

Child Protection and Safeguarding

(including Safer Recruitment, allegations against staff
and low-level concerns)

Independent School Standards:
6, 7 (a), (b), 34

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Section 1:

Key Contacts

ROLE	NAME	CONTACT DETAILS
Proprietor/Headteacher	Sophie Nelson	snelson@phoenixplace.co.uk
Designated Safeguarding Lead (DSL) / PREVENT Lead / LAC	Grace Jackson (Deputy Head)	gjackson@phoenixplace.co.uk
Deputy Designated Safeguarding Lead	Carl Samuels (Pastoral Manager)	csamuels1@phoenixplace.co.uk
Deputy Designated Safeguarding Lead	Carol Lake (Pastoral Assistant)	clake@phoenixplace.co.uk
<p>PhoenixPlace Safeguarding Team can be contacted on: safeguarding@phoenixplace.co.uk</p> <ul style="list-style-type: none"> • During school holidays the safeguarding team works on a rota basis to deal with any safeguarding issues that may arise outside of school hours. • When the DSL is absent, the deputies will act as cover. 		
DDSL SG - Chair of Strategic Advisory Panel	Linda Carmody	lcarmody@phoenixplace.co.uk
Local authority designated officer (LADO)	Eva Simcock	<p>Tel: 020 7525 0689 / Mob: 07943076608</p> <p>Email: Eva.Simcock@southwark.gov.uk</p> <p>LADO can also be contacted via Qau.Safeguarding@southwark.gov.uk.</p>
The LA's Schools Safeguarding Coordinator	Apo Çagrıcı	Tel: 020 7525 2715
Channel Helpline		020 7340 7264

There is also a system whereby one of the CP Coordinators in the Quality Assurance Unit is on duty each day to deal with LADO issues when LADO is unavailable. Duty telephone number for enquiries/referrals is **020 7525 3297**

We also note the '[Safeguarding information for professionals and the community in Southwark](#)' on Southwark Council's website.

Safer Schools Partnership

- Police Constable (PC) Sharon Rogers is the Safer Schools Police Officer for PhoenixPlace.
- There are now over 450 Safer School Partnerships operating throughout England and Wales, with police officers and community support officers based in schools to work closely with staff and students.
- PC Rogers is a familiar, trusted face around the school - working closely with students on issues that affect their lives both inside and outside of the school
- PC Rogers can be contacted by email at **Sharon.R.Rogers@met.police.uk**. Alternatively you can telephone the the school on 020 7703 7189 or email info@phoenixplace.co.uk

Safeguarding Intent

PhoenixPlace is committed to providing a safe and secure environment for children, staff, stakeholders and visitors promoting a culture of openness, trust and transparency where children and staff will feel confident about sharing any concerns which they may have about their own safety or the well-being of others.

We aim to safeguard and promote the welfare of children by protecting them 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; and taking action to enable all children to have the best outcomes.

We aim to ensure that child protection concerns and referrals are handled sensitively, professionally and in ways that support the specific needs of the individual child, in a culture of safeguarding where we aim to foster an atmosphere of trust, respect and security.

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 trained in recognising and reporting safeguarding issues

The aims of this Policy are Prevention, Protection and Support to ensure our students safe and effective care, particularly in relation to:

- maltreatment, neglect, violence and sexual abuse
- accidental injury and death
- factors that impair their mental and physical health or development
- discrimination and bullying in the School and the community
- becoming victims of crime and or involved in anti-social behaviour and criminal activity.

Legislation and statutory guidance

The School's Safeguarding policy draws upon duties conferred by the Children Acts 1989 and 2004, The Education & Inspections Act 2006, The Serious Crimes Act (2015), The Children and Families Act 2014, S175 of the 2002 Education Act (as amended), The Education (Independent School Standards) Regulations 2014 (for independent schools), The Non-Maintained Special Schools (England) Regulations 2015 (for non-maintained special schools), the Apprenticeships, Skills, Children and Learning Act 2009 (as amended), the Education and Training (Welfare of Children) Act 2021, The Mental Capacity Act 2005, The Care Act 2014, and the guidance contained in "[Working Together to Safeguard Children \(2018\)](#)", the DfE's statutory guidance "[Keeping Children Safe in Education \(2022\)](#)", Ofsted Guidance and procedures produced by the London Safeguarding Children Partnership ([LSCP](#)) and the Southwark Safeguarding Children Partnership ([SSCP](#)). We also have regard to the advice contained in DfE's "[What to do if you're worried a child is being abused](#)" and "[Information Sharing – Advice for practitioners](#)". The policy is applicable to all on and off-site activities undertaken by pupils whilst they are the responsibility of the School.

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

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Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18

[Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM

[The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children

Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what ‘regulated activity’ is in relation to children

[Statutory guidance on the Prevent duty](#), which explains schools’ duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

[The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)

[The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it’s proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there’s evidence that they’re being disproportionately subjected to sexual violence or harassment

[The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination

Additional legislation and guidance / Policies and procedures

- CHANNEL: protecting vulnerable people from being drawn into terrorism, 2012
- Sexual violence and harassment between children in schools and colleges, September 2021
- Human Rights Act 1998 and Data Protection 1998
- Freedom of Information Act
- Sexual Offences Act 2003
- Health & Safety at Work Act 1974
- The Management of Health & Safety Regulations 1999
- Health & Safety Responsibilities and Powers 2001
- Disability Discrimination Acts 1995 & 2005
- LA Safeguarding Children’s Board (LSCB): local policies and procedures
- Mental Health and Behaviour in Schools: Nov 2018 (or any in-year updates)
- Domestic Abuse Act 2021 - GOV.UK (www.gov.uk)

We will ensure that those staff who work directly with children read at least Part One and those staff who do not work directly with children read either Part One or Annex A (a condensed version of Part One) of DfE guidance “[Keeping children safe in education](#)”. This will depend on the assessment of which guidance will be most effective for the staff to safeguard and promote the welfare of children. We will also ensure that

mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part One (or Annex A if appropriate) of the guidance.

DSL is also aware of the requirement for children to have an Appropriate Adult. Further information can be found in the [Statutory guidance - Police and Criminal Evidence Act \(PACE\) Code C 2019](#).

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 4 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 4 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

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and perpetrator(s) are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

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 education
- Whose parent/carer has expressed an intention to remove them from school to be home educated

Contextual Safeguarding

Contextual Safeguarding is an approach to understanding, and responding to, young people’s experiences of significant harm outside of their families.

It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. For more information about Contextual Safeguarding, you can visit the Contextual Safeguarding website at the following address – www.contextualsafeguarding.org.uk.

The premise of Contextual Safeguarding is that parents and carers have little influence over contexts beyond the household, and young people’s experiences of extra-familial abuse can undermine parent-child relationships. Contextual Safeguarding expands the objectives of child protection systems in recognition that young people are vulnerable to abuse beyond their front doors.

In addition to the on-going training of staff and the teaching of students through the PSHE/RSE programme, the PhoenixPlace will take the following actions to safeguard students: (we will update this list and continue to receive guidance from stakeholders as to how we can improve our support)

Risk	PhoenixPlace’s actions to reduce risk
Mental Health and Wellbeing	<ul style="list-style-type: none"> ● We have a counsellor working at the school 5 days per week. Our counsellor is also available to parents/carers by arrangement. ● We currently have 2 members of staff undergoing Senior Mental Health Practitioner training and will have availability over 4 days per week. ● We have an Child Educational Psychologist who also supports students in 1:1 sessions twice per month (by appointment) ● Staff members are mental health first aid trained. ● Students are referred to CAMHS when appropriate. ● Students are signposted to organisations who can offer support in

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	PSHE/RSE lessons and through care cards and information posted around the school site.
Sexual Harassment and Sexual violence	<ul style="list-style-type: none"> • Staff have received training on sexual violence and sexual harassment and on how to identify concerns with a focus on how disclosures need to be taken seriously. • Through the personal development curriculum (eg PSHE/RSE) students undertake sessions on sexual violence and sexual harassment and how to report any concerns. • Students are signposted to organisations who can offer support in PSHE/RSE lessons and information posted around the school site.
Online Safety and social media	<ul style="list-style-type: none"> • Online Safety Page on Website with information for students, parents/carers • The school has recently purchased an online CPD platform to deliver training to staff and parent/carers with regards to how to keep students/their child safe online • Staff will receive a session on on-line safety. • Students will receive ongoing information in theme days, tutor time and assemblies on how to stay safe on-line and report any concerns. The Safeguarding and Personal Development team will ensure they are up to date with ongoing development of new harmful sites on social media.
Child Criminal Exploitation	<ul style="list-style-type: none"> • Students will receive ongoing information in theme days, tutor time and assemblies on criminal exploitation and how to report any concerns. • From time to time the school also organises workshops with guest speakers working within this field • The safeguarding team work collaboratively with the Police safer schools' officers to identify students who are vulnerable to exploitation and offer appropriate support for example mentoring.
Looked After Children	<ul style="list-style-type: none"> • We have a dedicated LAC Coordinator • Opportunities provided to support students academically but with a focus on extracurricular experience. • LAC students are a key vulnerable group and a standing priority agenda item

Section 2:

Safeguarding and child protection is **everyone's responsibility**.

This policy applies to all staff, volunteers and 'governors' in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment. This will be underpinned by our:

- Behaviour policy
- Pastoral support system
- Planned programme of relationships, sex and health education (PSHE/RSE), which is inclusive and delivered regularly, tackling issues such as:
 - ◆ Healthy and respectful relationships
 - ◆ Boundaries and consent

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- ◆ Stereotyping, prejudice and equality
 - ◆ Body confidence and self-esteem
 - ◆ How to recognise an abusive relationship (including coercive and controlling behaviour)
 - ◆ The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support
 - ◆ What constitutes sexual harassment and sexual violence and why they're always unacceptable

The Designated Safeguarding Lead (DSL) is a senior member of the School Leadership Team.

Our DSL is **Grace Jackson** - (Deputy Head - school title).

The Role of the Designated Safeguarding Lead (DSL)

is to;

- Ensure child protection procedures are in place and updated as appropriate in order to refer cases of suspected abuse to the local children's services as appropriate
- Ensure all staff are aware of the LA's and the schools policy and procedures
- Be available to provide advice/support to staff and for confidential discussion about concerns
- Be available to provide support to students
- Liaise with the Headteacher to keep them informed regarding child protection procedures
- Liaise with Social Services and other relevant staff/groups within the three safeguarding partners
- Maintain the single central record (SCR) of concerns, ensuring records are kept confidentially and accurately
- Be the first point of contact for external agencies that are pursuing Child Protection (CP) investigations
- Coordinate arrangements for monitoring of students on roll who have been identified as needing protection/additional vulnerabilities such as students who have special educational needs
- Co-ordinate the Schools' representation at Child Protection conferences, Core Group meetings, and the submission of written reports for conferences
- Keep a record of children who are the subject of child protection (CP)/child in need (CIN) plans.
- Monitor and maintain the up-to-date list of Looked After Children
- Ensure that any student who currently is the subject of a child protection plan who is absent without explanation for two days, is referred to Social Services
- Ensure all staff have access to relevant contact details for social services referrals
- Record all concerns that may potentially be linked to radicalisation to Channel and take appropriate steps in liaison with the Headteacher
- Record all concerns that may indicate a child is at risk of forced marriage or Female Genital Mutilation and take appropriate steps in liaison with the Headteacher.
- Ensure staff training is provided in relation to the need to protect students from harm which they may be causing to themselves (and which may or may not be a symptom of abuse by a third party). This includes suicidal feelings, self-harm (including harm via the use of alcohol or drugs), inappropriate sexual behaviour, sexting, upskirting and CME (child missing education)
- Ensure effective Safeguarding training is provided to the Strategic Advisory Panel (SAP)
- Ensure that safeguarding information is readily available e.g., in posters around the school to ensure students and staff know who they can speak to in event of any concerns
- Refer cases where a person is dismissed or left due to risk/harm to a child to the DBS
- Refer cases where a crime may have been committed to the Police as required
- Liaise with the Headteacher to ensure all cases of suspected or alleged abuse or harm by a member of the school staff, colleague or volunteer known to work with children to the local authority Children's Social Care and the LA Designated Officer (LADO)

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- Where children leave the school (including in year transfers) the Designated Safeguarding Lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. The DSL should ensure a copy of the file is kept for their own records.
 - Where the parents/carers inform school that they wish to 'home educate' their child, the school based Attendance and Welfare Officer discusses this with the parents/carers and the information is then passed to the 'Elective Home Education' team
 - Promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school leadership staff.
 - Refer all cases of suspected or alleged abuse or harm by a member of the school staff, colleague or volunteer known to work with children to the local authority Children's Social Care and the LA Designated Officer (LADO)
 - Have a working knowledge of how local authorities conduct a Child Protection Case Conference and a Child Protection Review Conference and be able to attend and contribute to these effectively when required to do so
 - Liaise with the headteacher to inform her of any issues and ongoing investigations and ensure there is always cover for the Safeguarding Lead role
 - Liaise with the headteacher to ensure all low-level concerns are reported appropriately. (see Appendix 3)
 - Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search

 - Take responsibility for ensuring that filtering and monitoring systems and processes for the School's IT systems are in place and updated in accordance with the latest DfE guidance.

 - Exercise their duty to challenge the actions or decisions of Children's Social Care or any other partner agency, in accordance with the Southwark Safeguarding Children Partnership (SSCP) [local escalation procedures](#) (or relevant LSCP's escalation procedures if the child resides in a different LA), where it is believed that an individual professional or agency might not be acting in the best interest of the child concerned.

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

When an individual concern/incident is brought to the notice of the DSL, they will be responsible for deciding upon whether this should be reported to other agencies as a safeguarding issue. It is expected that social services will reply within one working day. In emergencies/risk of immediate harm, the DSL will contact social services directly (and the police, if appropriate). The DSL will also be aware of the NSPCC guidance on when to call the police in relation to a safeguarding concern.

Where there is any doubt as to the seriousness of this concern, or disagreement between the DSL and the member of staff reporting the concern, advice will be sought from the Deputy Designated Safeguarding Lead

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(DDSL) or the Early Help Service (EHS) Duty Manager. Any staff member can make a referral in exceptional circumstances, such as in emergency or a genuine concern that appropriate action has not been taken.

In the absence of the DSL, DDSLs will deal with any safeguarding concerns and referrals.

The role of the Designated Prevent Trained Lead

Grace Jackson - (Deputy Head - school title).

Aim:

- to ensure compliance with the Prevent duty under section 26 of the Counter-Terrorism and Security Act 2015 (“the CTSA 2015”), to have due regard to the need to prevent people from being drawn into terrorism.

The Designated Prevent Lead should:

- Assess the risk of children being drawn into terrorism within PhoenixPlace, including support for extremist ideas with a specific understanding of how to identify individual children who may be at risk.
- Ensure that safeguarding arrangements consider the policies and procedures of Local Safeguarding Children Boards (LSCBs)
- Assess the training needs of staff considering their assessment of the risk to students at the PhoenixPlace being drawn into terrorism.
- Provide advice and support to other members of staff on protecting children from the risk of radicalisation.
- Ensure that children are safe from terrorist and extremist material
- Help to raise the awareness of the importance of online safety at PhoenixPlace to children, including when students have been asked to learn at home.

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
- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance
- Reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they’ll be interacting with online)

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, are
 - ◆ the staff’s code of conduct,
 - ◆ the role and identity of the designated safeguarding lead (DSL) and deputies
 - ◆ the schools behaviour policy,
 - ◆ the schools online safety policy
 - ◆ the safeguarding response to children who are absent from education

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- The early help assessment process/referral (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
 - ◆ child-on-child abuse,
 - ◆ child sexual exploitation (CSE),
 - ◆ child criminal exploitation (CCE),
 - ◆ indicators of being at risk from or involved with serious violent crime,
 - ◆ FGM,
 - ◆ radicalisation and
 - ◆ serious violence (including that linked to county lines)

 - The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
 - The fact that children can be at risk of harm inside and outside of their home, at school and online
 - The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBT) can be targeted by other children
 - What to look for to identify children who need help or protection

The role of staff in safeguarding includes but is not limited to:

- 'think the unthinkable' and 'that it could happen here'
- be vigilant by listening, observing and sharing information
- report quickly – 'it always better to be safe than sorry'
- take safeguarding seriously, engage in training and read any issued materials in depth
- know what is meant by identify, help (including early help) and manage safeguarding
- ask questions and clarify anything that they are unsure about
- be fully aware that abuse, neglect and safeguarding issues are rarely stand-alone events. Vigilance and reporting and 'Professional Curiosity' are therefore of vital importance
- always act in the best interest of the student

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, support and resources, and that there is always adequate cover if the DSL is absent

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- 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 (see appendix 3)
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
- Ensuring Online Safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
- Ensuring the leadership team and relevant staff are aware of and understand the IT filters and monitoring systems in place, manage them effectively and know how to escalate concerns
- Ensuring the school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). (see appendix 3)
- Ensuring that this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised

The Strategic Advisory Panel (SAP)

The SAP will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law,
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- Appoint a senior board level lead to monitor the effectiveness of this policy. This is always a different person from the DSL

The SAP has nominated **Linda Carmody** (SAP Chair) as a lead to take responsibility on the panel for the school's safeguarding arrangements.

Concerns about and allegations of abuse made against the headteacher will be referred to the Chair of our SAP who will liaise with the LA's designated officer (LADO) and partner agencies and will attend any strategy meetings called in respect of such an allegation against the headteacher.

As a good practice, the headteacher will provide termly report to the SAP outlining details of any safeguarding issues that have arisen during the term and the outcome of any cases identified. These reports will respect all issues of confidentiality and will not therefore identify any person(s) by name.

Also as a good practice, the nominated SAP member will meet on a regular basis with the DSL to monitor the school's safeguarding arrangements, and both the volume and progress of cases where a concern has been raised, to ensure that the school is meeting its duties in respect of safeguarding

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 (see appendix 3).

All SAP members will read Keeping Children Safe in Education in its entirety. Our SAP members recognise that whilst all children should be protected, some groups of children, such as children who need a social worker (Child in Need and Child Protection Plans); children who are absent from education; children requiring mental health support; looked after and previously looked after children; care leavers; children with special educational needs, disabilities or health issues, are potentially at greater risk of harm than others (both online and offline).

Staff Training

All staff

All staff will receive appropriate statutory safeguarding and child protection training, including online safety (which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring), at induction and then the start of each academic year. This training will be led by the DSL and there will be a particular focus on;

- recognising signs of abuse,
- managing a disclosure
- as well as recapping monitoring and reporting procedures of abuse and suspected abuse.

Staff will have to complete and pass a quiz that links to the training and key aspects of KCSIE. Staff who do not reach the pass mark will have one-to-one dialogue and re-take the quiz. The DSL will check for any trends in gaps in staff knowledge and will revisit any content as required. All staff must also read and sign that they have read key policies – this is done at induction and the beginning of each academic year in September.

In addition to this, all teaching and pastoral support staff will receive top up training during briefings and tutor meetings at least once every half term. The order and topic of delivery is sensitive to any emerging training needs or pressing local issues that need to be addressed.

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 [commissioning services] or a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

The DSL and deputies

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.

Strategic Advisory Panel (SAP Team)

All SAP members receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
- Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding

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

New/temporary Staff

New/temporary staff will receive training as part of their induction process. Every member of staff will read our updated Safeguarding Policy, as well as Keeping Children Safe in Education (2022) - part one and part five (also as and when updated) and they will have to sign that they have read and understood the documents.

Any new staff to the School outside of September where there is universal training will have an induction. The induction will specifically include:

- being given a copy of part one of KCSIE which has to be signed as having been read (sent prior to induction)
- given an overview of the leadership and management of safeguarding at PhoenixPlace (day one)
- given and taken through the safeguarding policy, with particular regard to contextual safeguarding
- taken through a specific safeguarding training presentation, including online safety, sexual violence, sexual harassment, and domestic violence (day one)
- enrolled on specified online training packages which must be completed within one month of start date. This includes Prevent training
- given any student-specific information for anyone in their classes (day one)
- policy sign off sheet and access to the policies therein (read and signed by end of first two weeks).

The safeguarding training of third-party staff/contractors will be verified and if necessary, further training may be given as part of the induction process. Should a child or a member of staff be concerned about another member of staff’s conduct in relation to child protection then procedures are in place.

All school staff should take care not to place themselves in a vulnerable position with a child. They should strictly adhere to the Department for Education and Skills (DfES) guidelines on teachers’ behaviour and the school’s policies.

Recruitment – interview panels

At least 1 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 2 of this policy for more information about our safer recruitment procedures.

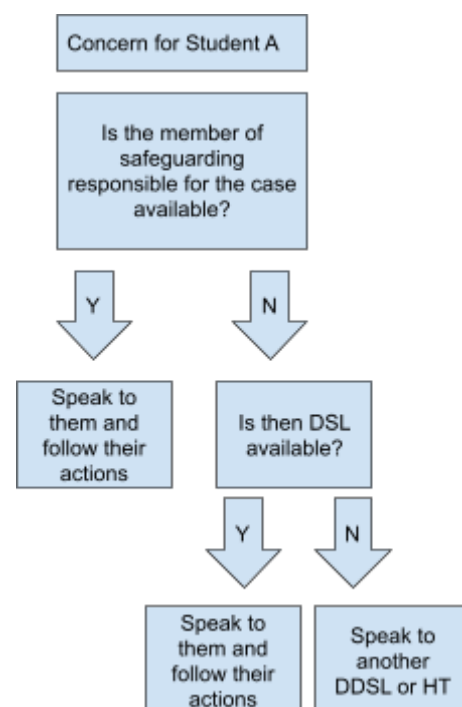
Section 3:

Procedures (for recording concerns/disclosures)

PhoenixPlace Safeguarding Team

Each team member has an assigned student caseload and would know more about specific students/cases however the team meets on a regular basis to discuss concerns and actions.

Staff should speak to a member of the safeguarding team, ideally the member of the team who is responsible for that child’s case as per case load shared with staff. Where this is not possible staff should seek to speak to DSL in the first instance if they are on site, with regards to any disclosures or concerns. If the DSL is not available staff should speak to any member of the



safeguarding team.

For example please see flow chart on the right hand side

We aim that there are at least two members of the safeguarding team always on site at all times.

The DSL is also the first point of contact for disclosures and referrals to the borough safeguarding team. However, in exceptional circumstances, such as in an emergency or a genuine concern that appropriate action has not been taken, **staff members can speak directly to children's social care.** The member of staff who makes this disclosure to children's social care should inform the DSL as soon as is feasible.

It is appreciated that staff members will be worried about a student so the safeguarding team will update the staff member who made the referral as often as feasibly possible and with the appropriate level of information.

Staff must make it a priority to report/record any disclosures made by students as early as possible - even if it means their lesson or supervision needs to be covered in order to write up the report.

If a child makes a disclosure to you

If a student begins to confide/disclose any matter involving alleged abuse, whether physical, emotional or sexual, to a member of staff, they should follow the following guidelines:

- Stay calm and reassuring. Never react with emotion/do not show that you are shocked or upset
- Listen to the student allowing them to talk openly rather than directly questioning them
- Remember that a child may not feel ready or know how to tell someone they are being abused (KCSIE 22)
- Do not press them for details or ask leading questions.
- Do not give your opinion or show judgement
- Explain that you cannot promise to keep what they tell you as a secret, it is in their own interest that you must inform a member of the safeguarding team. (Reminding them we have their best interests at heart)
- Ask the student if they have told anyone else.
- Ask the student's permission to take notes, only if you feel this will not impact on the student's disclosure. (Do this straight after if you feel it is more appropriate)
- Write a detailed account, in the student's own words, dated, timed and signed. Stick to the facts, and do not put your own judgement on it
- Ensure you are using first person, directly quoting the student *'then he said to me I must take the package to Streatham'*.
- Sign and date the write-up and pass it on to the DSL (or DDSL in their absence)
- Inform the DSL by logging the disclosure or concern on CPOMs immediately and uploading any paperwork as this may be needed as evidence in court. A follow-up conversation with the DSL is always encouraged.
- Assure the student that they have done the right thing and you know how difficult it is to talk about such experiences. 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.
- Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see section 3), 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**

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a **'professional curiosity'** and speaking to the DSL if you have concerns about a child.

The key task at this moment is to listen to the student and not interrupt if he or she is freely recalling significant events, and to make a note of all that is said to be passed to the DSL. Staff should also be aware that noted recordings of the discussion may need to be used in any subsequent court proceedings and may be made available to the student's parents at the Child Protection conference or meeting involving Children's Social Care

- The welfare of the student is paramount; therefore, all situations must be treated with sensitivity.
- The teacher should not reveal his/her own feelings to the student.
- Staff have a professional duty to share confidential information about the protection of children with Social Services via the DSL.
- Staff should take care not to discuss information given in confidence outside the appropriate professional contexts.
- The DSL will disclose any information about a student to other members of staff on a need-to-know basis only.
- The DSL will also ensure that the child's wishes, and feelings are taken into account when determining what action to take and what services to provide.

Concerns regarding child protection where there is a **risk of immediate harm** must always be passed to the Designated Safeguarding Lead in person and **must be prioritised over any other work commitment**.

You must interrupt the DSL to inform them of the immediate risk of harm. Concerns must then be added to CPOMS under Safeguarding.

If you feel there is a risk of immediate harm and there is no DSL on site, the Headteacher should be informed. However, there are a number of DSL trained staff in the school, therefore there should always be a DSL on site. The DSL will also ensure that the child's wishes and feelings are taken into account when determining what action to take and what services to provide.

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

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)".

- 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 (or DDSL in their absence) (see section 3) as soon as possible if you make a referral directly.

If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

Figure 1 below (page 13), illustrates the procedure to follow if you have any concerns about a child's welfare.

Child Protection and Safeguarding Policy

(including Safer Recruitment, allegations against staff and low-level concerns)

-
- 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 school 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.

The reason for the concern should be stated (for example disclosure, allegation, truancy etc), and then an CPOMs entry completed as soon as possible. For visitors who do not have access to CPOMs the DSL/DDSL will ask for the details to be emailed to the safeguarding team email urgently. Details should be recorded in a way that clarifies the concern, and where possible, the child's own words should be included. The record should be signed and dated.

Staff can also refer to: <https://www.gov.uk/report-child-abuse-to-local-council> webpage for reporting child abuse to the local council:

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 section 4 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

1. **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.
2. 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.
3. **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 should speak to the DSL and follow our local safeguarding procedures.

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 school leadership team and/or seek advice from local authority children's social care.

Child Protection and Safeguarding Policy

(including Safer Recruitment, allegations against staff and low-level concerns)

-
- 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 (see section 4)

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

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

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

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 in diagram on page 13.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree on a course of action.

Refer to the Department for Education guidance on [mental health and behaviour in schools](#) for more information.

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. The headteacher will then follow the procedures set out in appendix 2, if appropriate.

If the concerns/allegations are about the headteacher, speak to the local authority designated officer (LADO).

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).

Procedures for dealing with allegations of child-on-child abuse

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

Child Protection and Safeguarding Policy

(including Safer Recruitment, allegations against staff and low-level concerns)

Most cases of pupils hurting other pupils 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 pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

See section 4 for more information about child-on-child abuse.

If a pupil makes an allegation of abuse against another pupil:

- You must record the allegation and tell the DSL, 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 (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

Procedure for dealing with sharing of nudes and semi-nudes ('sexting')

Responsibilities when responding to an incident

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.

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 pupils 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 pupils 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.

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 pupils 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.

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.

Referring to the police

- If it is necessary to refer an incident to the police, this initially will be done through our safer schools officer, or by dialling 101].

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 3 of this policy also apply to recording these incidents.
- We will seek further guidance from [the UK Council for Internet Safety](#) for [all staff](#) and for [DSLs and senior leaders](#).

Curriculum coverage

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our PSHE/RSE curriculum. 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

Pupils 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 pupils so they are aware of the processes the school will follow in the event of an incident.

Making a referral

Referrals to services regarding concerns about a child or family typically fall into three categories:

- Early Help Services;
- Child in need - Section 17 (Children Act 1989) referrals;
- Child protection - Section 47 (Children Act 1989) referrals.

[The Southwark Safeguarding Board Multi Agency Threshold Guide](#) sets out the different levels of need and detailed guidance about how concerns within these different levels should be responded to by Southwark agencies.

Referrals should be made to the Southwark MASH team or Local Authority of residence for the student. and copied to the LA's Schools Safeguarding Coordinator

An initial call should be made to the Southwark MASH team (if the student resides in Southwark).

During core hours 9am to 5pm phone 020 7525 1921, out of hours phone 020 7525 5000, email MASH@southwark.gov.uk to ensure that making a referral is an appropriate action

This should then be followed up with a completed Multi-Agency Referral Form (MASH) as required by the safeguarding partner arrangements.

This should then be sent to:

MASH@southwark.gov.uk

KCSIE 2022 also includes an online tool (paragraph 49) to report child abuse to the local council.

The Designated Safeguarding Lead (DSL) is the first point of contact for external agencies that are pursuing Child Protection investigations and will coordinate the school's representation at CP conferences and Core Group meetings (including the submission of written reports for conferences).

In the absence of a DSL/DDSL, **anyone can make a referral**. If a child is in immediate danger or is at risk of harm, a referral should be made to children's social care and/or the police immediately.

In all cases where the member of staff who makes this referral is not the DSL, that member of staff should inform the Designated Safeguarding Lead or one of the DDSLs at the first possible opportunity.

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.

The parent/carer will normally need to be contacted to obtain their consent before a referral is made. However, if the concern involves, for example, alleged or suspected child sexual abuse, honour-based violence, fabricated or induced illness, suspected forced marriage, FGM or the DSL/DDSL has reason to believe that informing the parent at this stage might compromise the safety of the child or a staff member, nothing should be said to the parent/carer ahead of the referral.

However, a rationale for the decision to progress without consent should be provided within the referral.

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.

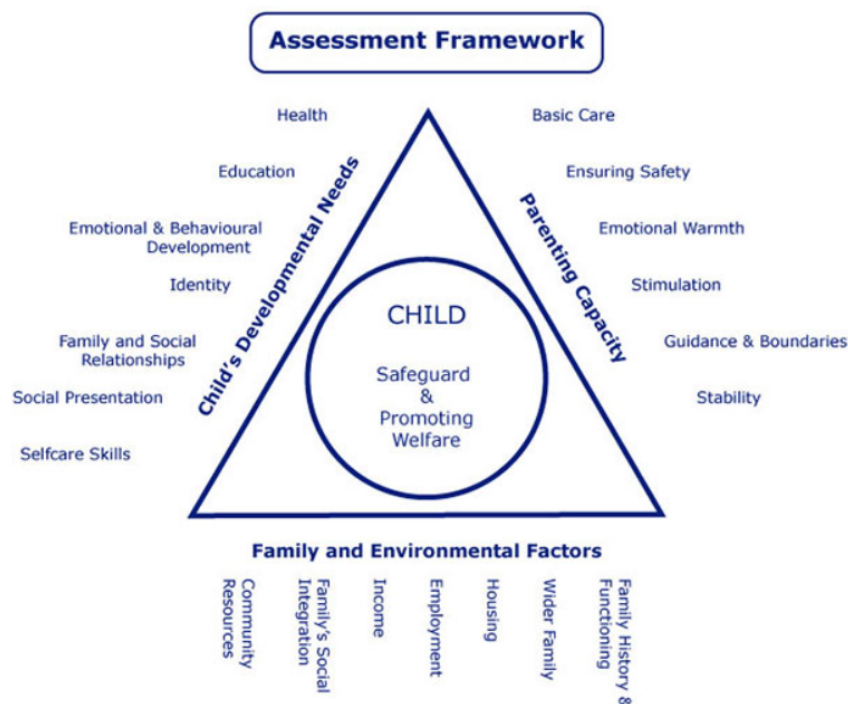
Where there is a safeguarding concern, we take into account the child's wishes and feelings when determining what action to take and what services to provide. We have systems in place for children to express their views and give feedback. We acknowledge that children who are affected by abuse or neglect may demonstrate their needs and distress through their words, actions, behaviour, demeanour, school work or other children. Ultimately, all our systems and processes operate with the best interests of the child at heart.

Early Help Referrals

Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. All staff should be prepared to identify children who may benefit from early help. Early help is central to a safe school environment.

Early Help will be adopted when there are concerns about a child's progress in terms of their health, welfare, behaviour or progress and where there are concerns about significant factors (such as illustrated in the graphic below) and where it is deemed that a child's needs are unclear or broader than a single service can address.

PhoenixPlace will use, wherever necessary, the Early Help Assessment (Common Assessment Framework) in order to support a child's wellbeing.



Any child may benefit from Early Help. However, staff will be particularly alert to the potential need for Early Help and other possible referrals (E.g. MASH) alerting the safeguarding team for a child who:

- Is disabled and has specific additional needs
- Has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- Is a young carer
- Is showing very early signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- Is frequently missing/goes missing from care or from home
- Is at risk of modern slavery, trafficking or exploitation
- Is at risk of being radicalised or exploited
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse (including where students suffer it from an intimate personal relationship)
- Is misusing drugs or alcohol themselves
- Has returned home to their family from care
- Is a privately fostered child

In the first instance staff will discuss any concerns with early help requirements with the DSL and add any concerns with early help requirements to CPOMS. The safeguarding team will discuss with the DSL who may be required to support other agencies and professionals in an early help assessment. This includes identifying emerging problems, sharing information with other professionals to support early identification and assessment and in some cases, a member of the SG team, other than the DSL will lead in undertaking an early help assessment.

The DSL may liaise with a range of teams including MASH to coordinate early help.

PhoenixPlace has bi-weekly Pupil Causing Concern (PCC) meetings. These meetings are a key platform for sharing information and deciding on strategies to provide support to a student and/or their family, including access to early help. These meetings are attended by a range of leadership and support staff involved in pastoral care.

Child Protection and Safeguarding Policy

(including Safer Recruitment, allegations against staff and low-level concerns)

All staff are aware of the importance of sharing information as provided by the Data Protection Act 2018 and the GDPR. 'Special category personal data' must be stored and shared sensitively, however, where a student or individual is at risk then information can be shared without consent.

The Southwark [early help offer](#) gives additional guidance about early help support in the borough.

The [Early Help Referral Form](#) will be used to request additional early help for a family when the needs of a child are beyond the level of support that can be provided by universal services. Southwark's [Family Early Help Service](#) Duty number is **020 7525 1922**, which will give four options:

- General enquiries and signposting
- Family Early Help Duty Manager for general advice including consultations around potential and new referrals and current casework
- Education, Inclusion and Attendance support and advice including all enforcement activity
- Parenting support and advice and information on parenting course and group work programmes

PhoenixPlace will put in place systems such as 'team around the child meetings' to gather the right staff around the table to flag any issues at an early stage. The Pastoral team and attendance lead, will be specifically trained on the early help offer to facilitate contacts with agencies to support families quickly.

If an early help assessment 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.

We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

All staff are given training on understanding the role of early help and the referral process and their role in circumstances where a child has an unexplained or suspicious injury that requires urgent medical attention, the CP referral process should not delay the administration of first aid or emergency medical assistance. **If a pupil is thought to be at immediate risk because of parental violence, intoxication, substance abuse, mental illness or threats to remove the child during the school day, for example, urgent Police intervention will be requested.**

Where a child sustains a physical injury or is distressed as a result of reported chastisement, or alleges that they have been chastised by the use of an implement or substance, this will immediately be reported for investigation.

PhoenixPlace recognises the need to be alert to the risks posed by strangers or others (including the parents or carers of other pupils) who may wish to harm children in school or pupils travelling to and from school and will take all reasonable steps to lessen such risks.

If the safeguarding/welfare concern is low level and does not require other agency involvement, the DSL or Pastoral Manager will initiate early intervention with the following aims:

- To engage with the parents/carers as soon as possible (unless the situation is so serious that would put the student at increased risk)
- To invite the parents/carers into school for a meeting to demonstrate professional concerns and discuss a supportive working partnership for the best interests of the student (e.g. breakfast club, additional in school support)
- At this meeting we will discuss the plan of next action should the situation not improve
- We will record all contacts with the family, dates and times, including phone calls/letters

Child Protection and Safeguarding Policy

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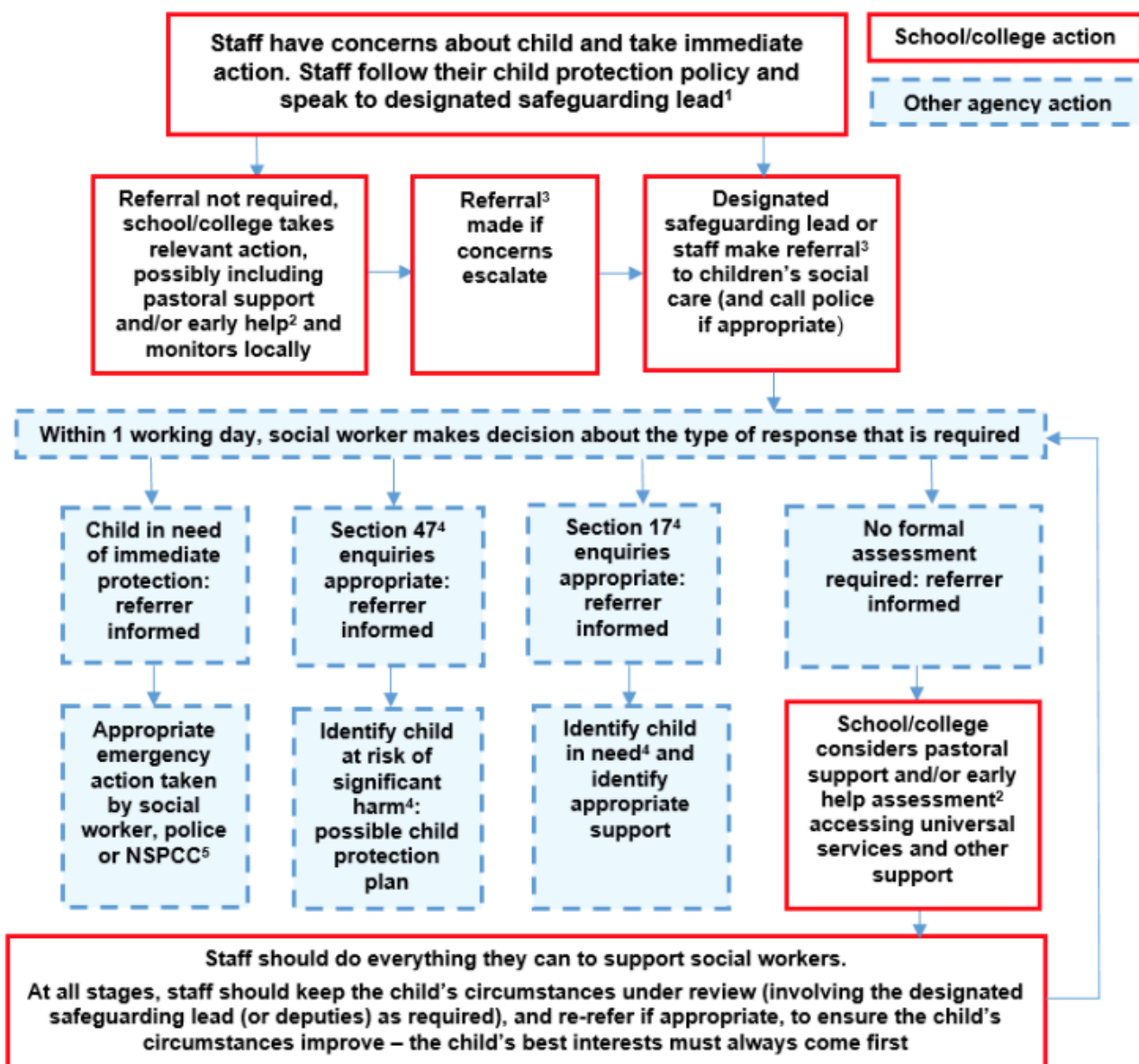
- We will monitor the student closely – e.g. behaviour/concerns/interaction with peers and parents/academic progress etc. This will demonstrate the frequency of concerns and help to build patterns. If the latter leads to further concerns, the DSL/Pastoral Manager will escalate the concern through Early Help or any other channel where necessary.

In circumstances where a child has an unexplained or suspicious injury that requires urgent medical attention, any Child Protection referral process should not delay the administration of first aid or emergency medical assistance.

All parents applying for places at PhoenixPlace will be informed of our safeguarding responsibilities and the existence of this policy. In situations where students sustain injury or are otherwise affected by an accident or incident whilst they are the responsibility of the School, parents will be notified of this as soon as possible.

Flow Chart Diagram -

So in summary: this flowchart from KCSIE makes clear what should happen



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- 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).

Section 4:

Safeguarding and Child Protection Risks

Appendix 1 summarises the types of abuse and their symptoms. In addition to these, there are specific aspects that all adults working with children should be aware of:

Vulnerable Students: Particular vigilance will be exercised in respect of students who are subject to a Child Protection Plan, Child In Need or are Children Looked After or who are absent from education or have a mental health need. Any incidents or concerns involving these children must be reported immediately to the DSL and will be reported to the allocated social worker. A vulnerable students list will be made available to staff. Grace Jackson (Deputy Head) will be the designated teacher for children looked after. She will liaise and work with the relevant virtual school/social workers to ensure personal education plans are in place. The designated teacher will ensure that prompt and proactive actions are taken for the academic and pastoral welfare of any children looked after.

If a student discloses that they have witnessed domestic abuse or it is suspected that they may be living in a household which is affected by family violence, this will be referred to the DSL as a safeguarding issue.

We will always ascertain the views and feelings of all children. The school fully supports the additional need for support and protection of children who are vulnerable by virtue of disability, homelessness, refugee/asylum seeker status, the effects of substance abuse within the family, those who are young carers, mid-year admissions, students where English is an additional language and we will use the translation service if necessary.

We know that children who are affected by abuse or neglect may demonstrate their needs and distress through their words, actions, behaviour, demeanour, school work or interactions with other children.

PhoenixPlace has a strong commitment to its prevention of bullying policy and will not tolerate any form of bullying which includes homophobic or racist bullying. PhoenixPlace will consider all coercive acts and inappropriate child-on-child behaviour and sexual activity within a Child Protection context.

Updates to KCSIE 22 include children who are lesbian, gay, bi, or trans (LGBT) as vulnerable students. The guidance states that the fact a child or young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.

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LGBT inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and there is a range of support available through this policy to help schools counter homophobic, biphobic and transphobic bullying and abuse.

Child Sexual Exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats 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. Children or young people who are being sexually exploited may not understand that they are being abused. They might be invited to parties and given drugs and alcohol. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend;
- Suffering from sexually transmitted infections or becoming pregnant;
- Appearing with unexplained gifts or new possessions;
- Associating with other young people involved in exploitation;
- Acquisition of money, clothes, mobile phones etc without plausible explanation;
- Gang-association and/or isolation from peers/social networks;
- Exclusion or unexplained/regular absences from school, college or work;
- Leaving home/care without explanation and persistently going missing or returning late;
- Excessive receipt of texts/phone calls;
- Returning home under the influence of drugs/alcohol;
- Inappropriate sexualised behaviour for age/sexually transmitted infections;
- Evidence of/suspicions of physical or sexual assault;
- Relationships with controlling or significantly older individuals or groups;
- Multiple callers (unknown adults or peers);
- Frequenting areas known for sex work;
- Concerning use of internet or other social media;
- Increasing secretiveness around behaviours; and
- Self-harm or significant changes in emotional well-being.

A child under the age of 13 is not legally capable of consenting to sex (it is statutory rape) or any other type of sexual touching. Sexual activity with a child under 16 is also an offence. It is an offence for a person to have a sexual relationship with a 16 or 17 year old if that person holds a position of trust or authority in relation to the young person. Non consensual sex is rape whatever the age of the victim. If the victim is incapacitated through drink or drugs, or the victim or his or her family has been subject to violence or the threat of it, they cannot be considered to have given true consent and therefore offences may have been committed. Child sexual exploitation is therefore potentially a child protection issue for all children under the age of 18. Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: [Child sexual exploitation: guide for practitioners](#).

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Where it comes to our notice that a child under the age of 13 is, or may be, sexually active, whether or not they are a pupil of this school, this will result in an immediate referral to Children's Services. In the case of a young person between the ages of 13 and 15, an individual risk assessment will be conducted in accordance with the [London Safeguarding Children Procedures](#). This will determine how and when information will be shared with parents and the investigating agencies.

If a member of staff suspects CSE, 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.

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
- Being regularly absent from 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.

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 (see above))

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

- Being male
- Having been frequently absent or permanently excluded from school

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- 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.

We are also aware that fear and a need for self-protection is a key motivation for children to carry a weapon – it affords a child a feeling of power. Neighbourhoods with high levels of deprivation and social exclusion generally have the highest rates of gun and knife crime. Children are more likely to carry knives and other weapons than guns.

All staff will be aware of the associated risks and will share any concerns about or knowledge of such children immediately with the DSL. Further advice on these is available in the Home Office documents [Advice to schools and colleges on gangs and youth violence](#) and [Criminal exploitation of children and vulnerable adults: county lines](#).

County Lines: County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across the UK – no specified distance of travel is required.

Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children’s homes and care homes. Children are also increasingly being targeted and recruited online using social media.

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

Some specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

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

Child-on-child abuse: Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the 2.

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that doesn’t mean that this kind of abuse isn’t happening.

Child-on-child abuse is most likely to include, but may not be limited to:

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- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
 - Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
 - 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
 - sexual abuse (indecent exposure, indecent touching or serious sexual assaults, forcing other children to watch pornography or take part in sexting)
 - 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 nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
 - having an older boyfriend/girlfriend, associating with unknown adults or other sexually exploited children, staying out overnight, photographing or videoing other children performing indecent acts)
 - 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 Upskirting is now a criminal offence.
 - 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 child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 3 of this policy, as appropriate.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

The school has a strong commitment to an anti-bullying policy and will consider all coercive acts and child on child abuse within a Child Protection context. We recognise that some pupils will sometimes negatively affect the learning and wellbeing of other pupils and their behaviour will be dealt with under the school's behaviour policy.

As a school, we will minimise the risk of allegations against other pupils by providing a developmentally appropriate PSHE syllabus which develops pupils' understanding of acceptable behaviour and keeping themselves safe, having systems in place for any pupil to raise concerns with staff, knowing that they will be listened to, believed and valued, delivering targeted work on assertiveness and keeping safe to those pupils identified as being at risk, developing robust risk assessments and providing targeted work for pupils identified as being a potential risk to other pupils.

It is important that all our staff recognise the indicators and signs of child on child abuse and know how to identify it and respond to reports. Any possible child on child abuse case will be shared with the DSL with a view to referring to appropriate agencies following the referral procedures. We also note the DfE's advice and guidance on [Preventing and Tackling Bullying](#).

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Although it is more likely that girls will be victims and boys perpetrators, all child on child abuse is unacceptable and will be taken seriously. We do not tolerate these or pass them off as “banter”, “just having a laugh” or “part of growing up”.

Sexual violence and sexual harassment between children in schools: Sexual harassment, online sexual abuse and sexual violence (including sexualised language) is unacceptable in our school and we have appropriate sanctions in place. We understand that sexual harassment, online sexual abuse and sexual violence are happening in and around the school, even when there are no specific reports. 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 any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report. All pupils are supported to report concerns about harmful sexual behaviour freely. We will take concerns seriously and deal with them swiftly and appropriately and will ensure pupils are confident that this is the case.

We will be alert to factors that increase vulnerability or potential vulnerability such as

- mental ill health,
- domestic abuse,
- children with additional needs, and
- children from groups at greater risk of exploitation and/or of feeling unable to report abuse (for example, girls and LGBT children).

We will identify and address any barriers that can prevent a pupil from making a disclosure, for example communication needs. Staff will share any concerns about or knowledge of such incidents immediately with the DSL with a view to ensuring that support systems are in place for victims. Where necessary, we will work with relevant external agencies to address the issue, which may include a referral to MASH and reporting to the Police. We will keep comprehensive records of all allegations.

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again

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- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

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.

We work actively to prevent sexual harassment, online sexual abuse and sexual violence through a whole-school approach that includes an effective behaviour policy, pastoral support and a carefully planned relationships, sex and health education curriculum, which specifically addresses sexual harassment, online abuse, sexual violence and issues of consent. We will ensure that children are taught about safeguarding risks, including online risks and will support pupils to understand what constitutes a healthy relationship, both online and offline

Our staff members have been made aware and have appropriate knowledge of 'Part 5: Child on child sexual violence and sexual harassment' of DfE guidance "[Keeping children safe in education](#)"

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

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 3 of this policy, as appropriate. In particular, appendix 1 set out more detail about our school's approach to this type of abuse.

Harmful sexual behaviour (HSB): Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent.

Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. HSB can occur online and/or face-to-face and can also occur simultaneously between the two.

We consider HSB in a child protection context. When considering HSB, both ages and the stages of development of the children are critical factors. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

We aim to have a good understanding of HSB, which will aid in planning preventative education, implementing preventative measures and incorporating the approach to sexual violence and sexual harassment into the whole school approach to safeguarding. HSB can, in some cases, progress on a continuum. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

Children displaying HSB have often experienced their own abuse and trauma. We will work with appropriate agencies to address HSB and to support children displaying HSB.

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Children who are lesbian, gay, bi, or trans (LGBT): We note that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children.

In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open.

Our staff will endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff. LGBT inclusion is part of the statutory [Relationships Education, Relationship and Sex Education and Health Education](#) curriculum. We will work with appropriate agencies to counter homophobic, biphobic and transphobic bullying and abuse and to provide support to LGBT children.

Domestic abuse: Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include

- intimate partner violence,
- abuse by family members,
- teenage relationship abuse (abuse in intimate personal relationships between children) and
- child/adolescent to parent violence and abuse.

It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others – for example, the impact of all forms of domestic abuse on children.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day.

If members of staff have a concern about or knowledge of any domestic abuse incidents, they will share it immediately with the DSL with a view to referring to appropriate agencies. Further information/guidance is available from [Domestic abuse and how to get help in Southwark](#) website.

The DSL will provide support according to the child's needs and update records about their circumstances.

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Operation Encompass:

At PhoenixPlace we are working in partnership with the Metropolitan Police and Children's Services to identify and provide appropriate emotional and practical help and support to pupils who have experienced domestic violence in their household; this scheme is called Operation Encompass.

The purpose of Operation Encompass is to safeguard and support children and young people who have been involved in or witness to a domestic abuse incident. Domestic abuse impacts on children in a number of ways. Children are at increased risk of physical injury during an incident, either by accident or because they attempt to intervene. Even when not directly injured, children are greatly distressed by witnessing the physical and emotional suffering of a parent.

Encompass has been created to highlight this situation. It is the implementation of key partnership working between the police and schools. The aim of sharing information with local schools is to allow 'Key Adults' the opportunity of engaging with the child and to provide access to support that allows them to remain in a safe but secure familiar environment. Further information is available via [Operation Encompass](#).

In order to achieve this, the Multi-Agency Safeguarding Hub ([MASH](#)) will share police information of all domestic incidents where one of our pupils has been present, with the Designated Safeguarding Lead(s) (DSL). On receipt of any information, the DSL will decide on the appropriate support the child requires, this should be covert dependent on the needs and wishes of the child. All information sharing and resulting actions will be undertaken in accordance with the Metropolitan Police and MASH Encompass Protocol Data Sharing Agreement. We will record this information and store this information in accordance with the record keeping procedures outlined in this policy.

The purpose and procedures in Operation Encompass have been shared with all parents and SAP members, is detailed as part of the school's Safeguarding Policy and published on our school website.

Violence Against Women and Girls (VAWG): VAWG is defined as any act of gender-based violence that results in, or is likely to result in physical, sexual or psychological harm or suffering to women including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or private life.

VAWG is the umbrella term which brings together multiple forms of serious violence such as crimes committed in the name of "honour"; domestic abuse; female genital mutilation (FGM); forced marriage; sexual violence, abuse, exploitation and rape; stalking; harassment; trafficking for sexual exploitation; prostitution. If members of staff have a concern about or knowledge of any VAWG incidents, they will share it immediately with the DSL with a view to referring to appropriate agencies. We also note [Southwark's VAWG Strategy](#).

Honour-based Abuse/Violence (HBA/V): 'Honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network committing collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. of family or community pressure and can include multiple perpetrators.

All forms of HBA is abuse (regardless of the motivation) and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

Female Genital Multilation (FGM):

Any concerns regarding FGM must be immediately reported to the Designated Safeguarding Lead. ALL STAFF HAVE A LEGAL DUTY TO REPORT ANY SUSPECTED FGM TO THE POLICE.

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

FGM is a procedure where the female genital organs are injured or changed and there is no medical reason for this. It is frequently a very traumatic and violent act for the victim and can cause harm in many ways. The practice can cause severe pain and there may be immediate and/or long-term health consequences, including mental health problems, difficulties in childbirth, causing danger to the child and mother; and/or death.

FGM is a deeply embedded social norm, practised by families for a variety of complex reasons. It is often thought to be essential for a girl to become a proper woman, and to be marriageable. The practice is not required by any religion.

FGM is an unacceptable practice for which there is no justification. It is child abuse and a form of violence against women and girls.

FGM is prevalent in 30 countries and is a deeply rooted practice, widely carried out mainly among specific ethnic populations in Africa and parts of the Middle East and Asia. While FGM is concentrated in countries around the Atlantic coast to the Horn of Africa, in areas of the Middle East like Iraq and Yemen, it has also been documented in communities in Colombia, Iran, Israel, Oman, The United Arab Emirates, The Occupied Palestinian Territories, India, Indonesia, Malaysia, Pakistan and Saudi Arabia. It has also been identified in parts of Europe, North America and Australia.

FGM is illegal in the UK. It is known that it is also carried out discreetly within the UK.

It is estimated that approximately 60,000 girls aged 0-14 were born in England and Wales to mothers who had undergone FGM and approximately 103,000 women aged 15-49 and approximately 24,000 women aged 50 and over who have migrated to England and Wales are living with the consequences of FGM. In addition, approximately 10,000 girls aged under 15 who have migrated to England and Wales are likely to have undergone FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues

A girl:

- Having difficulty walking, sitting or standing, or looking uncomfortable
- Prolonged absence from school with a noticeable change in behaviour on return
- Finding it hard to sit still for long periods of time (where this was not a problem previously)
- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Having frequent urinary, menstrual or stomach problems

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- Avoiding physical exercise or missing PE
 - Suddenly visiting the school nurse more frequently
 - A sudden change in dress
 - Being repeatedly absent from school, or absent for a prolonged period
 - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
 - Being reluctant to undergo any medical examinations
 - Asking for help, but not being explicit about the problem
 - Talking about pain or discomfort between her legs

Potential signs that a pupil may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues

A girl:

- Having a mother, older sibling or cousin who has undergone FGM
- Having limited level of integration within UK society
- Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
- Being unexpectedly absent from school
- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

The child victims regularly suffer several of the following health implications:

- Shock severe pain & Trauma
- Wound Infection, Septicaemia, Tetanus,
- Urine retention
- HIV & Hepatitis Infection
- Exhaustion from Screaming
- Failure to heal
- Abscess formation
- Excessive growth of scar tissue
- Pelvic Infection due to menstrual obstruction
- Obstruction to Urinary Flow & Urine Infections
- Broken/fractured bones from being pinned down against their will

Long term consequences can include:

- Recurrent bladder and urinary tract infections;

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- Cysts;
 - Infertility;
 - An increased risk of childbirth complications and new born deaths;
 - A need for further surgery. For example, the FGM procedure that seals or narrows a vaginal opening (type 3 above) needs to be cut open later to allow for sexual intercourse and childbirth. Sometimes it is stitched again several times, including after childbirth, hence the woman goes through repeated opening and closing procedures, further increasing and repeated both immediate and long-term risks.

We note a new duty that was introduced on 31 October 2015 that requires teachers, which includes qualified teachers or persons who are employed or engaged to carry out teaching work in schools and other institutions to report 'known' cases of FGM in girls aged under 18 to the police.

The duty applies to any teacher who is employed or engaged to carry out 'teaching work', whether or not they have qualified teacher status, in maintained schools, academies, free schools, independent schools, non-maintained special schools, sixth form colleges, 16-19 academies, relevant youth accommodation or children's homes in England.

The duty does not apply in relation to suspected cases – it is limited to 'known' cases' (i.e. those which are visually identified or disclosed to a professional by the victim). It will be rare for teachers to see visual evidence, and they should not be examining pupils or students.

The duty does not apply in cases where the woman is over 18 at the time of the disclosure/discovery of FGM (even if she was under 18 when the FGM was carried out). Further information on this duty can be found in the document "[Mandatory Reporting of Female Genital Mutilation – procedural information](#)". A useful summary of the FGM mandatory reporting duty is available in [FGM Fact Sheet](#).

Teachers in our school will personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they will still discuss any such case with the designated safeguarding lead (or deputy) with a view to involving children's social care as appropriate.

Forced Marriage: Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage.

We note The Forced Marriage Unit's statutory guidance [The right to choose: government guidance on forced marriage](#) and especially Chapter 7 on page 32 of the [Multi-agency guidelines](#), which is specifically aimed at teachers, lecturers and other members of staff within schools, colleges and universities.

We note that, in addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

Any possible forced marriage case will be shared with the DSL with a view to referring to appropriate agencies following the referral procedures.

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Staff will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fm@fco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

The Prevent Duty (extremism, radicalisation and terrorism): Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups

Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Terrorism is an action that:

- Endangers or causes serious violence to a person/people;
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

As a part of the Counter Terrorism and Security Act 2015, Schools have a duty to prevent children from being drawn into terrorism. This has become known as the 'Prevent Duty'. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a pupil is being radicalised can include:

Our 100% commitment to safeguarding student welfare means that we are vigilant to monitoring vulnerability to radicalisation which includes identifying students:

- Displaying feelings of grievance and injustice

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- Feeling under threat
 - Who are showing distance from cultural heritage
 - Who experience racism or discrimination
 - Who espouse a continuous feeling of failure.
 - Who evidence family tensions
 - Who are relocating/migrating.
 - Searching for identity, meaning and belonging
 - Who have a desire for status amongst their peers
 - Showing empathy for extremist causes
 - Glorifying violence, especially from other faiths or cultures
 - Who have a desire for excitement and adventure
 - Displaying a need to dominate and control others
 - Who have a susceptibility to indoctrination
 - Displaying a radical desire for political or moral change
 - Who are susceptible to opportunistic involvement
 - Who have family or friends involved in extremism
 - Susceptible to being influenced or controlled by a group
 - With mental health issues
 - Displaying secretive behaviour
 - Advocating messages similar to illegal organisations or other extremist groups.
 - Refusal to engage with, or becoming abusive to, peers who are different from themselves
 - Becoming susceptible to conspiracy theories and feelings of persecution
 - Changes in friendship groups and appearance
 - Rejecting activities they used to enjoy
 - Converting to a new religion
 - Isolating themselves from family and friends
 - Increased levels of anger
 - Increased secretiveness, especially around internet use
 - Expressions of sympathy for extremist ideologies and groups, or justification of their actions
 - Accessing extremist material online, including on Facebook or Twitter
 - Possessing extremist literature
 - Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

The examples above are not exhaustive and vulnerability may manifest itself in other ways

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

We see the Prevent duty as part of our school's wider safeguarding obligations and note the revised [Prevent duty guidance: for England and Wales](#), especially paragraphs 57-76.

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism that uses existing collaboration between local authorities, the police, statutory partners (such as the education sector, social services, children's and youth services and offender management services) and the local community.

We will refer children at risk of harm as a result of involvement or potential involvement in extremist activity to Southwark Multi Agency Safeguarding Hub ([MASH](#)). The MASH will share the referral details of new referrals with the Prevent lead police officer and LA Prevent coordinator at the point the referral is received. The referral will then be processed through the MASH multi agency information sharing system and parallel to this the Prevent police officer will be carrying out initial screening checks.

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The Prevent police officer will make a referral to the Channel Practitioner if there are sufficient concerns. The individual referred will be discussed at the Channel panel to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from our school will attend the Channel panel if and when we are asked to help with this assessment.

If staff are concerned about a pupil, they will follow our procedures set out in section 3 of this policy, including discussing their concerns with the DSL.

Staff should always take action if they are worried.

Further information on the school's measures to prevent radicalisation are set out in other school policies eg Management of Behaviour Policies; Online/e-safety policy and procedures, including in our PSHE curriculum

Children being absent from education

A child being absent from school, 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 absent 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 are absent 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.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

Indicators that a family may be at risk of homelessness include:

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- household debt,
 - rent arrears,
 - domestic abuse and anti-social behaviour,
 - family being asked to leave a property.

The DSL and deputies will be aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Referrals and/or discussion with the Local Housing Authority should be progressed as appropriate. However, this should not replace a referral into children's social care where a child has been harmed or is at risk of harm. Staff need to remain alert to any changes in the circumstances of children so that preventative action can be taken to avoid the child becoming homeless. Staff should raise any concerns regarding potential homelessness with the safeguarding team immediately, who will investigate and then make a referral to Lambeth via the Housing Advice Query service.

Private Fostering

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

Close relatives are defined as step-parents, grandparents, brothers, sisters, uncles or aunts (whether of full blood, half blood or by marriage). Great grandparents, great aunts, great uncles and cousins are not regarded as close relatives.

The Law requires that the Local Authority should be informed at least six weeks in advance of a private fostering arrangement or 48 hours after the arrangement has been made if in an emergency.

The purpose of the council's involvement is to support the child and private foster family (and wherever possible the biological parent/s) with any issues arising. These may be practical issues such as benefits, housing, immigration or emotional issues such as keeping contact with biological family, maintaining cultural identity.

Social workers will:

- Check the suitability of the private foster carers through checks and assessment;
- Make regular visits to the child and monitor the standard of care; and
- Ensure that private foster carers and birth families have all the necessary information and advice they require.

If we become aware of a child in a private fostering arrangement within Southwark, we will notify the council's Multi Agency Safeguarding Hub ([MASH](#)) by emailing MASH@southwark.gov.uk or calling **020 7525 1921**.

Advice about whether there is a need to notify the council, can be obtained by contacting MASH. In the case of a non-Southwark child, we will notify the relevant LA.

Children with SEN and disabilities (SEND)

We recognise that pupils with special educational needs (SEN) or disabilities or certain health conditions can face additional safeguarding challenges, and are 3 times more likely to be abused than their peers.

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
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils 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

Our staff, supported by the SENCO, will be particularly aware of the need for vigilance with SEND students.

Pupils with a social worker

Pupils 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 pupil 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

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 an appropriately trained teacher, Grace Jackson (Deputy Head), to take the lead on promoting the educational achievement of looked-after and previously looked-after children.

As part of their role, they 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

Section 5:

Creating a supportive environment in school and minimising the risk of child-on-child abuse

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be 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
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in 'Reporting systems for our pupils' section below)
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment

Ensure staff are trained to understand:

- How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
- That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
- That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
 - ◆ Children can show signs or act in ways they hope adults will notice and react to
 - ◆ A friend may make a report
 - ◆ A member of staff may overhear a conversation
 - ◆ A child’s behaviour might indicate that something is wrong
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- 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
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it

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- That they should speak to the DSL if they have any concerns
 - That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA children's social care to determine this
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

Safeguarding and promoting the welfare of children in our school is the responsibility of the whole school community. All adults working in this School (including visiting staff, supply teachers, volunteers and students on placement) are required to report instances of actual or suspected child abuse or neglect to the Designated Safeguarding Lead (DSL) or to a Deputy Designated Safeguarding Leads (DDSLs).

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 pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

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

Notifying parents or carers

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL/DDSLs 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. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

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- Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
 - Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

Confidentiality

- Our school aims to ensure that all personal data collected about staff, pupils, parents, governors, visitors and other individuals is collected, stored and processed in accordance with the [General Data Protection Regulation \(GDPR\)](#) and the expected provisions of the Data Protection Act 2018 (DPA 2018) as set out in the [Data Protection Bill](#).
- This policy applies to all personal data, regardless of whether it is in paper or electronic format.

Please refer to our Data Protection Policy

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk
- 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 a victim asks the school not to tell anyone about the sexual violence or sexual harassment:

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

The DSL should consider that:

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

Regarding anonymity, all staff will:

- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved

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- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

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

If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)

Confidentiality is also addressed in this policy with respect to record-keeping (see below), and allegations of abuse against staff in appendix 3

As part of our procedure we will always seek advice from social care duty and anonymise students names unless told otherwise.

Online safety and the use of mobile technology - see separate policy

Complaints and concerns about school safeguarding policies

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 (see appendix 3).

Whistle-blowing

All staff should be aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues. Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

- General guidance on whistleblowing can be found via: Advice on Whistleblowing
- The NSPCC whistleblowing helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school or college. Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk

Where there are concerns of extremism, terrorism or radicalisation of students, staff and governors will be encouraged to make use of our internal systems to whistle blow or raise any issue in confidence. They must inform the Headteacher straight away (or if it relates to the Headteacher, the Chair of SAP).

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. If you are in any doubt about whether to record something, discuss it with the DSL.

Accurate records are vital. All concerns about, or disclosures regarding, any form of abuse or risk of being abused or concerns for the welfare and safety of a child must be recorded in writing.

The record includes:

- the time, date, circumstances and who else was present
- exact details of what the student said, quoting the exact words used.

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- any signs of physical injury (without removing additional clothing)
 - objective accounts, and based on evidence and distinguishing between fact, observation, allegation and opinion.
 - Details of how the concern was followed up and resolved
 - A note of any action taken, decisions reached and the outcome

Any decisions regarding photographic recording of evidence and medical examinations will be left to the experts.

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

Child protection records are not open to students or parents. All child protection records are kept securely by the DSL and separately from educational records. Clear and coherent chronologies will be kept. They may only be accessed by the DSL, DDSLs and the Headteacher. If a file is removed from the storage, it must be signed for by the person removing and the DSL must be informed. Students' main files will be labelled to indicate there is a separate safeguarding file.

The content of child protection conferences or review reports prepared by the school will follow the headings recommended by children's services and will, wherever possible, be shared with the parents/carer in advance of the meeting.

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.

Where children are dual registered (e.g., on roll at a mainstream school, but receiving education with us), any existing child protection records should be shared with us prior to the child starting. This will enable us to assess risk appropriately. In order to safeguard children effectively, it is important that we are immediately made aware of any current child protection concerns, preferably by telephone prior to the transfer of records.

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 as soon as possible, securely, and separately from the main pupil file.

To allow the new school/college to have support in place when the child arrives, this should be within:

- 5 days for an in-year transfer, or within
- The first 5 days of the start of a new term

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.

In addition:

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks
- Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff

Links with other policies

This policy links to the following policies and procedures: for example

- Management of Behaviour
- Staff code of conduct
- Complaints
- Health and safety
- Attendance
- Online safety
- Equality
- Relationships and sex education
- First aid
- Curriculum
- Privacy notices
- Whistle blowing
- Anti-bullying
- Lone Working Policy
- Disclosure Policy

Appendix 1: Types Of Child Abuse And Neglect

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. They may be abused by an adult or adults or another child or children.

Physical abuse: a form of abuse which 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.

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development.

It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a 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, although it may occur alone.

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.

Neglect: 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, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the DSL and DDSs will be considering whether children are at risk of abuse or exploitation in situations outside their families.

Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence. This is known as [Contextual Safeguarding](#), which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

Mental Health: We are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

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

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

If staff have a mental health concern about a child that is also a safeguarding concern, this will be shared with the DSL with a view to referring to appropriate agencies following the referral procedures. We also note the DfE's advice and guidance on [Mental Health and Behaviour in Schools](#).

Appendix 2:

Safer Recruitment

Recruitment and selection process

The recruitment steps outlined below are based on part 3 of Keeping Children Safe in Education. To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training, in accordance with staffing regulations.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

Advertising

When advertising roles, we will make clear:

- Our school's commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

Application forms

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

Shortlisting

Our shortlisting process will involve at least 2 people and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns

Once we have shortlisted candidates, we will ask shortlisted candidates to:

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
 - ◆ If they have a criminal history
 - ◆ Whether they are included on the barred list
 - ◆ Whether they are prohibited from teaching

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- ◆ Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
 - ◆ Any relevant overseas information
 - ◆ Sign a declaration confirming the information they have provided is true

We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online.

Seeking references and checking employment history

We will obtain references before the interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references we will:

- Not accept open references
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher as accurate in respect to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed

Interview and selection

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made
- Include Value Based questioning as part of the interview questions

Pre-appointment vetting checks

We will record all information on the checks carried out in the school's single central record (SCR).

Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

New staff

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before,

or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken

- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
 - ◆ For all staff, including teaching positions: [criminal records checks for overseas applicants](#)
 - ◆ For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach
 - ◆ Check that candidates taking up a management position* are not subject to a prohibition from management (section 128) direction made by the secretary of state

As part of the shortlisting process we will consider carrying out an online search as part of our due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which we may explore with the applicant at interview. We will inform shortlisted candidates that online searches may be done as part of due diligence checks.

*Management positions are most likely to include, but are not limited to, headteachers, and deputy/assistant headteachers.

Regulated activity means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

Existing staff

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- We believe the individual has engaged in [relevant conduct](#); or

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- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform.

We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Any alleged misconduct of temporary or agency staff will be reported to the employer concerned and to the LA's Designated Officer (LADO).

Visitors/Contractors

All visitors must be collected from Reception by the member of staff with whom they have an appointment. The member of staff is responsible for them whilst they are on the school premises. Visitors/contractors must sign in and out and wear a visitor badge and red lanyard at all times.

- We will always check the identity of visitors as well as contractors and their staff on arrival at the school
- All visitors who are here for educational purposes, such as guest speakers, must be approved in advance by the Headteacher.

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will determine the appropriate level of supervision depending on the circumstances. If an individual working at our school is self-employed, we will consider obtaining the DBS check, as self-employed people are not able to make an application directly to the DBS on their own account.

Building contractors who are engaged by or on behalf of PhoenixPlace to undertake works on site will be made aware of this policy and the reasons for this. Long-term contractors who work regularly in the school during term time will be asked to provide their consent for DBS checks to be undertaken. These checks will be undertaken when individual risk assessments by the Leadership Team deem this to be appropriate.

During major works, when large numbers of workers and sub-contractors may be on site during term time, Health and Safety risk assessments will include the potential for contractors or their employees to have direct

access to students in non-teaching sessions. All contractors and sub-contractors will be issued with copies of the PhoenixPlace's code of conduct for staff.

Individuals and organisations contracted by the school to work with or provide services to students will be expected to adhere to this policy and their compliance will be monitored. Any such contractors will be subject to the appropriate level of DBS check, if any such check is required (for example because the contractor is carrying out teaching or providing some type of care for or supervision of students regularly).

Contractors for whom an appropriate DBS check has not been undertaken will be supervised if they will have contact with students and a risk assessment will be in place.

Volunteers

Any parent or other person/organisation engaged by PhoenixPlace to work in a voluntary capacity with students will be subjected to all reasonable vetting procedures and Criminal Records Checks.

There is no legal requirement to obtain a DBS certificate for volunteers who are not in regulated activity and who are supervised regularly and who work on an ongoing, day to day basis by a person who is in regulated activity, but an enhanced DBS check without a barred list check may be requested following a risk assessment.

Volunteers and third sector groups that operate within the school will be subject to the same code of conduct as paid employees of PhoenixPlace.

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment

If it comes to our attention that an allegation or complaint of mistreatment has been made against an employee or volunteer of such an organisation, this will be reported by the School to the Local Authority's Designated Officer (LADO).

'Governors' (Strategic Advisory Panel - SAP member)

All SAP members will have an enhanced DBS check without barred list information. They will have an enhanced DBS check with barred list information if working in regulated activity with children.

All proprietors, trustees, local governors and members will also have the following checks:

- A section 128 check (to check prohibition on participation in management under [section 128 of the Education and Skills Act 2008](#)).
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

Staff working in alternative provision settings

Where we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

We currently do not have any students placed with an alternative provider.

Adults who supervise pupils on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Staff Code Of Conduct

PhoenixPlace's staff code of conduct applies equally to teaching and non-teaching staff).

All staff (paid and voluntary) are expected to adhere to a code of conduct in respect of their contact with pupils and their families. The Teachers' Standards 2012 state that all teachers, including headteachers, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties. We will endeavour to create and embed a culture of openness, trust and transparency in which the school's values and expected behaviour which are set out in the staff code of conduct are constantly lived, monitored and reinforced by all staff.

Children will be treated with respect and dignity and no punishment, detention, restraint, sanctions or rewards are allowed outside of those detailed in the school's Behaviour Management Policy.

Safer working practices

For their own safety and protection, staff should exercise caution in situations where they are alone with pupils. Other than in formal teaching situations: Counselling, targeted 1:1/small groups, the door to the room should be left open. Where this is not practicable because of the need for confidentiality, another member of staff will be asked to maintain a presence nearby and a record will be kept of the circumstances of the meeting. All rooms that are used for the teaching or counselling of pupils will have clear and unobstructed glass panels in the doors.

School staff should be alert to behaviours that may cause 'low-level' concerns such as

- being over friendly with children,
- having favourites,
- taking photographs of children on their mobile phone contrary to school policy,
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door,
- humiliating pupils

School staff should ensure that their personal mobile phones are kept in their lockers or the Main Office when students are onsite.

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Staff are expected to exercise extreme caution in the use of social networking sites and must ensure their personal information is not accessible by parents or students. Students or parents (past or current) must never be accepted as friends and any inadvertent contact must be reported to the Headteacher. In the absence of the Headteacher, refer to the Chair of SAP. (Related policies in relation to E-safety and acceptable use of ICT must be read)

Home visits to students or private tuition of students should only take place with the knowledge and approval of the Headteacher. Visits/telephone calls by students to the homes of staff members should only occur in exceptional circumstances and with the prior knowledge and approval of the Headteacher. Any unplanned contact of this nature; out of hours contact, or suspected infatuations or “crushes” must be reported to the Headteacher. Staff supervising off-site activities or school journeys will be provided with a school mobile telephone as a point of contact for parents and carers.

Should a student make contact with a member of staff outside of school hours, the DSL (or DH-DDSL) should be notified by email as soon as possible. Staff should not respond to the student directly and, if a safeguarding emergency, should call the relevant emergency service as well as alerting the Safeguarding Manager.

Should a former student make contact with a staff member, it should be reported to the DSL and Headteacher immediately. Former students should only be invited onsite with the prior agreement of the DSL and Headteacher, and should be subject to and guided through the formal sign-in procedure on arrival. Contact with former students should be made by SLT, for official purposes only, such as progress reviews, formal visits and testimonials.

Staff should not let other considerations, such as fear of damaging relationships, get in the way of protecting children from abuse and neglect.

If a child is perceived to be in immediate danger, the police should also be contacted.

This should be 999 for immediate risk, 101 for high level concern

Using technology/social networking/mobile phones

- Staff will only use the school’s digital technology resources and systems for professional purposes or for uses deemed ‘reasonable’ within the schools policies. Staff will only use the approved school email, school learning platform or other school approved communication systems with pupils or parents/carers and only communicate with them on appropriate school business and will not disclose their personal telephone numbers and email addresses to pupils or parents/carers.
- Staff will not use personal cameras (digital or otherwise) or camera phones for taking and transferring images of pupils or staff without permission and will not store images at home.
- Staff are not at any time permitted to use recording equipment on their mobile phones, for example: to take recordings of children, or sharing images.
- Staff are expected to exercise extreme caution in the use of social networking sites and must ensure their personal information is not accessible by parents or students.
- Students or parents (past or current) must never be accepted as friends and any inadvertent contact must be reported to the Headteacher. In the absence of the Headteacher, refer to the Deputy Headteacher
- Staff should be aware of the school’s whistle-blowing procedures and share immediately any disclosure or concern that relates to a member of staff with the Headteacher (or in her absence, the Deputy Head) and nothing should be said to the colleague involved. It should be shared with the Chair of the SAP if it relates to the Headteacher.

We note the non-statutory [Guidance for Safer Working Practice for professionals working in education settings](#) published by the [Safer Recruitment Consortium](#).

Physical restraint and intervention

Whilst it would be unrealistic and undesirable to preclude all physical contact between adults and children, staff are expected to exercise caution and avoid placing themselves in a position where their actions might be open to criticism or misinterpretation.

All students have a right to be treated with respect and dignity. Corporal punishment is unlawful in all schools. Staff must not use any form of degrading treatment to punish a student. The use of sarcasm, demeaning or insensitive comments towards students is not acceptable in any situation. Shouting aggressively or hectoring is not acceptable in any situation. Deliberately intimidating students by overweening physical presence is not acceptable in any situation.

Under the Education and Inspections Act 2006, staff may legitimately intervene to prevent a student from committing a criminal offence, injuring themselves or others, causing damage to property, engaging in behaviour prejudicial to good order and to maintain good order and discipline. In all circumstances, staff should have regard to the health and safety of themselves and others.

Our policy of physical intervention and restraint by staff is that staff must only ever use physical intervention as a last resort and that, at all times, it must be the minimal force necessary to prevent injury to another person or to the student.

Under the DfE guidance – Use of Reasonable Force in Schools (2013) - all staff have a legal power to use 'reasonable force in the circumstances' and such force must be no more than is needed and only used to control a student.

Examples of circumstances when such intervention might be used range from guiding a student to safety by the arm, to breaking up a fight or restraining a student intent on causing violence or harm.

Examples of how students might be brought under control include the following:

- Passive physical contact - standing in front of a student or blocking their path towards another student
- Active physical contact - leading a pupil by the arm away from a situation or holding an arm where a student has an object in hand

Under no circumstances should physical force be used as a form of punishment. The use of unwarranted physical force is likely to constitute a criminal offence.

We understand that physical intervention of a nature which causes injury or distress to a child, may be considered under child protection or disciplinary procedures. If at any time physical intervention is required, the member of staff must make a report to their line manager immediately and follow up with a written report to the Headteacher before the end of the day.

Where incidents occur which might otherwise be misconstrued, or in the exceptional circumstances where it becomes necessary to physically restrain a pupil for their own protection or others' safety, this will be appropriately recorded and reported to the Headteacher and parents. Any physical restraint used will comply with DfE guidance "[Use of reasonable force in schools](#)" and the schools Restraint Policy.

Incidences that include a first aid or medical response

Except in cases of emergency, first aid will only be administered by qualified First Aiders. If it is necessary for the child to remove clothing for first aid treatment, there will, wherever possible, be another adult present. All

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first aid treatment and non-routine personal care will be recorded and shared with parents/carers at the earliest opportunity.

Children requiring regular medication or therapies for long-term medical conditions will be made the subject of a Medical Plan that has been agreed with the parents and health authority.

Appendix 3:

Allegations against staff (including low-level concerns)

PhoenixPlace takes seriously all safeguarding concerns or allegations against those working in or on behalf of our school in a paid or unpaid capacity. We will ensure that we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school are dealt with promptly and appropriately.

Procedures are in place for pupils, parents and staff to share any concern that they may have about the actions of any member of staff, including supply teachers, volunteers and contractors. All such allegations and concerns will be brought immediately to the attention of the Headteacher or one of the Designated Safeguarding Leads if the Headteacher is not available and nothing should be said to the colleague involved.

In cases where the Headteacher is the subject of the allegation or concern, they will be reported to the chair of the SAP, in order that they may activate the appropriate procedures.

There may be two levels of allegation/concern:

1. Allegations that may meet the harms threshold.
2. Allegations/concerns that do not meet the harms threshold – known as ‘low level concerns’.

Section 1: Allegations that may meet the ‘harms threshold’

This section is based on ‘Section 1: Allegations that may meet the ‘harms threshold’ in part 4 of Keeping Children Safe in Education.

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school that might make an individual unsuitable to work with children, which is known as transferable risk.

If we’re in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

The Local Authority Designated Officer (LADO) should be informed of all such allegations that come to a school’s attention and appear to meet the above criteria. Contact can also be made with LA’s Schools Safeguarding Coordinator who will liaise with the LADO.

Where we identify a child has been harmed, that there may be an immediate risk of harm to a child or if the situation is an emergency, we will contact the Southwark Multi Agency Safeguarding Hub ([MASH](#)) (or its equivalent in another LA if the child resides in a different LA) and/or the police immediately as per the referral process contained in this policy.

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We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation. This will be the headteacher (who is also the Proprietor), or the chair of SAP (where the headteacher is the subject of the allegation). The case manager will be identified at the earliest opportunity.

Some rare allegations will be so serious they will require immediate intervention by children's social care services and/or police. In such cases, referral to the LADO will lead to a Strategy Meeting or Discussion being held in accordance with the DfE guidance and [London Safeguarding Children Partnership \(LSCP\) procedures](#). This process will agree upon the appropriate course of action and the time-scale for investigations.

The school has a legal duty to refer to the DBS when an individual is removed from regulated activity (or would have been removed had they not left), and we believe the individual has engaged in relevant conduct in relation to children and/or adults, satisfied the harm test in relation to children and/or vulnerable adults or been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence.

The DBS will consider whether to bar the person. Referrals will be made as soon as possible when an individual is removed from regulated activity. Where we dismiss or cease to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, we will consider whether to refer the case to the Secretary of State, as required by law.

Our procedures for dealing with allegations will be applied with common sense and judgement.

Suspension of the accused until the case is resolved

Suspension of the accused will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the school.

If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care

If immediate suspension is considered necessary, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details

If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should

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be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation

If it is decided that further action is needed, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate

Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate eg school counsellor, Ed Psych Supervision, medical advice .

Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice

Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)

Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Additional considerations for supply teachers and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- The Headteacher will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated, unfounded, false or malicious reports

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the

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allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate

- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Confidentiality and information sharing

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the LADO, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, the school will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

Learning lessons

After any cases where the allegations are *substantiated*, the case manager will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: Concerns that do not meet the harm threshold - known as 'Low Level Concerns'

The section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education.

Definition of low-level concerns

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

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority **However, as a good practice, we will contact the LADO for consultation to ensure that we follow the appropriate and correct procedures even when the concern seems to be 'low-level'.**

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

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating pupils

All 'low-level' concerns will be brought immediately to the attention of the Headteacher and DSL or one of the Deputy Designated Safeguarding Leads if the Headteacher is not available and nothing should be said to the colleague involved. In cases where the Headteacher is the subject of the concern, they will be reported to the chair of the SAP and DSL.

The full procedures about dealing with allegations of abuse made against/concerns raised in relation to teachers and other staff can be found in Part Four of the DfE guidance "[Keeping children safe in education](#)".

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This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

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

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Sharing low-level concerns

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

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system
- Open discussion with the staff team

Responding to low-level concerns

If the concern is raised via a third party, the headteacher will collect evidence where necessary by speaking:

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

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's staff code of conduct. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL. The school will also use a guide: [Developing and implementing a low-level concerns policy: A guide for organisations which work with children](#)

Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR

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- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
 - Retained at least until the individual leaves employment at the school

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

References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign the visitors' book and wear a visitor's badge.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.