

SAFEGUARDING POLICY

Reviewed: September 2026

Ratified: October 2026

Next Review: September 2027

For the Pen Green and Kingswood Integrated Centre

Please read this in conjunction with our Child Protection Policy

This policy has been informed by Keeping Children Safe in Education 2026 – statutory guidance for schools and colleges (DfE, 2025)

All internal policy documents referenced can be found at:
<https://www.pengreen.org/about/policies/>

Policy Review

These policies will be reviewed in full by the Governing Body annually.

The policy was last reviewed and agreed by the Governing Body in September 2026

It is due for review in September 2027 (up to 12 months from the above date).

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Introduction & Purpose of the Safeguarding Policy

The purpose of the policy

Children have a right to grow up in an environment which is safe and free from any abuse. We believe the needs of the child are paramount and should underpin all our Safeguarding work at the Integrated Centre.

This Policy and procedures relate to all staff, students, governors, and volunteers working in the Integrated Centre and will be shared as part of the staff induction programme and ongoing training (See Induction Programme Policy).

Guidance in this policy is taken from Keeping Children Safe in Education (2026). Schools and colleges in England must have regard to it when carrying out their duties to safeguard and promote the welfare of children. For the purposes of this guidance children includes everyone under the age of 18.

Safeguarding and promoting the welfare of children is defined for the purposes of this policy as:

- Providing help and support to meet the needs of children as soon as problems emerge.

- Protecting children from maltreatment, whether within or outside the home, including online.
- Preventing impairment of children's mental and physical health or development.
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and taking action to enable all children to have the best outcomes.

Local agencies, including the police and health services, also have a duty under section 11 of the Children Act 2004 to ensure that they consider the need to safeguard and promote the welfare of children when carrying out their functions. Working Together to Safeguard Children (2026).

Safeguarding and promoting the welfare of children is everyone's responsibility.

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers, students, and governors in the school and is consistent with the procedures of Northamptonshire Safeguarding Children Partnership.

Our policy and procedures also apply to **extended school and off-site activities**.

We will include opportunities across the curriculum for children to be taught about Safeguarding and to develop the skills they need to recognise danger and know where to seek help.

We will maintain an attitude of "it could happen here" where Safeguarding is concerned.

Everyone who comes into contact with children and their families and carers has a role to play in Safeguarding children. To fulfil this responsibility effectively, all professionals should make sure their approach is child centred. This means that they should consider, always, what is in the best interests of the child.

No single professional can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information, and taking prompt action.

The Integrated Centre expects that every person working and volunteering in these provisions have a personal responsibility to respond when they have concerns about a child's well-being and safety.

We will work in partnership with parents by involving them as soon as possible in our concerns. If we consider that sharing with the parent immediately will threaten or compromise the safety of the child, we will seek further qualified advice from the Multi-Agency Safeguarding Hub (MASH) in line with guidance by the Northamptonshire Safeguarding Children Partnership.

The Governing Body is responsible for having Safeguarding policies and procedures in place and ensuring that all requirements of the policy are implemented. We have named governors with responsibility for Safeguarding.

What is Safeguarding?

Safeguarding in the Pen Green and Kingswood Integrated Centre takes place on different levels.

- Child Protection - all staff, students, governors, volunteers and visitors to the Integrated Centre and any satellite sites delivering Corby Children Centre services understand their responsibilities and procedures about what to do if they have a concern.
- Training is available for all staff, governors and volunteers.
- Ensuring that procedures are in place to support staff and families to maintain the safety and to support the learning of children and families.
- Ensuring that risk assessments are in place, health and safety processes are up to date, there are procedures in place for children who are missing from education.
- Understanding and identifying the needs of children and families and ensuring that, where needed, they receive support through universal services and community-based early help, the targeted early help level of Family Help, or statutory services, in line with local thresholds.

A child centred and coordinated approach to Safeguarding

All staff are an important part of the wider Safeguarding system for children. This system is described in the statutory guidance Working Together to Safeguard Children (2024) and Keeping Children Safe in Education (September 2026).

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the Integrated Centre's Safeguarding regime and know that such concerns will be taken seriously by the Centre Leadership Team.

Victims should always be taken seriously, kept safe and never be made to feel they are creating a problem for reporting abuse.

A child's wishes and feelings should always be considered when determining what action to take and what services to provide. Systems are in place and are easily accessible for children to confidently report abuse.

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the Designated Safeguarding Lead if they have concerns about a child.

Detailed information on statutory assessments can be found in Working Together to Safeguard Children 2026 also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

All staff should be aware of systems that support Safeguarding, these will be explained as part of their induction, including Child Protection Policy, Behaviour Policy, Staff Code of Conduct, Children Missing from Education, role of Designated Safeguarding Lead and Part One of Keeping Children Safe in Education, September 2026. All staff, students, governors and volunteers need to be aware that the abuse and neglect and Safeguarding issues are rarely standalone events that can be covered by one definition or label in many cases multiple issues will overlap one another. Staff need to be able to identify cases of children who may be in need of help or protection and be aware of the types of abuse and neglect, and examples of other factors that influence Safeguarding issues e.g., drug abuse, mental health issues.

Appropriate whistleblowing procedures, which are suitably reflected in staff training and staff behaviour policies, are in place for such concerns to be raised with the Integrated Centre's Leadership Team. The whistleblowing policy is available on the Pen Green Website for staff, parents/carers, students, volunteers, visitors and contractors. This can be accessed through www.pengreen.org

Where a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

The NSPCC whistleblowing helpline <https://www.gov.uk/government/news/home-office-launches-child-abuse-whistleblowing-helpline> is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call

0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk

When engaging with external partners the Centre will ensure that appropriate arrangements are in place to keep children safe. Personnel agreements will be completed by the lead of the external organisation/team to verify that vetting processes have been followed and confirm that their staff have appropriate checks.

Keeping Children Safe in the Integrated Centre.

The Designated Safeguarding Lead (DSL) are members of the Centre Leadership Team and senior staff. The DSL and the Deputy Designated Safeguarding Leads (DDSLs) provide support to staff members to carry out their Safeguarding duties and who will liaise closely with other services such as children's social care (See Appendix 2 for a full list of current DSL/DDSLs).

The Designated Safeguarding Lead (and any deputies) have a complete Safeguarding picture and are the most appropriate person(s) to give advice on the response to Safeguarding concerns.

Whilst the activities of the Designated Safeguarding Lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the Designated Safeguarding Lead; this lead responsibility should not be delegated. (Annex C; Keeping Children Safe in Education (September 2026).)

The Designated Safeguarding Lead is the Assistant Head of Centre. The Designated Safeguarding Lead are informed of issues - especially ongoing enquiries under section 47 of the [Children Act 1989](#) and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - [PACE Code C 2019](#).

All staff, students and volunteers need to be prepared to identify children who may benefit from support before statutory intervention. This may include universal services and community-based early help or the targeted early help level of Family Help. In the first instance, staff should discuss support needs with their Deputy Designated Safeguarding Lead, Duty or the Designated Safeguarding Lead. Staff may be required to contribute to a Family Help assessment or plan and, where appropriate, act as the lead practitioner.

All staff members should be aware of systems within the Integrated Centre 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
- Staff Code of Conduct Policy
- The Role of the Designated Safeguarding Lead (including the identities of the Designated Safeguarding Lead and the deputies)
- Keeping Children Safe in Education 2026 (Part 1)

Copies of policies and a copy of Part one of Keeping Children Safe in Education 2026 will be provided to staff at induction. The Teachers' Standards 2012 state that teachers, including head-teachers, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties. In addition, new guidance for the Teaching Online Safety in School and key themes will be incorporated into the Centre's practice and relevant policy.

Staff, Students, Governors and Volunteers and Partners will:

- Follow the procedures set out by Northamptonshire Safeguarding Children Partnership at [Northamptonshire SCP](#) within the Northamptonshire Safeguarding Children Partnership Procedures Manual.
- Refer to the local authority current local Thresholds document in relation to Safeguarding concerns.
- Understand the Prevent Duty (see Prevent Duty within the Child Protection Policy). Senior staff have undertaken training and are able to assist and support staff if any concerns arise. Senior staff could seek further advice and guidance from the Multi-Agency Safeguard Hub (MASH) and/or the Prevent Engagement Officers at Northamptonshire Police.
- Ensure that parents have an understanding of the responsibility placed on us for Safeguarding by setting out our obligations in policy statements and documents available in all areas of the Integrated Centre and satellite sites.
- Where there is escalation to the Duty Worker a Cause for Concern paper record will be completed by the worker. If appropriate and not deemed potentially harmful to the child, these records will be shared with parents/carers (See Recording Concerns about Children) before being passed to the Duty Worker.

- Electronic records of concerns about children are stored on CPOMS. Access rights for staff will be agreed with the DSL and Head of Centre.
- Ensure we practice safer recruitment by checking the suitability of staff and volunteers to work with children (See Safer Recruitment Policy) following the most up-to-date guidance; Keeping Children Safe in Education 2026 and Right to work.
- All Governors of the Maintained Nursery School will be required to undertake a Section 128 check, to check whether a person is banned from being involved in the management and governance of schools.
- The Governing Body should ensure that all governors and trustees receive appropriate safeguarding and child protection (including online) training at induction. 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 in schools and colleges are effective and support the delivery of a robust whole Centre approach to safeguarding. Their training should be regularly updated.
- Follow procedures for managing allegations made against workers (See Policy for managing allegations made against workers).
- Ensure that any allegations of harm or abuse by persons working in the setting are reported to the Head of Centre. If allegations relate to the Head of Centre, these must be reported to the Chair of Governors. The Head of Centre or Chair of Governors will notify Ofsted as soon as reasonably practicable, and within 14 days, where the EYFS notification requirement applies and notify the Local Authority Designated Officer (LADO). The current local LADO/Designated Officer referral procedure will be followed. Please refer to: LADOConsultations@NCTrust.co.uk.
- Refer to the DBS (Disclosure and Barring Service) if a worker:
 - Was dismissed because they harmed a child or adult.
 - Was dismissed because they might have harmed a child or adult otherwise.
 - We were planning to dismiss them for either of these reasons, but the person resigned first.
 - Any reporting to DBS would be initiated by the Head of Centre or the Chair of Governors.
- Check identity, Right to Work, qualifications, references, obtain an enhanced DBS check, including children's barred list information and verify the person's

mental and physical fitness to carry out their work responsibilities. This would be done for all workers, including sessional workers and the information obtained will be recorded on our Single Central Record and/or personnel files. The Centre makes the same checks on individuals who have lived or worked outside of the UK. In addition, the Centre will make any further checks they think appropriate so that any relevant events that occurred outside the UK can be considered.

- We rarely use any early years' practitioners or teachers from supply agencies. On the occasions we do, we would make sure that we have obtained written notification from the supply agency that they have carried out the same checks as we would.
- Ensure all sessional workers, volunteers and partners are made aware of and understand our Safeguarding procedures, and sign to record this understanding.
- Complete a Personnel Agreement with all external agencies to ensure a current DBS is in place for workers delivering services in any areas of the Integrated. These providers will be expected to meet the guidance of KCSIE paragraph 167. If Corby Family Hubs Cluster receive an allegation related to an incident that happened when an individual or organisation were on site for the purpose of running activities for children, our Safeguarding Policy and procedures apply and the LADO would be informed. (In line with Keeping Children Safe in Education 2026, paragraph 377).
- Regularly ask staff to disclose any conviction or caution.
- The Integrated Centre will meet the strengthened EYFS welfare requirements from 1 September 2026, including explicit safer sleep requirements, the prohibition on providing registered childcare from premises where a banned dog breed is kept or present, and having regard to DfE screen use guidance for early years settings.
- In line with the EYFS statutory framework from 1 September 2026, staff must also disclose information that may affect their suitability to work with children. The Integrated Centre will act on such information promptly and in accordance with safer recruitment and suitability procedures.
- Raise awareness of Safeguarding issues and equip children with skills needed to keep themselves safe (See Anti-Bullying Policy; Anti-Harassment and Discrimination Policy; Behaviour Policy; Learning to be Strong Programme; the Integrated Centre's Behaviour Strategies).
- All staff should be aware of indicators, which may signal that children are at

risk from or are involved with serious violent crime. These may include increased absence from Nursery school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm, or a significant change in well-being, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by or are involved with individuals associated with criminal networks or gangs.

- Develop and implement procedures for identifying and reporting cases, or suspected cases of child abuse (See Procedures for Safeguarding Children).
- Support children who have been abused or suspected of abuse in accordance with his/her Child Protection Plan.
- Establish a safe environment in which children can learn and develop (Health & Safety Policy; Online Safety Policy and Prevent Guidance, Anti-Bullying Policy; Anti-Harassment and Discrimination Policy; Risk Assessment Policy, Offsite Trip Risk Assessment Policy; Learning to be Strong programme).
- Staff and Governing Body should be aware of their obligation under the [Human Rights Act](#) (1998), the [Equality Act](#) (2010) (including the Public Sector Equality Duty) and their local multi-agency Safeguarding Arrangements (please refer to Equal Opportunity Policy).
- Support all children known to the Local Authority social work teams, children with additional needs and all children using the Integrated Centre's services.
- Ensure all staff, students, Governors, and volunteers understand their responsibilities in being alert to the signs of abuse and responsibility for sharing their concerns with the Designated Safeguarding Lead or a member of the Centre Leadership Team.
- All staff will read, confirm and sign to say that they understand and will implement the Safeguarding policies and procedures (see Appendix 1 Child Protection Policy).
- All staff receive appropriate safeguarding and child protection training which is regularly updated. In addition, all staff members receive safeguarding updates (for example, via email, e-bulletins, and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. This training is varied and applies to a wide scope of safeguarding in various guises for example, gang culture, adult mental health and will not always correlate directly with child protection.
- To reduce the risk of allegations, all staff should be aware of safer working

practice and should be familiar with the guidance contained in the staff handbook/school code of conduct/staff behaviour policy and Safer Recruitment Consortium Document [Guidance for safer working practice for those working with children and young people in education settings](#) (February 2022). The document seeks to ensure that the responsibilities of school leaders towards children and staff are discharged by raising awareness of illegal, unsafe, unprofessional, and unwise behaviour. This includes guidelines for staff on positive behaviour management in line with the ban on corporal punishment ([School Standards and Framework Act](#), 1998).

E-Learning is available through the local Safeguarding Partnership and the Centre also has its own 'training challenge' to support staff to complete training around various safeguarding topics. Updated safeguarding knowledge and any training needs identified are undertaken as part of the individual and group supervision sessions held for all staff.

All staff should understand local pathways for universal services and community-based early help, targeted early help through Family Help and statutory support under sections 17 and 47 of the Children Act 1989. This includes identifying emerging problems, liaising with the DSL or DDSLs, sharing information with other professionals, contributing to assessment and planning and, where appropriate, acting as lead practitioner.

Concerns about a child's welfare should be referred to local authority children's social care. Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and if appropriate the police) is made immediately. Referrals should follow the local referral process.

Children's social care assessments should consider where children are being harmed in contexts outside the home, so it is important that Centre staff provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm. Additional information is available here: Contextual Safeguarding.

[Contextual Safeguarding Network – The Contextual Safeguarding programme, and the team who deliver it, are part of the International Centre: Researching child sexual exploitation, violence and trafficking \(IC\) at the University of Bedfordshire](#)

Staff must be aware of the process for making referrals to children's social care and for statutory assessments under the [Children Act](#) 1989 that may follow a referral, along with the role they might be expected to play in such assessments (See Child Protection policy).

All referrals made to children's social care are to be made in agreement with the DSL or a DDSL. If there was a disagreement about the course of action, there would be a discussion with the Head of Centre.

Effective safeguarding of children is based on practitioners and front-line staff wanting the very best for children. They need to be ready to stand up in the best interests of children to enable collective responsibility for problem solving, even if this brings them into disagreement with other practitioners, with other organisations or with their own managers and employing bodies.

Escalating concerns about a child is an expected part of partnership working. There is often no right or wrong answer when it comes to safeguarding children and judgements and decisions should be made by way of robust challenge, discussion and debate about the most effective way forward to ensure the child receives the best possible outcome. Further guidance on this matter can be found at:

[Resolving Conflicts - Northamptonshire SCP](#)

Staff will know what to do if a child tells them he/she is being abused or neglected. (See Child Protection Policy). Staff will know how to manage the requirement to maintain an appropriate level of confidentiality whilst at the same time liaising with relevant professionals such as the DSL and children's social care. Staff must never promise a child that they will not tell anyone about an allegation, as this may ultimately not be in the best interests of the child.

**Allegations involving Staff /Students/Governors/Volunteers/Contractors
(please refer to the Child Protection policy for process regarding allegations.)**

If any member of staff, governor, volunteer, partner agency, and parent have concern about a member of staff, volunteer or other professional working in the Integrated Centre then this should be referred to the Head of Centre.

Where there are concerns about the Head of Centre, this should be referred to the Chair of Governors and in the absence of the Chair of Governors, the Local Authority Designated Officer (LADO). The process for making referrals to LADO changed in June 2024. Please refer to LADOConsultations@NCTrust.co.uk.

As shown, the Centre has clear procedures in place to manage safeguarding concerns, or allegations against staff (including students and volunteers) that might indicate they would pose a risk of harm to children. Concerns including allegations that may meet the 'harms test' are contained within these procedures.

Definition of a harm test:

A person satisfies the harm test if they may harm a child or vulnerable adult or put them at risk of harm. It is something a person may do to cause harm or pose a risk of harm to a child or vulnerable adult

Definition of low-level concern:

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

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

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

- being over friendly with children,
- having favourites,
- taking photographs of children on their mobile phone or other cellular devices,
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating, or offensive language.

A low-level concern is one that may indicate that an individual has behaved, or may, have behaved in a way that indicates they may not be suitable to work with children.

The last bullet point above includes behaviour that may have happened outside of the Centre, that might make an individual unsuitable to work with children, this is known as transferable risk.

Where appropriate an assessment of transferable risk to children with whom the person works should be undertaken. If in doubt seek advice from the Local Authority Designated Officer (LADO).

All low-level concerns must be shared with the DSL (Assistant Head of Centre). Please refer to the Child Protection Policy and follow any required actions.

The Assistant Head of Centre (DSL) will decide on an appropriate course of action, either through disciplinary procedures, or where a pattern of behaviour moves from a concern to meeting the harm threshold, in which case it will be referred to the LADO.

If there are any doubts about whether the information shared meets the harm threshold, they should consult with their LADO.

Where a teacher is dismissed due to serious misconduct or might have been dismissed had they not left first, the Centre will always consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).

Local Authority notification when private fostering is discovered

Where the Integrated Centre has not been involved in making the arrangement, but a member of staff or volunteer becomes aware that a child may be in a private fostering arrangement, (where a child under the age of 16 (or 18 if disabled) is provided with care and accommodation by someone to whom they are not related in that person's home), they should raise this in the first instance with the Designated Safeguarding Lead (DSL). The DSL will notify local authority of the circumstances, and the local authority will check that the arrangement is suitable and safe for the child.

Statutory Framework

To safeguard and promote the welfare of children, the Integrated Centre will act in accordance with the following legislation and guidance:

- [Keeping Children Safe in Education Statutory Guidance 2026](#)
- [The Children Act 1989](#)
- [The Children Act 2004](#)

Section 11 of the [Children Act 2004](#) places duties on a range of organisations and individuals to ensure their functions, and any services that they contract out to others, are discharged having regard to the need to safeguard and promote the welfare of children.

[Education Act 2002](#) (Section 175/157) outlines that Local Authorities and School Governing Bodies have a responsibility to “*ensure that their functions relating to the conduct of school are exercised with a view to Safeguarding and promoting the welfare of children who are its pupils*”.

Keeping Children Safe in Education: Part One - information for all school and college staff (DfE, September 2026)

Working together to safeguard children 2026: statutory guidance (publishing.service.gov.uk)

[The Education \(Pupil Information\) \(England\) Regulations 2005](#)

[Sexual Offences Act \(2003\)](#)

[Section 26, The Counter Terrorism and Security Act 2015 \(PREVENT duty\)](#)

[Female Genital Mutilation Act 2003 \(Section 74, Serious Crime Act 2015\)](#)

Working Together to Safeguard Children (2026) requires each school to follow the procedures for protecting children from abuse which are established by the Northamptonshire SCP

Schools are also expected to ensure that they have appropriate procedures in place for responding to situations in which:

- A child may have been abused or neglected or is at risk of abuse or neglect
- A member of staff has behaved in a way that has or may have harmed a child or that indicates they would pose a risk of harm.

Multi-agency working

The Centre has a pivotal role to play in multi-agency safeguarding arrangements. The Centre contributes to multi-agency working in line with statutory guidance, Working Together to Safeguard Children 2026.

Locally, the three safeguarding partners (the local authority; a clinical commissioning group for an area within the local authority; and the chief officer of police for an area (any part of which falls within the local authority area) will make arrangements to work together with appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs.

It is especially important that schools and colleges understand their role in the three safeguarding partner arrangements. Governing bodies, proprietors and their senior leadership teams. The Centre, and especially the Designated Safeguarding Lead is aware of, and follows the local arrangements.

The three safeguarding partners have a shared and equal duty to work together to safeguard and promote the welfare of children. To fulfil this role, they must set out how they will work together and with any relevant agencies. Relevant agencies are those organisations and agencies whose involvement that the three safeguarding partners consider may be required to safeguard and promote the welfare of children with regard to local need. The three safeguarding partners will have set out in their published arrangements which organisations and agencies they will be working with, and the expectations placed on any agencies and organisations by the arrangements.

The three safeguarding partners should make arrangements to allow all schools (including those in multi-academy trusts) and colleges in the local area to be fully engaged, involved, and included in safeguarding arrangements. It is expected that, locally, the three safeguarding partners will name schools and colleges as relevant agencies and will reach their own conclusions on the best way to achieve the active engagement with individual institutions in a meaningful way.

The safeguarding partners should publish a document which sets out the local criteria for action in a way that is transparent, accessible, and easily understood. This should include: the process for the Early Help Assessment and the type and level of Early Help services to be provided; the criteria, including level of need, for when a case should be referred to local authority children's social care for assessment and for statutory services under section 10, 11 17, 20, 31 and 47 of the [Children Act 1989](#); and clear procedures and processes for cases relating to the exploitation of children, children managed within the youth secure estate and disabled children.

The Local Authority, with their partners, should develop and publish local protocols for assessment. Protocols should set out clear arrangements for how cases will be managed once a referral is made to children's social care. More details on information requests by the Safeguarding partners is provided in [Working Together to Safeguard Children](#). (2024)

Inspection

From September 2026, inspection arrangements use Ofsted's renewed inspection toolkits. Safeguarding evaluation considers whether leaders have established an open culture in which safeguarding is everyone's responsibility; practitioners identify children who need help or are at risk of harm; multi-agency working and referrals are effective; recruitment, supervision and staff conduct are safe; and safeguarding systems are kept under continual review.

Inspectors will always report on whether or not arrangements for safeguarding children and learners are effective.

Information Sharing Guidance

The Integrated Centre governing body is aware that data protection laws - the Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025 - support lawful information sharing for safeguarding. Information sharing decisions will be necessary, proportionate, relevant, adequate, accurate, timely and secure.

Safeguarding information may be shared without consent where lawful and necessary, and the rationale for decisions to share or not share will be recorded.

The ICO guidance [For organisations | ICO](#) , includes information about our obligations and how to comply, including protecting personal information, and providing access to official information.

In addition, the DfE Data Protection guidance for schools, which helps Centre staff, governors and trustees understand how to comply with data protection law, develop their data policies and processes, know what staff and child data to keep and follow good practices for preventing personal data breaches.

Procedure for recording information and concerns regarding children and families using the Integrated Centre

Staff should refer to the Child Protection Policy. At the point that information needs to be recorded about a particular child or family the following procedure should be followed:

- If a staff member is unsure whether an electronic Record of Concern file exists for the child/family, they should refer to the DSL or in their absence a DDSL. The Duty Cause for Concern file will contain information on any previously recorded concerns for the child.

Record of concern files are stored securely on an electronic system and the member of staff should speak to the allocated Duty worker if they need to access this. Subsequent, or new information for the Record of Concern must be forwarded to the Duty Worker or the DSL for processing and scanning onto the system.

If there is reasonable concern that any child's safety could be further compromised staff must share this information immediately and agree action to be taken to safeguard the child.

Any workers from outside the Integrated Centre if they have a concern whilst in the Integrated Centre should follow the Centre's Safeguarding process.

We will hold records in line with our records retention schedule.

When a child for whom the Integrated Centre has, or has had, safeguarding concerns moves to their primary school setting, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from any other main pupil file. In the case of an in-year transfer, this will occur within five days or within the first five days of the start of a new term. The DSL will obtain confirmation of receipt from the receiving school.

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

Where a child moves from Nursery to another setting then the DSL will contact the new setting to share appropriately the concerns around the child.

The Governing Body should ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the [Data Protection Act 2018](#) and the [General Data Protection Regulation](#) (UKGDPR).

This includes:

- Being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal, and should be treated as 'special category personal data'.
- Understanding that 'Safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner, but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.
- For schools, not providing pupils' personal data where the serious harm test under the legislation is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harms test is met, they must withhold providing the data in compliance with schools' obligations under the Data Protection Act 2018 and the UKGDPR.

The [Data Protection Act 2018](#) and UKGDPR do not prevent the sharing of information for the purposes of keeping children safe. 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.

Further details on information sharing can be found:

- in Chapter one of [Working Together to Safeguard Children](#), 2024 which includes a myth-busting guide to information sharing.
- at [Information sharing advice for safeguarding practitioners - GOV.UK](#). The seven golden rules for sharing information will be especially useful.
- at [Information Commissioner's Office](#) (ICO), which includes ICO UKGDPR FAQs and guidance from the department.

- in [Data protection: toolkit for schools](#) - Guidance to support schools with data protection activity, including compliance with the UKGDPR.

Confidentiality and Information Sharing

Information sharing is vital in identifying and tackling all forms of abuse and neglect. UKGDPR does not prevent, or limit, the sharing of information for the purposes of keeping children safe. Lawful and secure information sharing between schools, Children's Social Care, and other local agencies, is essential for keeping children safe and ensuring they get the support they need.

[The Data Protection Act \(UKGDPR\) 2018](#) introduced '**Safeguarding**' as a reason to be **able to process sensitive, personal information, even without consent** (DPA, Part 2, 18; Schedule 8, 4)

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

All relevant information can be shared without consent if to gain consent would place a child at risk.

Fears about sharing information **must not be allowed** to stand in the way of promoting the welfare and protecting the safety of children. As with all data sharing, appropriate organisational and technical safeguards should still be in place.

The [Working Together to Safeguard Children](#) statutory guidance (2024) states the following:

1. No single practitioner can have a full picture of a child's needs and circumstances so effective sharing of information between practitioners, local organisations and agencies is essential for early identification of need, assessment, and service provision to keep children safe. Rapid reviews and child safeguarding practice reviews have highlighted that missed opportunities to record, understand the significance of, and share information in a timely manner can have severe consequences for children
2. Practitioners should be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children. This may be when problems are first emerging (for example, persistent school absences) or where a child is already known to local authority children's social care. Sharing information about any adults with whom that

child has contact, which may impact the child's safety or welfare, is also critical.

3. Information sharing is also essential for the identification of patterns of behaviour when a child is at risk of going missing or has gone missing, including being missing from education. When multiple children appear associated to the same context or locations of risk, or in relation to children in the secure estate where there may be multiple local
4. Child Safeguarding Practice Review Panel 2021: annual report 19 authorities involved in a child's care, it will be for local safeguarding partners to consider how they build relationships and share relevant information in a timely and proportionate way with each other, other local organisations, and other safeguarding partnerships.
5. The Data Protection Act 2018 and UK General Data Protection Regulation (UK GDPR) supports the sharing of relevant information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of safeguarding and promoting the welfare of children.

To ensure effective Safeguarding arrangements:

- The Integrated Centre is required to follow the [Northamptonshire Children's Trust](#) arrangements that set out clearly the processes and the principles for sharing information. The arrangement also covers how information will be shared within the Integrated Centre and with others who may be involved in a child's life.
- All professionals responsible for children should not assume that someone else will pass on information that they think may be critical to keeping a child safe. If a member of staff has concerns about a child's welfare and considers that they may be a child in need or that the child has suffered or is likely to suffer significant harm, then they should share the information with local authority children's social care and/or the police. Staff should be particularly alert to the importance of sharing information when a child moves from one setting to another, due to the risk that knowledge pertinent to keeping a child safe could be lost.
- The Integrated Centre will aim to gain consent to share information but is mindful of situations where to do so would place a child at increased risk of harm. Information may be shared without consent if there are good reasons to do so and believe that the sharing the information will enhance the Safeguarding of a child in a timely manner. When decisions are made to share or withhold information, this is recorded as to who has been given the information and why.

Safeguarding children raises issues of **confidentiality** that must be clearly understood by all staff/volunteers in schools.

- Staff should never promise a child that they will not tell anyone about an allegation, as this may not be in the child's best interests
- Staff/volunteers who receive information about children and their families in the course of their work should share that information only within appropriate professional contexts
- Timely information sharing is essential to effective Safeguarding
- Information must only be shared on a 'need-to-know' basis, but you do not need consent to share information if a child is suffering, or at risk of, serious harm.
- The Governing Body and the CLT team ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information.

The Local Authority, with their partners, will develop and publish local protocols for assessment. Protocols set out clear arrangements for how cases will be managed once a referral is made to children's social care, please refer to [Welcome to the Northamptonshire Children's Trust...](#)

More details on information requests by the Safeguarding partners is provided in Working Together to Safeguard Children (2026).

Alternative Provision Safeguarding Requirements

Where the Centre may be in a position of placing a child with an alternative provision provider, the Centre fully understands that it continues to be responsible for the safeguarding of that child and should be satisfied that the placement meets the child's needs. Children in Alternative Provision often have complex needs, it is important that governing bodies and proprietors of these settings are aware of the additional risk of harm that their pupils may be vulnerable to.

As a Centre we will obtain written confirmation from the Alternative provision provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that the centre would otherwise perform in respect of our own staff. This includes written confirmation that the alternative provider will inform the Centre of any arrangements that may be put the child at risk (i.e. staff changes), so that the Centre can ensure itself that appropriate safeguarding checks have been carried out on new staff.

The department has issued two pieces of statutory guidance to which commissioners of Alternative Provision should have regard:

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

Anti-bullying policy for children

At the Integrated Centre we want to create and maintain an environment where individuals are treated with dignity and respect. We want the Integrated Centre to be happy places for everyone. It is our policy that bullying in all forms is unacceptable.

Bullying is a common form of deliberately hurtful behaviour, and it may manifest itself in many ways, but there are three main types. It may be **physical** – e.g., hitting, kicking; **emotional** – e.g., isolating an individual from social activities; or **verbal** – racist remarks or name calling.

Adults are also aware of sexual bullying and sexual exploitation of individuals, affecting both females and males. All adults working at the Integrated Centre are aware of and vigilant in their monitoring for instances of bullying in any form.

All adults within the setting are aware of the importance of responding immediately to any incidence of bullying. We aim to identify and prevent any bullying; this is in relation to our Behaviour Strategies document and 'Learning to be Strong' programme. The principles of the 'Learning to be Strong' approach are intrinsic to the day-to-day practices and support for children across the Integrated Centre.

We actively promote respect between children and between children and adults.

We promote an environment where children are happy and confident.

We want all children to have the confidence that the strategies used are appropriate and they themselves can use the Behaviour Strategies and Learning to be Strong strategies. We want to create an environment where bullying is perceived by all to be intolerable.

If any bullying is noted or reported it will be dealt with immediately,

- Information explaining what has happened will be recorded.
- The worker will try to establish what has happened.
- Children will be supported to solve the problem that has occurred.
- Children's emotional needs will be supported.
- Children's behaviour will be monitored, and they will be supported to modify their behaviour if it is inappropriate.

- Parents will be informed of any incidents of bullying and information and discussed with them.

At all times workers will protect the interest of any child involved, ascertain factual information relating to any allegation, treat both parties fairly and keep parents fully informed. In relation to workers, we adhere to Local Authority Anti-harassment policy and procedure.

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

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

However, the Cass review identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism and/or attention deficit hyperactivity disorder.

Dealing with challenging behaviour or concern about possible abuse of staff.

We want to support all parents to access services at the Integrated Centre. If parents are for any reason unhappy with their experience, we would always want them to share that with us so we can together resolve the situation.

However, on some occasions parents may arrive at one of the Integrated Centre feeling distressed or angry. When a person arrives at reception and it is considered likely that they pose risk of harm (including verbal) to other users, staff or children, a senior member of staff will be notified immediately. Senior staff members will be made immediately available to meet with the person and to support reception staff.

Should any staff be aware in advance that a person is likely to arrive, and they could pose a risk of harm to other users, staff or children, they should immediately notify a member of the Centre Leadership Team. Appropriate staff members will be made available to receive the person and to support the reception staff.

Any person considered likely to pose any harm will not be allowed access through the Integrated Centre's' security doors.

Centre Leaders and appropriate staff members, at least two personnel, will endeavour to calm the person posing a risk and deal with any issue raised. Staff will follow the complaints procedure, if required, to ensure the person's concern is taken seriously and appropriate action taken.

If the person continues to pose a risk to either the Integrated Centre's users, staff or children, they will be asked to leave the premises. If the person refuses to leave and they continue to pose a risk the Police will be contacted.

The safeguarding and protection of children is always of paramount importance to us. At no time will staff endanger themselves dealing with any person posing a risk. Centre Leaders will follow up any circumstances, provided identity of person posing risk is known, in writing with the person involved.

After such an incident senior staff members will review the situation and consider if additional support is needed for the person.

Any person known to us that has a criminal conviction in relation to children and is considered a potential risk in the Integrated Centre will be discussed with the Designated Safeguarding Lead and the Centre Leadership Team. A risk assessment will be completed to inform any decision making regarding the person having access to either of the Centres.

Child 'going missing' from Nursery and Early Years provision and

All parents are asked to inform the Integrated Centre staff if their child is going to be absent due to sickness, appointments, or holidays. This can be done by the parent by phoning into reception and leaving a message. The absence will then be logged on the Domain register.

As part of our commitment to working together to improve school attendance we would engage with the local authority's if we were concerned about a child's lack of attendance. For guidance please see:

[Working together to improve school attendance - GOV.UK](#)

Where reasonably possible the Integrated Centre should hold more than one emergency contact number for each child. This goes beyond the legal minimum and is good practice to give the Integrated Centre additional options to contact a responsible adult when a child is absent from the setting.

If a child is absent without a valid reason for more than 2 days from the Nursery or Early Years provision the Family Worker will phone the parent/carer to ask, in a sensitive way, why the child is absent. Staff to remain mindful that unexplainable and/or persistent absence from education can be a warning sign of a range of safeguarding concerns such as neglect and abuse.

If a child is absent without a valid reason for more than two sessions (this may be two weeks) from a group, the Group Worker will phone the parent/carer to ask, in a sensitive way, why the child is absent.

If the absent child is on a **Child Protection Plan** or **Child in Need Plan** or has any safeguarding issues the Family Worker will log the absence and adhere to the Plan. This will include attempts to contact the parent/carer at least twice on the **first day** of absence, at different times during the day. Answerphone messages will be left if possible, asking that the parent/carer contacts the Centre.

If staff are unable to contact the family within 2/3 days this will be discussed with the DSL to agree the next steps. Discussions will take place with all workers who have had contact with the family across the different domains in order that they can share any observations/information of both the children and parent/carers.

This is to establish whether there are any patterns of behaviour that may potentially put the child at significant risk of a number of safeguarding issues including, and not exclusive to, radicalisation, extremism, female genital mutilation, child sexual exploitation and honour-based violence.

If there is no response from the parent/carer and all involved staff have been consulted, then the staff will refer to our Safeguarding and Child Protection Policy and inform the Child's Local Authority social worker and the Centre's Designated Safeguarding Lead (DSL).

Once contact has been established with the parent/carer a Home Visit, if appropriate, will be arranged, as soon as possible by the Family Worker/Group Worker/DSLs, to confirm that the child is safe and well.

If contact is not made with the family and there are significant concerns for the safety of a child, the DSL will make a referral to the Local Authority MASH team clearly outlining the presenting Safeguarding Concerns. The MASH team will then make any necessary referrals.

This procedure is supported by:

Keeping Children Safe in Education 2026.

[Working Together to Improve School Attendance.](#) 2024.

Emergency procedure if a child is lost whilst in the care of the organisation.

In the event that a child is missing, a senior member of staff will be informed immediately.

A full search of the building and grounds will be undertaken.

Parents will be informed immediately.

The police will be required to attend if the child is not found. Advice will be taken from the police at this point.

A report will be made to Ofsted explaining the nature of the incident. This will be made within 24 hours.

A Local Authority incident form will be completed.

An immediate risk assessment will be undertaken, dependent on the nature and the outcome of the incident.

Procedure for collecting a child

The Couthie, Creche, Kingswood and Nursery (Den and Studio)

Children attending the Couthie, Creche, Nursery and Kingswood Nursery will be collected by a known person at the end of their session. Parents are asked to give permission for at least 2 contacts for specific adults to collect their child should they not be able to do so themselves, specific adults need to be considered responsible and must be at least 18 years old.

Family members (such as siblings, aunts, uncles, cousins) with consent from the parents, can be aged 16 years old and collect children from nursery/0-3 settings.

The Family Worker will ask parents to complete a collection form indicating who can collect their child from the setting. Family workers will only hand the child over to a parent who has parental responsibility or a named person on a collection form.

The Creche

In the Creche, it is expected that children will be collected by the same person who drops them off. If this is not possible the parent/carer must inform the Creche staff as soon as possible, and proof of identity will be required from the person collecting the child.

In the case of an emergency or unexpected situation resulting in a parent not being able to collect their child, we will speak to the parent asking for a description of the

person who will be collecting their child. We will ask for a password and will confirm this with the person collecting the child on arrival.

As soon as possible the parent will be asked to review their collection permission form in light of the emergency/unexpected situation.

If staff deem an adult collecting a child to be ill or under the influence of a substance impairing their ability to care for that child, another person on the collection form will be urgently contacted to assist.

Procedure for an uncollected child

If a child has not been collected at the end of their session or the end of the day the worker will stay with the child in the setting. The worker will comfort and reassure the child until their parent arrives.

In the creche the relevant group leader will be contacted to establish the whereabouts of the parent.

A member of the Centre Leadership Team will be notified. If necessary, the CLT member can support the workers, this will ensure the numbers of children in the setting remains within ratios.

After fifteen minutes if the child has still not been collected the worker in the setting will call the parents. If the phone goes to answer machine, leave a clear and concise message about coming to pick their child up as soon as possible.

If there is no reply, the worker will call the emergency contact names and numbers listed on the child's records. If they answer several security questions will be asked without giving the child's name to ensure it is that named person. For example, do you know a child who attends Pen Green and do you know the month the child is born? If they answer correctly and are available and agree to come to collect the child, then staff are to phone the parent back and leave a message that the named person is on their way to pick up their child.

The worker and CLT member will wait with the child until their parent arrives to collect them.

If there is no response from the parent's contact numbers or the emergency contact numbers, we will call:

- The named Social Worker (if applicable)/Manager involved with the family.
- If after 6.00pm we will then call the Out of Hours Team on 01604 626938.

Where appropriate a fee is charged for late collection of children. Details of which can be found in the parent/carer contract.

Parental Responsibility

Who has parental responsibility? (Please read this carefully – it is not always who you think.)

Parental responsibility was created by the [Children Act 1989](#). Not all parents have parental responsibility.

People who have parental responsibility are:

- The natural Mother.
- The natural Father provided he is married to the mother when the child was born or has subsequently married her.
- The natural Father (from 1 December 2003 onwards) as long as the father and mother register the birth of the baby together.

These people do not automatically have parental responsibility:

- The father of the child if he and the mother are not married.
- Grandparents or other relatives.
- Stepfathers.
- Guardians of the child appointed by a will.

What does this mean for my child?

This means that consent and registration forms can only be signed by parents/carers with parental responsibility.

That children can be collected by parents/carers who do not have parental responsibility, but we must have written consent from the parent who has parental responsibility.

How to obtain parental responsibility

The father can obtain parental responsibility by:

- Parental Responsibility Agreement – this is a legal document, which the mother must sign. It must be witnessed and filed with the principal registry (0207 947 6936).
- Parental Responsibility Order (PRO). The father can apply to the court for an order if the mother refuses to make a PR agreement.
- Residence Order – this confers parental responsibility automatically.
- Marriage to the child's mother.

Private Fostering

With all Private Fostering arrangements, the responsibility for Safeguarding and promoting the welfare of the child remains with the parent or person with parental responsibility. If a staff member becomes aware that the child is living in a private fostering arrangement, they **must** inform the Designated Safeguarding Leads who will inform the MASH in line with the NCSP procedures.

Some common examples of circumstances in which Private Fostering arrangements may occur;

- When a child is placed with friends of the family on a long-term basis due to family breakdown or parent's ill health
- Children whose parent work commitments make it difficult for them to use registered services
- Overseas students who are living with a carer or 'host family' for over 28 days
- Children in boarding schools who live with another family during school holidays
- A teenager living with friends or in the home of a boyfriend or girlfriend.

A child's caring arrangement is **not** considered to be a Private Fostering arrangement when:

- The carer is the child's parent
- The carer has parental responsibility
- The carer is an approved foster carer, and who the placement was made by Children & Young People's Authority.

The nationally accepted definition of Private Fostering is when a child under the age of 16 (under 18 if disabled) is cared for by someone who is **not** their parent or a 'close relative'. This is a private arrangement made between a parent and a carer for 28 days or more.

Close relatives are defined as stepparents, grandparents, brothers, sisters, uncles or aunts (whether of full blood, half blood or marriage/affinity).

Many private fostering arrangements remain unknown to the Local Authority. This is a cause for concern as privately fostered children and young people, without the safeguards provided by law, are a particularly vulnerable group.

All staff should be alert to the definition and wider aspects relating to private fostering.

Northamptonshire Children's Trust (NCT) Services must be informed of all private fostering arrangements.

If professionals become aware of a child who is being privately fostered, they should encourage the parent/carers to inform NCT Children's Services of the arrangement or contact themselves if they think parents/carers may not have done so already.

Further information on private fostering can be found on the NSCB website: [Private Fostering - Northamptonshire SCP](#)

Fostering by Local Authority

When a child is **accommodated on a voluntary basis (Section 20 Care)** by the Local Authority the parents retain full parental responsibility. No important decisions about the child can be made without the parents' consent. The Local Authority does not have parental responsibility.

Parental responsibility for children who are subject to **Care Orders** lies with the Local Authority who share it with the parents. Good practice will often dictate that parents are still involved with the major decisions affecting the child. Fostering, which is about looking after someone else's child, is shared caring between the foster carers, the parents and the Department. Though foster carers carry a lot of responsibility, they do not carry it alone.

Useful Links:

Northamptonshire Safeguarding Children Partnership

[Home - Northamptonshire SCP](#)

National Society for Prevention of Cruelty to Children (NSPCC)

<http://www.nspcc.org.uk/>

0808 800 5000

Childline

<https://www.childline.org.uk/>

0800 1111

The revised guidance Keeping Children Safe in Education 2026 is reviewed annually in September of each year.

It is **essential** that **all** staff have access to this online document and read Part 1 and Annex, which provides further information on:

- Children missing from education
- Child sexual exploitation
- 'Honour based' violence
- FGM mandatory reporting duty
- Forced marriage
- Preventing radicalisation
- Domestic Abuse

This is to assist staff to understand and discharge their role and responsibilities as set out in this guidance. At the Integrated Centre staff are asked to sign to say they have read these sections and should subsequently be re-directed to these online documents again should any changes occur.

All Integrated Centre Governors, volunteers and staff members need to be aware that the abuse, neglect, exploitation, and safeguarding issues are rarely standalone

events that can be covered by one definition or label in many cases multiple issues will overlap one another.

Staff need to be able to identify cases of children who may need help or protection. Types of abuse, neglect and exploitation and examples of other factors that influence safeguarding issues e.g., Drug abuse mental health issues are described in the following sections.

Domestic Abuse

[The Domestic Abuse Act](#) 2021 outlines the 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 any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality.

This can encompass, but is not limited to, the following types of abuse: Psychological; Physical, Sexual, Financial & Emotional

Indicators of Domestic Abuse

Domestic violence and abuse can cause physical danger and emotional distress to children and adults. It can also affect infants and young children as there is a real risk of ever-increasing harm to their physical, emotional, and social development ([UNICEF 2006](#)). Indicators are presenting problems or conditions that are associated with domestic violence and abuse. They can include:

- symptoms of depression, anxiety, post-traumatic stress disorder, sleep disorders
- suicidal tendencies or self-harming
- alcohol or other substance use
- unexplained chronic gastrointestinal symptoms
- unexplained reproductive symptoms, including pelvic pain and sexual dysfunction
- adverse reproductive outcomes, including multiple unintended pregnancies or terminations, delayed pregnancy care, miscarriage, premature labour and stillbirth
- unexplained genitourinary
- vaginal bleeding or sexually transmitted infections
- chronic pain (unexplained)
- traumatic injury, particularly if repeated and with vague or implausible explanations

- problems with the central nervous system – headaches, cognitive problems, hearing loss
- repeated health consultations with no clear diagnosis
- intrusive 'other person' in consultations including partner or husband, parent, grandparent or an adult child (for elder abuse)
- concerning or inadequate explanations given for injuries.

All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Domestic Abuse Notification (DAN)

Within the Local Authority there is a domestic abuse notification scheme. The scheme is run by the Educational Inclusion and Partnership Team (EIPT) in partnership with the police.

The scheme involves early reporting to maintained nurseries and schools when a child or young person has been involved in a domestic abuse incident.

Upon receipt of a police notification, the Education Inclusion and Partnership Team, within North Northants Council, should contact the Designated Safeguarding Lead within the Integrated Centre and share the notification about the child or young person who has experienced or been subject to domestic abuse.

The Designated Safeguarding Lead can then share this information with relevant staff for the DSLs to consider what type of support needs to be offered to the affected child.

Some examples of support offered:

- Mentoring or someone to talk to
- Checking on well being
- Offering 'quiet time'
- Referrals to Social Care
- Just 'keeping an eye' on the individual
- Referrals to specialist support via an Early Help Assessment

Within the notification email there is a link to an online form. The DSL will access this link and complete the form to advise of receipt of the notification and advise what support was offered. The DSL will then receive a Reference Number which is added onto the Duty spreadsheet along with details of the child as an internal recording process.

All information sharing and resulting actions will be undertaken in accordance with the [Northamptonshire Domestic Abuse Service](#) We will record this information and

store this information in accordance with the record keeping procedures outlined in this policy.

[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: [How to Protect Children From Domestic Abuse | NSPCC](#)

[Operation Encompass](#) provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8AM to 1PM, Monday to Friday on 0204 513 9990 (charged at local rate).

Substance Misuse

Parental and family alcohol and drug use (or substance misuse) can potentially cause a range of complications and problems for the consistent well-being of children and can cause serious harm at all stage of their lives from conception through to adulthood. Research and practice tells us that working with vulnerable families at the very early stages of a child's life and in some cases even before birth is vital for improving the child's welfare in the future. Similarly, early intervention can be the most effective measure when helping parents deal with their substance misuse.

What is Parental Substance Misuse?

Parental substance misuse refers to the use of illegal or prescribed drugs and/or alcohol to a level that adversely impacts both on the health and behaviour of the parent, and the lives of their children.

Parental substance misuse is characterised by the use of either illicit drugs and/or alcohol, to a degree where the physical, emotional, psychological and behavioural well-being and care-taking capacity of the parent is compromised.

The adverse consequences for children are typically multiple and cumulative and will vary according to the child's age, stage of development and any protective factors in the wider environment.

What do we mean by 'substance'?

Put simply, a **substance** is anything that people take to change the way they feel, think or act. This includes things like alcohol, tobacco, and caffeine, as well as illegal drugs such as cannabis and cocaine. People may also misuse prescribed medicines to change how they feel, or in some cases chemicals such as lighter fluid or glue.

What do we mean by 'misuse'?

Anyone can **misuse** a substance (such as by drinking too much alcohol and feeling sick). In this instance 'misuse' also includes taking a substance to cope with anxiety or despair or relying on a substance to help cope with parts of day-to-day life.

What do we mean by 'dependence'?

Some people can become **dependent** upon a substance, either physically or psychologically. This dependency is different from misuse. When someone is dependent, their control over their substance use has become impaired, meaning that they are no longer in a position where they feel able to simply stop.

What role can we play at the Integrated Centre?

There are a number of protective factors to be considered for children aged between 0-5 years. At the Integrated Centre, in conjunction with partner agencies, we provide information on:

- Good regular antenatal care
- Health care for mother/baby (including nutritional advice)
- Support around income and housing
- Support for mother (from at least one caring adult)
- Access for the child to social and educational opportunities

Help around substance misuse is another protective factor that we can provide. Not least because of our ability to provide a safe, non-judgemental environment in which parents can be supported without feeling judged or stigmatised. Due to our ideal position as a local resource providing non-stigmatising, open door services and support to the whole community, we offer an empowering environment within which any family, parent or child-based need can be responded to.

With our focus on providing parents and families with all they need to provide every child with a good start we set the agenda to address a range of issues that may get in the way.

Alcohol and drug use are one of the issues within this range, and benefit from being approached in the same way as we currently promote healthy lifestyles. In this way we can support the promotion of the safe use of substances, in the interest of both parents and their children.

Signs and Indicators of Mental Ill-Health

We want all parents to feel they can access services at the Integrated Centre. We will work hard with individuals to understand their particular needs and strengths. We do not want any family to feel discriminated against because of their particular needs. The Integrated Centre have a philosophy that parents may be coming to the Integrated Centre because we provide services, but they may also want to contribute

to service delivery. All parents will be encouraged to access all the areas of the Integrated Centre they want to use and to have a say in the provision.

We want all staff to understand how to support parents with mental illness and not overlook the symptoms they are experiencing. So, what are the moods that accompany the onset of depression or mental disorders? Below is a list of emotions and moods commonly associated with the early stages of mental illness and depressive disorders. Staff at the Integrated Centre want to understand mental ill health and offer appropriate support to any parent experiencing symptoms of mental illness.

Whilst this list of symptoms is in no way an official test for diagnosing mental illness or disorders, staff can use it to confirm or deny their suspicions about mental health. Read through each of the descriptions of the moods and emotions, and then make a decision about what to do next i.e., talking to their Designated Lead, who is a DDSL in their domain.

The Integrated Centre has trained mental health first aiders and well-being champions who can support all adults accessing the Integrated Centre.

Some symptoms of mental illness:

- Overwhelmed by fear or worry
- Depressed mood
- Confused thinking
- Trouble dealing with stress
- Suicidal thoughts
- Severe anxiety
- Problems sleeping
- Distance from friends and family
- Paranoia
- Feeling physically ill with no clear diagnosis

Remember, these symptoms are not unique to one mental illness; rather, they are common symptoms amongst several different types of mental illness.

Mental Health in Children and Young People

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.

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.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy and speaking to the Designated Safeguarding Lead or a Deputy DSL.

The DfE has published advice and guidance on [Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools](#) (which may also be useful for colleges).

In addition, Public Health England has produced a range of resources to support schools 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.

Children requiring mental health support

The Integrated Centre has an important role to play in supporting the mental health and wellbeing of their pupils. 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. The Integrated Centre has a clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems. The Integrated Centre can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies.

Public Health England has produced a range of resources to support settings to promote positive health, wellbeing and resilience among young people. For further information please refer to: [Mental health and behaviour in schools - GOV.UK \(www.gov.uk\)](#)

Child Sexual Exploitation (CSE)

The process regarding concerns around Child Sexual Exploitation in the first instance is the DSL, in the absence of a DSL contact the local authority MASH team, in an emergency contact the police.

Child Sexual Exploitation (CSE) involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities.

Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. This is referred to the 'boyfriend model' or 'relationship model' of sexual exploitation.

What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation, or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyber-bullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

Child Criminal Exploitation (CCE) which includes information on how children can be exploited and makes clear that the experiences of girls being criminally exploited can be very different to boys, indicators of CCE may also be different for girls.

Child sexual exploitation is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them.

Child sexual exploitation does not always involve physical contact and can happen online.

A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point.

The following list of indicators is not exhaustive or definitive but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of sexual exploitation.

Signs include:

- Underage sexual activity
- Inappropriate sexual or sexualised behaviour
- Sexually risky behaviour, 'swapping' sex
- Repeat sexually transmitted infections
- In girls, repeat pregnancy, abortions, miscarriage
- Receiving unexplained gifts or gifts from unknown sources
- Having multiple mobile phones and worrying about losing contact via mobile
- Having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs)
- Changes in the way they dress
- Going to hotels or other unusual locations to meet friends

- Seen at known places of concern
- Moving around the country, appearing in new towns or cities, not knowing where they are
- Getting in/out of different cars driven by unknown adults
- Having older boyfriends or girlfriends
- Contact with known perpetrators
- Involved in abusive relationships, intimidated and fearful of certain people or situations
- Hanging out with groups of older people, or anti-social groups, or with other vulnerable peers
- Associating with other young people involved in sexual exploitation
- Recruiting other young people to exploitative situations
- Truancy, exclusion, disengagement with school, opting out of education altogether
- Unexplained changes in behaviour or personality (chaotic, aggressive, sexual)
- Mood swings, volatile behaviour, emotional distress
- Self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders
- Drug or alcohol misuse
- Getting involved in crime
- Police involvement, police records
- Involved in gangs, gang fights, gang membership
- Injuries from physical assault, physical restraint, sexual assault.
-

If staff have concerns surrounding any of the above information, they should immediately follow the Integrated Centre's Child Protection procedures. School and college staff can access government guidance via GOV.UK and other government websites.

For CSE there is the following guidance: [What to do if you suspect a child is being sexually exploited.](#) Additional information can be sought through using the [Child exploitation disruption toolkit - GOV.UK](#)

Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: [Child sexual exploitation: guide for practitioners](#)

Child Criminal Exploitation (CCE)

Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.

In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

Some of the following can be indicators of both child criminal and sexual exploitation where children:

- appear with unexplained gifts, money or new possessions
- associate with other children involved in exploitation
- suffer from changes in emotional well-being
- misuse alcohol and other drugs
- go missing for periods of time or regularly come home late, and
- regularly miss school or education or do not take part in education.

Children who have been exploited will need additional support to help keep them in education.

Child Sexual Exploitation (CSE) 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 additional specific indicators that may be present in CSE are children who:

- have older boyfriends or girlfriends; and
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: [Child sexual exploitation: guide for practitioners](#)

Child Criminal Exploitation: County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money.

Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in several locations including any type of schools (including special schools), further and higher educational institutions, pupil referral units, children's homes and care homes. Children are also increasingly being targeted and recruited online using social media.

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

A number of the indicators for CSE and CCE as detailed in above sections may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing and are subsequently found in areas away from their home
- have been the victim or perpetrator of serious violence (e.g. knife crime)
- are involved in receiving requests for drugs via a phone line, moving drugs,
- handing over and collecting money for drugs
- are exposed to techniques such as 'plugging', where drugs are concealed
- internally to avoid detection
- are found in accommodation that they have no connection with, often called a 'trap
- house or cuckooing' or hotel room where there is drug activity
- owe a 'debt bond' to their exploiters
- have their bank accounts used to facilitate drug dealing.

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office in [Criminal exploitation of children, young people and vulnerable adults: County lines](#)

Serious Violence

All Integrated Centre staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from the Integrated Centre, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

All staff should be aware of the associated risks and understand the measures in place to manage these. Advice for schools and colleges is provided in the Home Office's [Preventing youth violence and gang involvement \(2013\)](#) and its [Criminal exploitation of children and vulnerable adults: county lines \(accessible version\) - GOV.UK](#) guidance.
[Advice to schools and colleges on gangs and youth violence - GOV.UK \(www.gov.uk\)](#)

The PREVENT Duty

The [Prevent Strategy](#) published by the Government in 2011 is part of an overall counter-terrorism strategy [CONTEST](#). The aim of the Prevent Strategy is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism (DfE guidance July 2015).

In order to demonstrate compliance with the duty, under section 26 of the [Counter Terrorism and Security Act](#) 2015, to have “*due regard to the need to prevent people from being drawn into terrorism*”.

The Integrated Centre will:

- Review and work within the Integrated Centre's existing framework of wider Safeguarding duties.
- The Integrated Centre will continue to promote fundamental British values as part of children's personal, social and emotional development and understanding of the world (see EYFS and Behaviour as Communication).
- It is our view at the Integrated Centre that British values also represent a humanistic approach to working with children and adults these are characterised by warmth, companionship, openness, interest and cultural humility.
- A fresh emphasis will be placed on identifying children or adults vulnerable to radicalisation.
- A fresh emphasis will be placed on challenging extremist argument or behaviour in supervision or within an appropriate [safe space](#) within the Integrated Centre.
- To this end the staff/volunteers/governors at the Integrated Centre will work with existing partnership arrangements, e.g. The local authority, Police, Social Services, NCSP, other agencies, and parents, to familiarise themselves with potential dangers and risks within the local as well as wider context
- The Integrated Centre's Designated Safeguarding Lead, and other senior staff, will undertake awareness raising training. They will ensure that all staff are aware of how to better use their professional judgement in identifying

behavioural changes and appropriate ways of acting where there may be concerns that a child or adult might be vulnerable to radicalisation.

- All staff will take action to protect children from harm and will be alert to harmful behaviour by other adults in the child's life.
- Senior staff that have completed the training will be identified in each area of the Integrated Centre. The training will support them in recognising vulnerability to being drawn into terrorism, be aware of what action to take in response to concerns, when it is appropriate to make a referral to the Channel Programme and how to receive additional advice and support.
- If staff have concerns about a child or family in relation to radicalisation and being drawn into terrorism the designated person in their area that has completed the training will be used as the first point of call for advice about next steps. The senior person will then make the decision to contact MASH for further support and advice.
- Existing arrangements for filtering online material when accessing the internet onsite will be regularly checked to ensure that children and young people are safe when using the Integrated Centres' computers (please refer to the Integrated Centre Online Policy).
- The Lead member of staff with responsibility for the website and social media will oversee the management of filtering and monitoring of IT systems across the Integrated Centre. The Centre's DSL will have overall responsibility for ensuring we have effective strategies in place. These filters will block harmful and inappropriate content without unreasonably impacting on learning.
- Filtering and monitoring arrangements will be reviewed for effectiveness at least once every academic year by the senior leader responsible for filtering and monitoring, with support from the DSL and IT support. The review will include checks that filtering works appropriately on all internet-connected devices in all relevant locations, and a record of checks and reviews will be retained.

Since the Integrated Centre is engaged in family and adult education as well as the education of young children, it will continue to provide a safe environment for exploring sensitive or controversial issues.

The Integrated Centre will place renewed energy on promoting effective ways of resisting undesirable pressures, resilience, determination, self-esteem and confidence. Please refer to the Child Protection Policy for a full list of nominated trained staff within the Prevent Duty.

Preventing Radicalisation

The Centre adheres to the Prevent Duty statutory guidance (2023).

The [Counter-Terrorism and Security Act](#), 2015 places a duty on authorities 'to have due regard to the need to prevent people from being drawn into terrorism'.

Protecting children from the risk of radicalisation should be seen as part of schools' and colleges' wider Safeguarding duties and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised.

As with other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may need help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include making a referral to the Channel programme.

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

The Prevent Duty Guidance for England and Wales places requirements on the school under four themes: risk assessment, working in partnership, staff training and IT policies.

In addition, schools and colleges should refer to the [DfE Prevent Duty Guidance](#)

The use of social media for online radicalisation:

www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisation

Concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL are not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. In consultation with the DSL a referral can be made to the local authority children's social care team directly or if a member of staff is worried about someone and wants to find out more about Prevent before making a referral they can visit the [ACT Early website](#).

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

Channel Programme

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the Integrated Centre may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

Guidance on Channel is available at:

<https://www.gov.uk/government/publications/channel-guidance>

Additional support

The Government has published further advice for schools on the Prevent Duty.

<https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty>

Honour-Based Abuse (HBA)

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

All forms of so called HBA are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the Designated Safeguarding Lead. Professionals in all agencies, and individuals and groups in

relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

Staff who have a concern regarding a child that might be at risk of HBA, they should activate local Safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

Forced Marriage (FM)

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. Schools and colleges can play an important role in safeguarding children from forced marriage.

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 colleges) 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](#).

School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fm@fcdo.gov.uk.

In addition, since February 2024 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday. Section 5B(6) of the [Female Genital Mutilation Act](#) 2003 states teachers need not report a case to the police if they have reason to believe that another teacher has already reported the case. 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.

Additional information can be found on the [Home - Northamptonshire SCP](#)

Using Mobile Phones, Cameras and IT within the Centre

Mobile/Smart Phones/Smart Watches & Sport Watches/other electronic devices with imaging and sharing capabilities

Information for Staff/Volunteers/Students/Governors

Personal mobile phones are permitted in the Integrated Centre grounds, **but are to be used during break times only, within designated areas away from children.**

Personal mobile phones, access to smart and sport watches and electronic devices which are capable of receiving/sending images and data and/or communications are permitted on the Integrated Centre grounds, **but must only** be used during break times, and only within designated areas away from children.

The wearing of smart and sport watches by children attending any of the settings in the Integrated Centre is not allowed given the potential for unauthorised or unintentional, taking of photographs and/or video recording within the setting.

Staff/Volunteers should not have phones on their person during work hours, if you see a colleague using their mobile phone within work time there is the expectation that you will challenge this inappropriate use and request the phone be put away. Should this practice continue despite a colleague's challenge it **must** be reported to a member of CLT.

Personal mobile phones must **never** be used to contact children or their families, nor should they be used to take videos or photographs of children. Integrated Centres' issued devices only should be used for this purpose and, if containing sensitive information or photographs of children, should not leave the premises unless encrypted and this must be acknowledged in the policy.

Appropriate staff are issued with work mobiles, these are to be used for work purposes only. All staff issued with a work mobile are required to complete and sign the LGSS Mobile phone policy and by signing the document agree that they have read, understood and agree to comply with the policy.

For staff who are allocated a work mobile phone, access to the local authority system requires the use of two factor authentication. This process requires access to personal mobile phones by staff to receive the required code to use on their work devices. This is the **only permissible work-related use of staff personal phones.**

All staff will complete Safeguarding training which will include an element of online safety training – specifically filtering and monitoring.

Staff are required to undertake annual mandatory Data Protection and Cyber Security training facilitated by the Local Authority.

Whilst considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, the Governing Body should be doing all that they reasonably can to limit children's exposure to any risks from the Centre's IT system. As part of this process, the Governing Body should

ensure the Integrated Centre has appropriate filters and monitoring systems in place and regularly review their effectiveness. (please refer to the Integrated Centre Online Safety & Security Policy).

Information for Parents/Visitors/Centre Users

In line with the most up to date guidance from the Department of Education (2024) regarding mobile usage in school settings, mobile phones brought into the Integrated Centre are **prohibited** from being used across the Centre by parents/carers, visitors or centre users. There is one designated area (the Community Room). This would be where parents can make/receive urgent or emergency calls relating to their child(ren) or family's well-being or physical health.

Staff will be expected to consistently follow the policy and ensure parents/Visitors/Centre Users adhere to the policy while in the Centre.

If staff see photographs or videos being taken using a mobile phone, they will approach the person taking the image and will ask to view the images. If they include children other than those who the person has legal responsibility for, they will be deleted immediately.

Visitors are not allowed to take any photographs involving children in **any** childcare space within the Integrated Centre. Opportunities for taking photographs of the physical spaces when not inhabited by children can be made available. In addition, visitors can request material from the Integrated Centre's Marketing Officer, for which there may be a charge incurred.

Parents/carers are currently discouraged from accessing their mobile phones during groups and within the shared spaces areas. However, if they need to take or make a call, they will be encouraged to step outside of the group or shared space.

Up skirting is the practice whereby mobile phones can be used to take images under a person's clothing without their knowledge 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. Mobile phone usage in the Domain spaces as outlined above, or in the immediate area prior to entering the Domain space by parents/carers will be continually monitored and challenged appropriately by staff.

Photography and Video

Digital photographs and videos are an important part of the learning experience in the Integrated Centre and, as such staff have a responsibility to ensure that they not only educate children about the safe and appropriate use of digital imagery, but also model good practice themselves. To this end, there are strict policies and procedures for staff and children about the use of digital imagery and videos.

- Written consent must be obtained from parents or carers before photographs or videos of young people will be taken or used within the Integrated Centre including displays, learning journeys, Integrated Centre website and other marketing materials.
- Written consent must also be obtained from staff, students, volunteers and governors before any image is produced and used for Integrated Centre purposes (please see the Online Safety Policy for examples of consent).
- Staff will ensure that children are at ease and comfortable with images and videos being taken.
- Staff must not use personal devices, such as cameras, video equipment or camera phones, to take photographs or videos of children.
- Integrated Centre issued devices only should be used for this purpose and, if containing sensitive information or photographs of children, should not leave the premises unless encrypted and this must be acknowledged in the policy. In the case of an outing, all data must be transferred/deleted from the Integrated Centre camera/device before leaving the premises.

For further information on the use of IT within the Integrated Centre please refer to the Online Safety Policy. In addition, there revised the DfE [Teaching Online Safety in School](#) (2023) can be referenced for further guidance.

Filtering and monitoring

As an Integrated Centre we take responsibility for safeguarding and promoting the welfare of children, students, volunteers and staff. We provide them with a safe environment in which to learn. We do all that we reasonably can to limit exposure to harmful content on-line. We do this by ensuring we have appropriate filtering and monitoring systems in place and regularly review their effectiveness. Our CLT and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.

The Department for Education's filtering and monitoring standards ([Meeting digital and technology standards in schools and colleges - Filtering and monitoring standards for schools and colleges - Guidance - GOV.UK](#)) set out that schools and colleges should:

- Identify and assign roles and responsibilities to manage filtering and monitoring systems.
- Review filtering and monitoring provision at least annually.

- Block harmful and inappropriate content without unreasonably impacting teaching and learning.
- Have effective monitoring strategies in place that meet their safeguarding needs.
- Schools can use the DfE 'plan technology for your school service' ([Plan technology for your school - GOV.UK](#)) to self-assess against the filtering and monitoring standards and receive personalised recommendations on how to meet them.

UK Safer Internet Centre:

[Teachers and school staff - UK Safer Internet Centre](#)

The UK Safer Internet Centre produced a series of webinars for teachers on behalf of the Department. These webinars were designed to inform and support schools with their filtering and monitoring responsibilities and can be assessed at:

[Appropriate Filtering and Monitoring - UK Safer Internet Centre](#)

South West Grid for Learning (swgfl.org.uk) has created a tool to check whether a school or college's filtering provider is signed up to relevant lists (CSA content, Sexual Content, Terrorist content, Your Internet Connection Blocks Child Abuse & Terrorist Content).

Support for schools when considering what to buy and how to buy it is available via the: [Schools' buying strategy - GOV.UK](#) with specific advice on procurement here: [buying for schools](#).

The Department has published [Generative AI: product safety expectations - GOV.UK](#) 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.

Information security and access management

As an Integrated Centre we are directly responsible for ensuring we have the appropriate level of security protection procedures in place in order to safeguard our systems, staff, students, volunteers and children. We will review the effectiveness of these procedures periodically to keep up with the evolving cyber-crime technologies. Guidance on e-security is available from the [NEN National Education Network](#). We will take appropriate action to: [Meeting digital and technology standards in schools and colleges - Cyber security standards for schools and colleges - Guidance - GOV.UK](#)

Broader guidance can be found at:

[National Cyber Security Centre - NCSC.GOV.UK](#)

Reviewing online safety

As an Integrated Centre we will carry out an annual review of our approach to on-line safety, this will be supported by a risk assessment which reflects the risks that children face.

To ensure that we as a Centre remain committed to a whole centre approach to online safety the list of supporting documentation below may be helpful for staff, governors and parents.

Safety self-review tool – [360 Degree Safe - Online Safety Review Tool | SWGfL](#)

[UK Council for Child Internet Safety \(UKCCIS\) - GOV.UK](#)

[Online safety in schools and colleges: questions from the governing board - GOV.UK](#)

[Using external expertise to enhance online safety education: Guidance for education settings - GOV.UK](#)

Online Safety

(Please also refer to the Integrated Centre Online Safety & Security Policy)

It is important that children and young people receive consistent messages about the safe use of technology and, can recognise and manage risks posed both in the real world and the virtual world.

Terms such as 'e-safety', 'online', 'communication technologies' and 'digital technologies' refer to all fixed and mobile technologies that adults and children may encounter, now and in the future, which allow them access to content and communications that could raise issues or pose risks to their well-being.

The issues can be categorised into four areas of risk:

- Content – being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.
- Contact – being subjected to harmful online interaction with other users.
- Conduct – personal online behaviour that increases the likelihood of or causes harm.
- Commerce – risks such as on-line gambling, inappropriate advertising, phishing and or financial scams.

Best Practice:

- **Whole Setting Approach:** Staff recognise and are aware of online safety issues

and the Designated Safeguarding Lead (DSL) and leadership team should make online safety a priority.

- **Policies:** Designated Safeguarding Lead (DSL) and leadership team must ensure that all of the relevant online safety policies and procedures are in place and implemented. This includes having an awareness of the relevant sections of the EYFS Statutory Framework which relate to Safeguarding.
- **Monitoring and Evaluation:** Risk assessment is taken seriously and used to promote online safety. There are appropriate filters and monitoring systems in place to protect children from harmful online material.
-
- **Management of Personal Data:** Data is managed securely and in accordance with the requirements of the data protection laws, including the Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025.

As the Integrated Centre increases the amount of work online, it is essential that children and students are safeguarded from potentially harmful and inappropriate online material. To endeavour to keep children safe online (including when they are online at home) please refer to Annex C of Keeping Children Safe in Education 2026.

Making or sharing nudes and semi-nudes, AI-generated intimate images and Social Media Guidance

Online safeguarding includes risks arising from generative artificial intelligence, including altered or wholly AI-generated intimate images (sometimes described as deepfakes or deep nudes). Any incident involving the making or sharing of nude or semi-nude images requires a safeguarding response, whether consensual or non-consensual.

Introduction

'Sexting' is *"the exchange of sexual messages and images, creating, sharing and forwarding sexually suggestive nude or nearly nude images through mobile phones and the internet"* (NSPCC)

Understanding 'Sexting'

'Sexting' affects girls and boys. Although girls are adversely affected, it should not be seen as a 'girl' problem. Initiatives to tackle 'Sexting' need to take account of the different experiences of boys and girls. Rather than an issue in isolation, 'Sexting' is part of a much wider picture of sexual pressure including pornography, sexual exploitation, body image and appearance.

For boys, boasting about their sexual knowledge or experiences is applauded by peers, whereas girls who do the same would be labelled negatively. Gender

differences need to be explored sensitively and it might be appropriate to organise children into single sex groups to discuss the issues.

'Sexting' can be seen as an unwanted consequence of access to technology. The reality is that mobile technology and social networking is a constant presence in young people's lives.

So, banning technology is not a solution. 'Sexting' needs to be seen as part of a wider picture which has received a lot of recent media coverage and has been called the 'sexualisation of children'.

This includes issues such as pornography, gender based bullying and coercive sexual pressure placed on young people.

Online lessons in schools have been successful in alerting children and young people to the dangers of engaging with strangers on-line and the NSPCC research supports this. The young people interviewed said they would dismiss approaches by a stranger online very quickly. The challenge in helping children to understand about 'Sexting' is that it occurs between peers or online 'friends'; sometimes this can be adults pretending to be children or peers.

Use of Social Media

Following feedback from parents, Facebook, Twitter and Instagram accounts were created for the Nursery, Early Years provision and Pen Green integrated centre. These accounts aim to provide the same standards as the Nursery, Early Years provision and Pen Green Integrated Centre :

- Create an environment of openness, trust and goodwill
- Help parents feel confident and able to express their views, feelings and concerns
- Know that their comments will be treated with respect, and will receive an appropriate response

These are used as a virtual notice board keeping parents up to date with events and key messages from the Integrated Centre.

Platforms like Facebook open up new and exciting opportunities for services. However, there are a number of challenges to consider including Safeguarding; Privacy and Data Protection; Account management; Training.

Safeguarding

Ensuring that when using social media vulnerable children or families are protected from harm or abuse is the number one priority.

Key members of staff were shown how to alter account settings to provide the most secure environment for parents to access.

Parents are encouraged to access our social media accounts and interact with us. This activity is monitored by members of staff who would alert CLT to anything posted causing concern. Notifications of posts to the social media accounts are instant and monitored regularly.

Privacy and Data Protection

At the Integrated Centre our group work programme provides a great way for organisations to communicate with the public. However, having open groups present risks of inappropriate information being shared, specifically, details that might reveal private information about parents or their children. In groups at the Integrated Centre, we inform parents about online privacy settings and the risks of sharing information in the public domain.

Privacy in social media is a complex issue. Many people are comfortable with different levels of openness and adjust their privacy settings to suit. It is important at the Integrated Centre that we understand the needs of the parents that want to engage in this platform whilst protecting their information (See Online Safety & Security policy).

Account management

The Integrated Centres' social media accounts have been created and are administered by key members of staff. This allows them to manage the pages, connect with parents and comment in groups. They will also be responsible for monitoring the content of the accounts as well as each other's activity.

If there should be any items raising cause for concern a member of CLT will be alerted immediately. There is a central record of all passwords connected to social media which may be accessed by CLT and the administrators of the account.

Training

Online training sessions are run at different stages internally and via North Northamptonshire Council to help bring all the staff up to a standard of knowledge which would allow them to effectively manage their page/groups.

Training involves a run through of account and security settings, the potential of using pages and groups and also their limitations (open, private and secret).

The Integrated Centre has an Online Security Policy which clearly outlines the appropriate use of all forms of electronic usage. All staff administering the social media accounts are expected to adhere to these guidelines.

Opportunities to teach Safeguarding

The Integrated Centre use a range of processes to ensure that children are protected and taught about Safeguarding, including online safety. This is as part of providing a broad and balanced curriculum. Within the Integrated Centre the focus for this is the Learning to be Strong programme for personal interactions whilst access to IT is strictly monitored to be age appropriate.

The following resources can support staff and parents;

DfE advice for schools: teaching online safety in schools:

<https://www.gov.uk/government/publications/teaching-online-safety-in-schools>

UK Council for Internet Safety (UKCIS)27 guidance: Education for a connected-world:

<https://www.gov.uk/government/publications/education-for-a-connected-world>

National Crime Agency's CEOP education programme:

<https://www.thinkuknow.co.uk/>

Public Health England: Rise Above

<https://campaignresources.phe.gov.uk/schools/topics/mental-wellbeing/overview>

Child Exploitation and Online Protection (CEOP):

<http://ceop.police.uk/>

0870 000 3344

Online safety training and advice contact:

E-safety@northamptonshire.gov.uk

Online safety policy examples:

[Online Safety for Schools | SWGfL](#)

Early Years Foundation Stage Statutory Framework:

<https://www.gov.uk/government/publications/early-years-foundation-stage-framework--2>

Keeping Children Safe in Education

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

NSPCC

[NSPCC | The UK children's charity | NSPCC](#)

0808 800 5000

Online safety training and advice contact: Onlinesafety@northamptonshire.gov.uk

Whilst it is essential that the Governing body ensure that appropriate filters and monitoring systems are in place, they should be careful that "over blocking" does not lead to unreasonable restriction.

Female Genital Mutilation (FGM)

It is essential that we are all aware of FGM practices and the need to look for signs, symptoms and other indicators of FGM.

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

What is FGM?

It involves procedures that intentionally alter/injure the female genital organs for non-medical reasons.

4 types of procedure:

Type 1 Clitoridectomy – partial/total removal of clitoris

Type 2 Excision – partial/total removal of clitoris and labia minora

Type 3 Infibulation – entrance to vagina is narrowed by repositioning the inner/outer labia

Type 4 all other procedures that may include: pricking, piercing, incising, cauterising and scraping the genital area.

Why is it carried out?

Belief that:

- FGM brings status/respect to the girl – social acceptance for marriage
- Preserves a girl's virginity
- Part of being a woman/rite of passage
- Upholds family honour
- Cleanses and purifies the girl
- Gives a sense of belonging to the community
- Fulfils a religious requirement
- Perpetuates a custom/tradition
- Helps girls be clean/hygienic
- Is cosmetically desirable
- Mistakenly believed to make childbirth easier

Is FGM legal?

FGM is internationally recognised as a violation of human rights of girls and women. It is **illegal** in most countries including the UK.

Circumstances and occurrences that may point to FGM happening

- Child talking about getting ready for a special ceremony
- Family taking a long trip abroad
- Child's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leone, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afghani, Kurdistan, Indonesia and Pakistan)
- Knowledge that the child's sibling has undergone FGM
- Child talks about going abroad to be 'cut' or to prepare for marriage
- Child experiences or demonstrates fear or anxiety about a pending event.

Signs that may indicate a child has undergone FGM:

- Prolonged absence from school and other activities
- Behaviour change on return from a holiday abroad, such as being withdrawn and appearing subdued.
- Bladder or menstrual problems
- Finding it difficult to sit still and looking uncomfortable
- Complaining about pain between the legs
- Mentioning something somebody did to them that they are not allowed to talk about
- Secretive behaviour, including isolating themselves from the group
- Reluctance to take part in physical activity
- Repeated urinal tract infection
- Disclosure

The 'One Chance' rule

As with Forced Marriage there is the 'One Chance' rule. If you have any concerns it is essential that you take action **without delay**.

Further information on Female Genital Mutilation

Female Genital Mutilation (FGM): professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person.

Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 11-12 of the [Multi-Agency Practice Guidelines](#) (June 2014). Staff should activate local Safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

Guidance on the warning signs that FGM or forced marriage may be about to take place, or may have already taken place, can be found on pages 38-41 of the [Multi agency statutory guidance on FGM](#) (pages 59-61 focus on the role of schools and colleges) and pages 13-14 of the Multi-agency guidelines: [Handling case of forced marriage](#).

Children with family members in prison

Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The [National Information Centre on Children of Offenders](#) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11-year olds [Young witness booklet for 5 to 11 year olds - GOV.UK \(www.gov.uk\)](#), and 12-17 year olds . [Young witness booklet for 12 to 17 year olds - GOV.UK \(www.gov.uk\)](#)

Whilst children attending the Integrated Centre do not fall into these age groups it may be that they have siblings who are required to do so and family members caring for younger children may need further support from the Centre.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The Designated Safeguarding Leads (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent etc.

Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

[The Homelessness Reduction Act 2017](#) places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16- and 17-year-olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support.

Children's services will be the lead agency for these young people and the Designated Safeguarding Leads (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16- and 17-year-olds who may be homeless and/or require accommodation

APPENDIX 1: Family Help / Early Support Internal Process within the Pen Green and Kingswood Integrated Centre

Discuss with both parents (if possible)

If parents disagree about consent the parent who is the main carer decides.

If there is a disagreement where parents have shared care, either speak to the Designated EHA Integrated Centre link worker, or contact the FHC support service via 0300 126 1000 earlyhelpsupport@northamptonshire.gov.uk for advice

If you feel that a family will benefit from a Family Help Conversation (FHC), please discuss with your supervisor or Deputy Designated Safeguarding Lead (DDSL)

AGREED

Speak to the Designated Safeguarding Lead who will log the necessary information on the PG safeguarding system.

NOT AGREED

Speak to the Designated Safeguarding Lead who will log the date and declined offer on the PG safeguarding system.

Appropriate person to then discuss with the family who they would like the Lead Professional to be, who will then complete the FHC paperwork with them. Also discuss with parents which agencies they would like to be involved in the process

Once the FHC paperwork is completed to be given to the Designated Safeguarding Lead who will then log the appropriate information on the NCTrust Family Help online portal as well as adding detail of the FHC onto PG Safeguarding system.

Parent to then receive a copy of the FHC.

Designated Safeguarding Lead to be informed of the date for Team Around Family (TAF) meetings and subsequent reviews.

TAF MEETING including Review

Inform Designates Safeguarding Lead of the date for the next TAF meeting which they will then enter onto the PG .

Child's voice to be completed by Early Years practitioner for each TAF meeting.

Appropriate paperwork and relevant assessment (where necessary) to be shared at the TAF meeting and then given to the Lead Professional.

Any unmet needs/ concerns raised within the TAF meeting for workers, to be discussed with their supervisor or DDSL and DSL in line with our safeguarding policy.

Appropriate worker to give a copy of the minutes to parent by hand. Minutes to then be uploaded onto PG safeguarding system once agreed and signed by parents.

Lead professional to ensure that minutes are sent to TAF members

The Designated Safeguarding Lead will upload all relevant paperwork to the NCTrust Family Help online portal.

FHC Closure

Worker to discuss FHC closure with their line manager first.

Closure to be agreed at TAF meeting

Appropriate paperwork to be signed by parent(s)

Designated Safeguarding Lead to upload paperwork to PG safeguarding system and to the NCTrust Family Help online portal

Children who transition to another setting or leave

The lead professional must ensure that the Family Help Conversation is passed over to the appropriate person as agreed with the parent.

The current action plan must be shared with the receiving appropriate person.

The Designated Safeguarding Lead log the transition of the Family Help Conversation on PG safeguarding system and NCTrust Family Help online portal

FHC Closure

Worker to discuss FHC closure with their line manager first.

Closure to be agreed at TAF meeting

Appropriate paperwork to be signed by parent(s)

Designated Safeguarding Lead to upload paperwork to PG safeguarding system and to the NCTrust Family Help online portal

On occasions the FHC may not be achieving its intended outcomes. When this happens the complex case discussion process can be accessed. This is a case discussion led by Family Help co-ordinator to enable a shared review of the case to explore and identify options and solutions.

To initiate a complex case discussion contact the Family Help Co-ordinator. Where the complex case discussion has not achieved positive outcomes, referral to MASH should be considered.

APPENDIX 2: Low-level concerns within the Integrated Centre

The Integrated Centre comprises Pen Green Nursery School , Pen Green Early Years Provision, Pen Green Research & Training Base and Kingswood Community Nursery

Introduction

The Integrated Centre is committed to providing a safe and secure environment and to promote the welfare of children, their families and students with whom we work. It is expected that all staff, volunteers, governors and visitors will share this commitment.

The Integrated Centre expects all adults to conduct themselves in an appropriate manner and to be positive role models within their various duties and tasks across all the physical spaces within the Integrated Centre.

All staff who work in the Integrated Centre set examples of behaviour and conduct which can be emulated by children, their families, and students. All staff must avoid putting themselves at risk of any allegations of unprofessionalism or misconduct. In addition, the Integrated Centre expects all workers to promote the good standing of the Integrated Centre both within their immediate communities and beyond.

The Integrated Centre want to ensure there is an open and transparent culture in which all concerns about all adults working in or on behalf of the Centre are shared and then dealt with promptly and appropriately.

If the Integrated Centre receive an allegation relating to an incident that happened when an individual or organisation was using the premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, we would follow our safeguarding policies and procedures, including informing the LADO.

This means that the guidelines apply to all staff whatever their position, role, or responsibilities and volunteers, governors and visitors.

Purpose

This policy has been produced to give clear guidance to all staff regarding low-level concerns regarding appropriate conduct, it is to be read alongside the staff code of conduct which will advise on the expectations on a staff members behaviour and whether the behaviour is of concern.

The staff code of conduct policy covers all staff working within the Integrated Centre and is in addition to those staff employed within a teaching role and who are bound by the regulations of the [Teaching Regulation Agency](#).

This policy will explain what a low-level concern is and how to report and record this concern.

By adhering to the policy, it is hoped to:

- Enable the staff and the organisation to identify inappropriate, problematic, or

- concerning behaviour early.
- Minimise the risk of abuse, and
- Ensure that adults working in or on behalf of the Integrated Centre are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

What is a low-level concern?

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the Integrated Centre may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

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

- Being over friendly with children.
- Having favourites.
- Taking photographs of children on their mobile phone, contrary to school policy.
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door.
- Humiliating children.

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

Low-level concerns may arise in several ways and from a number of sources. For example: suspicion, complaint, or disclosure made by a child, parent or other adult within or outside of the organisation, or as a result of vetting checks undertaken.

It is crucial that all low-level concerns are shared responsibly with the Head (DSL) and recorded and dealt with appropriately.

How to share a concern:

If you have a low-level concern about a member of staff you must speak to the Head of Centre immediately. If the concern is regarding the Head of Centre this must be reported to the chair of governors.

A low-level concern form will need to be completed with details of what has been shared. You will be asked to sign that this is a factual account. The Head of Centre will make a collaborative decision on the next steps.

Low-level concerns will be treated with the upmost confidence. If however, there is any doubt whether the information shared in fact meets the harm threshold we will consult with the Local Authority Designated Officer (LADO). If information shared

raises a safeguarding concern this will be reported to ensure we remain compliant with our legal responsibility to safeguard children. Please see *Keeping Children Safe in Education (2026)* and Pen Green Policy for managing allegations against workers.

Reporting a low-level concern may result in an internal investigation whereby witnesses and the individual is spoken to regarding the reported concern. The information collected in this investigation will help to categorise the type of behaviour and determine what further action may need to be taken. This information needs to be recorded in writing along with the rationale for decisions and action taken.

Low-level concerns will be kept on the individual's confidential personnel file to ensure monitoring of the concerns over the period of the individual's employment. Following [Keeping Children Safe in Education](#) guidance 2026 we will retain information on the individual's personnel file until they leave the organisation.

Records will be reviewed so that potential patterns of inappropriate, problematic or concerning behaviour can be identified. Where a pattern of such behaviour is identified, the Integrated centre will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a low-level concern to meeting the harm threshold, in which case it should be referred to the LADO and the safeguarding policy followed.

The Head of Centre should be the ultimate decision makers in respect of all low-level concerns, although it is recognised that depending on the nature of some low-level concerns the Head of Centre may wish to consult with the DDSL duty worker and take a more collaborative decision-making approach.

In response to any low-level concerns being reported and upheld the Head will give consideration as to whether there are wider cultural issues within the Integrated Centre that enabled the behaviour to occur and where appropriate policies will be revised, or extra training delivered to minimise the risk of it happening again.

We encourage all staff to self-refer, where, for example, you have found yourself in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection you believe you have behaved in such a way that they consider falls below the expected professional standards.

If the Head is in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, they will consult with their LADO.

If low-level concerns are shared about contractors, we will ensure the employer of the individual is notified, so that any potential patterns of inappropriate behaviour can be identified.

Providing References for staff with low-level concerns recorded

[Keeping Children Safe in Education](#), 2026 is clear that the Integrated Centre should only provide substantiated safeguarding concerns/allegations (including a group of low-level concerns about the same individual) that meet the harm threshold in references. Low-level concerns should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference.

The low-level concerns policy has been written with reference to [Keeping Children Safe in Education](#), 2026, where it is advised to have a separate policy to low-level concerns, this is reflecting the staff code of conduct policy and should be read alongside the Pen Green Staff code of conduct policy 2026/27, Safeguarding policy 2026/27 and Child Protection policy 2026/27.

APPENDIX 3: Designated Safeguarding Lead (DSL)

Reviewed: September 2026

Designated Safeguarding Lead (DSL)

If you have a concern about the welfare of a child, you must share your concern as soon as possible and definitely before you go home.

Please speak to the lead person for your area in the first instance. The lead person will then, with you, decide if you need to involve the **Designated Safeguarding Lead**. **The DSL role is currently held by Kerry McNulty**

As a result of this discussion the lead person may suggest further consultation is required from the **Designated Safeguarding Lead**. If this is the case, please ensure you have the child's details ready for a discussion.

Area of Work	Lead for the area	Deputy Designated Safeguarding Lead
Duty for Centre	Kerry McNulty	Amy Devine
Den & Studio	Tracy Studders Kinga Szkudlarz Louise King Lesley Hill	Flavia Ribeiro Kerry McNulty Amy Devine
Couthie & Creche	Kerry McNulty	

		Flavia Ribeiro
The 0-4 Groups	Kerry McNulty	Amy Devine
Adult Education	Kat Clark	Jo Benford
Research Base	Jo Benford	Fliss Dewsbery
Administration Team	Angela Prodger	Amy Devine
Site Staff	Angela Prodger	Amy Devine
Catering Support Staff	Tracy Studders	Flavia Ribeiro
Kingswood	Kerry McNulty	Sarah Horsfall