



# **Phoenix Arch School**

## **Child Protection and Safeguarding**

**POLICY 2020 – EYFS AND YEARS 1-6**  
**DATE: SEPTEMBER 2020**

This policy has been updated in response to the release of Keeping Children Safe in Education 2020, which will come into effect on 1<sup>st</sup> September 2020.  
Covid 19 special arrangements still apply.

## **Contents:**

Statement of intent

1. Definitions
2. Legal framework
3. Roles and responsibilities
4. Inter-agency working
5. Abuse and neglect
6. Types of abuse and neglect
7. FGM
8. Forced marriage
9. Child sexual exploitation (CSE)
10. Homelessness
11. Pupils with family members in prison
12. Pupils required to give evidence in court
13. Contextual safeguarding
14. Preventing radicalisation
15. A child missing from education
16. Pupils with SEND
17. Alternative provision
18. Private fostering
19. Concerns about a pupil
20. Early help
21. Managing referrals
22. Concerns about staff members and safeguarding practices
23. Dealing with allegations of abuse against staff
24. Allegations of abuse against other pupils (peer-on-peer abuse)
25. Communication and confidentiality
26. Online safety
27. Mobile phone and camera safety
28. Sports clubs and extracurricular activities
29. Safer recruitment
30. Single central record (SCR)
31. Staff suitability
32. Training
33. Monitoring and review

## **Appendicies**

1.CPOMS

2.Body Map

3. Safeguarding Reporting Process

## Statement of intent

Phoenix Arch School is committed to safeguarding and promoting the welfare, both physical and emotional, of every pupil both inside and outside of the school premises. We implement a whole-school preventative approach to managing safeguarding concerns, ensuring that the wellbeing of pupils is at the forefront of all action taken.

This policy sets out a clear and consistent framework for delivering this promise, in line with safeguarding legislation and statutory guidance.

It will be achieved by:

- Creating a culture of safer recruitment by adopting procedures that help deter, reject or identify people who might pose a risk to children.
- Teaching pupils how to keep safe and recognise behaviour that is unacceptable.
- Identifying and making provision for any pupil that has been subject to abuse.
- Ensuring that members of the governing board, the Head teacher and staff members understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of child abuse and know to refer concerns to the DSL.
- Ensuring that the Head teacher and any new staff members and volunteers are only appointed when all the appropriate checks have been satisfactorily completed.

Signed by:

Headteacher

Date: 1<sup>st</sup> September 2020

Chair of governors

Date: 1<sup>st</sup> September 2020

## 1. Definitions

The terms “**children**” and “**child**” refers to anyone under the age of 18.

For the purposes of this policy, “safeguarding and protecting the welfare of children” is defined as:

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

For the purposes of this policy, the term “**harmful sexual behaviour**” includes, but is not limited to, the following actions:

- Using sexually explicit words and phrases
- Inappropriate touching
- Sexual violence or threats
- Full penetrative sex with other children or adults

In accordance with the DfE’s guidance, ‘Sexual violence and sexual harassment between children in schools and colleges’ (2018), and for the purpose of this policy, the term “**sexual harassment**” is used within this policy to describe any unwanted conduct of a sexual nature, both online or offline, which violates a child’s dignity and makes them feel intimidated, degraded or humiliated, and can create a hostile, sexualised or offensive environment.

For the purpose of this policy, the term, “**sexual violence**” encompasses the definitions provided in the Sexual Offences Act 2003, including those pertaining to rape, assault by penetration and sexual assault.

The term “teaching role” is defined as planning and preparing lessons and courses for pupils; delivering lessons to pupils; assessing the development, progress and attainment of pupils; and reporting on the development, progress and attainment of pupils. These activities are not teaching work if the person carrying out the activity does so (other than for the purposes of induction) subject to the direction and supervision of a qualified teacher or other person nominated by the Head teacher to provide such direction and supervision.

## 2. Legal framework

This policy has been created with due regard to all relevant legislation including, but not limited to, the following:

### Legislation

- Children Act 1989
- Children Act 2004
- Safeguarding Vulnerable Groups, Act 2006
- The Education (Schools Teachers’ Appraisal) (England) Regulations 2012 (as amended)
- Sexual Offences Act 2003
- General Data Protection Regulation (GDPR) Data Protection Act 2018
- (New for 2018) (Schools providing education to pupils under the age of eight only).The childcare (Disqualification) and childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018

## **Statutory Guidance**

- HM Government (2013) 'Multi-agency guidelines: Handling cases of Forced Marriage'
- DfE (2018) 'Working Together to Safeguard Children'
- DfE (2015) 'The Prevent Duty'
- DfE (2018) 'Keeping Children Safe in Education'
- DfE (2018) 'Disqualification under the Childcare Act 2006'

## **Non Statutory Guidance**

- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2018) 'Informing Sharing'
- DfE (2017) 'Child Sexual Exploitation'
- DfE (2018) 'Sexual violence and sexual harassment between children in schools and colleges'

## **Other relevant school policies include:**

- Children Missing Education Policy
- Prevent Duty Policy
- Managing Allegations Policy
- Behaviour Management Policy
- Staff Code of Conduct
- Data Protection Policy
- Whistleblowing Policy
- Anti-bullying Policy
- Online Safety Policy
- Data and E-Security Breach Prevention and Management Plan
- Lone Working Policy
- Acceptable Safe Use of ICT Policy
- Bereavement Policy
- British Values Policy
- Intimate Care Policy
- Lockdown Policy
- Off Site Visits Policy
- Photography Policy
- Racial Harassment Policy
- Single Equality Policy

## **3. Roles and Responsibilities**

The Governing Body has a duty to:

- Ensure that the school complies with its duties under the above child protection and safeguarding legislation
- Guarantee that the policies, procedures and training opportunities in the school are effective and comply with the law at all times
- Guarantee that the school contributes to inter-agency working in line with the statutory guidance 'Working Together to Safeguard Children' (2018)
- Confirm that the school's safeguarding arrangements take into account the procedures and practices of the LA as part of the inter-agency safeguarding procedures
- Comply with its obligations under section 14B of the Children Act 2004 to supply the local safeguarding arrangement with information to fulfil its functions

- Ensure that a member of the governing body is nominated to liaise with the LA and/or partner agencies on issues of child protection and in the event of allegations of abuse made against the Head teacher or another governor. This is **Umesh Shah**
- Guarantee that there are effective child protection policies and procedures in place together with a staff code of conduct
- Ensure that there is a member of the governing body responsible for safeguarding arrangements. This is **Anna Gray**
- Appoint a member of staff from the SLT to the roles of DSL as an explicit part of the role-holder's job description. **This is Judith Towell**
- Appoint one or more deputy DSL(s) to provide support to the DSL and ensure that they are trained to the same standard as the DSL and that the role is explicit in their job description(s). This is **Marion Joseph** and **Helen Patel**
- Make sure that pupils are taught about safeguarding, including protection against danger online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum
- Adhere to statutory responsibilities by conducting pre-employment checks on staff who work with children, taking proportionate decisions on whether to do any checks beyond what is required
- Ensure that staff members are appropriately trained to support pupils to be themselves at school, e.g. if they are LGBTQ+
- Guarantee that volunteers are appropriately supervised
- Make sure that at least one person on any appointment panels has undertaken safe recruitment training
- Ensure that all staff members receive safeguarding and child protection training updates, such as e-bulletins, emails and staff meetings, as required, but at least annually
- Certify that there are procedures in place to handle allegations against a member of staff or volunteers
- Confirm that there are procedures in place to make a referral to the DBS and the Teaching Regulation Agency (TRA), where appropriate, if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned
- Guarantee that there are procedures in place to handle pupils' allegations against other pupils
- Ensure that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of pupils and staff
- Ensure that procedures are in place to eliminate unlawful discrimination, harassment and victimisation, including those in relation to peer-on-peer abuse
- Make sure that pupils' wishes and feelings are taken into account when determining what action to take and what services to provide to protect individual pupils
- Guarantee that there are systems in place for pupils to express their views and give feedback
- Establish an early help procedure and ensure all staff understand the procedure and their role in it
- Appoint a designated teacher to promote the education achievement of LAC and ensure that this person has undergone appropriate training. This is **Marion Joseph**
- Ensure that the designated teacher works with the virtual school head to discuss how the pupil premium funding can best be used to support CLS
- Introduce mechanisms to assist staff in understanding and discharging their roles and responsibilities
- Make sure that staff members have the skills, knowledge and understanding necessary to keep LAC safe, particularly with regards to the pupil's legal status, contact details and care arrangements

- Put in place appropriate safeguarding responsibilities for pupils who go missing from school, particularly on repeat occasions, to help identify any risk of abuse and neglect, including sexual abuse or exploitation, and prevent the risk of their disappearance in future
- Ensure that all members of the governing board have been subject to an enhanced DBS check

The Head teacher **Judith Towell** has a duty to:

- Safeguard pupils' wellbeing and maintain public trust in the teaching profession
- Ensure that the policies and procedures adopted by the governing body, particularly concerning referrals of cases of suspected abuse and neglect, are followed by staff members
- Provide staff, upon induction, with the Child Protection and Safeguarding Policy, Staff Code of Conduct, part one of the 'Keeping Children Safe in Education' (KCSIE) guidance, Behaviour Management Policy, The Children Missing from Education Policy, online safety training, and the identity of the DSL and any deputies

The Designated Safeguarding Lead, **Judith Towell** has a duty to:

- Refer all cases of suspected abuse to Children's social care services team – 0208 937 4300. The LA designated officer (LADO – Tel: 0208 937 2090) Child protection concerns should also go through Family Front Door on 0208 937 4300. The DBS, and the police in cases where a crime has been committed
- Refer cases of radicalisation to the Channel programme
- Liaise with the Head teacher to inform them of safeguarding issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations
- Liaise with the deputy DSL(s) to ensure effective safeguarding outcomes
- Act as a source of support, advice and expertise to staff members on matters of safeguarding by liaising with relevant agencies
- Understand the assessment process for providing early help and intervention
- Support staff members in liaising with other agencies and setting up inter-agency assessment where early help is deemed appropriate
- Keep cases of early help under constant review and refer them to the Family Front Door if the situation does not appear to be improving
- Have a working knowledge of how Brent conducts a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- Ensure each member of staff has access to and understands the school's Child Protection and Safeguarding Policy and procedures – this will be discussed during the staff induction process
- Be alert to the specific requirements of children in need, especially as those with SEND and young carers are particularly vulnerable
- Keep detailed, accurate and secure records of concerns and referrals
- Secure access to resources and attend any relevant training courses
- Encourage a culture of listening to children and taking account of their wishes and feelings
- Work with the governing board to ensure the school's Child Protection and Safeguarding Policy is reviewed annually and the procedures are updated regularly
- Ensure the school's Child Protection and Safeguarding Policy is available publicly, and parents are aware that the school may make referrals for suspected cases of abuse or neglect, as well as the role the school plays in these referrals



- Link with local safeguarding arrangements to make sure that staff members are aware of the training opportunities available and the latest local policies on safeguarding
- Ensure that a pupil's active child protection file is copied when transferring to a new school
- Ensure that a pupils information is passed to a new school
- Ensure that any new school has the name of the social worker to contact for information about any Child in Need
- Be available at all times during school hours to discuss any safeguarding concerns
- The designated teacher, **Marion Joseph**, has a responsibility for promoting the educational achievement of CLA, and for children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales

**All staff members** have a responsibility to:

- Safeguard pupils' wellbeing and maintain public trust in the teaching profession as part of their professional duties.
- Provide a safe environment in which pupils can learn.
- Act in accordance with school procedures with the aim of eliminating unlawful discrimination, harassment and victimisation, including those in relation to peer-on-peer abuse.
- Maintain an attitude of 'it could happen here' where safeguarding is concerned.
- Be aware of the signs of abuse and neglect.
- Record all concerns on the CPOMS reporting system
- Follow up their concern with the DSL before leaving school at the end of the day
- Monitor any concerns they have reported and report again if outcomes have not improved for the child. Repeat this until outcomes have improved and you no longer have concerns
- Where a child is at risk of immediate harm or has been harmed, report their concern at the first available opportunity to the DSL.
- Ensure that any written notes are passed to the DSL for secure storage
- Be aware of the early help process and understand their role in it.
- Act as the lead professional in undertaking an early help assessment, where necessary. Or work with Jude or Marion to ensure she has the information needed to be an effective lead professional for any child you work with in school.
- Be aware of, and understand, the process for making referrals to (0208 937 4300 or through Brent's portal through the website), as well as for making statutory assessments under the Children Act 1989 and their role in these assessments.
- Be aware of and understand the procedure to follow in the event that a child confides they are being abused or neglected.
- Support social workers in making decisions about individual children, in collaboration with the DSL.
- Maintain appropriate levels of confidentiality when dealing with individual cases, and always act in the best interest of the child.
- Comply with the emergency evacuation, administration of medicines, staff code of conduct, school attendance, e-safety, data protection, anti-bullying and behaviour management policies. They must write, share and follow the risk assessments for individual pupils and activities on and off the school site. They must report any accidents or incidents involving pupils or staff through CPOMS, HT or DHT. Issues involving the building must be reported, to the front office.
- Follow the school's procedures for safeguarding and ensure that their teams maintain their awareness by including safeguarding on the agenda of their weekly team meetings.
- Follow the school's procedure for, and approach to, preventing radicalisation as outlined in the Prevent Duty Policy

## 4. Inter-agency working

All supply staff including teachers have the same safeguarding procedures as any other member of staff.

Phoenix Arch School contributes to inter-agency working as part of its statutory duty. Phoenix Arch School works with MASH, Children's Disability Service, the police, health services, Education Welfare Officer and other services to protect the welfare of its pupils, through the early help process and by contributing to inter-agency plans to provide additional support when necessary.

Phoenix Arch School recognises the importance of information sharing between professionals and local agencies in order to effectively meet pupils' needs.

Staff members are aware that whilst the GDPR and the Data Protection Act 2018 places a duty on schools to process personal information fairly and lawfully, it is not a barrier to sharing information where failure to do so would result in the pupil being placed at risk of harm.

Staff members will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of pupils.

Phoenix Arch School also recognises the particular importance of inter-agency working in identifying and preventing child sexual exploitation (CSE).

Phoenix Arch School works closely with parents and carers as part of our approach to keeping pupils safe. Parents and carers are asked to inform school of any concerns they have and school informs parents and carers of our concerns and any referrals we need to make unless there is a risk of increased harm for the child or to do so may interfere with a possible police investigation. In a case where a child has an injury that causes concern and the child is unable to communicate, school will contact Social Care for advice before contacting parents.

Phoenix Arch School can support referrals to other agencies, this is supported by Marion who works closely with families and can refer to early help support.

## 5. Abuse and neglect

All members of staff will be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be given a specific label and multiple issues often overlap one another.

We recognise that because of the day-to-day contact with children, school staff are well-placed to observe the outward signs of abuse. The school will, therefore:

- Establish and maintain an environment where children feel secure, are encouraged to communicate and are listened to;
- Ensure children know that there are adults in the school whom they can approach if they are worried. Each pupil in school will have a key worker
- Ensure that all children are supported in their preferred method of communication
- Listen to, believe and act on what children disclose
- Include opportunities in the PSHE/ PSED curriculum for children to develop the skills they need to recognise and stay safe from abuse.
- Maintain an attitude of 'it could happen here' where safeguarding is concerned.
- When concerned about the welfare of a child, staff members should always act in the interests of the child
- If a child makes a disclosure to a member of staff they will Listen, Reassure Record and Report. At no time will a member of staff promise a child they will not tell anyone or keep a secret.

All staff members will be aware of the indicators of abuse and the appropriate action to take following a pupil being identified as at potential risk of abuse or neglect.

When identifying pupils at risk of potential harm, staff members will look out for a number of indicators including, but not limited to, the following:

## **INDICATORS of Abuse/Neglect**

### **Emotional Abuse**

**Persistent** emotional maltreatment of a child such as to cause **severe and persistent adverse effects** on their emotional development.

It may involve:-

Conveying they are worthless, unloved, inadequate or only valued insofar as they meet the needs of another person

- Not giving child opportunity to express views, 'making fun' of what say or how communicate
- Inappropriate expectations for their age or development – including overprotection
- Seeing or hearing the ill treatment of others
- Serious bullying & causing child to feel frightened or in danger
- Exploitation or corruption of children
- All types of ill-treatment of a child

### **Examples of factors in emotional abuse:**

- Lack of praise and encouragement
- Lack of comfort and love
- Lack of attachment
- Lack of appropriate stimulation
- Lack of continuity of care
- Singling out one child for such treatment
- Child carrying out tasks in the home which are inappropriate for their age or development
- Over protective and possessive behaviour of a parent which prevents the child from having normal contact with friends
- Exposure to domestic abuse
- Inconsistency of parenting
- Harsh discipline
- Negative comments – put downs

### **Physical Abuse**

Hitting, Shaking, Throwing, Poisoning, Burning or Scalding, Drowning, Suffocating or otherwise causing physical harm to a child

Physical harm can also be caused when a parent or carer feigns the symptoms of, or deliberately causes ill health to a child for whom they are caring (FI: Fabricated or Induced Illness)

#### ➤ **Some examples of indicators of physical abuse:**

- Bruising on a baby
- Multiple bruises
- Black eyes
- Torn frenulum (skin between the top lip and the front teeth.)
- Bite marks
- Burns – cigarette, iron, linear etc.
- Scalds
- Fractures
- Poisoning
- Shaking injuries
- Ligature marks –internal injuries

### **Sexual Abuse**

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.

Activities include:-

- Physical contact, including penetrative and non-penetrative acts
- Involving children looking at or in the production of sexual images
- Watching sexual activities
- Encouraging children to behave in sexually inappropriate ways
- Grooming a child in preparation for abuse

Women can also commit acts of sexual abuse as can other children.

**Possible physical signs of sexual abuse:**

- Finger- tip bruising on the inside of the thigh
- Itchiness, soreness, discharge, bleeding, pain on passing urine, repeated urine infections
- Rectal bleeding
- Injuries to the genital area
- Persistent abdominal pain or headaches without apparent cause
- Pregnancy in a girl below the age of 16 years, especially if she is vague or secret about the age of the father

**Behavioural Indicators can include:**

- The child's disclosure that sexual abuse has happened
- Sleep disturbances
- Inappropriate sexual play
- Explicit sexual knowledge
- Attention needing rather than attention seeking behaviour
- Lack of trust or fear of familiar adults
- Learning difficulties
- Running away from home
- Self- harm/appetite disorders/anti-social behaviour

**Neglect**

**Persistent failure** to meet a child's basic physical &/or psychological needs, likely to result in the **serious** impairment of a child's health or development. May occur during pregnancy as a result of parental substance misuse.

**Parent or Carer fails to provide:-**

- Adequate food, clothing or shelter (including exclusion from home & abandonment)
- Protection from physical & emotional harm or danger
- Ensure adequate supervision
- Access to appropriate medical care or treatment
- For child's basic emotional needs

**Some possible features of neglect:**

- Impairment of growth or obesity
- Pot belly, thin hands
- Mottled hands and feet which may be swollen
- Poorly clothed, neglected appearance, smelly child
- Unhygienic home conditions
- Abnormally voracious appetite
- Dry sparse hair
- Impairment of development
- Lack of stimulation
- Lack of supervision
- Failure to seek medical care
- Failure to attend school

**Behavioural Indicators may include:**

- Fear of going home or parents being contacted
- Undue fear of adults
- Aggression/bullying
- Behaviour changes without any explanation
- Overly compliant behaviour or 'watchful attitude'
- Unexplained patterns of absences from school

All members of staff will be aware of the indicators of peer-on-peer abuse, such as those in relation to bullying, gender-based violence, sexual assaults and sexting.

All staff will be aware of the necessary procedures to follow to prevent peer-on-peer abuse, as outlined in the school's Anti-Bullying Policy.

All staff will be aware of the behaviours linked to drug taking, alcohol abuse, truancy and sexting, and will understand that these put pupils in danger.

Staff members will be aware of the effects of a pupil witnessing an incident of abuse, such as witnessing domestic violence at home. Any concerns should be reported to the DSL through Cpoms.

## 6. Types of abuse and neglect

**Abuse:** A form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm. Children may be abused in a family, institutional or community setting by those known to them or, more rarely, by others, e.g. via the internet.

**Physical abuse:** A form of abuse which may involve actions such as hitting, throwing, burning, drowning and poisoning, or otherwise causing physical harm to a child. Physical abuse can also be caused when a parent fabricates the symptoms of, or deliberately induces, illness in a child.

**Emotional abuse:** A form of abuse which involves the emotional maltreatment of a child to cause severe and adverse effects on the child's emotional development. This may involve telling a child they are worthless, unloved, inadequate, not giving them the opportunities to express their views, deliberately silencing them, or often making them feel as though they are in danger.

**Sexual abuse:** A form of abuse which involves forcing or enticing a child to take part in sexual activities, not necessarily involving a high level of violence, and whether or not the child is aware of what is happening. This may involve physical assault, such as penetrative assault and touching, or non-penetrative actions, such as looking at sexual images or encouraging children to behave in an inappropriate way.

**Neglect:** A form of abuse which involves the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of a child's mental health or development. This may involve providing inadequate foods, clothing or shelter, or the inability to protect a child from physical or emotional harm or ensure access to appropriate medical treatment.

Staff need to be aware that mental health problems 'can be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Abuse and neglect are not just manifested physically, and that if a child is demonstrating a mental health concern, particularly if this seems to be newly developed, staff should be vigilant for potential safeguarding issues and report concerns immediately through Cpoms. Staff should also be aware that the mental health of parents and carers can impact on pupils well-being and this concerns should be reported to the DSL through Cpoms.

Staff need to be aware that there may be increased risk of mental health support required for our families following the Covid 19 pandemic and any concerns should be reported to DSL Jude or Marion to enable us to signpost to support services as required.

We all share responsibility and to do nothing is a sign of neglect.

## 7. FGM

For the purpose of this policy, FGM is defined as the partial or total removal of the external female genitalia, or any other injury to the female genital organs.

FGM is considered a form of abuse in the UK and is illegal.

All staff will be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. If staff members are worried about someone who is at risk of FGM or who has been a victim of FGM, they are required to share this information with social care and/or the police. Staff should be mindful of family member risks.

Teaching staff are **legally required** to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a girl under the age of 18. Teachers failing to report such cases will face disciplinary action.

**NB.** The above does not apply to any suspected or at-risk cases, nor if the individual is over the age of 18. In such cases, local safeguarding procedures will be followed.

There are a range of potential indicators that a pupil may be at risk of FGM. While individually they may not indicate risk, if two or more indicators are present, this could signal a risk to the pupil.

Victims of FGM are most likely to come from communities that are known to adopt this practice. It is important to note that the pupil may not yet be aware of the practice or that it may be conducted on them, so staff will be sensitive when broaching the subject.

Indicators that may show a heightened risk of FGM include the following:

- The socio-economic position of the family and their level of integration into UK society
- Any girl with a mother or sister who has been subjected to FGM
- Any girl withdrawn from PSHE

Indicators that may show FGM could take place soon include the following:

- When a female family elder is visiting from a country of origin
- A girl may confide that she is to have a 'special procedure' or a ceremony to 'become a woman'
- A girl may report they are to have a celebration not linked to birthdays.
- A girl may request help from a teacher if she is aware or suspects that she is at immediate risk
- A girl, or her family member, may talk about a long holiday to her country of origin or another country where the practice is prevalent

Staff will be vigilant to the signs that FGM has already taken place so that help can be offered, enquiries can be made to protect others, and criminal investigations can begin.

Indicators that FGM may have already taken place include the following:

- Difficulty walking, sitting or standing
- Spending longer than normal in the bathroom or toilet
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems
- Prolonged or repeated absences from school followed by withdrawal or depression
- Reluctance to undergo normal medical examinations
- Asking for help, but not being explicit about the problem due to embarrassment or fear

Teachers will not examine pupils, and so it is rare that they will see any visual evidence, but they will report concerns to the DSL who will refer to the police where an act of FGM appears to have been carried out and refer to the Family Front Door.

FGM is also included in the definition of 'honour-based' violence (HBV), which involves crimes that have been committed to defend the honour of the family and/or community, alongside forced marriage and breast ironing.

All forms of **Honour- Based Abuse [ABA]** will be treated and escalated as such.

Staff will be alert to the signs of HBA, including concerns that a child is at risk of HBA, or has already suffered from HBA and will consult with the DSL who will activate local safeguarding procedures if concerns arise having regard to section 47 of the Children Act 1989

## **8. Forced marriage**

For the purpose of this policy, a "**forced marriage**" is defined as a marriage that is 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 the marriage. Forced marriage is classed as a crime in the UK.

As part of HBA, staff will be alert to the signs of forced marriage including, but not limited to, the following:

- Becoming anxious, depressed and emotionally withdrawn with low self-esteem
- Showing signs of mental health disorders and behaviours such as self-harm or anorexia
- Displaying a sudden decline in their educational performance, aspirations or motivation

- Regularly being absent from school
- Displaying a decline in punctuality
- An obvious family history of older siblings leaving education early and marrying early

If staff members have any concerns regarding a child who may have undergone, is currently undergoing, or is at risk of, forced marriage, they will speak to the DSL and local safeguarding procedures will be followed – this could include referral to the police or the Forced Marriage Unit.

## **9. Child sexual exploitation (CSE)**

For the purpose of this policy, “**child sexual exploitation**” is defined as: a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person into sexual activity, for either, or both, of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage or increased status of the perpetrator or facilitator

CSE does not always involve physical contact, as it can also occur online. It is also important to note that a child can be sexually exploited even if the sexual activity appears consensual. The school has adopted the following procedure for handling cases of CSE, as outlined by the DfE:

### **Identifying cases**

School staff members are aware of and look for the key indicators of CSE; these are as follows:

- Appearing with unexplained gifts and new possessions
- Having older boyfriends or girlfriends
- Undergoing mood swings or drastic changes in emotional wellbeing
- Displaying inappropriate sexualised behaviour
- Displaying changes in emotional wellbeing
- Accessing inappropriate websites.

### **Referring cases**

Where CSE, or the risk of it, is suspected, staff will discuss the case with the DSL. If after discussion a concern still remains, local safeguarding procedures will be triggered, including referral to the LA.

### **Support**

The LA and all other necessary authorities will then handle the matter to conclusion. The school will cooperate as needed.

## **10. Homelessness**

The DSL and deputy(s) will be aware of the contact details and referral routes in to the Local Housing Authority so that concerns over homelessness can be raised as early as possible. Indicators that a family may be at risk of homelessness include the following:

- Household debt
- Rent arrears
- Domestic abuse
- Anti-social behaviour
- Any mention of a family moving home because “they have to”
- Transfer from one benefit to Universal Credit.

## **11. Pupil’s with family members in prison**

Pupils with a family member in prison will be offered pastoral support as necessary.

## **12. Pupils required to give evidence in court**

Pupils required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support.

Pupils where appropriate are allowed the opportunity to discuss questions and concerns.

## **13. Contextual safeguarding**

Safeguarding incidents can occur outside of school and can be associated with outside factors. School staff, particularly the DSL and their deputy(s), will always consider the context of incidents – this is known as contextual safeguarding.

Assessment of pupils' behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare.

The school will provide as much contextual information as possible when making referrals.

All staff, but including the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families.'

All school staff to be aware of that young people will often hide exploitative relationships from their own parents or carers, particularly as they become older and more independent, and sometimes staff might find out about these issues before anyone else.

All staff have a duty to report concerning friendships or activities of children outside school. Our pupils are particularly vulnerable and staff have a duty to share this information with the DSL even if the information has been acquired from outside the school community.

All staff will know how to report concerns within the community directly through the Family Front Door

## **14. Preventing radicalisation**

For the purpose of this policy, “**radicalisation**” refers to the process by which a person comes to support terrorism and extremist ideologies.

Protecting children from the risk of radicalisation is part of the school's wider safeguarding duties.

Phoenix Arch School will actively assess the risk of pupils being drawn into terrorism.

Staff will be alert to changes in pupils' behaviour which could indicate that they may be in need of help or protection.

Staff will use their professional judgement to identify pupils who may be at risk of radicalisation and act appropriately, which may include making a referral through family front door. The school will work with local safeguarding arrangements as appropriate.

School will ensure that they engage with parents and families, as they are in a key position to spot signs of radicalisation. In doing so, the school will assist and advise family members who raise concerns and provide information for support mechanisms.

Any concerns over radicalisation will be discussed with a child's parents, unless the school has reason to believe that the child would be placed at risk as a result.

All staff at Phoenix Arch School receive Prevent/WRAP training. The WRAP trainers will hold formal training sessions with all members of staff to ensure they are aware of the risk indicators and their duties regarding preventing radicalisation.

### **Risk Indicators of vulnerable children**

Indicators of an identity crisis include the following

- Distancing themselves from their cultural/religious heritage
- Uncomfortable with their place in society

Indicators of a personal crisis include the following:

- Family tensions
- A sense of isolation
- Low self-esteem



- Disassociation from existing friendship groups
- Searching for answers to questions about identity, faith and belonging

Indicators of vulnerability through personal circumstances includes the following:

- Migration
- Local community tensions
- Events affecting their country or region of origin
- Alienation from UK values
- A sense of grievance triggered by personal experience of racism or discrimination

Indicators of vulnerability through unmet aspirations include the following:

- Perceptions of injustice
- Feelings of failure
- Rejection of civic life
- Indicators of vulnerability through criminality:
- Experiences of dealing with the police
- Involvement with criminal groups

### **Making a judgement**

When making a judgement, staff will ask themselves the following questions:

- Does the pupil have access to extremist influences?
- Does the pupil access the internet for the purposes of extremist activities (e.g. using closed network groups, accessing or distributing extremist material, contacting such groups covertly using Skype)?
- Is there a reason to believe that the pupil has been, or is likely to be, involved with extremist organisations?
- Is the pupil or their family known to have possessed, or be actively seeking, extremist literature/other media likely to incite racial or religious hatred?
- Does the pupil sympathise with or support illegal/illicit groups?
- Does the pupil support groups with links to extremist activity?
- Has the pupil encountered peer, social, family or faith group rejection?
- Is there evidence of extremist ideological, political or religious influence on the pupil?
- Have international events in areas of conflict and civil unrest had a noticeable impact on the pupil?
- Has the pupil come into conflict with family over religious beliefs, lifestyle or dress choices?
- Has the pupil witnessed or been the victim of racial or religious hate crimes?
- Is the pupil a foreign national or refugee, or awaiting a decision on their/their family's immigration status?
- Is there evidence that a significant adult or other person in the pupil's life has extremist views or sympathies?

Critical indicators include where the pupil is:

- In contact with extremist recruiters.
- Articulating support for extremist causes or leaders.
- Accessing extremist websites.
- Possessing extremist literature.
- Using extremist narratives and a global ideology to explain personal disadvantage.
- Justifying the use of violence to solve societal issues.

Any member of staff who identifies such concerns, because of observed behaviour or reports of conversations, will report these to the DSL.

The DSL will consider whether a situation may be so serious that an emergency response is required. In this situation, a 999 call will be made; however, concerns are most likely to require a police investigation, in the first instance.

## **Extremist speakers**

Phoenix Arch School does not allow speakers who may promote extremist views to use the school premises. The school does not allow any groups to use the school to practice religious beliefs.

## **Building children's resilience**

The school will:

- Provide a safe environment for debating controversial issues.
- Promote fundamental British values, alongside pupils' spiritual, moral, social and cultural development.
- Allow pupils time to explore sensitive and controversial issues.
- Provide pupils with the knowledge and skills to understand and manage potentially difficult situations, recognise risk, make safe choices and recognise where pressure from others threatens their personal safety and wellbeing.
- Equip pupils to explore political and social issues critically, weigh evidence, debate, and make reasoned arguments.
- Teach pupils about how democracy, government and law making/enforcement occur.
- Teach pupils about mutual respect and understanding for the diverse national, regional, religious and ethnic identities of the UK.

## **Resources**

The school will utilise the following resources when preventing radicalisation:

- Local safeguarding arrangements
- Local police (contacted via 101 for non-emergencies)
- The DfE's dedicated helpline (020 7340 7264)

## **15. A child missing from education**

A child going missing from school is a potential indicator of abuse or neglect and, as such, these children are increasingly at risk of being victims of harm, exploitation or radicalisation. Staff will monitor pupils that go missing from the school, particularly on repeat occasions, and report them to the DSL following normal safeguarding procedures, in accordance with the Children Missing Education Policy.

Phoenix Arch School will inform the LA of any pupil who fails to attend regularly or has been absent without the school's permission for a continuous period of 10 school days or more. Phoenix Arch School make contact with families daily if a child does not arrive to school. If after three days the school has not heard from parents or carers the school will visit the home to confirm the family is safe and is not in need of additional support.

## **Admissions register**

Phoenix Arch School will ensure that the admissions register is kept up-to-date and accurate at all times.

At least two emergency contact details will be held for each pupil where possible. Parents and Carers are asked to supply three emergency contacts. If a parent notifies the school that their child will live at a different address, the school will record the following information on the admissions register:

- The full name of the parent with whom the pupil will live
- The new address
- The date from when the pupil will live at that address

If a parent notifies the school that their child will be attending a different school, or is already registered at a different school, the following information will be recorded on the admissions register:

- The name of the new school
- The date on which the pupil first attended, or is due to attend, that school

Where a pupil moves to a new school, the school will use a secure internet system to securely transfer pupils' data

To ensure accurate data is collected to allow effective safeguarding, the school will inform the LA of any pupil who is going to be deleted from the admission register, in accordance with the Education (Pupil Registration) (England) Regulations 2006 (as amended), To ensure accurate data is collected to allow effective safeguarding, the school will inform the LA of any pupil who is going to be deleted from the admission register, in accordance with the Education (Pupil Registration) (England) Regulations 2006 (as amended), where they:

- Have been taken out of the school by their parents, and are being educated outside the national education system, e.g. home education.
- Have ceased to attend the school, and no longer live within a reasonable distance of the premises.
- Have been permanently excluded.

The school will only remove a pupil from the admissions register where the school and LA are satisfied that a referral has been made to the Child Missing Education team and family Front door if appropriate.

## **16. Pupils with SEND**

The school recognises that pupils with SEND can face additional safeguarding challenges and understands that further barriers may exist when determining abuse and neglect in this group of pupils.

Staff will be aware of the following:

- Certain indicators of abuse, such as behaviour, mood and injury, may relate to the pupil's disability without further exploration; however, **it should never be assumed that a child's indicators relate only to their disability**
- Pupils with SEND can be disproportionately impacted by things like bullying, without outwardly showing any signs
- Communication barriers may exist, as well as difficulties in overcoming these barriers

When reporting concerns or making referrals for pupils with SEND, the above factors will always be taken into consideration.

When managing a safeguarding issue relating to a pupil with SEND, the DSL will liaise with the school's teaching teams, as well as the pupil's family where appropriate, to ensure that the pupil's needs are effectively met

## **17. Alternative provision**

The school will remain responsible for a pupil's welfare during their time at an alternative provider including school residential trips.

## **18. Private fostering**

Where the school becomes aware of a pupil being privately fostered, they will notify the LA as soon as possible to allow the LA to conduct any necessary checks

## **19. Concerns about a pupil**

If a member of staff has a concern about a child's welfare, they will act on them immediately by speaking to the DSL or a deputy.

All staff members have a log into CPOMS and must record their concerns on this system at the first available opportunity. Any written notes must be signed, dated and handed to the DSL for secure storage.

All staff members are aware of the procedure for reporting concerns and understand their responsibilities in relation to confidentiality and information sharing, as outlined in section 28 on this policy.

Where the DSL is not available to discuss the concern with, staff members will contact the deputy DSL with the matter. Where neither the DSL or DDSL are available staff will contact **Helen Patel**.

If a referral is made about a child by anyone other than the DSL, the DSL will be informed as soon as possible.

If a pupil has committed a crime the police will be notified without delay.

## 20. Early help

Early help means providing support as soon as a problem emerges, at any point in a child's life.

Any pupil may benefit from early help, but in particular staff will be alert to the potential need for early help for pupils who:

- Have SEND
- Are young carers
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- Are frequently missing/going missing from care or from home
- Misuse drugs or alcohol
- Are at risk of modern slavery, trafficking or exploitation
- Are in a family circumstance presenting challenges such as substance abuse, adult mental health problems or domestic abuse
- Are returned home to their family from care
- Show early signs of abuse and/or neglect
- Are at risk of being radicalised or exploited
- Are privately fostered

Early help will also be used to address non-violent harmful sexual behaviour to prevent escalation.

All staff will be made aware of the local early help process and understand their role in it.

The Child and Family Support Worker will take the lead where early help is appropriate. She will update the DSL at least weekly on all these cases.

## 21. Managing referrals

The reporting and referral process outlined in the Appendix 1 will be followed accordingly. All staff members, in particular the DSL, will be aware of the LA's arrangements in place for managing referrals. The DSL will provide staff members with clarity and support where needed.

When making a referral to MASH or other external agencies, information will be shared in line with confidentiality requirements and will only be shared where necessary to do so. The DSL will work alongside external agencies, maintaining continuous liaison, including multi-agency liaison where appropriate, in order to ensure the wellbeing of the pupils involved.

The DSL will work closely with the police to ensure the school does not jeopardise any criminal proceedings, and to obtain help and support as necessary.

Where a pupil has been harmed or is in immediate danger or at risk of harm, the referrer will be notified of the action that will be taken within one working day of a referral being made.

**Where this information is not forthcoming, the referrer will contact the assigned social worker for more information.**

The school will not wait for the start or outcome on an investigation before protecting the victim and other pupils: this applies to criminal investigations as well as those made by MASH.

Where MASH decide that a statutory investigation is not appropriate, the school will give consideration to referring the incident again if it is believed that the pupil is at risk of harm.

Where MASH decide that a statutory investigation is not appropriate and the school agrees with this decision, the school will give consideration to the use of other support mechanisms, such as early help and pastoral support.

At all stages of the reporting and referral process, the pupil will be informed of the decision made, actions taken and reasons for doing so.

Discussions of concerns with parents will only take place where this would not put the pupil or others at potential risk of harm.

The school will work closely with parents to ensure that the pupil, as well as their family, understands that the arrangements in place, such as in-school interventions, are effectively supported and know where they can access additional support.

## **22. Concerns about staff members and safeguarding practices**

If a staff member has concerns about another member of staff, it will be raised with the headteacher.

If the concern is with regards to the headteacher, it will be referred to the chair of governors. Any concerns regarding the safeguarding practices at the school will be raised with the SLT, and the necessary whistleblowing procedures will be followed, as outlined in the Whistleblowing Policy.

If a staff member feels unable to raise an issue with the SLT, they should access other whistleblowing channels such as the NSPCC whistleblowing helpline (0800 028 0285). Any allegations of abuse made against staff members will be dealt with in accordance with the school's Managing Allegations Policy

## **23. Dealing with allegations of abuse against staff**

All allegations will be dealt with in line with the school's Managing Allegations Policy. Where an allegation is substantiated, and the individual is dismissed or resigns, the school will refer it to the DBS. They will also consider referring the matter to the TRA (teaching regulation authority) for consideration for a prohibition order.

If a case manager is concerned about the welfare of other children in the community following a staff member's suspension, they may report this concern to MASH.

## **24. Allegations of abuse against other pupils (peer-on-peer abuse)**

### **Sexual harassment**

Sexual harassment refers to unwanted conduct of a sexual nature that occurs online or offline. Sexual harassment violates a pupil's dignity and makes them feel intimidated, degraded or humiliated, and can create a hostile, sexualised or offensive environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence.

Sexual harassment includes:

- Sexual comments
- Sexual "jokes" and taunting
- Physical behaviour, such as deliberately brushing against another pupil
- Online sexual harassment, including non-consensual sharing of images and videos and consensual sharing of sexual images and videos (often known as sexting), inappropriate comments on social media, exploitation, coercion and threats – online sexual harassment may be isolated or part of a wider pattern.

### **Sexual Violence**

Sexual violence refers to the three following offences:

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

- **Sexual Assault:** A person (A) commits an offence of sexual assault if she/he intentionally touches another person (B), the touching is sexual, (B) does not consent to the touching and (A) does not reasonably believe that (B) consents.
- Harmful sexual behaviours

The term “**harmful sexual behaviour**” is used to describe behaviour that is problematic, abusive and violent, and that may cause developmental damage. Harmful sexual behaviour may include:

- Using sexually explicit words and phrases.
- Inappropriate touching.
- Sexual violence or threats.
- Full penetrative sex with other children or adults.
- Sexual interest in adults or children of very different ages to their own.
- Forceful or aggressive sexual behaviour.
- Compulsive habits.
- Sexual behaviour affecting progress and achievement.
- Using sexually explicit words and phrases.
- Inappropriate touching.
- Sexual violence or threats.

Sexual behaviour can also be harmful if one of the children is much older (especially where there is two years or more difference, or where one child is pre-pubescent and the other is now) and where the child may have SEND.

### **A preventative approach**

In order to prevent peer-on-peer abuse and address the wider societal factors that can influence behaviour, the school will educate pupils about abuse, its forms and the importance of discussing any concerns and respecting others through the curriculum, assemblies and PSHE lessons. Such content will be age and stage of development specific.

The school will also ensure that pupils are taught about safeguarding, including online safety, as part of a broad and balanced curriculum in PSHE lessons, RSE and group sessions. Such content will be age and stage of development specific, and tackle issues such as the following:

- Healthy relationships
- Respectful behaviour
- Gender roles, stereotyping and equality
- Body confidence and self-esteem
- Prejudiced behaviour
- That sexual violence and sexual harassment is always wrong
- Addressing cultures of sexual harassment
- How to stay safe on line
- Who to report a concern to and how to access support if they have a concern for themselves or their peers.

Pupils will be allowed an open forum to talk about concerns and sexual behaviour. They are taught how to raise concerns and make a report, including concerns about their friends or peers, and how a report will be handled. Such content will be age and stage of development specific.

### **Awareness**

All staff will be aware that pupils of any age and sex are capable of abusing their peers and will never tolerate abuse as “banter” or “part of growing up”.

All staff will be aware that peer-on-peer abuse can be manifested in many different ways, including sexting and gender issues, such as girls being sexually touched or assaulted, and boys being subjected to hazing/initiation type of violence which aims to cause physical, emotional or psychological harm.

All staff will be made aware of the heightened vulnerability of pupils with SEND, who are three times more likely to be abused than their peers. Staff will not assume that possible indicators of abuse relate to the pupil's SEND and will always explore indicators further.

LGBTQ+ children can be targeted by their peers. In some cases, children who are perceived to be LGBTQ+, whether they are or not, can be just as vulnerable to abuse as LGBTQ+ children.

The school's response to boy-on-boy and girl-on-girl sexual violence and sexual harassment will be equally as robust as it is for incidents between children of the opposite sex.

Pupils will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers.

### **Support available if a child has been harmed, is in immediate danger or at risk of harm.**

If a child has been harmed, is in immediate danger or is at risk of harm, a referral will be made to the Family Front Door.

### **Support available if early help, section 17 and/or section 47 statutory assessments are appropriate**

If early help, section 17 and/or section 47 statutory assessments (assessments under the Children Act 1989) are appropriate, school staff may be required to support external agencies. The DSL and deputies will support staff as required.

#### **Support available if reports include online behaviour**

Online concerns can be especially complicated. The school recognises that there is potential for an online incident to extend further than the local community and for a victim, or the alleged perpetrator, to become marginalised and excluded both online and offline. There is also strong potential for repeat victimisation if the content continues to exist.

If the incident involves sexual images or videos held online, the Internet Watch Foundation will be consulted to have the material removed.

Staff will not view or forward illegal images of a child. If they are made aware of such an image, they will contact the DSL.

### **Managing disclosures**

Victims will always be taken seriously, reassured, supported and kept safe. Victims will never be made to feel like they are causing a problem or made to feel ashamed.

If a friend of a victim makes a report or a member of staff overhears a conversation, staff will take action – they will never assume that someone else will deal with it. The basic principles remain the same as when a victim reports an incident; however, staff will consider why the victim has not chosen to make a report themselves and the discussion will be handled sensitively and with the help of MASH where necessary. If staff are in any doubt, they will speak to the DSL.

Where an alleged incident took place away from the school or online but involved pupils from the school, the school's duty to safeguard pupils remains the same.

All staff will be trained to handle disclosures. Effective safeguarding practice includes:

- Never promising confidentiality at the initial stage.
- Only sharing the report with those necessary for its progression.
- Explaining to the victim what the next steps will be and who the report will be passed to.

Recognising that the person the child chose to disclose the information to is in a position of trust.

- Being clear about boundaries and how the report will be progressed.
- Not asking leading questions and only prompting the child with open questions.
- Waiting until the end of the disclosure to immediately write a thorough summary. If notes must be taken during the disclosure, it is important to still remain engaged and not appear distracted.
- Only recording the facts as the child presents them – not the opinions of the note taker.
- Where the report includes an online element, being aware of searching, screening and confiscation advice and UKCCIS sexting advice.
- Wherever possible, managing disclosures with two staff members present (preferably with the DSL or a deputy as one of the staff members).
- Informing the DSL or deputy as soon as possible after the disclosure if they could not be involved in the disclosure.

The DSL will be informed of any allegations of abuse against pupils. They will record the incident in writing and, working with the DDSL will decide what course of action is necessary, with the best interests of the pupil in mind at all times.

## **25. Communication and Confidentiality**

The school will only engage staff and agencies required to support the victim and/or be involved in any investigation. If a victim asks the school not to tell anyone about the disclosure, the school cannot make this promise. Even without the victim's consent, the information may still be lawfully shared if it is in the public interest and protects children from harm.

The DSL will consider the following when making confidentiality decisions:

- Parents will be informed unless it will place the victim at greater risk.
- If a child is at risk of harm, is in immediate danger or has been harmed, a referral will be made to MASH.
- Rape, assault by penetration and sexual assaults are crimes – reports containing any such crimes will be passed to the police.

The DSL will weigh the victim's wishes against their duty to protect the victim and others. If a referral is made against the victim's wishes, it will be done so extremely carefully and the reasons for referral will be explained to the victim. Appropriate specialist support will always be offered.

### **Anonymity**

There are legal requirements for anonymity where a case is progressing through the criminal justice system. The school will do all it can to protect the anonymity of children involved in any report of sexual violence or sexual harassment. It will carefully consider, based on the nature of the report, which staff will be informed and what support will be in place for the children involved.

When deciding on the steps to take, the school will consider the role of social media in potentially exposing victims' identities and facilitating the spread of rumours.

### **Risk assessment**

The DSL or a deputy will make an immediate risk and needs assessment any time there is a report of sexual violence. For reports of sexual harassment, a risk assessment will be considered on a case-by-case basis. Risk assessments are not intended to replace the detailed assessment of experts, and for incidents of sexual violence it is likely that a professional risk assessment by a social worker or sexual violence specialist will be required.



Risk assessments will consider:

- The victim
- The alleged perpetrator
- Other children at the school, especially any actions that are appropriate to protect them

Risk assessments will be recorded (either on paper or electronically) and kept under review in accordance with the school's Data Protection Policy.

### **Taking action following a disclosure**

The DSL or a deputy will decide the school's initial response, taking into consideration:

- The victim's wishes.
- The nature of the incident.
- The ages and developmental stages of the children involved.
- Any power imbalance between the children.
- Whether the incident is a one-off or part of a pattern.
- Any ongoing risks.
- Any related issues and the wider context, such as whether there are wider environmental factors in a child's life that threaten their safety and/or welfare.
- The best interests of the child.
- That sexual violence and sexual harassment are always unacceptable and will not be tolerated.

### **Managing the report**

The decision of when to inform the alleged perpetrator of a report will be made on a case-by-case basis taking advice other agencies when appropriate. If a report is being referred to MASH or the police, the school will speak to the relevant agency to discuss informing the alleged perpetrator.

There are four likely outcomes when managing reports of sexual violence or sexual harassment.

- Managing internally
- Providing early help
- Referring to MASH
- Referring through Family Front Door
- Reporting to the police

Whatever outcome is chosen, it will be underpinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated. All concerns, discussion, decisions and reasons behind decisions will be recorded either on paper or electronically. The following situations are statutorily clear and do not allow for contrary decisions:

- A child under the age of 13 can never consent to sexual activity
- The age of consent is 16
- Sexual intercourse without consent is rape
- Rape, assault by penetration and sexual assault are defined in law
- Creating and sharing sexual photos and videos of children under 18 is illegal- including children making and sending images and videos of themselves.

### **Managing internally**

In some cases, e.g. one-off incidents, the school may decide to handle the incident internally through behaviour and bullying policies and by providing pastoral support.

### **Providing early help**

The school may decide that statutory interventions are not required, but that pupils may benefit from early help – providing support as soon as a problem emerges. This approach can be particularly useful in addressing non-violent harmful sexual behaviour and may prevent escalation of sexual violence.

### **Referral to Family Front Door**

If a child has been harmed, is at risk of harm or is in immediate danger, the school will make a referral through Family Front Door. Parents will be informed unless there is a compelling reason not to do so (if referral will place the victim at risk). This decision will be made in consultation with family Front Door or MASH.

The school will not wait for the outcome of an investigation before protecting the victim and other children.

The DSL will work closely with MASH to ensure that the school's actions do not jeopardise any investigation. Any related risk assessment will be used to inform all decisions.

If Family Front Door decide that a statutory investigation is not appropriate, the school will consider referring the incident again if they believe the child to be in immediate danger or at risk of harm.

If the school agrees with the decision made by 'Family Front Door', they will consider the use of other support mechanisms such as early help, pastoral support and specialist support.

### **Working with parents and carers**

In most sexual violence cases, the school will work with the parents of both the victim and alleged perpetrator. For cases of sexual harassment, these decisions will be made on a case-by-case basis and may involve the support of external agencies.

## **26. Online safety**

As part of a broad and balanced curriculum, all pupils will be made aware of online risks and taught how to stay safe online.

Through training, all staff members will be made aware of the following:

- Pupil attitudes and behaviours which may indicate they are at risk of potential harm online
- The procedure to follow when they have a concern regarding a pupil's online activity

The school will ensure that suitable filtering systems are in place to prevent children accessing terrorist and extremist material, in accordance with the school's Data and E-Security Breach Prevention and Management Plan.

The use of mobile phones by staff is closely monitored by the school, in accordance with the Acceptable use of ICT policy / Online Safety Policy /GDPR policy.

The school will ensure that the use of filtering and monitoring systems does not cause "over blocking" which may lead to unreasonable restrictions as to what pupils can be taught regarding online teaching.

## **27. Mobile phone and camera safety**

Staff members will not use personal mobile phones or cameras when pupils are present. Staff may use mobile phones on school premises outside of working hours when no pupils are present.

Staff may use mobile phones in the staffroom during breaks and non-contact time.

Mobile phones will be safely stored and in silent mode whilst pupils are present.

Staff will use their professional judgement in emergency situations.

Staff may take mobile phones on trips, but they must only be used in emergencies and should not be used when pupils are present. School mobile phones must be taken on off site visits.

Personal mobile devices will not be used to take images or videos of pupils or staff in any circumstances.

The sending of inappropriate messages or images from mobile devices is strictly prohibited. Staff who do not adhere to this policy will face disciplinary action.

ICT technicians and the e-safety officer will review and authorise any downloadable apps – no apps or programmes will be downloaded without express permission from an ITC technician or the headteacher.

The school will adhere to the terms of the Online Safety policy at all times.

Photographs and videos of pupils will be carefully planned before any activity with particular regard to consent and adhering to the school's Data Protection policy.

The headteacher will oversee the planning of any events where photographs and videos will be taken.

Where photographs and videos will involve CLA pupils, adopted pupils, or pupils for whom there are security concerns, the headteacher will liaise with the DSL and to determine the steps involved.

The DDSL will lead, in known cases of a pupil who is an CLA or who has been adopted, liaise with the pupil's social worker, carers or adoptive parents to assess the needs and risks associated with the pupil.

The school will adhere to its Photography Policy at all times.

Staff will report any concerns about another staff member's use of mobile phones to the DSL, following the procedures outlined in the Child Protection and Safeguarding Policy and the Managing Allegations

## **28. Sports clubs and extracurricular activities**

Clubs and extracurricular activities hosted by external bodies, e.g. charities or companies, will work in collaboration with the school to effectively safeguard pupils and adhere to local safeguarding arrangements.

Paid and volunteer staff running sports clubs and extracurricular activities are aware of their safeguarding responsibilities and promote the welfare of pupils.

Paid and volunteer staff understand how they should respond to child protection concerns and how to make a referral to MASH or the police, if necessary.

All national governing bodies of sport that receive funding from either Sport England or UK Sport, must aim to meet the Standards for Safeguarding and Protecting Children in Sport.

## **29. Safer recruitment**

An enhanced DBS check with barred list information will be undertaken for all staff members engaged in regulated activity. A person will be considered to be in 'regulated activity' if, as a result of their work, they:

- Are responsible on a daily basis for the care or supervision of children.
- Regularly work in the school at times when children are on the premises.
- Regularly come into contact with children under 18 years of age.

The DfE's DBS Workforce Guides will be consulted when determining whether a position fits the child workforce criteria.

### **Pre-employment checks**

The governing board will assess the suitability of prospective employees by:

- Verifying the candidate's identity, preferably from the most current photographic ID and proof of address except where, for exceptional reasons, none is available
- Obtaining a certificate for an enhanced DBS check with barred list information where the person will be engaged in regulated activity
- Checking that a candidate to be employed as a teacher is not subject to a prohibition order issued by the Secretary of State
- Verifying the candidate's mental and physical fitness to undertake their working responsibilities, including asking relevant questions about disability and health to establish whether they have the physical and mental capacity for the specific role. This will include seeking advice from an Occupational Health service
- Checking the person's right to work in the UK. If there is uncertainty about whether an individual needs permission to work in the UK, the advice set out on the Gov.UK website will be followed
- If the person has lived or worked outside the UK, making any further checks that the school considers appropriate; this includes checking for any teacher sanctions or restrictions that an EEA professional regulating authority has imposed
- Checking professional experience, QTS and qualifications as appropriate using Teacher Services

An enhanced DBS certificate will be obtained from candidates before or as soon as practicable after appointment. An online update check may be undertaken through the DBS update service if an applicant has subscribed to it and gives their permission.

### **Internal candidates**

References from internal candidates will always be scrutinised before appointment.

### **Governors**

An enhanced DBS check will be carried out for each member of the governing board. Where a governor also engages in regulated activity, a barred list check will also be requested. The school will also contact the DfE using Teacher Services to check if a proposed governor is barred as a result of being subject to a section 128 direction. Where a barred list check has been performed, the section 128 direction will also be shown and will not require a separate check.

### **Those who have lived or worked outside of the UK**

For those who have lived or worked outside of the UK, additional checks regarding teacher sanctions or restrictions will be conducted, this includes checking for any teacher sanctions or restrictions that the EEA professional regulating authority has imposed.

### **Barred list check**

If there are concerns about an applicant, an enhanced DBS check with barred list information may be requested, even if they have worked in regulated activity in the three months prior to appointment.

Written information about their previous employment history will be obtained from candidates and the appropriate checks undertaken to ensure information is not contradictory or incomplete

### **References**

References will be obtained directly from referees and scrutinised, with all concerns satisfactorily resolved prior to confirmation of employment.

References will only be accepted from a senior person and not from a colleague.

References will be sought on all short-listed candidates, including internal ones, before an interview and checked on receipt to ensure that all specific questions were answered satisfactorily.

References will be obtained prior to interviews taking place and discussed during interviews. Open testimonials will not be considered.

Information about past disciplinary actions or allegations will be considered carefully when assessing an applicant's suitability for a post.

Information sourced directly from a candidate or online source will be carefully vetted to ensure they originate from a credible source.

### **Volunteers**

No volunteer will be left unsupervised with a pupil or allowed to work in regulated activity until the necessary checks have been obtained.

The school will obtain an enhanced DBS certificate with barred list check for existing volunteers that provide pastoral care.

Unless there is cause for concern, the school will not request any new DBS certificates with barred list check for existing volunteers that have already been checked.

A risk assessment will be undertaken for volunteers not engaged in regulated activity when deciding whether to seek an enhanced DBS check

### **Contractors**

The school will ensure that any contractor or employee of the contractor working on the premises has been subject to the appropriate level of DBS check.

Checks will be conducted to ensure that the contractor presenting themselves for work is the same person on whom the checks have been made.

Contractors without a DBS check will be supervised if they will have contact with children.

The identity of the contractor will be checked upon their arrival at the school.

### **Data retention**

Data will be collected and stored as set out in the Data Protection Policy under guidance from Brent.

### **Referral to the DBS**

The school will refer to the DBS anyone who has harmed a child or poses a risk of harm to a child, or if there is reason to believe the member of staff has committed an offence and has been removed from working in regulated activity.

### **30. Single central record (SCR)**

The school keeps an SCR which records all staff, including supply staff and teacher trainees on salaried routes, who work at the school.

The following information is recorded on the SCR

- An identity check
- A barred list check
- An enhanced DBS check
- A prohibition from teaching check
- A check of professional qualifications
- A check to determine the individual's right to work in the UK
- Additional checks for those who have lived or worked outside of the UK

For supply staff, the school will also record whether written confirmation from the employment business supplying the member of staff has been received, which indicates that all of the necessary checks have been conducted and the date that confirmation was received.

If any checks have been conducted for volunteers, this will also be recorded on the SCR. If risk assessments are conducted to assess whether a volunteer should be subject to an enhanced DBS check, the risk assessment will be recorded.

have completed all relevant checks will also be included.

Employed staff from Phoenix Arch School are not permitted to give references to Agency Staff. Requests should be reported to the head teacher.

### **31. Staff Suitability**

All centres providing care for pupils under the age of eight must ensure that staff and volunteers working in these setting are not disqualified from doing so under the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018.

A person may be disqualified if they

- Have certain orders or other restrictions placed upon them.
- Have committed certain offences.

All staff members are required to sign the declaration form provided in the appendices of this policy confirming that they are not disqualified from working in a schooling environment. A disqualified person will not be permitted to continue working at the school, unless they apply for and are granted a waiver from Ofsted. The school will provide support with this process.

## **32. Training**

### **All staff**

#### **SAFEGUARDING**

On induction or arrival - staff handbook or agency pack

Single agency safeguarding training - 6 hours

Renewal - every two years

Refresher - annually or as necessary

#### **PREVENT**

On induction or arrival - Prevent policy and/or agency pack

Prevent training - 3 hours

Renewal - every two years

### **DSL and deputies/Child and Family worker**

Single agency safeguarding training - 6 hours

Renewal - every two years

Refresher - annually or as necessary

**PLUS** Safer recruitment training - 3 hours or on-line

Renewal - every 3 years

**PLUS** Prevent training - 3 hours

Renewal - every 2 years

### **Governors**

Single agency safeguarding training - 6 hours

Renewal - every two years

Refresher - annually or as necessary

**PLUS** Safer recruitment training - 3 hours or on-line

Renewal - every 2 years

### **Chair and vice-chair of governing body**

**PLUS** Safer recruitment training - 3 hours or on-line

Renewal - every 2 years

**PLUS** Prevent training - 3 hours

Renewal - every 2 years

## **33. Monitoring and review**

This policy is reviewed annually by the DDSL and the Head teacher [DSL].

Any changes made to this policy by the Head teacher and DSL will be communicated to all members of staff and governors .

All members of staff are required to familiarise themselves with all processes and procedures outlined in this policy as part of their induction programme.

The next scheduled review date for this policy is September 2019

## **CPOMS**

At Phoenix Arch we use CPOMS (Child Protection Online Monitoring System) to record our child protection and safeguarding concerns. All staff have an individual log in linked to their school email account. All concerns are monitored by the DSL (Judith Towell) and the DDSL's (Marion Joseph & Helen Patel). Other relevant members of staff can also be alerted to concerns or incidents where appropriate. All members of staff can log their concerns but only key members of staff have access to all information and the chronology for each pupil.

All staff must record their concerns at the first available opportunity and it is their responsibility to speak to the DSL or DDSL's before leaving school to chase up their concern if they have not been informed earlier in the day.

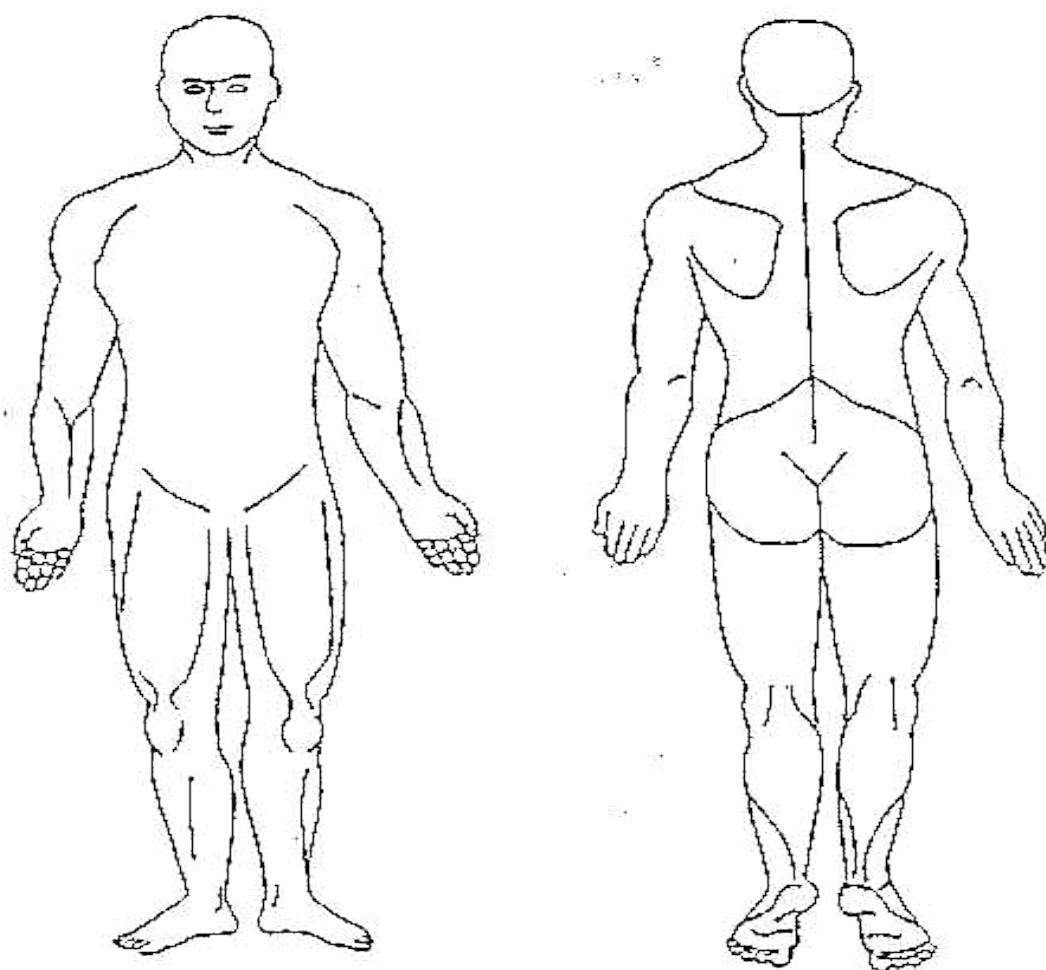
CPOMS can be accessed via the link on a school computer or by the secure link <https://>

The user name is an individual Phoenix Arch email address and each user is prompted to set up their own password when they log on.

## Body Maps

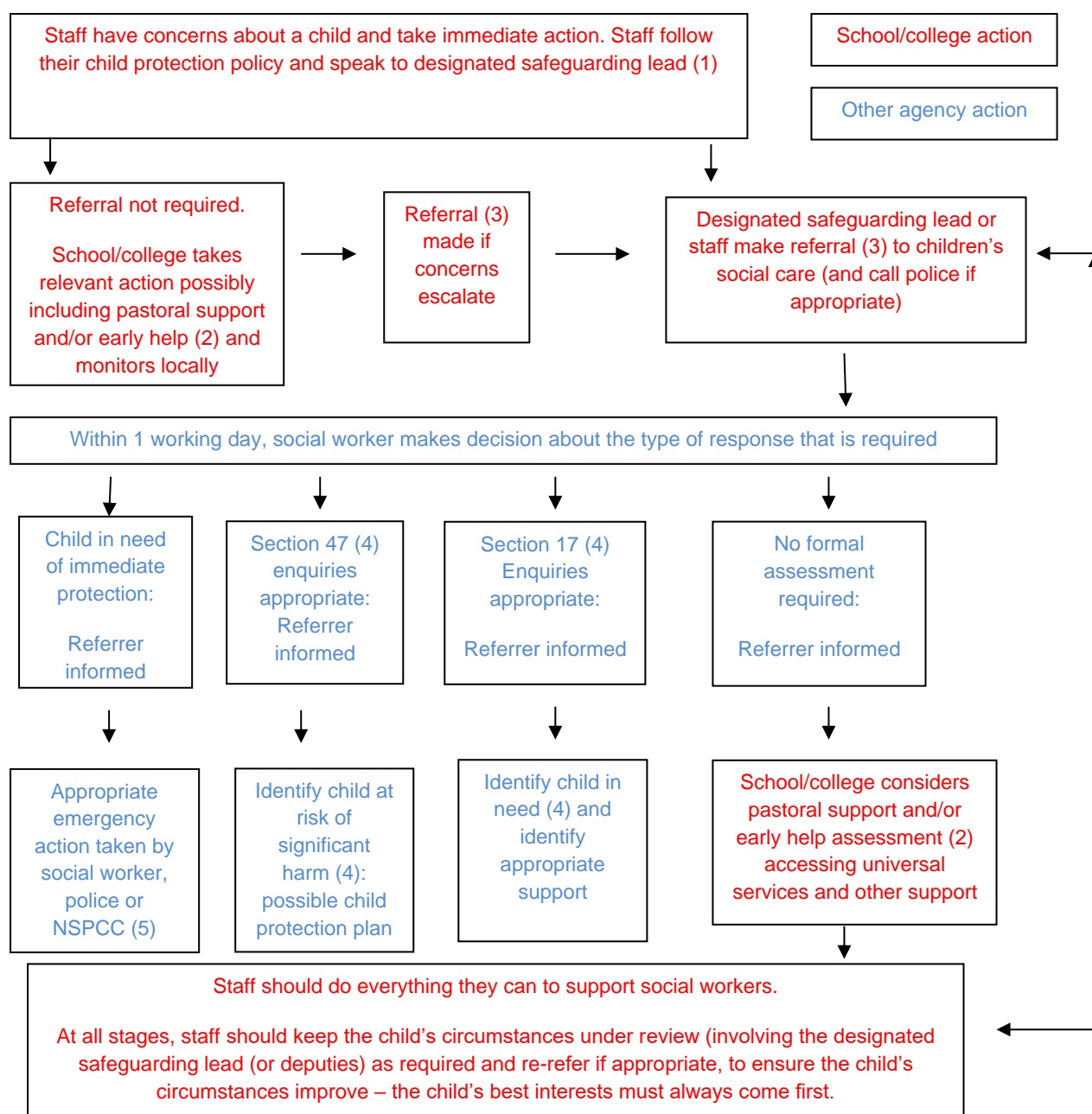
These body maps are not a substitute for a medical report/map by a paediatrician. They are intended as an optional tool to help indicate the place, size and severity of any physical injuries observed.

The child must not be examined in order to complete these and should be referred to a paediatrician if there are any suspicious marks





## Actions where there are concerns about a child



- (1) In cases which also involve a concern or an allegation of abuse against a staff member. See part four of this guidance.
- (2) Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.
- (3) Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).
- (4) Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under Section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm. It has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working Together to Safeguard Children](#).
- (5) This could include applying for an Emergency Protection Order (EPO).