevent unauthorised access and sensitive information should not be stored on laptop computers, which, by the nature of their portability, could be lost or stolen. Child protection information will be stored separately from the pupil's Academy file and the Academy file will be 'tagged' to indicate that separate information is held.

Child protection records are normally exempt from the disclosure provisions of the GDPR and Data Protection Act 2018, which means that children and parents do not have an automatic right to see them. If any member of staff receives a request from a pupil or parent/carer to see child protection records, they should refer the request to the DSP.

The Data Protection Act 2018 does not prevent Academy staff from sharing information with relevant agencies, where that information may help to protect a child. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children in a timely fashion. Further details to support staff with information sharing can be found in **Data protection: toolkit for schools**

When a pupil transfers to another setting
If the pupil is on the child protection register, their Social Worker will be contacted by the DSP and informed of the transfer.

When the child changes schools within the authority, the child protection file should be transferred to the designated teacher at the receiving school as soon as possible, ensuring secure transit, and confirmation of receipt should be obtained. For schools, this should be transferred separately from the main pupil file.

When the child is moving to another authority, information will be passed onto the next school's designated teacher as soon as possible, ensuring secure transit, and confirmation of receipt should be obtained. Case conference minutes are not transferred but the date, name of Chair, LA and outcome will be included on the records transferred. Any CP or CIN plan issued must be transferred with the record.

Case conferences and core group meetings
In each case the Academy will assign the appropriate member of staff to attend a Child Protection Case Conference. This member of staff will normally be the DSP.

The DSP should prepare a report presenting the case to the Case Conference Chair at the start of the meeting.

The Chair will gather all information and assess the risks. The DSP will be asked for their view in respect of registration.

If a child's name is placed on the local Child Protection Register a Core Group will be agreed. All Core Group members meet regularly. Attendance at these meetings will be given priority.

Where no registration has taken place schools may be asked to monitor, it is the school's responsibility to ask for clarity about information required, timescales, and reporting methods.

C8. Support for those involved in a Child Protection issue

Child abuse is devastating for the child and can also result in distress and anxiety for staff who become involved.

Overall support

This is provided by:

- Taking all suspicions and disclosures seriously.
- Nominating a link person who will keep all parties informed and be the central point of contact. This will usually be the DSP.
- Where a member of staff is the subject of an allegation made by a pupil, separate link people will be nominated to avoid any conflict of interest.
- Responding sympathetically to any request from children or staff for time out to deal with distress or anxiety.
- Maintaining confidentiality and sharing information on a need to know basis only with relevant individuals and agencies (see the Trust website for further guidance).
- Storing records securely.
- Offering details of help-lines, counselling or other external support.
- Following the procedures laid down in the HAT whistle-blowing, complaints and disciplinary policies and procedures.
- Cooperating fully with relevant statutory agencies.

Support for Children and families

The Trust recognises that children who are abused or who witness violence may find it difficult to develop a sense of self-worth and to view the world in a positive way. The Academy may be the only stable, secure and predictable element in the lives of children at risk.

Therefore, this Trust will endeavour to support children through:

- the curriculum to encourage self-esteem and self-motivation,
- the Trust and Academy ethos, which promotes a positive, supportive and secure environment and which gives all children and adults a sense of being respected and valued,
- the implementation of each Academy's behaviour management policies,
- a consistent approach, which recognises and separates the cause of the behaviour from that which the pupil displays,
- regular liaison with other professionals and agencies who support children and their families,

- a commitment to develop productive, supportive relationships with parents/carers, whenever it is in the pupil's interests to do so,
- teaching them how to stay safe when working online at home, and
- the development and support of a responsive and knowledgeable staff group trained to respond appropriately in child protection situations.

C9. Preventative Strategies and curriculum provision

A key focus for effective safeguarding is to ensure that our children are aware of our procedures but also are prepared for events that may cause harm as much as possible.

Preventative education is most effective in the context of a whole-school approach that prepares pupils and students for life in modern Britain and creates a culture of zero tolerance for sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict.

Academy staff should foster a culture of openness where young people feel confident to share information about anything that is worrying them. This can be strengthened with a strong and positive age appropriate PHSE / RSHE / Character curriculum (including relationships education in primary academies and sex and relationships education in secondary academies) where children openly discuss issues with peers. The statutory RSHE guidance can be found here: **Statutory guidance: relationships education relationships and sex education (RSE) and health education**.

School programmes will tackle, at an age-appropriate stage, issues such as:

- supporting children to develop the skills that form the building blocks of all positive relationships,
- healthy and respectful relationships,
- boundaries, consent and kindness in relationships,
- stereotyping, prejudice and equality,
- body confidence and self-esteem,
- how to recognise and report concerns about an abusive relationship, including coercive and controlling behaviour,
- the concepts of, and laws relating to all forms of sexual harassment, and abuse, and how to access support,
- what constitutes sexual harassment and sexual violence and why these are always unacceptable, emphasising that it is never the fault of the person experiencing it, and
- understanding online harms such as sharing images, the prevalence of deepfakes, pornography and misogynistic influencers and when and where to seek help.

The DfE has produced a one-stop page for teachers on GOV.UK, which can be accessed here: **Teaching about relationships sex and health**. This includes teacher training modules on the RSHE topics and non-statutory implementation guidance. Trust academies must focus on the development of appropriate strategies to prevent child on child abuse rather than relying on managing incidents in a reactive way as they occur. These will be shared and evaluated at Trust safeguarding meetings.

Academy staff must recognise that all types of abuse and child on child abuse can and will occur in their school regardless of the most stringent policy and support mechanisms.

Staff must recognise and manage the risks, implement strategies and talk about issues through training and information sharing sessions with other staff.

Academy leaders must foster a culture of openness and honesty among their staff to ensure the whole workforce feels confident and enabled to talk about issues and challenge perceptions of young people e.g. inappropriate language, prejudiced behaviour etc.

Academy leaders must put in place programmes for whole staff training and CPD around abusive behaviours and talking to young people to ensure that peer to peer abuse has a consistently high focus in staff minds and to ensure that concerns raised by young people are dealt with consistently.

Academy leaders should ensure that school councils are encouraged to actively participate in the development and review of 'rules of acceptable behaviour' which will aid the creation of a positive and consistent ethos in the school and one where all young people understand the boundaries of behaviour before it becomes abusive.

C10. Staff

Receiving a disclosure or observing signs of abuse can be very distressing. All staff should discuss their feelings with the DSP or a senior member of staff.

Incidents of a child protection nature can affect staff not directly involved. Meetings should be used to support staff in this situation.

Members of staff may be asked to attend a Strategy Meeting. You will need to take any information the Academy may hold.

You may be required to attend a child protection case conference for which you should provide a report. The DSP will be available to support and advise you.

Any member of staff who is concerned about involvement in child protection issues can discuss the matter with the Designated Senior Person, Principal, or the CEO.

Supervision is available to staff who are regularly dealing with complex cases of child protection.

C11. Confidentiality

Staff have a professional responsibility to share relevant information about the protection of children with other professionals, particularly investigating agencies.

If a pupil confides in a member of staff and requests that the information is kept secret, it is important that the member of staff tells the child sensitively that he/she has a responsibility to refer the matter to the Designated Senior Person for the child's own sake. At the same time, the child should be reassured that the matter will only be disclosed to the DSP, who will then decide on appropriate action. However, this course of action may involve discussion with other relevant professionals.

Staff who receive information about children and families in the course of their work should have the information only within a professional context. Child protection records should be kept securely.

Personal information about all children and their families is regarded by those who work in this Trust as confidential. All staff will aim to maintain this confidentiality. All records relating to child protection incidents will be maintained by the DSP and only shared in accordance with the protection of children guidelines.

C12. Parents and Carers

Hatton Academies Trust shares a purpose with parents/carers to keep children safe from harm and to have their welfare promoted. We are committed to working with parents/carers positively, openly, and honestly. We ensure that all parents/carers are treated with respect and courtesy. We encourage parents/carers to discuss any concerns about their child with the relevant Class Teacher, Form Tutor, Phase Leader, Director of Year or another member of the Academy support or pastoral team.

Parents/carers play an important role in protecting their children from abuse. The Trust is required to consider the safety of the pupil and should a concern arise professional advice will be sought prior to contacting parents/carers. The priority is the needs of the child and effective liaison is crucial for this.

The Trust will work with parents/carers to support the needs of their child and ensure that parents/carers are aware of the Trust's child protection and safeguarding work. There is a range of ways we communicate with parents/carers: information leaflets; Academy website; and consultation via "Parents Voice" and questionnaires.

It should be recognised that families from different backgrounds and cultures will have different approaches to raising their children these differences should be acknowledged and respected provided they do not place the child at risk of harm.

The Trust aims to help parents/carers understand that the Trust has a responsibility for the welfare of all its children and has a duty to refer cases to the Social Services in the interests of the child.

This policy, together with all safeguarding policies, is available to parents/carers on the Trust's website and individual Academy websites and in hard copy on request.

C13. Multi-agency working and partnership with others

Northamptonshire Safeguarding Children Partnership (NSCP) is the statutory multi-agency partnership lead by three strategic leads as stipulated in Working Together to Safeguard Children 2026, these being North Northamptonshire Council, West Northamptonshire Council, Northamptonshire Police and Northamptonshire Integrated Care Board. In order to promote the welfare of children and protect them from harm, we aim to work closely and collaboratively with local and national agencies such as: Local Authority; Social Care; Police; Education Welfare Service, Health, Prevent Team and local community groups.

Further details regarding the purpose and values of NSCP can be found at **http://www.northamptonshirescb.org.uk/about-northamptonshire-safeguarding-children-partnership/the-partnership/**

C14. Complaints Procedure

Our complaints procedure will be followed where a pupil or parent/carer raises a concern about poor practice toward a pupil that initially does not reach the threshold for child protection action. Complaints are managed by senior staff, the CEO and Directors. Details of the Hatton Academies Trust complaints procedures are in the Trust's Complaints Policy.

C15. Safeguarding Training

It is important that all staff have training to enable them to recognise the possible signs of abuse and neglect and to know what to do if they have a concern. New staff and Academy representatives will receive training during their induction. All staff will receive training, including online safety and details of the academy filtering and monitoring system, which will be updated at least every three years. All staff must receive regular safeguarding updates and these must happen at least annually. Supply staff and other visiting staff will be given the individual Academy's Visiting Staff leaflet.

The DSP will receive formal role specific training updated at least every two years. In addition to their formal training as set out above, their knowledge and skills should be updated (for example via e-bulletins, meeting other designated safeguarding leads at Trust Safeguarding meetings, or taking time to read and digest safeguarding developments), at regular intervals, and at least annually, to keep up with any developments relevant to their role.

The Trust is committed to the DSP undertaking training in inter-agency working and attendance at inter-agency child protection meetings. Time will be given to enable this commitment to be met. However, it is the responsibility of the individual to notify the appropriate senior member of staff to ensure cover.

The DSP will be expected to ensure that staff training is fully appropriate and up to date and to cascade learning to the wider staff group via meetings etc. A record of training will be kept and a copy provided for the CEO**. (Appendix C5 can be used if none is kept via electronic means.)**

The Hatton Academies Trust's strategy for child protection training is that it will train all staff in the basic child protection training and not just teaching staff since all staff come into contact with children and thus their roles are equally important. This training will be delivered at least every three years and will be part of induction procedures for **all** staff. Attendance at the training will be monitored and extra 'catch-up' sessions given for those absent. In addition to the basic training extra sessions on safeguarding topics will be offered to staff through the training workshop programme.

Staff and Academy Representatives/Directors/Governors with additional responsibilities for safeguarding topics e.g. recruitment will attend additional training.

The training for all staff should:

- Emphasis the right of ***every*** child to protection.
- Enable and empower staff to reflect on their practice.
- Be based on up to date knowledge and best practice.
- Present challenging subject matter sensitively.
- Leave staff feeling positive about their role in protecting children and young people.

The basic course for all staff should include:

- Aim, objectives/learning outcomes and 'ground rules'.
- Definitions of the four types of abuse.
- Recognising physical/behavioural indictors of abuse.
- Why children often do not disclose abuse.
- Dealing with a disclosure or a suspicion.
- Reporting and recording procedures.
- Confidentiality and information sharing.
- The statutory safeguarding framework.
- What to do if staff have concerns about the conduct of a colleague.
- The Academy's role in multi-agency working.
- How the Academy supports staff and associated training/guidance.

Evaluation of the training provision will be through the Academy's training evaluation processes as for all courses and INSET.

Opportunities are provided for Trust staff to contribute to and shape safeguarding arrangements and child protection policy via the Trust Safeguarding Group.

All Directors/Trustees/Governors must receive appropriate safeguarding and child protection (including online safety and filtering and monitoring systems) training at induction and at regular intervals following this. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a robust whole school approach to safeguarding.

C16. Safer Recruitment

The Trust is committed to safeguarding and promoting the welfare of children and young people and recognises that safer recruitment is a key element of effective safeguarding practice.

All recruitment, selection, vetting and pre-employment checks are undertaken in accordance with the requirements of Keeping Children Safe in Education and relevant employment and safeguarding legislation. The Trust's recruitment processes are designed to deter, identify and reject unsuitable applicants and to promote a culture of vigilance and safeguarding throughout the organisation.

The Trust maintains a comprehensive Safer Recruitment Policy which sets out arrangements relating to:

- recruitment and selection procedures

- pre-employment checks
- references and safeguarding enquiries
- online searches
- volunteers
- agency and supply staff
- contractors and commissioned services
- governor, trustee and member vetting
- alternative provision safeguarding assurance
- induction and ongoing suitability to work with children
- maintenance of the Single Central Record

At least one member of every interview panel will have completed appropriate safer recruitment training.

All staff, volunteers and others working on behalf of the Trust are required to undergo safeguarding checks appropriate to their role, responsibilities and level of contact with children.

All new staff will receive safeguarding induction and training appropriate to their role, including familiarisation with this Child Protection Policy, the Staff Code of Conduct, safeguarding reporting procedures and the identity and responsibilities of the Designated Safeguarding Lead.

The Trust recognises that safeguarding responsibilities continue throughout employment and engagement with the Trust. Appropriate procedures are in place to manage allegations, low-level concerns, professional conduct issues and any concerns relating to an individual's ongoing suitability to work with children.

Further information can be found in the Trust's Safer Recruitment Policy.

C17. Existing Staff

If a Trust Academy has concerns about an existing staff member's suitability to work with children, the Academy should carry out all relevant checks as if the person were a new member of staff. Similarly, if a person working at the Academy moves from a post that was not regulated activity into work which is considered to be regulated activity, the relevant checks for that regulated activity must be carried out.

Academies have a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- the **harm test** is satisfied in respect of that individual;
- the individual has received a caution or conviction for a relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence; and
- the individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left.

The legal duty to refer applies equally in circumstances where an individual is deployed to another area of work that is not regulated activity, or they are suspended.

The DBS will consider whether to bar the person. Referrals should be made as soon as possible after the resignation, removal or redeployment of the individual.

Details of the Harm Test are found in the Trust Managing Allegations Against Staff Policy on the Trust website.

C18. The use of 'reasonable force'

There are circumstances when it is appropriate for Academy staff to use reasonable force to safeguard children and young people. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed for the least amount of time'. The use of force may involve either passive physical contact, such as standing between pupils or blocking their path, or active physical contact such as leading them by the arm from the classroom.

When using reasonable force in response to risks presented by incidents involving children with SEN or disabilities or with medical conditions, the school should in considering the risks carefully recognise the additional vulnerability of these groups. They should also consider their duties under the Equality Act 2010 in relation to making reasonable adjustments, non-discrimination and their Public Sector Equality Duty.

By planning positive and proactive behaviour support, for instance through drawing up individual behaviour plans for more vulnerable children, and agreeing them with parents and carers, Trust academies can reduce the occurrence of challenging behaviour and the need to use reasonable force.

Staff are referred to the HAT Physical Restraint and Reasonable Force policy.

C19. Extended Services: work experience, trips and visits and after school activities

The Trust's child protection arrangements apply to all out of school activities, and extended services provided by each Academy.

If other organisations provide services or activities on our sites we will check that they have appropriate procedures in place to keep children safe. The Trust should therefore seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with the Trust on these matters where appropriate. The Trust should also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

When our children attend off-site activities, we will check that effective child protection arrangements are in place. For work experience placements, we will ensure that any named staff in the work experience setting who are providing teaching, training,

instruction or care or supervision for more than three days in thirty have a barred list check completed before the placement begins, as this counts as regulated activity.

The Trust's 'Trips and Visits' Policy details these procedures.

C20. Elective Home Education

We would expect the parents' decision to home educate to be made with their child's best education at the heart of the decision. However, this is not the case for all, and home education can mean some children are less visible to the services that are there to keep them safe and supported in line with their needs.

Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, the Academy must try to make contact with the LA and other key professionals and work together to coordinate a meeting with parents/carers where possible. Ideally, this would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker. Any child who is subject to a Child Protection Plan can only be home educated with agreement from the LA. There is not automatic right for a parent to remove them from school.

Appendix C1: Job description for the Designated Senior Person (DSP) for Child Protection

Job title: Designated Senior Person (DSP) for Child Protection
Accountable to: Academy Principal on behalf of the CEO

Role Purpose

- To take lead responsibility in the Academy for safeguarding and child protection
- Act as a source of support, advice, and expertise for all staff
- To lead and manage the Deputy DSLs where these are in place
- To be the Designated Teacher (DT) for Looked After Children and be the lead for the care and achievement of previously Looked After Children
- To ensure that the Academy and Trust meet statutory requirements regarding children's safety and welfare according to "Keeping Children Safe in Education" September 2026.

The responsibilities of the Designated Senior Person are:

i. General

- The DSP is responsible for ensuring that all cases of suspected or actual problems associated with child protection, child on child abuse, and radicalisation & extremism are investigated and dealt with
- Be able to keep detailed accurate secure electronic or written records of referrals/concerns, ensuring that such records are stored securely and flagged on, but kept separate from, the pupil's general file
- Keep detailed, accurate, secure and up to date written records of concerns and referrals;
- The DSP will ensure that he/she is aware of the latest national and local guidance and requirements and will keep the Principal, CEO and staff informed as appropriate
- The DSP will act as a source of support for the Academy community
- The DSP will liaise with the Trust CEO to ensure the Trust has high levels of safeguarding practice and procedure
- Develop effective links with relevant statutory and voluntary agencies
- Ensure that children are informed of the Academy's procedures as appropriate
- Ensure that the Academy's curriculum includes child protection awareness for all children
- Produce at least an annual report for the CEO/Board of Directors on the effectiveness of the Trust's policy and procedures for Child Protection and Safeguarding.

ii. Manage Referrals

The DSP is expected to:

- Refer cases of suspected abuse to the local authority children's social care as required;
- Support staff who make referrals to local authority children's social care;
- Refer cases to the Channel programme where there is radicalisation concern as required;

- Support staff who make referrals to the Channel programme
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- Refer cases where a crime may be committed to the Police as required. **NPCC - When to call the police** should help understand when to consider calling the police and what to expect when working with the police.

iii. Work with others

- Liaise with the Principal and CEO to inform him/her of issues especially ongoing enquiries under section 47 of the Children's Act 1989, and police investigations.
- Contribute to inter-agency working e.g. provide a co-ordinated offer of early help when additional needs of children are identified and contribute to inter-agency plans.
- Ensure that where a child is placed in an alternative provision, at least every half term a check is made on their attendance, that their needs are being met, the setting is safe and they are making progress. Where safeguarding concerns arise, the placement should be immediately reviewed, and terminated, if necessary, unless or until those concerns have been satisfactorily addressed.
- Engage with statutory safeguarding partners to agree the levels for the different types of assessment and services to be commissioned and delivered, as part of the local arrangements.
- Allow access for Children's Social Care from the host Local Authority and where appropriate, from a placing Local Authority, for that Authority to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment.
- Hold details of the local authority Personal Advisor appointed to guide and support a care leaver and should liaise with them as necessary regarding any issues of concern affecting the care leaver.
- Take lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school.
- Ensure that Academy staff knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort.
- Support teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.
- Act as a point of contact with safeguarding partners.
- Act as support, advice and expertise within the Academy when deciding whether to make a referral by liaising with relevant agencies.
- Liaise with the Principal to inform them of any issues and ongoing investigations and ensure that there is always cover for this role.
- Liaise with the mental health lead where safeguarding concerns are linked to mental health.
- Ensure that all staff have training to recognise and identify signs of abuse, and when it is appropriate to make a referral, and to understand how child protection procedures operate.

- Promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- Notify Children's Social Care if a child with a child protection plan is absent from the Academy for more than two days.
- Notify an allocated social worker if a child with a Child Protection or Child in Need plan is subject to suspension or permanent exclusion.
- Raise awareness of child safety issues in the Academy.
- Ensure that relevant policies and procedures are kept up-to-date.
- Ensure that the CEO, Principal, and parents/carers are kept informed as required, liaise with the 'case manager' and designated LA officer(s) re child protection concerns in cases which concern a staff member.

iv. Training

- Receive training, at least every two years, in order to ensure they have the knowledge and skills required to carry out their role to a high standard.
- Undertake Prevent awareness training.
- Ensure that knowledge and skills are refreshed at regular intervals, and at least annually, to ensure they understand and keep up with any developments relevant to their role.
- Understand the assessment process for providing early help and statutory intervention including local criteria for action and NNC children's social care referrals.
- Recognise how to identify signs of abuse and when it is appropriate to make a referral.
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- Ensure all staff have read and understood the Trust's Child Protection Policy and associated policies and signed the Trust statement to indicate this.
- Ensure **all staff** have induction training covering child protection and are able to recognise and report any concerns immediately they arise.
- Keep a record of all child protection training and staff attendance.
- Advise the Principal, CEO and Directors on their training needs to enable them to fulfil their role.
- Understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at the Academy.
- Recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online.
- Understand and support the Academy with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation.
- Obtain access to resources and attend any relevant refresher training courses;
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the Academy may put in place to protect them.
- Ensure that own training and development is fully up to date and includes the following elements (not an exhaustive list):
    - identification of the signs and symptoms of abuse,

- relevant legislation and guidance,
- national and locally agreed procedures,
- managing disclosures,
- Confidentiality,
- recording and keeping safe records – transfer of information,
- how local statutory services are configured and referral processes,
- thresholds for referral,
- making referrals,
- contact with parents,
- Family Help Assessments, initial and core assessments, child protection conference and review conferences, child protection plans,
- training and supporting staff, and
- writing a policy, procedures and guidance for staff.

v. Raising awareness

- Ensure the Trust's child protection policies are known, understood, accessible and used appropriately.
- Advise the CEO on the review of the Trust's Child Protection Policy and associated policies when it is updated and reviewed annually.
- Ensure the public and parents/carers have access to the Child Protection Policy and are aware that referrals may be made and the role of the Academy and Trust in this to avoid conflict later.
- Link with the Northamptonshire Safeguarding Children Partnership (NSCP) to make sure staff are aware of training opportunities and the latest local policies on safeguarding.
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and leadership staff.

vi. Child Protection File

- Ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice.
- Ensure a child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained.
- Ensure key staff such as Deputy DSL are aware of new files that have arrived as a lack of information about their circumstances can impact on the child's safety, welfare and educational outcomes.
- Consider if it would be appropriate to share any additional information with the new setting in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school. For example, information that would allow the new setting to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

vii. **Availability**

- Ensure that during term time the DSP (or a Deputy DSL) are always available (during school hours) for staff in the Academy to discuss any safeguarding concerns. Whilst generally speaking the DSP (or Deputy DSL) would be expected to be available in person, it is matter for the Academy, working with the DSP to define 'available'. As a minimum the Trust expects the DSP to leave a Deputy DSL in charge or be available by mobile phone when off site.
- Organise adequate and appropriate cover arrangements for any out of hours and out of term activities and ensure that the Principal and staff are aware of these.

Meeting statutory and other requirements

- Ensure that as DSP they are kept up to date with national and local developments in child protection and inform the CEO and Principal as appropriate.
- Ensure that as DSP they understand the online filtering and monitoring systems used in their academy, monitoring it and training others to understand it as part of the academy induction process.
- Ensure they seek assurance that any alternative provider of education used by the academy has appropriate safeguarding and child protection policies and procedures in place. The alternative provider retains responsibility as it is important that the governing bodies of these settings are aware of the additional risk of harm that children may be vulnerable to.
- Meet with the CEO and keep them informed of developments.
- Evaluate the effectiveness of the Trust's child protection policy and procedures and advise the CEO/Principal on any changes and developments needed
- Keep up to date records that:
    - Are up to date, detailed and complete.
    - Show compliance with the Trust's agreed procedures.
    - Demonstrate effective identification and management of the risk of harm.
    - Demonstrate decision-making and appropriate, timely responses to concerns and relevant referrals that have been made.
    - Provide evidence of effective partnership working and sharing information.
    - Provide evidence of attendance at or contribution to inter-agency meeting and conferences.
    - Are kept securely in a locked cabinet if any paper copies are still held or on a secure online system, with accessibility only for the DSP, Principal, and CEO.

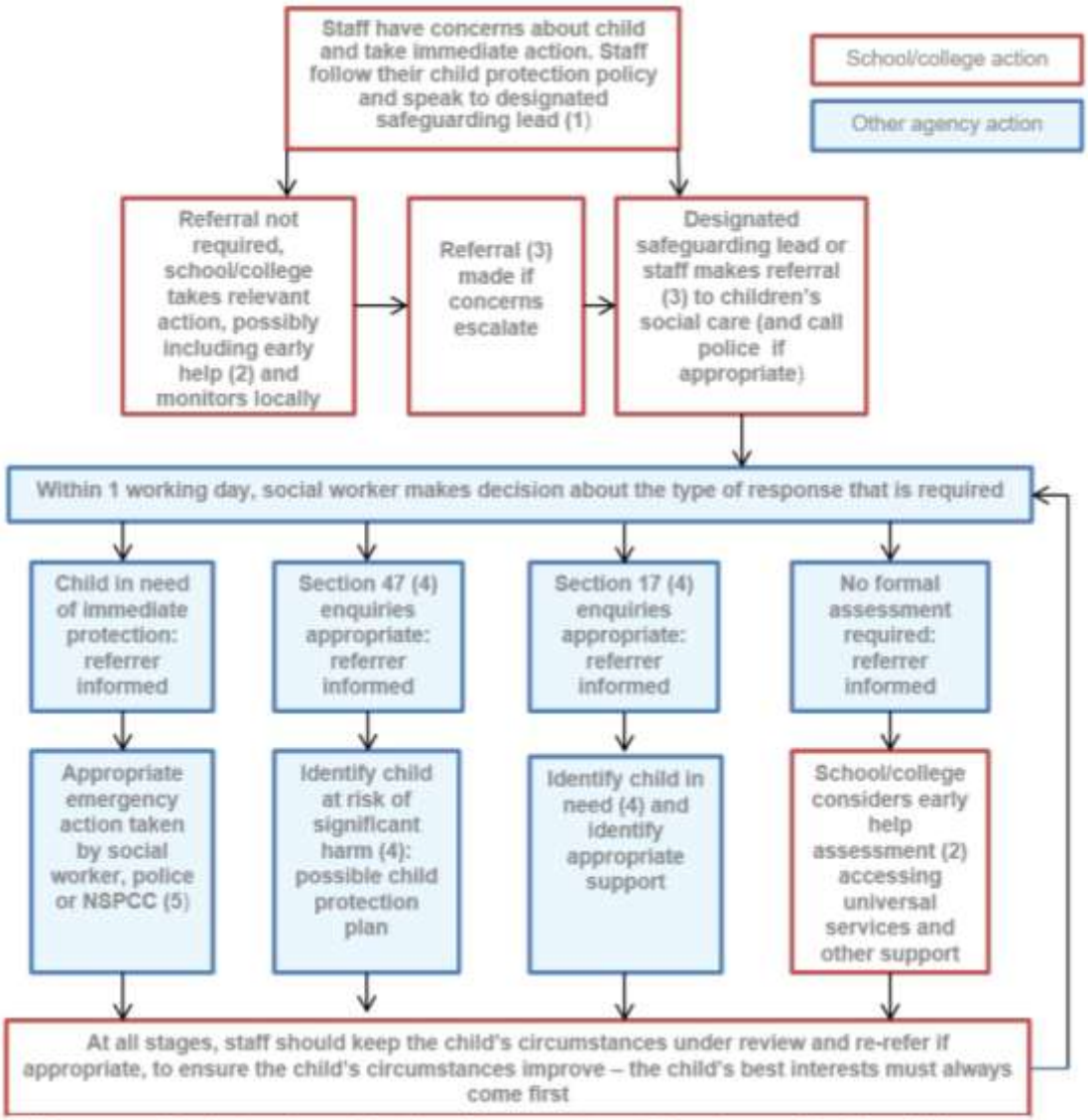
Name _____

Signature _____

Date _____

Appendix C2: Actions where there are concerns about a child

Staff should do everything they can to support social workers.



(1) In cases which also involve an allegation of abuse against a staff member, see Part Four of this guidance.

(2) Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of Working together to safeguard children provides detailed guidance on the early help process.

(3) Referrals should follow the local authority's referral process. Chapter one of Working together to safeguard children.

(4) Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. This can include section 17 assessments of children in need and section 47 assessments of children at risk of significant harm. Full details are in Chapter One of Working together to safeguard children.

(5) This could include applying for an Emergency Protection Order (EPO).

Appendix C3: Risk and Needs Assessment following Report of Child on Child Abuse

This appendix should be completed for every incident that Keeping Children Safe in Education (2026) identifies as child on child abuse (*see also Farrer & Co (2023) Addressing child-on-child abuse: a resource for schools and colleges*).

Nature of Incident

Date of incident report:		**Staff member(s) responsible for taking actions following initial report:**	
Type of concern (Highlight from list – you can select more than one):	• Bullying • Hate incident/ hate crimes • Abuse in intimate personal relationships between children • Physical abuse • Initiation/hazing type violence and rituals • Harmful Sexual Behaviour • Child sexual exploitation • Child criminal exploitation	**Where further details can be found e.g. CPOMS OR MYCONCERN:**	

Details of incident

Overview of what has been reported identifying concerns:	
Where the incident(s) took place:	
When (date and time) the incident(s) took place:	

Details of those involved:

Name of victim:		**Age of victim:**	
Pertinent contextual information regarding victim e.g. SEN need or medical condition:		**Is the victim already open to social care (if so state under what sort of plan e.g. CIN):**	
Alleged or substantiated perpetrator?		**If substantiated, state why:**	
Voice of the victim – what are they worried about and what would they like to happen next?			
Name of perpetrator:		**Age of perpetrator:**	
Pertinent contextual information regarding perpetrator e.g. SEN need or medical condition:		**Is the perpetrator already open to social care (if so state under what sort of plan e.g. CIN):**	
Voice of the perpetrator – what is their understanding of the incident, what are they worried about and what would they like to happen next?			
Any other children involved:		**In what capacity are other children involved e.g. witness?**	

Onward reporting/actions:

Name of person/agency/action:	Completed? (Y/N)	Date completed (and additional details if relevant e.g. response /outcome/ views of parent/carer etc)
Victim's parent/carer		
Victim's social worker (if relevant)		
Perpetrator's parent/carer		
Perpetrator's social worker (if relevant)		
MASH referral		
Sanction imposed for perpetrator if relevant (please specify the sanction)		
Police incident report		
Other (please specify)		
Other (please specify)		
Other (please specify)		

Risk Assessment Reference Sheet

SEVERITY		LIKELIHOOD	
5	Death, debilitating injury (incl. psychological)	**5**	It is expected to happen in most circumstances
4	Major injury – *broken bone, deep lacerations, unconsciousness, significant psychological harm*	**4**	Will probably occur at some time, or in most circumstances
3	Moderate injury - *sprains, strains, lacerations, hospital referral, emotional / psychological support*	**3**	Fairly likely to occur at some time, or in some circumstances
2	Minor injury – superficial cuts, *1st Aid required, emotional support*	**2**	It is unlikely to, but could, occur at some time
1	Trivial injury - *Minor impact - bumps, bruises, emotional wellbeing*	**1**	May only occur in exceptional circumstances

Appendix C4: Pupil Safety Plans

Safety Plan for Victim:

Prompt	Identified Risk/Hazard	Who May Be Harmed? Who is at risk?	The Likelihood (of the risk happening) 1-5 (unlikely to certain)	The Potential Consequence (if this were to happen) 1-5 (minor impact to life-threatening)	Control Measure (including any external agency referrals)	Communicated to who and how?	Person responsible
In the classroom							
Unstructured times/lesson transitions							
Travelling to and from school							
Online risks							
Emotional wellbeing							
Protective behaviours and/or education if relevant							

Safety Plan for Perpetrator:

Prompt	Identified Risk/Hazard	Who May Be Harmed? Who is at risk?	The Likelihood (of the risk happening) 1-5 (unlikely to certain)	The Potential Consequence (if this were to happen) 1-5 (minor impact to life-threatening)	Control Measure (including any external agency referrals)	Communicated to who and how?	Person responsible
In the classroom							
Unstructured times/lesson transitions							
Travelling to and from school							
Online risks							
Emotional wellbeing							
Protective behaviours and/or education if relevant							

Safety Plan Sign-off and Review:

Date of this assessment:	
Sign-off from DSL (full name):	
Sign-off from DSL (signature):	
Date of sign-off:	
Date of next review:	
Staff member responsible for review:	

Appendix C5: Safeguarding & Child Protection Training Record

Designated person	Training received	Date	Disseminated through…

Teaching staff (individual training)	Training received	Date	Disseminated through…

Support staff (individual training)	Training received	Date	Disseminated through…

Teaching staff (group training)	Training received	Date	Members of staff attending

Support staff (group training)	Training received	Date	Members of staff attending

Whole Academy or Trust training	Training received	Date	Members of staff attending