

September 2020

# Safeguarding & Child Protection Policy



**OUR  
HISTORY  
THEIR  
FUTURE**

Date of Issue: September 2020

Date of update: 24/07/20

Signed: Catherine Deans

Review Date: 31/08/21

## SAFEGUARDING & CHILD PROTECTION POLICY ISSUES AND UPDATES

PAGES	ISSUE	DATE
Whole document revised	1	Aug 2019
Document review – all pages	Minor changes to references throughout document	July 2020
	Section 3 – local issues removed	July 2020
	Section 21 – Children in specific circumstances removed	July 2020

The following policy has been approved by the Trustee appointed for Safeguarding and Senior Leadership Team and the Board of Trustees.

The policy will be reviewed on an annual basis unless circumstances arise requiring the policy to be reviewed earlier.

Approved by Board of Trustees: July 2020

Board signatory: ELLA BEVAN

Planned review: August 2021

## CONTENTS

<a href="#">Part 1: Safeguarding Policy</a>		
1.	<a href="#">Introduction</a>	Page 5
2.	<a href="#">Overall Aims</a>	Page 6
3.	<a href="#">Key Processes</a>	Page 7
4.	<a href="#">Expectations</a>	Page 7
5.	<a href="#">The Designated Safeguarding Lead (DSL)</a>	Page 7
6.	<a href="#">The Designated member of staff for Looked After Children</a>	Page 9
7.	<a href="#">The Trustee Board</a>	Page 9
8.	<a href="#">A Safer Foundation Culture</a>	Page 10
	<a href="#">8.1 Safer Recruitment and Selection</a>	Page 10
	<a href="#">8.2 Induction</a>	Page 10
	<a href="#">8.3 Staff Support</a>	Page 11
9.	<a href="#">The Use of Reasonable Force</a>	Page 11
10.	<a href="#">Our Role in the Prevention of Abuse</a>	Page 11
	<a href="#">10.2 The Programmes</a>	Page 12
	<a href="#">10.3 Other Areas of Work</a>	Page 12
11.	<a href="#">What We Will Do if We Are Concerned</a>	Page 12
12.	<a href="#">Safeguarding Pupils/Students who are Vulnerable to organised crime</a>	Page 13
13.	<a href="#">Risk Reduction</a>	Page 13
14.	<a href="#">Children who go Missing from Education</a>	Page 14
15.	<a href="#">Sexual Violence and harassment Between Children in Foundations and Colleges</a>	Page 14
	<a href="#">15.1. Aware</a>	Page 15
	<a href="#">15.2. Rape</a>	Page 15
	<a href="#">15.3. Assault by Penetration</a>	Page 15
	<a href="#">15.4. Sexual Assault</a>	Page 15
<a href="#">Part 2: The Key Procedures</a>		Page 16
16.	<a href="#">Responding to a concern</a>	Page 16
	<a href="#">16.1 Emergency Response</a>	Page 16
	<a href="#">16.2 Non-emergency Response</a>	Page 16
	<a href="#">16.3 How to make a referral</a>	Page 16
	<a href="#">16.4 Recording</a>	Page 17
	<a href="#">16.5 Involving Parents/Carers</a>	Page 17
17.	<a href="#">Multi-Agency Work</a>	Page 17
18.	<a href="#">Our Role in Supporting Children</a>	Page 17
19.	<a href="#">Responding to an Allegation About a Member of Staff</a>	Page 18
20.	<a href="#">Children With Additional Needs</a>	Page 18
21.	<a href="#">Children in Specific Circumstances</a>	Page 19
22.	<a href="#">Links to additional information about safeguarding issues and forms of abuse</a>	Page 20

<a href="#">Appendices</a>	
<a href="#">Appendix 1: Definitions and Indicators of Abuse</a>	Page 22
<a href="#">1. Neglect</a>	Page 22
<a href="#">2. Physical Abuse</a>	Page 23
<a href="#">3. Sexual Abuse</a>	Page 23
<a href="#">4. Sexual Exploitation</a>	Page 24
<a href="#">5. Emotional Abuse</a>	Page 24
<a href="#">6. Responses from Parents</a>	Page 25
<a href="#">7. Disabled Children</a>	Page 25
<a href="#">Appendix 2: Dealing with a Disclosure of Abuse</a>	Page 27
<a href="#">Appendix 3: Allegations About a Member of Staff, Governor or Volunteer</a>	Page 28

## PART ONE: SAFEGUARDING POLICY

Ratified by the Trustee Board: Due September 2020

To be reviewed (annually): August 2021

### 1.0 INTRODUCTION

1.1 Safeguarding and promoting the welfare of children is defined as –

- Protecting children from maltreatment;
- Preventing impairment of children's health or development;
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care; and
- Acting to enable all children to have the best outcomes.  
Children include everyone under the age of 18.

1.2 Northampton Saints Foundation is committed to safeguarding and promoting the welfare of all its pupils/students. We believe that:

- All children/young people have the right to be protected from harm, abuse and neglect;
- That every child/young person has the right to an education and children/young people need to be safe and to feel safe in the Foundation;
- Children/young people need support that matches their individual needs, including those who may have experienced abuse;
- All children/young people have the right to express their views, feelings and wishes and voice their own values and beliefs;
- All children/young people should be encouraged to respect each other's values and support each other;
- All children/young people have the right to be supported to meet their emotional and social needs as well as their educational needs – a happy, healthy, sociable child/young person will achieve better educationally;
- The Foundation must contribute to the prevention of abuse, victimisation, bullying (including homophobic, bi-phobic, trans-phobic and cyber-bullying), exploitation, extreme behaviours, discriminatory views and risk-taking behaviours; and
- All staff and visitors have an important role to play in safeguarding children and protecting them from abuse.

1.3 Northampton Saints Foundation will fulfil their local and national responsibilities as laid out in the following documents: -

- The most recent version of [Working Together to Safeguard Children \(DfE\)](#)
- The most recent version of [Keeping Children Safe in Education: Statutory guidance for Foundations and colleges](#) (DfE Sept 2020)
- Northamptonshire Safeguarding Children Procedures
- The Education Act 2002 s175
- Mental Health and Behaviour in Foundations: Departmental Advice (DfE 2014)
- Sexting in Foundations & Colleges – responding to incidents and safeguarding young people (UKCCIS) 2016
- [General Data Protection Legislation](#) (2018)

## 2.0 OVERALL AIMS

2.1 This policy will contribute to the protection and safeguarding of our pupils/students and promote their welfare by:

- Clarifying standards of behaviour for staff and pupils/students;
- Contributing to the establishment of a safe, resilient and robust ethos in the Foundation, built on mutual respect and shared values;
- Introducing appropriate work within the curriculum;
- Encouraging pupils/students and parents to participate;
- Alerting staff to the signs and indicators that all may not be well;
- Developing staff awareness of the causes of abuse;
- Developing staff awareness of the risks and vulnerabilities their pupils/students face;
- Addressing concerns at the earliest possible stage; and
- Reducing the potential risks pupils/students face of being exposed to violence, extremism, exploitation, discrimination or victimisation.

2.2 This policy will contribute to supporting our pupils/students by:

- Identifying and protecting the vulnerable;
- Identifying individual needs as early as possible; and
- Designing plans to address those needs.

2.3 This policy will contribute to the protection of our pupils/students by:

- Including appropriate work within the curriculum;
- Implementing Child Protection Policies and procedures; and
- Working in partnership with pupils/students, parents/carers and other agencies.

2.4 This policy extends to any establishment our Foundation commissions to deliver education to our pupils on our behalf including alternative provision settings.

- The Trustee Board will ensure that any commissioned agency will reflect the values, philosophy and standards of our Foundation. Confirmation should be sought from the Foundation that appropriate risk assessments are completed and ongoing monitoring is undertaken.

## 3. KEY PROCESSES

3.1 All staff must be aware of the guidance issued by Northamptonshire Safeguarding Children Board and threshold guidance.

## 4.0 EXPECTATIONS

4.1 All staff and volunteers will:

- Be familiar with this Safeguarding Policy;
- Understand their role in relation to safeguarding;
- Be subject to Safer Recruitment processes and checks, whether they are new staff, supply staff, contractors, volunteers etc.;
- All Trustees must be subjected to an enhanced DBS.

- Be involved, where appropriate, in the implementation of individual Education Programmes, Early Help Assessments and support plans, Child In Need plans and inter-agency Child Protection plans;
- Be alert to signs and indicators of possible abuse (See Appendix 1 for current definitions and indicators);
- Record concerns and give the record to the Designated safeguard lead (DSL), or deputy DSL, and
- Deal with a disclosure of abuse from a child in line with the guidance in Appendix 2 - you must inform the DSL immediately, and provide a written account as soon as possible.

4.2 All staff will receive annual Safeguarding training and update briefings as appropriate. Key staff will undertake more specialist safeguarding training as agreed by the Trustee Board.

## 5.0 THE DESIGNATED SAFEGUARDING LEAD (DSL)

5.1 Our DSL on the Senior Leadership Team is **Catherine Deans**. Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL. This responsibility should not be delegated.

5.1.1 The deputy DSLs will support the DSL within the role and deputise when the DSL is not on-site. They are:

Jordan Letts  
Connor Fleming

5.2 Trustees should ensure an appropriate senior member of staff, from the Foundation leadership team is appointed to the role of DSL. This should be explicit in the role-holder's job description.

5.3 Any steps taken to support a child who has a safeguarding vulnerability must be reported to the lead DSL in our Foundation; the DSL will go through the relevant actions to ensure all steps are covered.

5.4 Safeguarding and Child Protection information will be dealt with, in a confidential manner. Staff will be informed of relevant details only when the DSL feels their having knowledge of a situation will improve their ability to support an individual child and/or family. A written record will be made of what information has been shared, with whom, and when.

5.5 Safeguarding records will be stored securely in a central place separate from academic records. Individual files will be kept for each child: the Foundation will not keep family files. Files will be kept for at least the period during which the child is attending the Foundation, and beyond that in line with current data legislation and guidance.

5.5.1 Where records are stored electronically e.g. within Egress etc. there is no requirement to maintain paper files.

5.6 Access to records by staff other than by the DSL and Deputy DSL will be restricted, and a record will be kept of who has had access to them, when and why they accessed them.

- 5.7 Parents/carers will be aware that information may be held on their children and kept up to date regarding any concerns or developments by the appropriate members of staff. General communications with parents will be in line with any home school policies and give due regard to which adults have parental responsibility.
- 5.8 Do not disclose to a parent any information held on a child if this would put the child at risk of significant harm.
- 5.9 If a pupil/student moves from our Foundation, Child Protection records will be forwarded on to the DSL at the new establishment, with due regard to their confidential nature and in line with current government guidance on the transfer of such records. Direct contact between the Foundation and the new placement may be necessary. We will record where and to whom the records have been passed and the date.
- 5.10 In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any information with the new placement or School in advance of a child leaving. For example, information that would allow the new placement or school to continue supporting victims of abuse, and have that support in place for when the child arrives.
- 5.11 If sending by post, pupil records will be sent by “Special/Recorded Delivery”. For audit purposes, a note of all pupil records transferred or received should be kept in either paper or electronic format. This will include the child’s name, date of birth, where and to whom the records have been sent and the date sent and/or received.
- 5.12 If a pupil/student is removed off our programme and moves to another county, Child Protection records will be forwarded on to the relevant organisation.
- 5.13 Where a vulnerable young person is moving to a Further Education establishment, consideration should be given to the student’s wishes and feelings regarding their child protection information being passed on in order that the FE establishment can provide appropriate support (see para 6.10).
- 5.14 Our DSL and any deputies must undergo training to provide them with the knowledge and skills required to carry out the role. The training should be updated every two years.
- 5.14.1 In addition to their formal training as set out above, their knowledge and skills should be updated, (for example via e-bulletins, meeting other DSLs, 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.
- 5.15 When a DSL resigns their post or no longer has Child Protection responsibility, there should be a full face-to-face handover/exchange of information with the new post holder.
- 5.15.1 In exceptional circumstances, when a face to face handover is unfeasible, the Foundation Managing Director will ensure that the new post holder is fully conversant with all procedures and case files.



## 6.0 THE DESIGNATED MEMBER OF STAFF FOR LOOKED AFTER AND PREVIOUSLY LOOKED AFTER CHILDREN

- 6.1 The Foundation Managing Director must appoint a designated member of staff and should work with referring agencies/education providers to promote the educational achievement of registered pupils who are looked after.
- 6.2 The designated member of staff must have appropriate training and the relevant qualifications and experience. The designated Member of staff is:  
**Jordan Letts**
- 6.3 The designated member of staff will work with the Virtual School to provide the most appropriate support utilising the pupil premium plus to ensure they meet the needs identified in the child's personal education plan.
- 6.4 The designated member of staff should also work with the Virtual School head to promote the educational achievement of previously looked after children. In other Schools and Colleges, an appropriately trained teacher should take the lead.

## 7.0 THE TRUSTEE BOARD

- 7.1 The Trustee Board are the accountable body and must ensure that they comply with their duties under legislation.
- 7.2 The Trustee Board will ensure that:
- Trustees should ensure that there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare;
  - The Foundation operates "Safer Recruitment" procedures and ensures that appropriate checks are carried out on all new staff;
  - At least one senior member of the Foundation leadership team acts as a DSL, and at least a further deputy DSL is appointed;
  - That appropriate time is made available to the DSL and deputy DSL(s) to allow them to undertake their duties; their role should be explicit in their job description;
  - The Foundation Managing Director and all other staff who work with children undertake safeguarding training on an annual basis with additional updates as necessary within a 2 year framework and a training record maintained;
  - Temporary staff and volunteers are made aware of the Foundation arrangements for safeguarding & child protection and their responsibilities;
  - The Foundation remedies any deficiencies or weaknesses brought to its attention without delay; and
  - The Foundation has procedures for dealing with allegations of abuse against staff/volunteers.
- 7.3 The Trustee Board should review all policies/procedures that relate to safeguarding and child protection annually.
- 7.4 The Nominated Trustee for safeguarding at the Foundation is **Ella Bevan**. The Nominated Trustee is responsible for liaising with the Foundation Managing Director and DSL over all matters regarding safeguarding and child protection issues. The role is

strategic rather than operational – they will not be involved in concerns about individual pupils/students.

7.4.1 The Nominated Trustee will receive safeguarding training relevant to the governance role and this will be updated every 2 years.

7.5 The Nominated Trustee will liaise with the Foundation Managing Director/ DSL to report relevant safeguarding issues to the Trustee Board at each meeting.

7.5.1 The Foundation has clear operational guidance on how its staff are governed with respect to any allegations of abuse of members of staff, visitors, volunteers or Trustees. If any offence is alleged, it will be investigated in the first instance by the Foundation Managing Director; in conjunction with Northampton Saints HR Department as required.

In the event of an allegation of abuse of members of staff, visitors, volunteers or Trustees being brought against the Foundation Managing Director, this will be escalated to the Chair of the Foundation Trustee Board to be further investigated, before presenting his / her findings to the Trustee Board; in conjunction with Northampton Saints HR Department as required in order to determine next steps.

7.6 A member of the Trustee Board is nominated to be responsible for liaising with the Children's Trust in the event of allegations of abuse being made against the Foundation Managing Director.

## 8.0 A SAFER FOUNDATION CULTURE

### 8.1 Safer Recruitment and Selection

8.1.1 The Foundation is aware of 'Keeping Children Safe in Education Sept 20'. Safer Recruitment practice includes scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining professional and character references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking interviews and appropriate checks including criminal record checks (DBS checks).

8.1.2 All recruitment materials will include reference to the Foundations commitment to safeguarding and promoting the wellbeing of pupils.

8.1.3 Relevant staff will have undertaken appropriate training in Safer Recruitment. One of the above will be involved in all staff / volunteer recruitment processes and sit on the recruitment panel.

### 8.2 Induction

8.2.1 All staff must be aware of systems within their Foundation which support safeguarding, and these should be explained to them as part of staff induction. This should include:

- The child protection policy;
- The behaviour policy;
- The staff behaviour policy (sometimes called a code of conduct);
- The safeguarding response to children who go missing from education; and
- The role of the DSL (including the identity of the DSL and any deputies).

Copies of policies and a copy of part one of the KSCIE-20 document should be provided to staff at induction.

### 8.3 Staff Support

8.3.1 We recognise the stressful and traumatic nature of safeguarding and child protection work. We will support staff by providing an opportunity to talk through their anxieties with the DSL and to seek further support as appropriate.

8.3.2 Regular supervision will be offered to the Lead DSL within Foundation, usually half-termly and may be extended to other members of staff as deemed appropriate by the Foundation.

## 9.0 THE USE OF REASONABLE FORCE

9.1 There are circumstances when it is appropriate for staff in Foundation to use reasonable force to safeguard children and young people. Relevant staff are trained in Team Teach protocol, The term 'reasonable force' covers the broad range of actions used by staff that involves 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'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom. Departmental advice for Foundations is available here: [Use of reasonable force advice Reviewed July 2015.pdf](#)

9.2 Our Foundation will not have a 'no contact' policy as this could leave our staff unable to fully support and protect their pupils and students.

9.3 When using reasonable force in response to risks presented by incidents involving children including any with SEN or disabilities, or with medical conditions, staff should consider the risks carefully.

9.4 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.

9.5 Our Foundation will, 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, will reduce the occurrence of challenging behaviour and the need to use reasonable force.

## 10.0 OUR ROLE IN THE PREVENTION OF ABUSE

10.1 We will provide opportunities for pupils/students to develop skills, concepts, attitudes, and knowledge that promote their safety and well-being.

### 10.2 The Programmes

10.2.1 Safeguarding issues will be addressed through sessions that align with the PSHE curriculum, for example self-esteem, emotional literacy, assertiveness, power, healthy relationship education, online safety, sexting and bullying (including cyber bullying).

10.2.2 Relevant issues will be addressed through all Foundation programmes.

### 10.3 Other Areas of Work

10.3.1 All our policies which address issues of power and potential harm, for example Anti-Bullying, Discrimination, Equal Opportunities, Handling, Positive Behaviour, will be inter-linked to ensure a whole Foundation approach.

10.3.2 Our safeguarding policy cannot be separated from the general ethos of the Foundation which should ensure that pupils/students are treated with respect and dignity, taught to treat each other with respect, feel safe, have a voice, and are listened to.

## 11.0 WHAT WE WILL DO WHEN WE ARE CONCERNED

11.1 Where unmet needs have been identified for a child/ young person but there is no evidence of a significant risk, the DSL will add the child/young person to our records of children with a safeguarding vulnerability, and support Foundation staff to deliver an appropriate Early Help response.

11.1.2 At this stage, simple reasonable adjustments within the educational setting may be all that is needed to address the unmet needs and after review the child/young person may need no further response.

11.1.3 Should the professional opinion of the DSL indicate that a multi-agency Early Help response is required in order to meet the unmet safeguarding need, the DSL will generally lead on this.

11.2 If concerns increase a referral to the MASH CCCare Team may be required. The DSL will lead on this in the first instance, however other members of the Safeguarding team and Staff may do so as appropriate. (for further information see 'Foundation Procedures, Making a Referral').

## 12.0 SAFEGUARDING STUDENTS WHO ARE VULNERABLE TO ORGANISED CRIME

12.1.1 Since 2010, when the Government published the first version of the Prevent Strategy, there has been an awareness of the specific need to safeguard children, young people and families from extremist ideologies. There have been several occasions both locally and nationally in which extremist groups have attempted to radicalise vulnerable children and young people to hold extreme views including views justifying political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.

12.1.2 Northampton Saints Foundation values freedom of speech and the expression of beliefs and ideology as fundamental rights underpinning our society's values. Pupils/students and teachers have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.

- 12.1.3 The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people, to involve them in terrorism or in activity in support of terrorism. The normalisation of extreme views may also make children and young people vulnerable to future manipulation and exploitation. Northampton Saints Foundation is clear that this exploitation and radicalisation must be viewed as a safeguarding concern and that protecting children from the risk of radicalisation is part of the Foundation safeguarding duty.
- 12.1.4 Definitions of radicalisation and extremism, and indicators of vulnerability to radicalisation are in Appendix 4.
- 12.1.5 Northampton Saints Foundation seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right/Neo-Nazi/White Supremacist ideology, Domestic Terrorism, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

## 13.0 RISK REDUCTION

- 13.1 The Foundation Trustees, the Foundation Managing Director and the DSL will assess the level of risk within the Foundation and put actions in place to reduce that risk. This may include consideration of the Foundation's SEND policy, the use of Foundation premises by external agencies, integration of students by gender and SEN, anti-bullying policy and other issues specific to the Foundation's profile, community and philosophy. To this end, we may carry out open source due diligence checks on all speakers invited to our Foundation.
- 13.2 This risk assessment will be reviewed as part of the annual policy review undertaken by the Foundation.
- 13.3 Response
- 13.3.1 The Foundation has "due regard to the need to prevent people being drawn into terrorism" (section 26, Counter Terrorism and Security Act 2015). This is known as The Prevent Duty. All staff undertake Prevent training every three years.
- 13.3.2 There is no single way to identify an individual who is likely to be susceptible to an extremist ideology. Specific background factors may contribute to vulnerability and these are often combined with specific needs for which an extremist group may appear to provide answers, and specific influences such as family, friends and online contacts. The use of social media has become a significant feature in the radicalisation of young people.
- 13.3.3 Staff within our Foundation will be alert to changes in a child's behaviour or attitude which could indicate that they are in need of help or protection.
- 13.3.4 When any member of staff has concerns that a student may be at risk of radicalisation or involvement in terrorism, they should speak with the SPOC and to the DSL if this is not the same person.

13.3.5 Numerous factors can contribute to and influence the range of behaviours that are defined as violent extremism, but most young people do not become involved in extremist action. For this reason, the appropriate interventions in any particular case may not have any specific connection to the threat of radicalisation, for example they may address mental health, relationship or drug/alcohol issues.

#### 14.0 CHILDREN WHO GO MISSING FROM EDUCATION

14.1 A child going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding risks, including abuse and neglect, which may include sexual abuse or exploitation; child criminal exploitation; mental health problems; substance abuse and other issues. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of them going missing in future.

14.2 Our Foundation will have access to two or more emergency contact numbers for each pupil. It is good practice to give our Foundation additional options to contact a responsible adult when a child missing education, is also identified as a welfare and/or safeguarding concern.

14.3 The Foundation must notify the School or college of any pupil/student who fails to attend Foundation regularly after making reasonable enquiries or has been absent without the Foundation's permission for a continuous period of time.

14.4 Our Foundation will demonstrate that we have taken reasonable enquiries to ascertain the whereabouts of children that would be considered 'missing'.

#### 15.0 SEXUAL VIOLENCE AND SEXUAL HARASSMENT BETWEEN CHILDREN IN FOUNDATION

15.1 It is important that Foundation staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

15.2 Rape: A person (A) commits an offence of rape if: there is intentional penetration of 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.

15.3 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.

15.4 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.

## PART TWO – THE KEY PROCEDURES

### 16.0 RESPONDING TO A CONCERN

#### 16.1 Emergency Response

If a child is at imminent risk of significant harm/immediate danger you should consider calling 999 in the first instance (for police or ambulance) and making a referral to children's social care by immediately calling Northampton Mash team. You will be expected to complete a **Mash referral form** <mailto:MASH@northamptonshire.gcsx.gov.uk>. Where referrals are not made by the designated safeguarding lead, they should be informed, as soon as possible, that a referral has been made.

#### 16.2 Non-Emergency Response

If there is no risk of immediate danger you must complete and submit a MASH as soon as possible and within a maximum of 24 hours, this should be done in consultation with the referring agency or education provision. Send the MASH on completion via secure email to [MASH@northamptonshire.gcsx.gov.uk](mailto:MASH@northamptonshire.gcsx.gov.uk)

16.2.1 Parents/carers should be informed if a referral is being made except in this would increase risk. However, inability to inform parents for any reason should not prevent a referral being made to children's social care via if you believe the child is at risk of harm. It would then become a joint decision with Children's Social Care about how and when the parents should be approached and by whom.

16.2.3 If low level multi-agency support is required for a child and/or their family, the DSL will recommend to referring agency or education provision that, with consent of the parent/carer, they submit an Early Help Assessment to enable a team around the family plan to be initiated. This will be targeted multi-agency support to help the family resolve any identified concerns.

16.2.4 If the concerns are more complex and require statutory intervention, then the DSL will refer the matter to children's social care where a decision will be made whether any enquiries are needed under Section 17 (child in need enquiry) or Section 47 (child protection enquiry) of the Children Act 1989.

#### 16.3 How to make a referral

16.3.1 If it is believed a referral is necessary the Foundation/DSL would consult with the referring agency or education provider, formulate a plan appropriate to the individual needs and inform appropriate agencies jointly or separately as required.

16.3.2 Social Care – submit a referral form of concern unless it is an emergency (see above) via secure email where consideration will be given to the referral via the MASH screening process.

16.4 Accurately record the action agreed following the referral, including if no further action is to be taken and the reasons for this decision, noting with whom discussions were held.

#### 16.5 Involving parents and carers

16.5.1 In general, we will discuss any Safeguarding or Child Protection concerns with referring agencies or education providers before approaching other agencies and will seek their consent to making a referral to another agency. Appropriate staff will approach referring agencies/education providers after consultation with the DSL. It is unlikely the Foundation will have direct contact with parents/carers.

16.5.2 Referring agencies and education settings will be informed about our Safeguarding Policy through letters and notices

## 17. MULTI-AGENCY WORK

17.1 We work in partnership with other agencies to promote the best interests of our children as a top priority in all decisions and actions that affect them. The Foundation will, where necessary, liaise with these agencies. Where the child already has a safeguarding Social Worker or Family Support Worker, the request for support should go immediately to the team involved, or in their absence to their team manager.

17.2 When invited the DSL will participate in a MASH strategy meeting, usually by conference phone, adding Foundation -held data and intelligence to the discussion so that the best interests of the child are met.

17.3 We will co-operate with any Child Protection enquiries conducted by Children's Social Care: The Foundation will ensure representation at appropriate inter-agency meetings such as Our Family Plan, Children In Need, Initial and Review Child Protection Conferences, and Core Group meetings.

17.4 We will provide reports as required for these meetings. If the Foundation is unable to attend, a written report will be sent and shared with at least 24 hours prior to the meeting.

17.5 Where a pupil/student is subject to an inter-agency Child Protection plan or a multi-agency risk assessment conference (TAC) meeting, the Foundation will contribute to the preparation, implementation and review of the plan as appropriate.

## 18. OUR ROLE IN SUPPORTING CHILDREN

18.1 Our Foundation staff will offer appropriate support to individual pupils/students who have experienced abuse, who have abused others (peer on peer abuse) or who act as Young Carers in their home situation.

18.2 The Foundation would follow a safeguarding action plan devised by involved agencies, implemented and reviewed regularly for these children. This plan will detail areas of support, who will be involved, and the child's wishes and feelings. A copy of the plan will be kept in the child's safeguarding record.

18.3 Children and young people who abuse others will be responded to in a way that meets their needs as well as protecting others within the Foundation community through a multi-agency risk assessment. Within our Foundation we will ensure that the needs of children and young people who abuse others will be considered separately from the needs of their victims.



18.4 We will ensure the Foundation works in partnership with parents / carers and other agencies as appropriate.

## 19.0 RESPONDING TO AN ALLEGATION ABOUT A MEMBER OF STAFF

19.1 This procedure must be used in any case in which it is alleged that a member of staff, Trustee, visiting professional or volunteer has:

- Behaved in a way that has harmed a child or may have harmed a child;
- Possibly committed a criminal offence against or related to a child; or
- Behaved in a way that indicates s/he is unsuitable to work with children.

19.2 Although it is an uncomfortable thought, it needs to be acknowledged that there is the potential for staff in Foundation to abuse children.

19.3 All staff working within our organisation must report any potential safeguarding concerns about an individual's behaviour towards children and young people immediately.

19.3.1 Allegations or concerns about staff, colleagues and visitors must be reported directly to the Foundation Managing Director who will liaise with the Designated Officer (LADO), who will decide on any action required.

19.3.2 If the concern relates to a senior member of staff, it must be reported immediately to the Chair of the Trustee Board, who will liaise with the Designated Officer and they will decide on any action required.

## 20.0 CHILDREN WITH ADDITIONAL NEEDS

20.1 Northampton Saints Foundation recognises that all children have a right to be safe. Some children may be more vulnerable to abuse, for example those with a disability or special educational need, those living with domestic violence or drug/alcohol abusing parents, etc.

20.2 When the Foundation is considering excluding, either for a fixed term or permanently, a vulnerable pupil or one who is the subject of a Child Protection plan or where there is an existing Child Protection file, we will call a multi-agency risk-assessment meeting prior to making the decision to exclude. In the event of a one-off serious incident resulting in an immediate decision to exclude, this will be reported the Board of Trustees.

## 21.0 LINKS TO ADDITIONAL INFORMATION ABOUT SAFEGUARDING ISSUES AND FORMS OF ABUSE

<http://northamptonshirescb.proceduresonline.com>

21.1 Staff who work directly with children, and their leadership team should read refer to this information

21.2 Guidance on children in specific circumstances found in Annex A of KCSIE- 20, and additional resources as listed below:

Issue	Guidance	Source
Abuse	<a href="http://www.northamptonshirescb.org.uk/young-people/what-is-abuse/">http://www.northamptonshirescb.org.uk/young-people/what-is-abuse/</a>	Northamptonshire safe guarding board
Bullying	<a href="http://www.northamptonshirescb.org.uk/young-people/bullying/">www.northamptonshirescb.org.uk/young-people/bullying/</a>	Northamptonshire safe guarding board
Children and the courts	<a href="http://www.northamptonshirescb.org.uk/young-people/crime/">http://www.northamptonshirescb.org.uk/young-people/crime/</a>	Northamptonshire safe guarding board
Missing from Education, Home or Care	<a href="http://westmidlands.procedures.org.uk/pkpls/regional-safeguarding-guidance/children-missing-from-care-home-and-education">http://westmidlands.procedures.org.uk/pkpls/regional-safeguarding-guidance/children-missing-from-care-home-and-education</a>  <a href="http://westmidlands.procedures.org.uk/pkotx/regional-safeguarding-guidance/children-missing-education-cme">http://westmidlands.procedures.org.uk/pkotx/regional-safeguarding-guidance/children-missing-education-cme</a>	Northamptonshire safe guarding board
Family Members in prison	<a href="https://www.nicco.org.uk/">https://www.nicco.org.uk/</a>	Barnardos in partnership with Her Majesty's Prison and Probation service (HMPPS) advice
Drugs	<a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/270169/drug_advice_for_Foundation_s.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/270169/drug_advice_for_Foundation_s.pdf</a>	DfE & ACPO
Domestic Abuse	<a href="http://www.northamptonshirescb.org.uk/young-people/what-is-abuse/yp-domestic-violence/">http://www.northamptonshirescb.org.uk/young-people/what-is-abuse/yp-domestic-violence/</a>	Northamptonshire safe guarding board
Child Exploitation	<a href="http://www.northamptonshirescb.org.uk/young-people/young-people-and-cse/">http://www.northamptonshirescb.org.uk/young-people/young-people-and-cse/</a>	Northamptonshire safe guarding board
Homelessness	<a href="https://www.gov.uk/government/publications/homelessness-reduction-bill-policy-factsheets">https://www.gov.uk/government/publications/homelessness-reduction-bill-policy-factsheets</a>	HCLG
Health & wellbeing	<a href="http://www.northamptonshirescb.org.uk/young-people/health-and-happiness/">http://www.northamptonshirescb.org.uk/young-people/health-and-happiness/</a>	Northamptonshire safe guarding board
On-line	<a href="http://policeandFoundations.org.uk/onewebmedia/Searching%20Screening%20&amp;%20Confiscation%20Jan%202018.pdf">http://policeandFoundations.org.uk/onewebmedia/Searching%20Screening%20&amp;%20Confiscation%20Jan%202018.pdf</a>	Police and Foundations panels
Private fostering	<a href="http://www.northamptonshirescb.org.uk/young-people/home-life/private-fostering/">www.northamptonshirescb.org.uk/young-people/home-life/private-fostering/</a>	Northamptonshire safe guarding board

Radicalisation	<a href="http://www.northamptonshirescb.org.uk/young-people/what-is-abuse/yp-radicalisation/">http://www.northamptonshirescb.org.uk/young-people/what-is-abuse/yp-radicalisation/</a>	Northamptonshire safe guarding board
Mental Health	<a href="http://www.northamptonshirescb.org.uk/police/mental-health/">http://www.northamptonshirescb.org.uk/police/mental-health/</a>	Northamptonshire safe guarding board

## APPENDIX 1

### DEFINITIONS AND INDICATORS OF ABUSE

#### 1. 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 maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- Protect a child from physical and emotional harm or danger;
- Ensure adequate supervision (including the use of inadequate care-givers); or
- Ensure access to appropriate medical care or treatment.

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

The following may be indicators of neglect (this is not designed to be used as a checklist):

- Constant hunger;
- Stealing, scavenging and/or hoarding food;
- Frequent tiredness or listlessness;
- Frequently dirty or unkempt;
- Often poorly or inappropriately clad for the weather;
- Poor Foundation attendance or often late for Foundation ;
- Poor concentration;
- Affection or attention seeking behaviour;
- Illnesses or injuries that are left untreated;
- Failure to achieve developmental milestones, for example growth, weight;
- Failure to develop intellectually or socially;
- Responsibility for activity that is not age appropriate such as cooking, ironing, caring for siblings;
- The child is regularly not collected or received from Foundation ; or
- The child is left at home alone or with inappropriate carers.

#### 2. PHYSICAL ABUSE

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

The following may be indicators of physical abuse (this is not designed to be used as a checklist):

- Multiple bruises in clusters, or of uniform shape;
- Bruises that carry an imprint, such as a hand or a belt;
- Bite marks;
- Round burn marks;
- Multiple burn marks and burns on unusual areas of the body such as the back, shoulders or buttocks;
- An injury that is not consistent with the account given;
- Changing or different accounts of how an injury occurred;
- Bald patches;
- Symptoms of drug or alcohol intoxication or poisoning;
- Unaccountable covering of limbs, even in hot weather;
- Fear of going home or parents being contacted;
- Fear of medical help;
- Fear of changing for PE;
- Inexplicable fear of adults or over-compliance;
- Violence or aggression towards others including bullying; or
- Isolation from peers.

### 3. SEXUAL ABUSE

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

The following may be indicators of sexual abuse (this is not designed to be used as a checklist):

- Sexually explicit play or behaviour or age-inappropriate knowledge;
- Anal or vaginal discharge, soreness or scratching;
- Reluctance to go home;
- Inability to concentrate, tiredness;
- Refusal to communicate;
- Thrush, persistent complaints of stomach disorders or pains;
- Eating disorders, for example anorexia nervosa and bulimia;
- Attention seeking behaviour, self-mutilation, substance abuse;
- Aggressive behaviour including sexual harassment or molestation;
- Unusual compliance;
- Regressive behaviour, enuresis, soiling;
- Frequent or open masturbation, touching others inappropriately;
- Depression, withdrawal, isolation from peer group;
- Reluctance to undress for PE or swimming; or

- Bruises or scratches in the genital area.

#### 4. EXPLOITATION

Child Sexual Exploitation occurs when a child or young person, or another person, receives “something” (for example food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of the child/young person performing sexual activities, or another person performing sexual activities on the child/young person.

The presence of any significant indicator for sexual exploitation should trigger a referral to Local Authority/ Children’s Trust Children’s Trust. The significant indicators are:

- Having a relationship of concern with a controlling adult or young person (this may involve physical and/or emotional abuse and/or gang activity);
- Entering and/or leaving vehicles driven by unknown adults;
- Possessing unexplained amounts of money, expensive clothes or other items;
- Frequenting areas known for risky activities;
- Being groomed or abused via the Internet and mobile technology; and
- Having unexplained contact with hotels, taxi companies or fast food outlets.
- Missing for periods of time (CSE and County Lines)

#### 5. 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 insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may also involve seeing or hearing the ill-treatment of another person. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment.

The following may be indicators of emotional abuse (this is not designed to be used as a checklist):

- The child consistently describes him/herself in very negative ways – as stupid, naughty, hopeless, ugly;
- Over-reaction to mistakes;
- Delayed physical, mental or emotional development;
- Sudden speech or sensory disorders;
- Inappropriate emotional responses, fantasies;
- Neurotic behaviour: rocking, banging head, regression, tics and twitches;
- Self harming, drug or solvent abuse;

- Fear of parents being contacted;
- Running away;
- Compulsive stealing;
- Appetite disorders - anorexia nervosa, bulimia; or
- Soiling, smearing faeces, enuresis.

N.B.: Some situations where children stop communicating suddenly (known as “traumatic mutism”) can indicate maltreatment.

## 6. RESPONSES FROM PARENTS/CARERS

Research and experience indicate that the following responses from parents may suggest a cause for concern across all five categories:

- Delay in seeking treatment that is obviously needed;
- Unawareness or denial of any injury, pain or loss of function (for example, a fractured limb);
- Incompatible explanations offered, several different explanations or the child is said to have acted in a way that is inappropriate to her/his age and development;
- Reluctance to give information or failure to mention other known relevant injuries;
- Frequent presentation of minor injuries;
- A persistently negative attitude towards the child;
- Unrealistic expectations or constant complaints about the child;
- Alcohol misuse or other drug/substance misuse;
- Parents request removal of the child from home; or
- Violence between adults in the household;
- Evidence of coercion and control.

## 7. DISABLED CHILDREN

When working with children with disabilities, practitioners need to be aware that additional possible indicators of abuse and/or neglect may also include:

- A bruise in a site that may not be of concern on an ambulant child such as the shin, maybe of concern on a non-mobile child;
- Not getting enough help with feeding leading to malnourishment;
- Poor toileting arrangements;
- Lack of stimulation;
- Unjustified and/or excessive use of restraint;
- Rough handling, extreme behaviour modification such as deprivation of medication, food or clothing, disabling wheelchair batteries;
- Unwillingness to try to learn a child’s means of communication;
- Ill-fitting equipment, for example, callipers, sleep boards, inappropriate splinting;
- Misappropriation of a child’s finances; or
- Inappropriate invasive procedures.

## APPENDIX 2

### DEALING WITH A DISCLOSURE OF ABUSE

When a pupil tells me about abuse they have suffered, what should I remember?

- Stay calm.
- Do not communicate shock, anger or embarrassment.
- Reassure the child. Tell her/him you are pleased that s/he is speaking to you.
- Never enter into a pact of secrecy with the child. Assure her/him that you will try to help but let the child know that you will have to tell other people in order to do this. State who this will be and why.
- Tell her/him that you believe them. Children very rarely lie about abuse; but s/he may have tried to tell others and not been heard or believed.
- Tell the child that it is not her/his fault.
- Encourage the child to talk but do not ask "leading questions" or press for information.
- Listen and remember.
- Check that you have understood correctly what the child is trying to tell you.
- Praise the child for telling you. Communicate that s/he has a right to be safe and protected.
- Do not tell the child that what s/he experienced is dirty, naughty or bad.
- It is inappropriate to make any comments about the alleged offender.
- Be aware that the child may retract what s/he has told you. It is essential to record in writing, all you have heard, though not necessarily at the time of disclosure.
- At the end of the conversation, tell the child again who you are going to tell and why that person or those people need to know.
- As soon as you can afterwards, make a detailed record of the conversation using the child's own language. Include any questions you may have asked. Do not add any opinions or interpretations.
- If the disclosure relates to a physical injury do not photograph the injury, but record in writing as much detail as possible.

NB, it is not education staff's role to seek disclosures. Their role is to observe that something may be wrong, ask about it, listen, be available and try to make time to talk.

Immediately afterwards

You should not deal with this yourself. Clear indications or disclosure of abuse must be reported to Local Authority/ Children's Trust without delay, by the Foundation Managing Director, DSL or in exceptional circumstances by the staff member who has raised the concern.

Children making a disclosure may do so with difficulty, having chosen carefully to whom they will speak. Listening to and supporting a child/young person who has been abused can be traumatic for the adults involved. Support for you will be available from your DSL or Head Teacher/Principal.

### APPENDIX 3

#### ALLEGATIONS ABOUT A MEMBER OF STAFF, TRUSTEE OR VOLUNTEER

1. Inappropriate behaviour by staff/volunteers could take the following forms:
  - Physical  
For example, the intentional use of force as a punishment, slapping, use of objects to hit with, throwing objects, or rough physical handling.
  - Emotional  
For example, intimidation, belittling, scapegoating, sarcasm, lack of respect for children's rights, and attitudes that discriminate on the grounds of race, gender, disability or sexuality.
  - Sexual  
For example, sexualised behaviour towards pupils, sexual harassment, inappropriate phone calls and texts, images via social media, sexual assault and rape.
  - Neglect  
For example failing to act to protect a child or children, failing to seek medical attention or failure to carry out an appropriate risk assessment.
  - Spiritual Abuse  
For example using undue influence or pressure to control individuals or ensure obedience, follow religious practices that are harmful such as beatings or starvation.
2. If a child makes an allegation about a member of staff, Trustee, visitor or volunteer the Foundation Managing Director must be informed immediately. The Foundation Managing Director must carry out an urgent initial consideration in order to establish whether there is substance to the allegation.
3. The Foundation Managing Director should exercise and be accountable for their professional judgement on the action to be taken as follows:
  - If the actions of the member of staff, and the consequences of the actions, raise credible Child Protection concerns the Foundation Managing Director will notify the Children's Trust Designated Officer (LADO). The LADO will liaise with the Chair of Trustees and advise about action to be taken, and may initiate internal referrals within Local Authority/ Children's Trust Children's Trust to address the needs of children likely to have been affected.
  - If the actions of the member of staff, and the consequences of the actions, do not raise credible child protection concerns, but do raise other issues in relation to the conduct of the member of staff or the pupil. These should be addressed through the Foundation's own internal procedures.
  - If the Foundation Managing Director decides that the allegation is without foundation and no further formal action is necessary, all those involved should be informed of this conclusion, and the reasons for the decision should be recorded on the child safeguarding file. The allegation should be removed from personnel records.
4. Where an allegation has been made against the Foundation Managing Director, then the Chair of the Trustee Board takes on the role of liaising with the LADO in determining the appropriate way forward. For details of this specific procedure see the Section on **Allegations against Staff and Volunteers** in the procedures of Local Authority/ Children's Trust Safeguarding Children Board.



## Safeguarding Leaders



**Catherine Deans**  
Managing Director  
DSL



**Jordan Letts**  
Inclusion Manager  
Deputy DSL

### HITZ Lead



**Shirley Malin**  
Programme Lead  
Safe Guarding Support

### Engage P&S Lead



**Harry James**  
Programme Lead  
Safe Guarding Support

### Engage + Lead



**Helena Fitzhenry**  
Programme Lead  
Safe Guarding Support

**If you are concerned please speak to the designated safeguarding lead straight away. Our safeguarding team will make contact with children's social care or other external agencies.**