



EMPOWERING YOUNG PEOPLE TO TAKE ON THE WORLD

## Safeguarding Policy

|                                     |                   |
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| <b>Ratified by governors</b>        | Full Governors    |
| <b>Reviewed by Headteacher</b>      | Nicola Mason      |
| <b>Drafted by Safeguarding Lead</b> | Stephanie Shaldas |
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# IMPORTANT CONTACTS

**Designated safeguarding lead (DSL) :** Stephanie Shaldas

**Deputy Designated Safeguarding Leads:**

**Primary DSL:** Lisa Placks

**Middle DSL:** Nicky Stockley

**Secondary DSL:** Havva Tayfur

**Six21 DSL:** Alexander Henderson

**Chair of Governors:** Terry Paul

**Link Governor for Safeguarding :** Luke Alexander

**Local Authority Designated Officer LADO:**

Nick Pratt Newham Dockside

020 3373 1462

**CHANNEL helpline:** 020 3373 0440

## 1. POLICY STATEMENT & AIMS

### 1.1 Policy statement

School 21 strives to provide a school environment where all students are safe, secure, valued, respected and each one is heard. School 21 takes seriously the duty *to protect and prevent harm, whilst also promoting the health and development of children both within and outside of the school.*

Every member of staff appreciates the duty to report any concerns they may have about a child, primarily through the designated safeguarding lead and deputies.

Our school culture is one in which pupil's health and development is promoted so that each of our children and young people may achieve their potential. School 21 promotes learning whilst also nurturing a sense of belonging to the school community, resilience, responsibilities and rights. Our values of mutual respect, celebrating the uniqueness of each child, rules and culture of the school community informs the social, emotional, behavioural and learning development of children.

School 21 understands that our work in safeguarding children must always have regard for the national guidance issued by the Secretary of State and should be in line with local guidance and procedures.

Schools have an important role to play and are well placed to offer early help and support to the family. Where the input of more than one agency is required (a multi-agency response) to support the family's circumstances, a lead early help practitioner within the school should be identified. The Lead Early Help Practitioner will develop an Early Help Record with the family, with consent, as a tool for understanding strengths and needs, establishing goals, and recording the work undertaken by all practitioners in partnership with the family.

The lead Early Help Practitioner will also be responsible for drawing all agencies who are named in the Early Help Record into a Team around the Family (TAF). The TAF will work with the family in a coordinated way and will meet with the family to achieve the goals established in the plan.

If the family's needs are more complex, services such as Families First may be appropriate and can offer a more intensive and targeted and intensive intervention. Following receipt of any information raising concern, the DSL will consider what action to take and can seek advice from a number of resources, as required:

- Early Help Partnership team
- Neighbourhood Action Meeting
- Team Around the School
- Newham Children's Triage

## 1.2 Aims

The school aims to ensure that:

- appropriate action is taken in a timely manner to safeguard and promote children's welfare
- all staff are aware of their statutory responsibilities with respect to safeguarding
- staff are properly training in recognising and reporting safeguarding issues

## 2. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education \(2021\)](#) and [Working Together to Safeguard Children \(2018\)](#), and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school.

- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the "2018 Childcare Disqualification Regulations") and [Childcare Act 2006](#), which set out who is disqualified from working with children

Our safeguarding policy is compliant with the London Child Protection Procedure (5 th edition 2017 London Safeguarding Children Board). It is also compliant with relevant local protocols in Newham's pathways To Help and Support ,2018. [http://www.newhamscb.org.uk/wp-content/uploads/2018/02/04892-Pathways\\_A4-HIRES.pdf](http://www.newhamscb.org.uk/wp-content/uploads/2018/02/04892-Pathways_A4-HIRES.pdf) .

### 3. DEFINITIONS

**Safeguarding and promoting the welfare of children** means:

- Protecting children from maltreatment
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

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

**Abuse** is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

**Neglect** is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

**Sharing of nudes and semi-nudes** (also known as sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.

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

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

- The local authority (LA)
- A clinical commissioning group for an area within the LA
- The chief officer of police for a police area in the LA area

### 4. EQUALITY STATEMENT

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities or health conditions (see section 10)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language

- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member’s mental health needs
- Are looked after or previously looked after (see section 12)
- Are missing from education
- Whose parent/carer has expressed an intention to remove them from school to be home educated

## 5. ROLES AND RESPONSIBILITIES

### 5.1 All staff

All staff will read and understand part 1 and annex B of the Department for Education’s statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually.

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

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the Big Education Trust code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputies, the school culture and behaviour for learning policy as well as the online safety policy and the safeguarding response to children who go missing from education
- The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children’s social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as peer-on-peer abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe

Section 16 and appendix 3, 4 & 5 of this policy outline in more detail how staff are supported to do this.

### 5.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. Our DSL is Stephanie Shaldas, Senior Leader: Pupil Support 4 - 18. The DSL takes lead responsibility for child protection and wider safeguarding in the school.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

Outside of school hours and during the school holidays, the DSL can be contacted via the school safeguarding email: [safeguarding@school21.org.uk](mailto:safeguarding@school21.org.uk)

When the DSL is absent, the deputies Lisa Placks, Nicky Stockely, Havva Tayfur and Alexander Henderson will act as cover.

If the DSL and deputies are not available, Michele Barthram, Business Manager will act as cover (for example, during out-of-hours/out-of-term activities).

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

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly

The DSL will also keep the headteacher informed of any issues, and liaise with local authority case managers and designated officers for child protection concerns as appropriate.

The full responsibilities of the DSL and deputies are set out in their job description.

### **5.3 The governing board**

The governing board will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation
- Appoint a senior board level (or equivalent) lead or link governor to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL
- The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate
- All governors will read Keeping Children Safe in Education in its entirety.

Section 15 of this policy has information on how governors are supported to fulfil their role.

### **5.4 The headteacher**

The headteacher is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers:
  - ❖ Are informed of our systems which support safeguarding, including this policy, as part of their induction
  - ❖ Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- ❖ Communicating this policy to parents/carers when their child joins the school and via the school website
- ❖ Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- ❖ Ensuring that all staff undertake appropriate safeguarding and child protection training, and updating the content of the training regularly

- ❖ Acting as the ‘case manager’ in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate
- ❖ Ensuring the relevant staffing ratios are met, where applicable
- ❖ Making sure each child in the Early Years Foundation Stage is assigned a key person

## 6. Confidentiality

### 6.1 Information sharing

Information about students given to us by the children themselves, their parents or carers, or by other agencies will remain confidential. Staff will be given relevant information only on a “**need to know**” basis in order to support the child if that is necessary and appropriate.

We are, however, under a duty to share any information which is of a child protection nature. We understand that this is in the best interests of the child and overrides any other duties we have regarding confidentiality and information sharing.

We have a duty to upload onto My Concern and keep any paper copy records which relate to child protection work undertaken by us or our partner agencies and to ensure that these are kept apart from the main pupil record, stored securely and only accessible to key members of staff. We also have a duty to send copies of these records to any school to which the pupil transfers.

Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child’s best interests. If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or small school deputy).

Confidentiality is also addressed in this policy with respect to record-keeping in section 14, and allegations of abuse against staff in appendix 4.

The government’s [information sharing advice for safeguarding practitioners](#) includes 7 ‘golden rules’ for sharing information, and will support staff who have to make decisions about sharing information.

### 6.2 Data protection

School 21 abides by the lawful duties as ascribed by the data protection legislation. All safeguarding records are kept securely and information is shared usually with consent other than in the circumstances when a child is at risk of significant harm. Information is also shared by other agencies, for example the police, in relation to issues that may have direct or indirect impact on children, such as domestic abuse alerts/concerns. Such information is routinely uploaded onto My Concern and paper copies kept in children’s safeguarding files. Children’s Safeguarding My Concern files and paper files will be kept by School 21 until the respective child has reached the age of 25 or if a child moves school then the safeguarding file will be automatically transferred to that school. Parents and children should be reassured as the transfer of files occurs to help the new schools to understand any needs your child may have in the future.

### 6.3 Sharing our policy

This policy is available to all parents of students and prospective students via our website and can be made available by hard copy on request.

## 7. Recognising abuse and taking action

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.

Please note – in this and subsequent sections, you should take any references to the DSL to mean “the DSL (or deputy DSL)”.

Appendix 3 illustrates the procedure to follow if you have any concerns about a child’s welfare.

Where possible, speak to your small school DSL ( or any other DSL if they are unavailable) first to agree on a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children’s social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

Make a referral to local authority children’s social care directly, if appropriate (see ‘Referral’ below). Share any action taken with the DSL as soon as possible.

### Early help

If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

The DSL will keep the case under constant review and the school will consider a referral to local authority children’s social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

### Referral

If it is appropriate to refer the case to local authority children’s social care or the police, the DSL will make the referral or support you to do so.

If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

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

If the child’s situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child’s situation improves. (see section 7.7)

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

Make a referral to children’s social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. **Anyone can make a referral.**

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

Newham MASH: 020 3373 4600

Police : 999

## 7.2 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

- ❖ Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- ❖ Stay calm and do not show that you are shocked or upset
- ❖ Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- ❖ Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- ❖ Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it. Add your write up to MyConcern.
- ❖ Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

## 7.3 If you discover that FGM has taken place or a pupil is at risk of FGM

Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 5 of this policy.

**Any teacher** who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

**Any other member of staff** who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures.

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

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

You can contact the local authority with regards to any concerns about a student who has experienced or at risk of FGM via the following link: [Female Genital Mutilation](#)



#### **7.4 If you have 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 is 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. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

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](mailto: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

#### **7.5 If you have a mental health concern**

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps at the beginning of selection 7.

If you have a mental health concern that is **not** also a safeguarding concern, the Head of Inclusion who will add the student to the agenda of Every Child Panel where a course of action will be agreed. You may be asked to complete a referral which will be shared with outside agencies.

#### **7.6 Concerns about a staff member, supply teacher, volunteer or contractor**

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the headteacher as soon as possible. If the concerns/allegations are about the headteacher, speak to the chair of governors.

The headteacher/chair of governors will then follow the procedures set out in the policy for allegations against teachers or staff, if appropriate.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the headteacher, report it directly to the local authority designated officer (LADO).

Where appropriate, the school will inform Ofsted of the allegation and actions taken, within the necessary timescale (see appendix 4 for more detail).

## **7.7 Sharing of nudes and semi-nudes ('sexting')**

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

- ❖ View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- ❖ Delete the imagery or ask the pupil to delete it
- ❖ Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- ❖ Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- ❖ Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

### **7.7.1 Initial review meeting**

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the students involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the students involved (in most cases parents/carers should be involved)

The DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)

- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

### **7.7.2 Further review by the DSL**

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

They will hold interviews with the students involved (if appropriate).

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

### **7.7.3 Informing parents/carers**

The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

### **7.7.4 Referring to the police**

If it is necessary to refer an incident to the police, this will be done through our Safer Schools Officer or by dialling 101.

### **7.7.5 Recording incidents**

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording these incidents.

### **7.7.6 Curriculum coverage**

Students are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our coaching and assembly programme. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
- Issues of legality
- The risk of damage to people's feelings and reputation
- Students also learn the strategies and skills needed to manage:
- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

This policy on the sharing of nudes and semi-nudes is also shared with students so they are aware of the processes the school will follow in the event of an incident.

### **7.8 Reporting systems for our students**

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

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

To achieve this, we will:

- Put systems in place for students to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for students
- Make it clear to students that their concerns will be taken seriously, and that they can safely express their views and give feedback

Students should report concerns to any trusted member of staff though this may often be their coach or class teacher in the first instance. Students may also use "worry boxes" distributed around the school to report concerns.

Students will be reminded of reporting systems via termly safeguarding assemblies as well as safeguarding displays in each small school and communal areas.

### **7.9 Challenging Partner Agencies and Escalating Concerns**

If the DSL believes there is evidence that warrants a challenge of another agency, regarding the safeguarding of a child, Newham Safeguarding Child Board's Safeguarding Escalation and Resolution Policy will be followed :

<http://www.newhamscb.org.uk/wp-content/uploads/2016/06/NSCB-Escalation-Policy.pdf>

## **8. PEER ON PEER ABUSE & SEXUAL HARASSMENT & VIOLENCE IN SCHOOL**

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter" or "part of growing up" or "boys will be boys". Most cases of students hurting other students will be dealt with under our school's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put students in the school at risk
- Is violent
- Involves students being forced to use drugs or alcohol
- Involves sexual exploitation or sexual abuse, such as indecent exposure, sexual assault, or sexually inappropriate pictures or videos (including sexting)
- Involves sexual violence or harassment

### **8.1 Definition of peer on peer abuse**

Peer-on-peer abuse can be defined as “any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between children and within children's relationships (both intimate and non-intimate).” (Firmin, C. 2017. Abuse Between Young People: A Contextual Account).

Peer-on-peer abuse can take various forms, including: serious bullying (including cyber-bullying), relationship abuse, domestic violence, child sexual exploitation, youth and serious youth violence, harmful sexual behaviour, and/or gender-based violence.

Peer-on-peer abuse is most likely to include, but may not be limited to:

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

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about peer-on-peer abuse, or a child makes a report to them, they will follow the procedures

## **8.2 Sexual harassment and sexual violence in schools**

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a

problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

### **Serious violence**

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation)

Risk factors which increase the likelihood of involvement in serious violence include:

- Being male
- Having been frequently absent or permanently excluded from school
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

## **8.2 Raising awareness about peer on peer abuse**

At School 21, we actively seek to raise awareness and tackle peer on peer abuse. Staff should be aware of the importance of:

- Challenging any form of derogatory or sexualised language or behaviour
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys

- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensuring students know they can talk to staff confidentially through their coach, class teacher, mentor or any other trusted adult in school
- Ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy (**see section 16**)

### 8.3 Reporting allegations of peer on peer abuse

It is essential that all concerns/allegations of peer-on-peer abuse are handled sensitively, appropriately and promptly. The way in which they are responded to can have a significant impact on our school environment.

If a pupil makes an allegation of abuse against another pupil, staff **MUST**:

- Tell the DSL and record the allegation on My Concern, but do not investigate it
- The DSL will contact the local authority children’s social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved – both the victim(s) and the child(ren) against whom the allegation has been made – with a named person they can talk to if needed
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

The reporting flowchart in Appendix 4 should be followed in all cases of peer on peer abuse.

Greater details of the whole school approach to peer on peer abuse can be found in the “Tackling Peer on Peer Abuse” policy which can be found on the Source.

## 9. ONLINE SAFETY AND THE USE OF MOBILE TECHNOLOGY

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as ‘mobile phones’)
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

**Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism

**Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

**Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and

**Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

## **9.1 Roles and responsibilities**

### **9.1.1 IT Systems staff**

IT Systems staff will:

- ensure all students have access to a working device
- ensure that filters and restrictions on all devices function
- ensure that any breaches of the Acceptable User Policy are reported to the relevant Head of School or DSL (where appropriate)
- maintain software to ensure that access to learning is not disrupted

### **9.1.2 Teachers**

Teachers will:

- Adhere to the expectations of the Acceptable User Policy
- Deliver online lessons from a living room or kitchen area (not a bedroom)
- Dress appropriately to deliver online lessons
- Copy the relevant HoY/HoS/DSL into prolonged correspondence with an individual student
- Deliver online lessons to groups of students, never one to one
- Record online lessons
- Take a register an attendance register and escalate absence to the relevant HoY/HoS
- Use only their school email to contact students
- Not use any form of social media to contact students or other minor with whom they do not have a familial connection
- Not share their personal telephone or email addresses with students or parents

### **9.1.3 Students**

Students will:

- Adhere to the expectations of the Acceptable User Policy
- Use only their school email to contact staff
- Be aware that staff have the right to search students' iPads, Chromebooks or mobile phones
- Not invite anyone from outside of School 21 to Google Hangout lessons
- Dress appropriately to attend online lessons

### **9.1.4 Parents**

Parents will:

- ensure that their child accesses online learning from a supervised location in the home.
- ensure that their child attends virtual lessons where necessary
- ensure that they put appropriate parental controls on school devices
- seek support from reputable sources to keep their children safe online

This section summarises our approach to online safety and mobile phone use. For comprehensive details about our school's policy on online safety and the use of mobile phones, please refer to our online safety policy and mobile phone policy, which you can find on our website: <https://www.school21.org.uk/policies>

## **10. NOTIFYING PARENTS**

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved, once we have sought advice from the local authority children's social care team.

## **11. STUDENTS WITH SPECIAL EDUCATIONAL NEEDS, DISABILITIES OR HEALTH ISSUES**

We recognise that students with special educational needs (SEN) or disabilities or certain health conditions can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Students being more prone to peer group isolation or bullying (including prejudice-based bullying) than other students
- The potential for students with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges

We offer extra pastoral support for these pupils. This includes:

- Daily check ins with their one to one Pupil Achievement Coach (PAC)
- Where there is an allegation of peer on peer abuse involving a student with SEND, the Head of Inclusion will always be involved in the entire process

## **12. STUDENTS WITH A SOCIAL WORKER**

Students may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health. The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

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

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support

### **13. LOOKED AFTER AND PREVIOUSLY LOOKED AFTER CHILDREN**

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

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

We have appointed a designated teacher, **Charlie Dilger Head of Inclusion**, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).

The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

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

## 14. COMPLAINTS AND CONCERNS ABOUT SCHOOL SAFEGUARDING POLICIES.

### 14.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff as dictated with the relevant [policy](#).

### 14.2 Other complaints

All other safeguarding-related complaints will be dealt with in accordance with our school culture and behaviour for learning policy. The designated safeguarding lead will be involved in the whole process.

### 14.3 Whistle-blowing

If staff have any concerns regarding the way the school safeguards pupils – including poor or unsafe practice, or potential failures, they should refer to the Trust whistle-blowing policy linked [here](#).

## 15. RECORD KEEPING

We will hold records in line with our records retention schedule. All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing on MyConcern.

**MyConcern safeguarding software** is an electronic recording system which enables members of staff in educational establishments and other trusted users to record and update safeguarding concerns. The system allows Designated Safeguarding Leads (DSLs) to case manage incidents, produce data reports and access all relevant data for their establishment. Further details on MyConcern can be found in Appendix 6.

### 15.1 Records

Records will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome

Staff should only add details to MyConcern once they have spoken to the DSL or Deputy DSLs

Concerns and referrals will be kept in a separate child protection file for each child.

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.

Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

## **16. TRAINING**

### **16.1 All staff**

All staff members will undertake safeguarding and child protection training at the start of every academic year, including on whistle-blowing procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect.

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the 3 safeguarding partners
- Have regard to the Teachers' Standards to support the expectation that all teachers:
  - Manage behaviour effectively to ensure a good and safe environment
  - Have a clear understanding of the needs of all pupils

Staff will receive regular safeguarding and child protection updates in weekly small school briefings.

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings).

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

### **16.2 DSLs and Deputy DSLs**

The DSL and deputies will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake Prevent awareness training.

### **16.3 Governors**

All governors receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

As the chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, they receive training in managing allegations for this purpose

#### **16.4 Recruitment - Interview panels**

At least one person conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures. See appendix 6 of this policy for more information about our safer recruitment procedures.

#### **16.5 Staff who have contact with pupils and families**

All staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

### **17. MONITORING ARRANGEMENTS**

This policy will be reviewed **annually** by the Senior Leader: Pupil Support 4 - 18. At every review, it will be approved by the full governing board.

### **18. LINKED POLICIES**

This policy links to the following policies and procedures:

- School culture and behaviour for learning
- Professional Conduct and online acceptable use
- Dealing with allegations against teachers and other staff
- Health and safety
- Anti Bullying Policy
- Tackling peer on peer abuse
- Attendance and Children Missing Education
- Online safety
- Safer recruitment
- Relationships and sex education
- Positive Handling
- Prevent

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## APPENDIX 1 : TYPES OF ABUSE

**Significant Harm** means ill-treatment or impairment of health and development, including, for example, impairment suffered from seeing or hearing the ill-treatment of another; Development means physical, intellectual, emotional, social or behavioural development; Health includes physical and mental health; Ill-treatment includes sexual abuse and other forms of ill-treatment which are not physical.

**Abuse and Neglect** are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm or failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting; by those known to them, or, more rarely, by a stranger and for example via the internet. They may be abused by an adult or adults or another child or children.

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

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

**Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or constantly belittling and humiliating the child. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

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

- provide adequate food and clothing, shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate caretakers)
- ensure access to appropriate medical care or treatment.



## APPENDIX 2: SPECIFIC SAFEGUARDING ISSUES

### Children missing from education

A child going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

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

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

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points. These procedures are laid out in the [attendance and children missing in education policy](#).

### Child Sexual Exploitation

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

We recognise that 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.

We will consider the following CSE indicators:

- 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.
- 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 cyberbullying 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**

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

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

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

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

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

## **Female Genital Mutilation**

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. Female genital mutilation (FGM) is illegal in the UK or take a child abroad for the purpose of 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 significant harm: FGM.

We recognise that there is a range of potential indicators that a girl or young woman may be at risk of FGM and under the FGM Act 2003 and amendments to it via the Serious Crimes Act 2015 we are aware of our mandatory reporting duty.

### ***Mandatory Reporting Duty***

Female Genital Mutilation Act 2003 (Section 5B as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers, along with social workers and healthcare professionals, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Alongside the reporting to the police a record of the safeguarding concern should be written up and forwarded to the Lead designated safeguarding person.

In the event that preliminary evidence suggests FGM may occur that should be reported through the school's safeguarding processes.

If staff have any concerns they should follow the school's procedures and policies which are in line with local safeguarding procedures and local protocols for multi- agency liaison with police and children's social care.

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/591903/CSE\\_Guidance\\_Core\\_Document\\_13.02.2017.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/591903/CSE_Guidance_Core_Document_13.02.2017.pdf)

## **Preventing Radicalisation Protecting children from the exposure of radicalisation**

This is part of the school's safeguarding duty as exposure to radicalization and extremism will likely have a n adverse impact on a child's health and development. In addition, from 1 July 2015 schools are subject to a duty under section 26 of the Counter-

Terrorism and Security Act 2015, in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”. The statutory Prevent guidance summarises the requirements on schools in terms of four general themes: risk assessment, working in partnership, staff training and IT policies.

School 21 is clear that extremism and radicalisation should be viewed as safeguarding concerns. School 21 embeds British values into the curriculum and the culture of the school. We value personal freedom of speech and the expression of beliefs and both pupils/students and adults have the right to speak freely and voice their opinions. In addition, we demonstrate the importance of mutual respect and tolerance. The conduct we expect from our staff and pupils is in line with the concept of the rule of law. We value the principle of democracy with which comes the need for being inclusive of all.

Further information on the school’s measures to prevent radicalisation are set out in the [Preventing Exposure to Radicalism](#) policy.

### **Private Fostering**

This is a private arrangement in regard to the care of a child under 16 (under 18 if disabled) by someone other than a parent or a close relative. Private foster carers may be from the extended family, such as a cousin or great aunt, however a person who is a relative under the Children Act 1989 or a step-parent will not be a private foster carer. To meet the criteria of private fostering there must be the intention that it should last twenty eight days or more.

School 21 will notify the Local Authority in which the private foster carer resides for they are responsible for deciding whether the arrangement is suitable and for monitoring whether the arrangement continues to be suitable. We appreciate that there is a plethora of drivers that need to children being placed in private foster care (Replacement Children Act Guidance on Private Fostering - DfES 2005) such as:

- Children living apart from their families due to parental or family problems;
- Teenagers living with a friend, or friend’s parent/carer, where relationships at home have broken down; or
- To complete a stage of education because of a family move;
- Children whose parents are working abroad or in another part of the country or serving in the armed forces;
- Children whose parents come into the country to study or work and find it difficult to care for their own children;
- Children sent to the UK for a “better life” or for educational purposes, including those attending language schools, foreign exchanges or sport academies who stay with host families;
- Children attending residential schools who stay with a teacher, or a friend’s parents during the long school holidays;
- Children brought in from abroad with a view to adoption;
- Unaccompanied minors who are living with friends, relatives or strangers.

Private fostering arrangements may be a supportive measure from within the community to difficulties experienced by families. Nonetheless, School 21 will notify the relevant Local Authority, if and when we become aware of a privately fostered child so that Children's Social Care may carry out an assessment. Whilst many privately fostered children will receive a good standard of care, we also recognise that some children in private fostering arrangements may be extremely vulnerable. For example, a child may have been trafficked or exploited. Some children may have been placed with people who are not suitable to look after children. Children may be in need of protection or require specific support services.

### **Domestic Violence**

See emotional abuse definition, however domestic violence may also pose a risk of other forms of abuse such as physical.

### **Substance and Alcohol Misuse**

The misuse of such substances will have an adverse impact on their physical and mental health and development of children. Children may need assistance in order to deal with an addiction or to come to realize substance misuse is problematic for their daily life (as well as being unlawful). Staff should be alert to substance misuse and its possible connection with CSE, gangs or as used as ‘medication’ in dealing with other issues in their lives.

### **Fabricated or induced illness**

This may be a matter of emotional or physical abuse. Identification of such concern by a school nonetheless requires specialist agencies: Children's Services and health in order to determine if the concerns is or is not fabricated illness.

### **Faith Abuse**

This relates to abuse motivated or explained by religious beliefs, primarily belief that a child is under the influence of witchcraft or possessed by malevolent entities. Abuse could be physical, neglect or emotional.

### **Forced Marriage and Honour based abuse**

A forced marriage refers to a child/young person who has not consented or does not have capacity to consent. If a young person fears a forced marriage or has been forced into a marriage, staff must refer such concerns to DSL so that appropriate action is taken in accordance with the level of concern and with agencies.

Honour based abuse could be physical, sexual, emotional or neglect. It is inflicted by adults who commit crimes against children in order to defend or protect the supposed honour of the family/community.

### **Gangs and Youth Violence**

Any child that is vulnerable to being groomed or is being groomed or is part of a gang requires a safeguarding concern referral. Children's family life needs to be understood as well as the dynamic of the gang pull and push factors. Gang involvement can be linked to physical or sexual violent initiations, punishments or be part of gang activity. For some children/ young people may carry weapons as perceived protection. Any such indicators require an urgent reporting to the DSL.

### **Mental Health**

Staff should understand and be alert to signs and disclosures regarding mental ill health from suicidal ideation, self-harm, anorexia, symptoms of psychosis, conduct disorders. Mental ill health requires concerns to be raised so that the child may receive help/treatment. There can be a multitude of factors that may trigger mental ill health and staff need to be identify any traumatic or stressful circumstances and always consider impact on the child's mental health.

**APPENDIX 3: SAFEGUARDING CONCERN RESPONSE FLOWCHART**

## **APPENDIX 4: PEER ON PEER ABUSE RESPONSE FLOWCHART**

## APPENDIX 5: ABOUT MYCONCERN

### **User Management of My Concern**

The DSL for the establishment will be responsible for managing access to the system and ensuring that individuals are allocated appropriate user roles within MyConcern.

When a member of staff leaves the establishment, it will be the responsibility of the DSL to ensure that the relevant account has been deactivated.

### **Recording Concerns and Updates on My Concern**

When a staff member identifies a concern, it will be their responsibility to record that concern on the system as soon as practicable. The recording of the concern should not take precedence over any support that needs to be provided to a child or young person who may be at risk of harm. There may also be an immediate need to contact the DSL prior to a record being made on the system.

The person recording the concern should provide as much relevant information as possible, so that the DSL is in a position to make an informed assessment of the incident. Members of staff recording concerns should ensure that the information they provide is factual, non-judgemental and avoids assumptions. Staff codes should not be used when recording information. Any relevant documentation and/or media files (eg: scanned documents, screenshots etc) should be uploaded to the concern at the time of recording.

The threshold for reporting safeguarding concerns will be the responsibility of the Headteacher in each establishment and in line with local policy and/or guidance (eg: academy/school policies, local authority guidance).

Trusted Users will ensure that concerns are updated as soon as possible if they have further, information relating to that incident.

### **Triaging Concerns by the Designated Safeguarding Lead(s)**

The DSL will be responsible for responding to new concerns that have been recorded and for triaging those concerns on the system. Each concern should be assessed by the DSL and the relevant categories of concerns added to the record. The DSL should also ensure that each concern is associated with the correct pupil(s). Any decisions or action taken by the DSL should be recorded as an update, so it appears in the chronology for that concern.

### **Managing the Concerns Dashboard**

The DSL will be responsible for maintaining the 'Concerns Dashboard' and ensuring that those concerns which are no longer active and require no further action are filed.

### **Managing Referrals**

The DSL will ensure that any referrals to other agencies are recorded in the Referrals area under the Dashboards tab in the main navigation bar. This will ensure that the establishment has a full record of all agency referrals in the system. All relevant documentation relating to the referral process should be uploaded onto the system to facilitate secure storage and access to key documents when required.

### **Managing Information Flags**

The DSL will be responsible for managing the creation and application of Information Flags linked to profiles.

### **Managing Levels of Need**

The DSL will be responsible for setting the 'Level of Need' for each profile on the system and for ensuring that these are in line with local authority and/or LSCB[1] policies.

### **Managing Local Policies**

The DSL will be responsible for uploading and maintaining any local policies and other relevant documentation in the Local Policies area of the system and for ensuring that those documents are kept up to date.

### **Information Sharing**

The DSL will be responsible for ensuring that information sharing on the system is in line with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018. Further guidance can be found in the HM Govt Information Sharing Advice for

Practitioners.

DSLs are able to invite Trusted Users into individual concerns and profiles as a team member when they wish to share relevant information and should ensure that the rationale for doing so is recorded in the system.

The DSL is able to invite members of staff from other agencies into concerns and profiles provided they have been created as a Trusted User. It will be the responsibility of the DSL to decide on the necessity for sharing that information in line with data protection principles.

### **Transfer of Profile Records**

The DSL will be responsible for ensuring that the profiles of pupils that have transferred to another establishment are forwarded on to the relevant safeguarding lead. This can be achieved by transferring the record electronically providing the other establishment is a user of MyConcern. The electronic transfer would include all of the concerns and chronology updates in the profile and any relevant files selected by the DSL.

Alternatively, a PDF Safeguarding Transfer Record can be created for transfers to schools not using MyConcern, which would include all of the concerns and chronologies relating to that pupil. This document can be forwarded onto the new establishment together with any files selected by the DSL for transfer.

When pupils leave the establishment, it will be the responsibility of the DSL to ensure that their profiles are archived on the system and that any data is retained in line with data retention policies/guidelines.

If a Safeguarding Transfer Record is not accepted or rejected by the new establishment, reasonable steps should be taken by the DSL to establish the whereabouts of the pupil.

### **MyConcern Users - Data Security**

It will be the responsibility of the DSL to ensure effective advice is provided to members of staff on the use of MyConcern as follows:-

- Users on the system will avoid re-using a password that they currently use or have previously used for other systems.
- Users are responsible at all times for the security of their password and will not disclose it to any other person or allow any other person to use it.
- If a user's password is lost, stolen or otherwise compromised the password will be changed immediately and a senior user notified immediately.
- Use of the system will be in accordance with the GDPR, the Data Protection Act 2018 and the school's policies on information security.
- Any non-user requests for information from the system (whether from a parent, pupil or any other person) should be directed to the DSL.
- Users will ensure that no-one is able to see their log-in details or any of the information recorded on the system whilst in use.
- When using Wi-Fi users will ensure that access to the system is from secure wireless access points
- When users have finished using the system they will make sure they have logged off so no-one else can gain unauthorised access.
- If it is suspected that any person has gained unauthorised access to the system, the DSL or a member of the Senior Leadership Team must be notified immediately.

### **Timeliness of Recording**

It is important that all data entered onto MyConcern and all management actions by the DSL(s) are carried out as soon as practicable in the circumstances.

### **Support for Users**

The DSL is the primary point of contact for user support and will be able to access the customer support team and MyConcern trainers at One Team Logic if the matter cannot be resolved locally.

## **APPENDIX 6: SAFER RECRUITMENT**

All staff and volunteers working with children in our school will be recruited safely.

### **Preparation**

We will always consider the vacancy that has arisen within the context of safeguarding children and ensure that we include the responsibility to safeguard children within the requirements of the role.

### **Advertising**

We will always advertise our vacancies in a manner that is likely to attract a wide range of applicants. The advertisement will always include a statement about our commitment to safeguarding children and our expectation that all applicants will share that commitment. The advertisement will state that the post is subject to a Disclosure and Barring check.

### **Applications**

We will ensure that our application form enables us to gather information about the candidates' suitability to work with children by asking specific and direct questions. We will scrutinise all completed application forms.

### **References**

We will not accept CVs, open references or testimonials. We will ask for the names of at least two referees. We will take up references prior to the interview and ask specific questions about the candidate's previous employment or experience of working with children. We will follow up any vague or ambiguous statements.

### **Interviews**

We will always conduct a face to face interview even when there is only one candidate. Our interview panel will always contain at least one member trained in safer recruitment practice. Our interview questions will seek to ensure we understand the candidate's values and beliefs that relate to children. All candidates will be asked to bring original documents which confirm their identity, qualifications, and right to work.

### **Appointments**

Our offer of appointment will be conditional on all requested checks having been returned as satisfactory. We will refer to the Disclosure and Barring Service any person whose checks reveal that they have sought work when barred from working with children.

### **Induction**

We will always provide newly appointed staff with appropriate guidance about safe working practice, boundaries and propriety and explain the consequences of not following the guidance.

### **Continuing Professional Development**

We will ensure that all staff receive regular training in Child Protection.

### **Supervision**

We will always supervise staff and act on any concerns that relate to the safeguarding of children.

### **Allegations**

We will always follow our locally agreed procedures for the management of allegations against staff. The procedures are available at: NSCB LADO and in line with London Child Protection Procedures (2017)

### **Local Authority Designated Officer:**

**Nick Pratt Newham Dockside**

**0203 3733803 / 0203 3736706**

**Dismissal**

We will always refer to the Disclosure and Barring Service any member of staff who is dismissed because of misconduct relating to a child.

**Safe Practice and Whistleblowing**

We understand that all adults working in or on behalf of our school have a duty to safeguard children and promote their welfare. We aim to provide a safe and supportive environment for our children through the relationship we have with them and their parents or carers and will always seek to ensure that all adults working in our school behave in a manner that fosters this relationship.

We will ensure that all staff are clear about the expectations we have of their behaviour towards all children and that any incident that falls below our expected standards will be dealt with appropriately.

If you believe there has been negligence or misconduct in a workplace regarding safeguarding matter, then you can 'blow the whistle' by contacting Ofsted on: Whistleblower Hotline on 0300 123 3155 (Monday to Friday from 8.00am to 6.00pm).

