PHOENIX PLACE

Safeguarding (Child Protection) **Policy**

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

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

Safeguarding & Child Protection Policy 2026-27	
Updated:	September 2026
Date for next review	August 2027
Reviewed and approved by Proprietor:	Sophie Nelson
Reviewed and approved by Judicium SG:	Judicium
Reviewed and approved by (Strategic Advisory Partners - SAP)	*Currently recruiting*

Key Contacts @ Phoenixplace

RESPONSIBILITIES AND IMMEDIATE ACTION 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, neglect or exploitation to the Designated Safeguarding Lead (DSL) or to a Deputy Designated Safeguarding Lead (DDSL).		
Name	**Role**	**Contact Details**
Carl Samuels	Designated Safeguarding Lead (DSL) csamuels1@phoenixplace.co.uk	For any Safeguarding concerns, please email the safeguarding team directly at safeguarding@phoenixplace.co.uk
Emma Dulake	Deputy Designated Safeguarding Lead (DDSL, SG & Attendance Lead) edulake@phoenixplace.co.uk	
Sophie Hallowes	Deputy Designated Safeguarding Lead (DDSL) (LAC/PLAC)*	
Luke Johnson	(Trainee) Deputy Designated Safeguarding Lead (DDSL) (LAC/PLAC)*	
Sophie Anderson	Deputy Designated Safeguarding Lead (DDSL)	
During school holidays the SG team works on a rota basis to deal with any safeguarding issues that may arise outside of school hours.		

*= *Looked After Children (LAC) / Previously Looked After Children (PLAC)*

Southwark Safeguarding Contacts	
Southwark Local Authority Designated Officer (LADO)	Eva Simcock (020 7525 0689; 07943076608, Eva.Simcock@southwark.gov.uk. LADO can also be contacted via Qau.Safeguarding@southwark.gov.uk. There is also a duty system and one of the CP Coordinators in 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
Southwark Strategic Lead Officer for safeguarding in education services	Director of Children's Services Alasdair Smith (020 7525 0654, alasdair.smith@southwark.gov.uk)
Southwark Safeguarding in Schools Lead	Emma Geiringer (020 7525 5377, 07860 354 934, emma.geiringer@southwark.gov.uk)
Southwark Schools Safeguarding Coordinator	Apo Çağırıcı (020 7525 2715, 07946 453527, apo.cagirici@southwark.gov.uk)
Southwark Multi Agency Safeguarding Hub (MASH)	020 7525 1921, mash@southwark.gov.uk Southwark MASH Online Referral Form
Southwark Family Early Help Service	020 7525 1922, earlyhelp@southwark.gov.uk Family Early Help referral form
Southwark Virtual School Head	Usha Singh, 020 7525 54076, 07548 712129 usha.singh@southwark.gov.uk
Southwark Specialist Private Fostering Senior Social Worker	Joab Keatley-Whyte (020 7525 7239, 07523 944253, Joab.Keatley-Whyte@southwark.gov.uk)

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: 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. Appendix 1 explains the different types of abuse.

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

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

Children include everyone under the age of 18.

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.

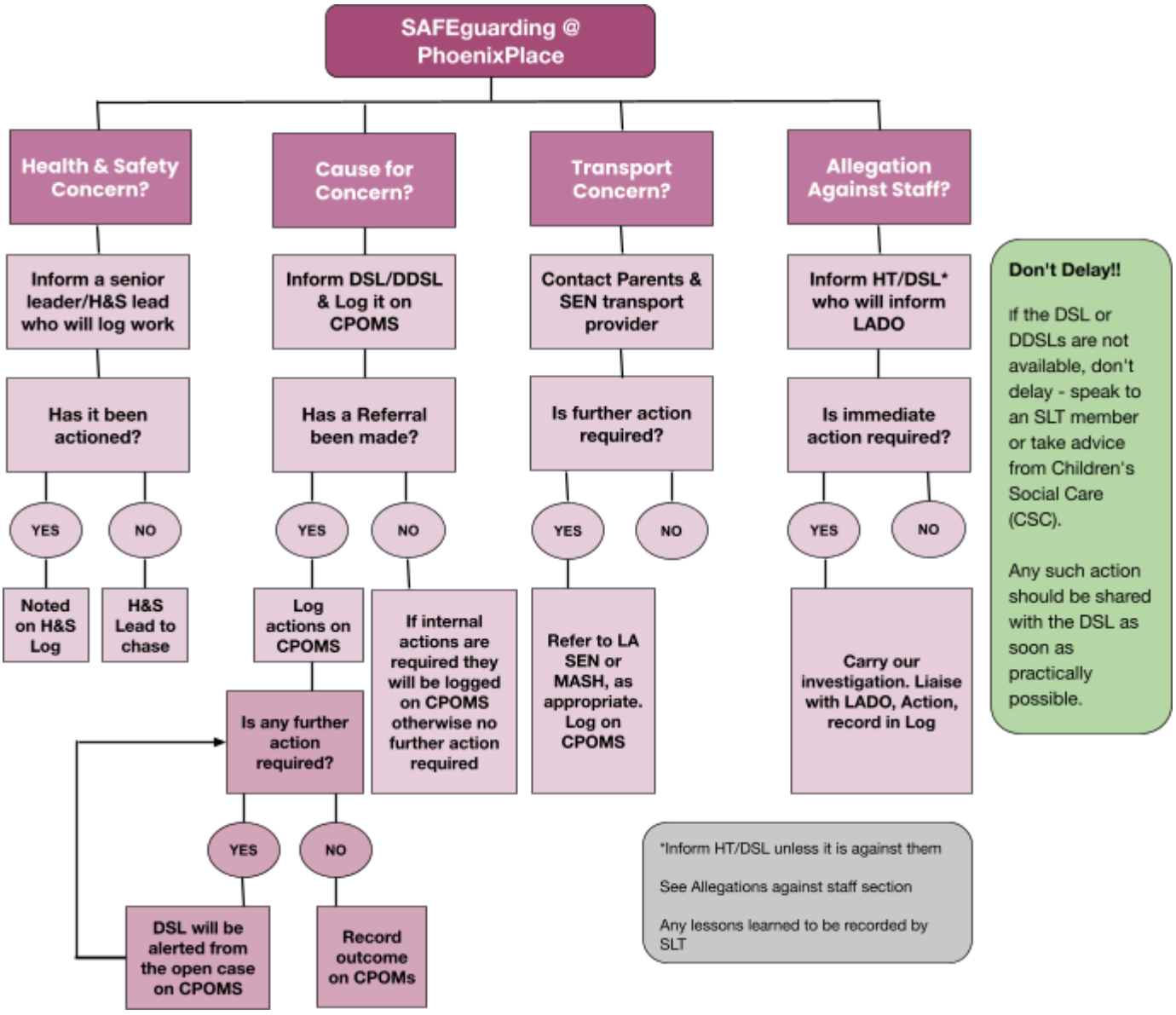
Alleged perpetrator(s) and perpetrator(s) are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms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

(See appendix 1 for more detailed information)

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

'What Do I Do If I Have A Concern???'



'It can happen here!'

Safeguarding and child protection is **EVERYONE'S RESPONSIBILITY.**

Key Contacts @ Phoenixplace **2**
Definitions **3**
'What Do I Do If I Have A Concern???' **4**
Section 1: Introduction **6**
Safeguarding Intent 6
Safeguarding And Promoting The Welfare Of Children 6
Aims & Purpose 6
Equality Statement 6
Legislation And Statutory Guidance 7
Section 2: Responsibilities And Immediate Action **9**
Designated Safeguarding Lead (DSL) And Deputies (DDSLs) 9
The Strategic Advisory Panel (SAP) 10
All Staff 11
Training 12
Staff Code Of Conduct 12
Section 3: Managing Safeguarding Concerns And Making Referrals **14**
Early Help Referrals 15
Children Potentially At Greater Risk Of Harm 16
Contextual Safeguarding 20
Child-on-child abuse 21
Section 4: Information Recording And Sharing **22**
Reporting Platform 23
Notifying parents/carers 25
Filtering And Monitoring 25
Section 5: Safeguarding In School **25**
Safeguarding Requirements Relating To School Premises 25
Curriculum And Opportunities To Teach Safeguarding 27
Working In Partnership With Parents And Carers 28
Monitoring and evaluation 28
Complaints 28
Appendix 1: Types of abuse and safeguarding concerns **29**
Additional Specific Safeguarding Issues That Members Of Staff Will Also Be Alert To 30
Appendix 2: Safer Recruitment **43**
Appendix 3: Procedures for dealing with Allegations of abuse against staff **47**
WhistleBlowing 49
Confidentiality 49
Complaints 50

Section 1: Introduction

Safeguarding Intent

PhoenixPlace is committed to providing a safe and secure environment for children, staff and visitors and 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.

Safeguarding And Promoting The Welfare Of Children

Safeguarding and promoting the welfare of children is defined in *Working Together to Safeguard Children* guidance as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing the 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
- promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children
- taking action to enable all children to have the best outcomes in line with the outcomes set out in the *Children's Social Care National Framework*.

Children include everyone under the age of 18.

Aims & Purpose

PhoenixPlace 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.

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

Legislation And Statutory Guidance

The School's Safeguarding policy draws upon duties conferred by national legislation and guidance, including:

- *Children Act 1989* and *Children Act 2004*
- *Education and Inspections Act 2006*
- *Children and Families Act 2014*
- *Children and Social Work Act 2017*
- *S175 of the 2002 Education Act*
- *The Education (Independent School Standards) Regulations 2014* *(for independent schools)*
- *The Non-Maintained Special Schools (England) Regulations 2015* *(for non-maintained special schools)*
- *Children's Wellbeing and Schools Act 2026*
- *Online Safety Act 2023* and *proposed changes*
- *Crime and Policing Act 2026*
- The guidance contained in the statutory guidance *Working Together to Safeguard Children*"
- The DfE's statutory guidance *Keeping children safe in education*
- *Ofsted Guidance*
- *Use of reasonable force in schools guidance*
- *Early years foundation stage (EYFS) statutory framework*
- We also have regard to the advice contained in DfE's guide for practitioners *What to do if you're worried a child is being abused* and *Information Sharing – Advice for practitioners*

The policy also draws on local guidance, including:

- Procedures produced by the London Safeguarding Children Partnership (*LSCP*)
- Procedures produced by the Southwark Safeguarding Children Partnership (*SSCP*) including Southwark's *Neglect Strategy* and *Neglect Toolkit*

This policy is consistent with all other policies and should in particular be read in conjunction with the following policies relevant to the safety and welfare of children:

- Safer recruitment policy
- Anti-bullying policy
- Complaints procedure

- Educational visits policy
- Behaviour policy
- Acceptable use of ICT policy
- Online Safety Policy
- Code of Conduct policy
- Health & Safety Policy
- Risk Assessment policy
- Attendance Policy
- Relationships and Sex Education policy
- First aid policy
- Curriculum policy
- Privacy notices

All adults working with, or on behalf of, our school must always follow all of our procedures.

The policy is applicable to all on site, off-site and online activities undertaken by pupils whilst they are the responsibility of the school, including pupils with special educational needs or disabilities (SEND) or certain medical or physical health conditions, pupils in kinship care, pupils with additional vulnerabilities related to disability, sex, ethnicity, or sexual orientation and pupils who might be placed in Alternative Provision.

We will ensure that those staff who work directly with children read at least Part one of DfE guidance *Keeping children safe in education*. We will also ensure that those staff who do not work directly with children read Part one of the guidance. We will ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part one of the guidance.

Section 2: Responsibilities And Immediate Action

Designated Safeguarding Lead (DSL) And Deputies (DDSLs)

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, neglect or exploitation to the Designated Safeguarding Lead (DSL) or to a Deputy Designated Safeguarding Lead (DDSL).

The Designated Safeguarding Lead (DSL), who is a senior member of the school's leadership team, takes lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). The role of the DSL carries a significant level of responsibility, and will be given the additional time, funding, training, resources and support they need to carry out the role effectively.

The DSL will attend the LA's dedicated or another appropriate induction course and then refresher training at least every two years. The DSL will also undertake Prevent awareness training and will be able to understand the unique risks associated with online safety. In addition to this formal training, their knowledge and skills will be refreshed (for example, via e-bulletins, meeting other designated safeguarding leads or simply taking time to read and digest safeguarding developments) at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role. Designated staff will be encouraged to attend appropriate network meetings and to participate in the *multi-agency training programme* organised by the Southwark Safeguarding Children Partnership (SSCP).

We also have Deputy Designated Safeguarding Leads (DDSLs) who are trained to the same standard as the DSL. Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection remains with the DSL, this lead responsibility will not be delegated.

A comprehensive description of the DSL role can be found in Annex B of *Keeping children safe in education* but, in summary, the DSL will:

- Act as a source of support, advice and expertise for all staff.
- Liaise with the headteacher on issues including child protection enquires and police investigations, remaining aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance *PACE Code C 2019.*
- Work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and the possible impact on children's attendance, engagement and achievement at school or college. This includes ensuring school knows which pupils have or have had a social worker, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort, including supporting teaching staff to provide additional academic support or reasonable adjustments help these pupils reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.
- Liaise with staff (especially teachers, pastoral support staff, school nurses, IT technicians, senior mental health leads and special educational needs co-ordinators (SENCOs)) on matters of safety, safeguarding and welfare (including online and digital safety), including when deciding whether to make referrals to consider children's needs holistically.
- Promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.

- As required, liaise with the "case manager" (as per Part Four of the *Keeping children safe in education*) and the local authority designated officer (LADO) for child protection concerns in cases which concern a staff member.

- Know what the local Early Help process is and how and where to access support.

- Act as a point of contact with the safeguarding partners.

- Refer cases of suspected abuse and neglect to the local authority children's social care as required and support staff who make referrals to local authority children's social care. The DSL will also contribute to strategy discussions and inter-agency meetings (or support other staff to do so) and contribute to assessments, plus 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.

- To the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme.

- To the Disclosure and Barring Service as required, where a person is dismissed or left due to risk/harm to a child. To the Police as required, where a crime may have been committed. *NPCC - When to call the police* will help understand when to consider calling the police and what to expect when working with the police.

During term time school hours, the DSL (or a deputy) will always be available for staff in the school to discuss any safeguarding concerns. It is expected they will be available in person, but in exceptional circumstances it may be via phone and/or Microsoft Teams or other such media.

To ensure continuity of safeguarding responsibilities, we will implement robust cover arrangements for periods when the DSL is unavailable due to illness, leave, or other circumstances and ensure there is a clear, reliable, and known arrangement in place so that concerns can be raised. This could, for example, include a confidential shared mailbox or equivalent system to ensure that safeguarding concerns are received, monitored, and acted upon without delay. We will arrange adequate and appropriate cover arrangements for any out-of-hour/out of term activities.

All our staff will be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened, or experience barriers due to their vulnerability, disability, sexual orientation, and/or language barriers.

This should not prevent staff from applying professional curiosity and speaking to the DSL if they have concerns about a child, including those linked to observations or indicators. It is also important that staff determine how best to build trusted relationships with children and young people which could support communication.

The Strategic Advisory Panel (SAP)

'We are currently in the process of restructuring our Strategic Advisory Partners (SAP) Board. In the interim we have commissioned Judicium to support us with our safeguarding policies and procedures, they have reviewed this policy and through their advice and audit process support us to achieve safeguarding compliance and best practice. We are currently recruiting for this restructured board and below outlines their roles and responsibilities when in place.'

- *Review and approve this policy at each review and hold the headteacher to account over its implementation.*
- *Appoint a safeguarding governor to oversee safeguarding compliance and the effectiveness of this policy.*
- *Read and understand Keeping Children Safe in Education, and review this guidance at least annually.*
- *Engage with safeguarding training, including training at induction, that equips the governing body with the skills to provide strategic challenge in relation to safeguarding.*
- *Be aware of the Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) that places duties on organisations and individuals to process personal information fairly and lawfully and to keep information they hold safe and secure. In addition, adhere to the ICO guidance, which includes information about the obligations and how to comply with these.*
- *Review the filtering and monitoring system and processes to ensure compliance with Keeping Children Safe in Education.*
- *In accordance with the DfE's filtering and monitoring standards, the Governing Body have assigned a senior leader (tbc) and a Governor (tbc) to ensure that these standards are being met. (In the interim period the Headteacher and IT Manager will oversee).*
- *We will identify and assign roles and responsibilities to manage filtering and monitoring systems; review filtering and monitoring provision at least annually; block harmful and inappropriate content without unreasonably impacting teaching and learning and have effective monitoring strategies in place that meet their safeguarding needs. We note the DfE's 'plan technology for your school service' to self- assess against the filtering and monitoring standards and receive personalised recommendations on how to meet them and the Generative AI: product safety expectations guidance to support schools to use generative artificial intelligence safely, and explains how filtering and monitoring requirements apply to the use of generative AI in education.*
- *The Governing Body will ensure that the school contributes to inter-agency working in accordance with statutory guidance "Working Together to Safeguard Children" and that the school's safeguarding arrangements take into account the procedures and practice of the local authority as part of the inter-agency safeguarding procedures set up by the Southwark Safeguarding Children Partnership (SSCP).*

All Staff

- Receive appropriate 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.
- Receive safeguarding updates regularly through internal/online CPD and at least annually that provide the relevant skills and knowledge to safeguard children effectively.
- Understand the local early help process and staff's role in relation to it and the circumstances students may be in who might benefit from this as listed in part 1 of KCSIE.[1]
- Understand the process for making referrals to local authority children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (child protection) that may follow a referral, along with the role they might be expected to play in such assessments, for example supporting the safeguarding team with collecting information for enquiries or multi-agency meetings.

[1]

- Understand that the process for making referrals locally
- Know what to do if a child tells them they are being abused, exploited, or neglected and to maintain an appropriate level of confidentiality.
- Know not to promise a child that they will not tell anyone about a report of any form of abuse.
- Reassure victims that they are being taken seriously and assure them that they are not causing a problem by reporting.
- Be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/ or they may not recognise their experiences as harmful. This should not prevent professional curiosity and discussions with the DSL.

Training

All staff will receive appropriate safeguarding and child protection training (including online safety) at induction, which is regularly updated and is in line with any advice from local safeguarding partners. In addition, all staff members will receive regular safeguarding and child protection updates (for example, INSET DAYs, via email, e-bulletins and staff meetings), as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively.

Arrangements are in place for all non-classroom based support staff (including meals, cleaning and other contracted staff) to receive relevant induction and ongoing safeguarding training.

All newly recruited staff (teaching and non-teaching) and Governors will be apprised of this policy and will be required to attend relevant LA or Southwark Safeguarding Children Partnership (SSCP)/or equivalent providers training. In addition, all new staff and temporary staff will be required to attend an induction session with the Designated Safeguarding Lead or their deputy on their first day in the school.

DSL and DDSLs will attend the LA's dedicated or another appropriate induction course and then refresher training at least every two years. (see paragraph 4.3 for further information about DSL/DDSL training). We note the *safeguarding training offer for Southwark schools* including mandatory DSL/DDSL training, bespoke safeguarding training for staff and webinar series.

Staff Code Of Conduct

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* state that all teachers, including headteachers should uphold public trust in the profession and maintain high standards of ethics and behaviour, within and outside school and should have regard for the need to safeguard pupils' well-being, in accordance with statutory provisions. 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. There are limited circumstances when it is appropriate for staff in our school to use 'reasonable force' to safeguard children.

The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a child needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is necessary for the least amount of time', the application of which will depend on the circumstances.

We recognise that the adoption of a 'no contact' policy at a school can leave staff unable to fully support and protect their pupils. Our policies allow and support our staff to make appropriate physical contact when required. The decision on whether or not to use 'reasonable force' to control or restrain a child is down to the professional judgement of the staff concerned within the context of the law and will always depend on individual circumstances.

Advice on how to make this assessment is provided in DfE's *Restrictive interventions, including use of reasonable force in schools* guidance. When using 'reasonable force' in response to risks presented by incidents involving children with SEND, mental health problems or with medical conditions, in considering the risks carefully, we recognise the additional vulnerability of these groups.

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. If a child needs help with toileting, nappy changing or washing after soiling themselves, another adult should be present or within earshot. All first aid treatment and non-routine changing or personal care will be recorded and shared with parents/carers at the earliest opportunity.

For their own safety and protection, staff should exercise caution in situations where they are alone with pupils. Other than in formal teaching situations; for example, during musical instrument tuition, the door to the room in which the 1:1 coaching, counselling or meeting is taking place 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. Any concerns about possible infatuations should be reported to the Headteacher.

School staff should be alert to behaviours by staff or volunteers that may cause 'low-level concerns' such as being 'overfriendly' 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 or humiliating pupils. These are known as 'concerns' in *London Safeguarding Children Procedures* (see below for more detail about identifying and sharing these concerns).

School staff should also be alert to the possible risks that might arise from social contact with pupils outside of the school. Staff should be clear on expectations and any unplanned contact between staff and pupils should be reported to the Headteacher. Staff supervising off-site activities or school journeys will be provided with a school mobile phone as a point of contact for parents and carers.

Staff will only use the school's digital technology resources and systems for professional purposes or for uses deemed 'reasonable' by the Head and Governing Body. 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), camera phones or other recording devices (including smart glasses) or media for taking and transferring images of pupils or staff without permission and will not store images at home.

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 one of the Designated Safeguarding Leads if the Headteacher is not available and nothing should be said to the colleague involved. It should be shared with the Chair of Governors 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*.

Section 3: Managing Safeguarding Concerns And Making Referrals

Although all staff should be aware of the process for making referrals to children's social care and for statutory assessments that may follow a referral, along with the role they might be expected to play in such assessments, the DSL (and any deputies) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns.

The DSL or a deputy will always be available to discuss safeguarding concerns. If in exceptional circumstances, the DSL (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from local children's social care. In these circumstances, any action taken should be shared with the DSL (or deputy) as soon as is practically possible.

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*.

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, schoolwork or interactions with others. Ultimately, all our systems and processes operate with the best interests of the child at heart.

When addressing a safeguarding concern, we note that there are many avenues of support available. We also acknowledge that some social care systems and safeguarding processes are likely to undergo change through the Government-led *Families First Partnership Programme* reforms, and will keep our policies and processes under review accordingly. Support typically falls into the following categories:

- Universal services and community-based early help
- Family Help, including targeted early help (under Sections 10 and 11 of the Children Act 1989) and statutory Child in Need services (under section 17 of the Children Act 1989)
- Child Protection (under Section 47 of the Children Act 1989)

Any child may benefit from support before statutory intervention. Universal services and community based Early Help play a crucial role in identifying emerging problems and providing support at an early stage. These may include actions taken by the school or input from other agencies such as voluntary, community, youth or health organisations and Best Start Family Hubs.

Some children and families may require more targeted support than that offered at the universal and community based Early Help level and require input from the local authority and/or their partners to address specific concerns.

Targeted Early Help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. It may be provided before and/or after statutory intervention, and may be appropriate for children and families who have several needs or whose circumstances might make them more vulnerable. It is a voluntary approach, requiring the family's consent. Our staff will be alert to the potential need for early help for any child.

At present, help from Southwark's *Family Early Help Service* can be requested by completing the *Early Help Referral Form* for a family when the needs of a child are beyond the level of support that can be provided by Universal services and community-based early help. 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

Early Help Referrals

Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse.

Early help may be appropriate for children and families who have several needs, or whose circumstances might make them more vulnerable.

It is a voluntary approach, requiring the family's consent to receive support and services offered. These may be provided before and/or after statutory intervention. Our staff will be alert to the potential need for early help for a child

- who is disabled;
- or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory education;
- health and care (EHC) plan);
- is a young carer;
- is bereaved;
- is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime;
- is frequently missing/goes missing from care or from home;
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation;
- is at risk of being radicalised;
- is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves;
- is suffering from mental ill health;
- has returned home to their family from care;
- is a privately fostered child; has a parent or carer in custody or is affected by parental offending;
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
- is missing education, or persistently absent from school, or not in receipt of full time education;
- has experienced multiple suspensions and is at risk of, or has been permanently excluded.

We note that the referral process may change as a result of the Families First Partnership Programme reforms, and will keep our policies and processes under review accordingly.

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

We note that Southwark's Multi Agency Safeguarding Hub (*MASH*) adopted the London Safeguarding Children Partnership (LSCP) *Threshold Document*. We also note the LSCP's *The Continuum of Need Matrix*, which is not an exhaustive list but provides examples that can be used as a tool to assist assessment, planning and decision making for professionals working to safeguard and promote the welfare of children. Safeguarding indicators will always be considered alongside a child's other needs. We will refer to LSCP's Threshold Document and Continuum of Need Matrix when assessing the children's needs and making referrals to Southwark MASH.

When there is a clear concern that a child may need protection, according to the *The Continuum of Need Matrix*, a safeguarding referral will be made to Southwark Multi Agency Safeguarding Hub (*MASH*) by submitting the *online referral form* or to the social care department of the Local Authority where the child resides in line with their procedures. For all referrals, we also note the *Referring to Southwark MASH: best practice guidance* and will provide as much information as possible as part of the referral process. The parent/carer will normally 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 Abuse, fabricated or induced illness or the Designated Safeguarding Lead 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, but a rationale for the decision to progress without consent will be provided with the referral. 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 to MASH for investigation.

In situations where it is unclear whether a referral is required or further advice and guidance is required about a situation, there will be a verbal consultation with the MASH social worker or manager, by calling the duty desk on **020 7525 1921.** Parental consent is not required prior to seeking a MASH consultation as the family's identifying details will not be taken. Should the information shared during the consultation indicate immediate safeguarding risks to a child, the process will no longer be managed anonymously and the family's details will be requested to convert the consultation to a referral.

Following a referral being submitted to Southwark MASH, within one working day a social worker should acknowledge its receipt and make a decision about the next steps and the type of response that is required. If this response is not received, we will seek an update by contacting MASH via MASH@southwark.gov.uk.

If, after a referral, the child's situation does not appear to be improving and in case of professional differences where there are concerns about the welfare and safety of children, we will consider following *local escalation procedures* to ensure that the concerns have been addressed and, most importantly, that the child's situation improves.

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**.

All parents applying for places at this school will be informed of our safeguarding responsibilities and the existence of this policy. In situations where pupils 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.

We recognise that children can be harmed in contexts outside of the home, including when travelling to and from school, and will remain alert to and take all reasonable steps to lessen such risks.

Children Potentially At Greater Risk Of Harm

Whilst all children should be protected, we recognise that some groups of children are potentially at greater risk of harm than others (both online and offline).

Children who need a social worker (Child in Need and Child Protection Plans)

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse and/or neglect and/or exploitation and/or complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged including barriers to attendance, learning, behaviour and mental health. Particular vigilance will be exercised in

respect of pupils who are subject to any involvement from social care service and any incidents or concerns involving these children will be reported immediately to the allocated Social Worker and confirmed in writing.

As a matter of routine, local authorities should share with our school the fact that a child has a social worker, and the DSL should hold and use this information to inform decisions about safeguarding (for example, responding to unauthorised absence or to a child missing education where there are known safeguarding risks); promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services); and making decisions in the best interests of the child's safety, welfare and educational outcomes. There are clear powers to share this information under existing duties on both local authorities and schools to safeguard and promote the welfare of children.

Children who are absent from education

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues, or may increase known safeguarding risks, including neglect, child sexual and child criminal exploitation – particularly county lines.

We will liaise with Southwark's Education Inclusion Team (EIT) that provides advice and intervention on attendance and inclusion, and leads on statutory attendance processes across all schools and provisions in Southwark with children of statutory school age. We note the *Education Inclusion Handbook* that explains more about EIT's work and the support available. We also note the DfE's statutory guidance on school attendance *Working together to improve school attendance*, which sets out how schools must work with local authority children's services where school absence indicates safeguarding concerns.

We will help identify children missing education (CME) by informing the Local Authority of any children that may come to our notice and who we believe may be missing education. If we think a child is missing from education because they do not have a school place, or are not getting any kind of education**,** we will inform the Local Authority in accordance with Southwark's *Children Missing Education (CME) Protocol*. We also note the DfE's statutory guidance *Children Missing Education*.

When a parent / carer expresses intention to remove a child from school with a view to educating at home, a meeting may be convened to consider what is in the best interest of the child and ensure the parent /carer knows the implications of choosing to home educate. The Local Authority will be informed when a child's name is removed from the admissions register. We note the guidance for local authorities and schools about children educated at home *Elective home education*.

Children requiring mental health support

We acknowledge that mental health problems can, in some cases, develop into safeguarding concerns, and could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. This could include self-harm, signs of an eating disorder, suicidal ideation or suicide.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem, but our staff have an important role to play in promoting good mental wellbeing and preventing the onset of mental illness; observing pupils and identifying early those who may be experiencing mental health problems or being at risk of developing one; ensuring early targeted support is provided; and liaison with/referral to specialist services where needed.

Where support is needed, the DSL (or a deputy) will consider whether to inform parents or carers to support the child's wellbeing, where doing so would not place the child at additional risk.

Our staff will consider the range of locally available support to meet the needs of children and young people and other support available outside of education settings that might be suitable.

We note the DfE's advice and guidance on *Promoting and supporting mental health and wellbeing in schools and colleges*.

Looked after children and previously looked after children

The most common reason for children becoming looked after by a local authority is as a result of abuse and/or neglect. We will ensure that our staff have the skills, knowledge and understanding to keep looked after children safe. In particular, we will ensure that appropriate staff have access to the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order) and the child's contact arrangements with birth parents or those with parental responsibility. We will also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after the child. The DSL will have details of the child's social worker and the name of the Virtual School Head in the authority that looks after the child.

A previously looked after child potentially remains vulnerable and all staff will have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, we will work together with all agencies and take prompt action when necessary to safeguard these children, who are a particularly vulnerable group.

We have appointed a Designated Teacher who works with local authorities to promote the educational achievement of registered pupils who are looked after and previously looked after. The designated teacher has appropriate training and the relevant qualifications and experience. The statutory guidance *Designated teacher for looked-after and previously looked-after children* contains further information on the role and responsibilities of the designated teacher.

Virtual School Heads in LAs manage pupil premium plus for looked after children and receive this funding based on the latest published number of children looked after by the local authority. Our designated teacher will work with the Virtual School Head to discuss how funding can be best used to support the progress of looked after children in our school and meet the needs identified in the child's personal education plan. The designated teacher will also work with the Virtual School Head to promote the educational achievement of previously looked after children. We note the statutory guidance on *Promoting the education of looked-after and previously looked-after children* that contains further information on the roles and responsibilities of Virtual School Heads.

Virtual School Heads also have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment, and progress of children with a social worker and a non-statutory responsibility to promote the educational achievement of all children in kinship care. We note the non-statutory guidance on *Promoting the education of children with a social worker and children in kinship care arrangements: virtual school head role extension* that contains further information on the roles and responsibilities of Virtual School Heads.

Care leavers

Local authorities have on-going responsibilities to the children who cease to be looked after and become care leavers, including keeping in touch, preparing an assessment of their needs and appointing a Personal Advisor who develops a pathway plan with the young person describing how the local authority will support them to participate in education or training. When we have any care leavers in our school, our DSL will have details of the local authority Personal Advisor appointed to guide and support the care leaver and liaise with them as necessary regarding any issues of concern affecting the care leaver.

Young carers

We are alert to the needs of any young carers in our school, recognising that caring responsibilities can impact on their attendance, attainment, behaviour and wellbeing. We acknowledge that early identification is essential to ensure young carers receive support at the right time and by the appropriate services including additional support from external partners, or local authority and health services.

Children with special educational needs, disabilities or health issues

We acknowledge that children with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline and the fact that additional barriers can exist when recognising abuse, neglect and exploitation in this group of children. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration,
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children,
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without necessarily outwardly showing any signs,
- communication barriers and difficulties in managing or reporting these challenges risks that they do not understand that what is happening to them is abuse,
- the need for intimate care or that these children are isolated from others,
- that these children are more likely to be dependent on adults for care, and
- these children may have issues over cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

There will be close liaison between our DSL (or a deputy) and the special educational needs coordinator (SENCO) in case of any reports of abuse involving children with SEND.

We will consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place. We note further information in the DfE's *SEND Code of Practice 0 to 25 years*.

Safeguarding children with medical conditions

An incident relating to the management of a child or young person's medical condition (including allergies) would not in and of itself warrant a referral to local safeguarding partners. A safeguarding referral would only be needed where an incident highlighted concern that the child or young person might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family because of their medical condition. This might occur where relevant information about a child or young person's medical condition is not provided to our school or where they are repeatedly sent without essential medication, thereby putting the individual at risk. We note the further information provided in DfE's statutory guidance on *Supporting pupils with medical conditions at school* and *Allergy safety in schools*, which includes requirements for some settings to have a dedicated allergy safety policy, staff training, and Individual Healthcare Plans.

Children who are lesbian, gay or bisexual

A child or young person being lesbian, gay, or bisexual is not in itself a risk factor for harm; however, they can sometimes be vulnerable to discriminatory bullying or other risks. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are. We will consider how to address vulnerabilities and take steps to prevent risk and harm, including putting appropriate sanctions in place for bullying. We will work with appropriate agencies to counter homophobic, biphobic and transphobic bullying and abuse and to provide support to lesbian, gay, or bisexual children.

Children who are questioning their gender

In recent years, there has been a significant increase in the number of children who are questioning the way they feel about being a boy or a girl, including the physical attributes of their sex and the related ways in which they fit into society. We will take time to understand the thoughts and feelings of children who are questioning their gender and will be appropriately professionally curious about the full range of the child's experiences. We will remain aware of the potential vulnerabilities of children who are questioning their gender, including the

possibility of complex mental health and psychosocial needs, for example relating to relationships with family, peers or their broader social environment, including discriminatory bullying. We will consider adopting policies across school life that maintain flexibility and avoid rigid rules based on gender stereotypes.

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	• We have a counsellor working at the school 3 days per week. Our counsellor is also available to parents/carers by arrangement. • We have an Child Educational Psychologist who also supports students as arranged by the SEND team but also support staff development and understanding • Students are referred to CAMHS when appropriate or MASH referral (as appropriate). • Students are signposted to organisations who can offer support in PSHE/RSE lessons and through care cards and information posted around the school site.
Sexual Harassment and Sexual violence	• Staff will receive training on sexual violence and sexual harassment and on how to identify concerns with a focus on how disclosures need to be taken seriously at least annually. • 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 less and information posted around the school site.
Online Safety and social media	• Online Safety Page on Website with information for students, parents/carers • The school has recently purchased on 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 team will ensure they are up to date with ongoing development of

	new harmful sites on social media.
Child Criminal Exploitation	• Students will receive ongoing information in 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 works 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	• We have a dedicated LAC Coordinator (and a staff in training) • 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

Child-on-child abuse

In line with our strong commitment to safeguarding, at PhoenixPlace we believe that all children have a right to learn in a safe environment and take a whole-school approach to child-on-child abuse which includes preventative work, appropriate responses, and a zero-tolerance approach to abuse.

Our staff recognise that children of any age or gender can be capable of abusing other children, which can happen both inside and outside of school and online. This behaviour will be dealt with in line with our Behaviour Policy.

This child-on-child abuse can include, but is not limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (also known as teenage relationship abuse)
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence and harassment
- causing someone to engage in sexual activity without consent
- consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery)
- 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
- upskirting which is a criminal offence
- initiation-type violence and rituals

All the above are examples of abuse and should never be tolerated or passed off as "banter," "just having a laugh", "boys will be boys" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

We recognise that the gendered nature of child-on-child abuse makes it more likely that girls will be victims and boys perpetrators but all reports will be taken seriously. All concerns should be passed onto the DSL (or a deputy).

We minimise the risk of child-on-child abuse through our extensive PSHE curriculum and pastoral programmes, including assemblies and other key messages. All staff understand the importance of challenging

inappropriate behaviours between peers and their role in preventing and responding to child-on-child abuse. Our staff understand that even if there are no reports of child-on-child abuse in our school, it does not mean child-on-child abuse is not happening-it may be the case that it is just not being reported. Children can report any child-on-child abuse. They are encouraged to speak to Tutors, SG team or trusted member of staff.

Any cases of child-on-child abuse will be thoroughly investigated, with the victim always being taken seriously and both the victim and alleged perpetrator given appropriate support. Support will take the child's wishes into account and may include increased pastoral support, a mentor, access to counselling and a referral to external services. We will liaise with the police and children's social care as necessary. Where there has been a report of sexual violence, an immediate risk assessment will be made, considering the needs of the victim, the alleged perpetrator, and our other pupils. All allegations of child-on-child abuse will be recorded in our safeguarding files.

In cases where nudes or semi-nudes have been shared, we follow guidance given to schools and colleges by the UK Council for Internet Safety (UKCIS): Sharing nudes and semi-nudes (December 2020).

We record these incidents in line with our normal record-keeping process. Staff must record their concern or the disclosure using CPOMS.

Section 4: Information Recording And Sharing

Our staff will be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to local authority children's social care. We acknowledge that the data protection laws do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children. Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe.

Detailed and accurate written records will be kept of all incidents and child protection or child in need concerns, discussions and decisions made, and the rationale for those decisions, relating to individual pupils. This will include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program, etc. This information may be shared directly with other agencies as appropriate. All contact with parents and external agencies will be logged and these will be kept as Child Protection records. The school will take into account the views and wishes of the child who is the subject of the concern, but staff will be alert to the dangers of colluding with "secrets".

All Child Protection records are kept securely by the Designated Safeguarding Lead and separately from educational records. They may only be accessed by the Designated Safeguarding Lead, their Deputies and the senior managers of the school.

The content of Child Protection Conference 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/carers in advance of the meeting.

Child Protection records will be sent to receiving schools separately from the main pupil file and under a confidential cover when pupils leave the school 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 ensuring secure transit and a confirmation of receipt will be obtained.

In addition to the child protection file, the DSL will also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse, incidents that may indicate concerns about serious violence or harmful behaviours and/or

details of those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives. We acknowledge that it would be good practice for a conversation to take place at the appropriate and relevant points between the designated safeguarding leads at both settings, where there are issues or concerns to ensure information is being actively considered and acted upon.

When we receive child protection records from other schools, we will ensure key staff such as the DSL and SENCO are aware as required.

If a pupil is withdrawn from the school having not reached the normal date of transfer (due to a family move or any other reason) all efforts will be made to identify any new address and the school to which they are being admitted and to ensure that their educational records are sent without delay to the child's new school. If the parent/carer fails to provide this information, an urgent referral will be made to the Family Early Help Service through in order that they might make further enquiries. If this school receives educational records concerning a child who is not registered with us, the records will be returned promptly to the sending school with a note, advising them to refer to their LA's Children's Services Department. **A child's name will only be removed from the School's Admissions Register in accordance with the DfE's statutory guidance *Working together to improve school attendance*.**

We will inform the Local Authority when we are about to add or delete a pupil's name from the school admission register for any reason in accordance with Southwark's *Children Missing Education (CME) Protocol*.

When a pupil ceases to be registered at this school and becomes a registered pupil at another school in England or Wales, we will send a Common Transfer File (CTF) to the new school via DfE's secure data transfer website called School to School (S2S) in accordance with DfE's *School to school (S2S) guide*.

When a pupil transfers from our school and we do not know to which school they have gone, we will generate CTF for each pupil using XXXXXXX for school number in place of LLLsss2 to indicate the destination is unknown, as per paragraph 2.4.2 of the *CTF 26 specification*. Given that schools cannot search the "lost pupils database", if a pupil arrives in our school and we do not know the previous school, we will contact the LA's Education Data Manager Natasha Sharmah (Natasha.Sharmah@southwark.gov.uk, 020 7525 2914), who will be able to search the database for a matching record using gender, names or former names and date of birth and forward it to our school.

The school will require documentary proof as to the identity of pupils presented for admission. If there is any doubt as to the identity of the pupil, advice will be sought from the local authority and other statutory agencies, as appropriate. We will maintain accurate and up to date records of those with Parental Responsibility and emergency contacts. We will hold more than one emergency contact number for each pupil or student to make contact with a responsible adult when a child who is absent from education is also identified as a welfare and/or safeguarding concern. Pupils will only be released to the care of those with Parental Responsibility or someone acting with their written consent.

We will take actions according to Southwark's *Protocol for Children who are Uncollected from School* when pupils who ordinarily do not make their own way home are not collected by their parents/carers at the end of the school day or from after school clubs and activities and when any children with Special Educational Needs who are transported from school cannot be dropped-off at their home or meeting point due to the absence of the parent or carer.

Reporting Platform

At PhoenixPlace staff report their concerns by informing the DSL/DDSLs and recording their concerns on CPOMS (which stands for Child Protection Online Monitoring System)

When staff or visitors to the school have a safeguarding concern, they should promptly contact the DSL or a member of the SG team by;

- Verbal communication (if on site)
- Email
- Telephone call (if not on site)

All staff should know what to do if a child tells them they are being abused, exploited, or neglected and to maintain an appropriate level of confidentiality. All staff should know to act upon concerns about a child's welfare immediately.

Staff will provide first-hand a summary of their concern or detail of a disclosure they have received. They will use professional language and try to capture the incident as it took place or as it was described to them. They will report all concerns in a timely fashion. The safeguarding team will ensure that any action taken, or outcome is accurately recorded in line with good record-keeping guidance which should follow:

- ➔ A clear and comprehensive summary of the concern
- ➔ Details of how the concern was followed up and resolved, and
- ➔ A note of any action taken, decisions reached and the outcome.
- ➔ The rationale for the action taken including where a decision to refer, or not, to external agencies has been made.

Students can confidently report concerns knowing that these concerns will be treated seriously, and that they can express their views and give feedback too. This can be done through a variety of means which include Speaking with a trusted adult.

All staff should be aware of the following when responding to concerns:

- All staff should know not to promise a child that they will not tell anyone about a report of any form of abuse.
- All staff should be able to reassure victims that they are being taken seriously and assure them that they are not causing a problem by reporting.
- All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/ or they may not recognise their experiences as harmful. This should not prevent professional curiosity and discussions with the DSL.

If a member of staff is concerned by verbal conversations, disclosures, or signs of abuse or neglect these should immediately be recorded in writing and passed to the DSL. If the member of staff is unsure, they should always speak to the DSL or a deputy regarding their concerns.

The DSL will then decide what action must be taken, which can include:

- Further pastoral support in school
- Referral for an Early Help assessment
- Referral to children's social care

If the DSL and deputies are not available, a staff member should not delay and should consider speaking to another member of SLT or contact local children's social care for advice or to make a referral. Any such action should be shared with the DSL as soon as is practically possible.

(Staff can refer to tip sheet: Procedure On Handling A Disclosure From A Child)

Notifying parents/carers

Parents should be aware that referrals can be made where there is suspected abuse or neglect by the school and that our concerns regarding a student will be shared.

The school will always seek to share these concerns and the referral with parents first, unless to do so would put the child at greater risk of harm, where we are advised not to, or where it has not been practicable to.

Filtering And Monitoring

PhoenixPlace uses SENSo as a filtering and monitoring system. This filters and monitors for categories. This covers our school network and the following devices: eg laptops, tablets, PCs.

The DSL has the responsibility for understanding the filtering and monitoring systems and processes in place. The DSL and deputies monitor the effectiveness of this system through SENSO alert and dashboard.

Test filtering.com

The school takes care to not 'over block; content so that there are not unreasonable restrictions on what students can be taught regarding online safety.

The processes we have in place have been informed by our risk assessment - (Prevent) - DfE has a model assessment as required by the Prevent Duty. (Email Prevent Officer) - what should be included from a local perspective

The DfE has published filtering and monitoring standards which set out that schools should:

- Identify and assign roles and responsibilities to manage filtering and monitoring systems
- Review filtering and monitoring provision at least annually
- Block harmful and inappropriate content without reasonable impacting teaching and learning
- Have effective monitoring strategies in place that meet their safeguarding needs SG Email address

We at PhoenixPlace have done the following in relation to this: When the filtering and monitoring system detects usage through SENSO, it will notify us and we will take appropriate action, including a referral to children's social care when necessary.

Section 5: Safeguarding In School

Safeguarding Requirements Relating To School Premises

No internal doors to classrooms will be locked whilst pupils are present in these areas.

Entry to school premises will be controlled by doors that are secured physically or by constant staff supervision or video surveillance.

Our headteacher will use their professional judgement about the need to escort or supervise visitors such as children's relatives or other visitors attending a sports day for example. In the case of individuals visiting the school in a professional capacity e.g. educational psychologists, social workers etc., we will check their ID and be assured that the visitor has had the appropriate DBS check depending on the activity they are here to carry out (or that the visitor's employers have confirmed that their staff have appropriate checks).

We note that where a visitor will have no contact with children, it is unlikely that a DBS check will be required. They will be logged into and out of the premises and will be asked to wear their identity badges or be issued

with school visitor badges. Unidentified visitors will be challenged by staff or reported to the Headteacher or school office.

Carelessness in closing any controlled entrance will be challenged. Visitors will not be allowed to use their personal cameras (digital or otherwise), camera phones or other recording devices (including smart glasses) or media for taking and transferring images of pupils or staff without permission.

The presence of intruders and suspicious strangers seen loitering near the school or approaching pupils, will be **reported to the Police by calling 101 or 999**, depending on the circumstances and the urgency of the case so that if police stops these individuals they can be spoken to about what they were doing and dealt with accordingly. We will also inform our local Safer Neighbourhood Teams (SNT).

Parents, carers or relatives may only take still or video photographic images of pupils in school or on school-organised activities with the prior consent of the school and then only in designated areas. Images taken must be for private use only. Recording and/or photographing other than for private use would require the consent of the other parents whose children may be captured on film. Without this consent the Data Protection legislation would be breached. If parents do not wish their children to be photographed or filmed and express this view in writing, their rights will be respected.

Toilets

We will not allow children into toilets designated for the opposite biological sex. This includes where we are responding to a request to support any degree of social transition for children who are questioning their gender.

We provide separate cubicled toilets for our students

Therefore, if a child does not want to use the toilet designated for their biological sex, we will consider whether we can provide an alternative toilet facility, for example self-contained individual toilets, without compromising the provision of single-sex facilities. These alternative arrangements should not compromise the safety, comfort, privacy or dignity of the child, or of any other children. We will keep a clear record of these situations, ensure they are communicated appropriately, and review them regularly.

Changing Rooms and Showers

We currently do not have changing rooms/shower facilities at PhoenixPlace. However we have access to these facilities at our Local Leisure centre. Supervising staff from PhoenixPlace will ensure that Changing/shower facilities are safe for our students to use as this is a shared space. We will not allow a child access to changing rooms designated for the opposite sex.

Use of school premises for non-school activities

In case where we hire or rent out our school facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities), we will ensure that appropriate arrangements are in place to keep children safe.

When services or activities are provided by our school, our arrangements for child protection will apply.

However, where services or activities are provided separately by another body this will not necessarily be the case. We will therefore seek assurance that the provider concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place for the provider to liaise with our school on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on our school roll.

We will also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this will lead to termination of the agreement. We note the guidance on *Keeping children safe in out-of-schools settings*, which details the safeguarding arrangements that schools and colleges should expect these providers to have in place.

Curriculum And Opportunities To Teach Safeguarding

We acknowledge that schools and colleges play a crucial role in preventative education to teach children how to keep themselves and others safe, including online. Preventative education is most effective in the context of a whole-school or college approach that prepares pupils and students for life in modern Britain and creates a culture of zero tolerance for sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict. This will be underpinned by our Behaviour policy and Pastoral support system.

We recognise that effective education will be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs and/or disabilities (SEND).

Relevant topics will be included within Relationships, Sex and Health Education (for all secondary pupils). In teaching these subjects we will have regard to the statutory guidance on *Relationships and sex education (RSE) and health education*. 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
- 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

We will have a clear set of values and standards, upheld and demonstrated throughout all aspects of school life. These will be underpinned by the school's behaviour policy and pastoral support system, as well as by a planned programme of evidence based RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum.

Such a programme will be fully inclusive and developed to be age and stage of development appropriate (especially when considering the needs of children with special educational needs and/or disabilities (SEND) and other vulnerabilities). Further guidance can be found about the topics the programme should cover in *Keeping children safe in education*.

Whilst it is essential that we ensure that appropriate filtering and monitoring systems are in place, we will be careful that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding.

Healthy Schools And Wellbeing

PhoenixPlace will work with partners to promote a whole, healthy, inclusive school approach and achieve the standards through the curriculum with the aim of:

- "Closing the gaps" and inequalities over time, through using the full capacity and flexibility of the curriculum to help pupils to be safe, confident, healthy, happy and active citizens
- Developing a school ethos, culture and environment as well as provision for spiritual, moral, social and cultural (SMSC) education that encourage a safe and healthy lifestyle for all children and young people, including the most disadvantaged and vulnerable.
- Encouraging participation in fitness activities to promote physical fitness and improve mental health.
- Promoting an understanding of the full range of issues, attitudes and behaviours which impact upon lifelong health and wellbeing, including emotional wellbeing, mental health and safety.
- Working in partnership with parents/carers, local communities, external agencies and volunteers to support the wellbeing, health and personal development of all pupils including the most disadvantaged (including those with SEND), "closing the gaps" over time.
- Ensuring that food and drink that are available across the school day reinforce the healthy lifestyle message.

Working In Partnership With Parents And Carers

It is our policy to work in partnership with parents or carers to secure the best outcomes for our children. We will therefore communicate as clearly as possible about the aims of this school.

- We will use clear statements in our brochures and correspondence.
- We will liaise with agencies in the statutory, voluntary and community sectors and locality teams that are active in supporting families.
- We will be mindful of translation needs of parents/carers where English is not their first language and accommodate these in an appropriate way, remaining mindful of confidentiality.
- We will make available a copy of this policy to any parent who requests it. The policy will also be available through the school's website.
- We will promote our complaints policy and procedures with parents and carers, which is available on our school website.
- We will keep parents informed as and when appropriate.

Monitoring and evaluation

It will be the role of the SAP to monitor the safeguarding arrangements in the school to ensure that these arrangements are having a positive impact on the safety and welfare of children. This will be evaluated on the basis of evidence of:

- the extent to which a positive culture and ethos is created where safeguarding is an important part of everyday life in the school, backed up by training at every level
- the content, application and effectiveness of safeguarding policies and procedures, and safer recruitment and vetting processes
- the quality of safeguarding practice, including evidence that staff are aware of the signs that children may be at risk of harm either within the setting or in the family or wider community outside the setting
- the timeliness of response to any safeguarding concerns that are raised
- the quality of work to support multi-agency plans around the child.

Complaints

All complaints arising from the operation of this policy will be considered under the school's complaint procedure, with reference to the LA's Strategic Lead Officer for safeguarding in education services, as necessary. Please refer to our WhistleBlowing policy.

Appendix 1: Types of abuse and safeguarding concerns

We acknowledge that abuse, neglect, exploitation, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap. Therefore, staff will always be vigilant and always raise any concerns with the DSL (or deputy).

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, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult(s) or another child(ren). Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

KCSIE splits abuse into four main categories:

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 such as through the use of stress positions. 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 verbal abuse, such as persistent criticism, belittling, or name-calling, as well as 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 penetration with an object) 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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Most sexual abuse is committed by individuals known to the victim.

Sexual abuse is not solely perpetrated by adult males – any gender can commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all our staff should be aware of it and of our school's policy and procedures for dealing with it.

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.

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. (see section 4)

Additional Specific Safeguarding Issues That Members Of Staff Will Also Be Alert To

Child criminal exploitation (CCE) and child sexual exploitation (CSE)

Both CCE and CSE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal or sexual activity. They can be committed or facilitated by an individual, or an organised network or gang, and the victim may identify as being part of this group.

CCE and CSE can affect children of any gender. They may involve an exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence.

They may involve children being moved for the purpose of exploitation (commonly referred to as trafficking) which may constitute modern slavery, and further information is available in the statutory guidance *Modern slavery: how to identify and support victims*.

Child Criminal Exploitation (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines; working in cannabis factories; shoplifting or pickpocketing; committing vehicle crime; or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. Children who are criminally exploited should have their vulnerabilities recognised by adults and professionals (particularly older children) and should be treated as victims.

It is not possible for a child to consent to be exploited, abused or trafficked, and they may not recognise that it is happening to them. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys therefore the indicators may not be the same, but professionals should be aware that girls are at risk too. It is also important to note that children being criminally exploited may be at higher risk of sexual exploitation too.

Some of the indicators of CCE are:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who suffer from changes in emotional well-being;

- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and
- children who are regularly absent from school or education or do not take part in education.

Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge, for example through others sharing videos or images of them on social media.

CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. This can be committed by an individual or an organised network and most sexual abuse is committed by those previously known to the victim.

Some children do not realise they are being exploited and may believe they are in a genuine romantic relationship. As with CCE, victims are not always recognised and can be criminalised for actions they take whilst under coercion.

Some indicators of children being sexually exploited are:

- going missing for periods of time or regularly coming home late;
- being regularly absent from school or education or not taking part in education;
- appearing with unexplained gifts or new possessions;
- associating with other young people involved in exploitation;
- having older boyfriends or girlfriends;
- suffering from sexually transmitted infections;
- mood swings or changes in emotional wellbeing;
- drug and alcohol misuse and displaying inappropriate sexualised behaviour.

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*.

Any possible CCE and CSE case will be shared with the DSL with a view to referring to appropriate agencies following the referral procedures.

Consensual and non-consensual sharing of nudes and semi-nudes, including where generated by AI

Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal. This includes incidents where:

- a person under 18 creates and shares nudes and semi-nudes of themselves with someone they believe to be under 18
- a person under 18 shares nudes and semi-nudes created by another person under the age of 18 with a peer under 18

- a person under 18 is in possession of nudes and semi-nudes created by another person under 18.

Images may be taken by the child themselves (sometimes referred to as 'self-generated imagery') or taken or created by another person. They may also be digitally altered or wholly generated using artificial intelligence, including what are sometimes described as 'deepfakes' or 'deep nudes'.

When such an incident involving nudes and semi-nudes comes to a member of staff's attention, this will be shared with the DSL (or a deputy) with a view to referring to appropriate agencies following the referral procedures.

Further information and advice on nudes and semi-nudes is available in the non-statutory guidance produced by the UK Council for Internet Safety (UKCIS) *Sharing nudes and semi-nudes: advice for education settings working with children and young people*. We also note the DfE's *Searching, screening and confiscation in schools* guidance.

Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). The impact of cybercrime extends well beyond immediate financial losses, with scope to cause disruption to national infrastructure. Cyber-dependent crimes include:

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded,
- 'Denial of Service' (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources, and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Young people across the UK experiment with illegal online activity, often without understanding the legal or ethical implications. Sometimes children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area in our school, the DSL (or a deputy), will consider referring into the Cyber Choices programme - a preventative police programme supporting young people at risk of committing, or being drawn into, low-level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Additional advice can be found at: *Cyber Choices*, *'NPCC- When to call the Police'* and *National Cyber Security Centre*.

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 and/or 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 any type of education setting or children's homes. Children are also increasingly being targeted and recruited online using

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

A number of the indicators detailed above for CCE and CSE may be replicated for when children are involved in county lines. Some additional specific indicators include children who:

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

We note that further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office *Child exploitation disruption toolkit (accessible)* and The Children's Society *County lines and criminal exploitation toolkit*.

Child on child abuse (including harassment and violence)

Our staff are aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of school and online. Even if there are no reports in our school, it does not mean it is not happening. It may be the case that abuse is not being reported.

We are aware that child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator.

When staff have any concerns regarding child-on-child abuse (whether these concerns are thought to have taken place on or off-site) they will speak to our DSL (or a deputy). We will also try to be alert to when children might be at highest risk around the school day (for example immediately after school). As well as knowing how to respond to concerns, we are aware that child-on-child abuse is preventable. As well as knowing how to recognise behaviours and indicators of risk early, we are also aware that timely, evidence-based support can be key to preventing children from going on to commit abuse or violence.

All our staff understand the importance of challenging inappropriate behaviours between children that are abusive in nature, examples of which are listed below. We are aware that downplaying certain behaviours can lead to a culture of unacceptable behaviour, misogyny, an unsafe environment for children where abuse may be normalised leading to children not coming forward to report it.

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".

Child-on-child abuse can present in many ways, including:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying),
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse'),
- actual or threat of physical abuse, assault or harm (which may include an online element which facilitates, threatens and/or encourages physical abuse),

- sexual violence, assault, harassment or causing someone to engage in sexual activity without consent, including 'upskirting' and the consensual and non-consensual making or sharing of nudes and semi-nudes (see further information below),
- 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).

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.

Domestic abuse

The Domestic Abuse Act 2021 introduced the first ever statutory definition of domestic abuse. Domestic abuse can encompass but is not limited to a single incident or a pattern of incidents involving psychological, physical, sexual, financial or emotional abuse between people over 16 who are personally connected.

Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The Domestic Abuse Act 2021 also recognises children as victims in their own right if they see, hear or experience the effects of abuse, which can have a detrimental and long-term impact on their health, well-being, and ability to learn.

Young people can also experience domestic abuse within their own intimate relationships, sometimes referred to as 'teenage relationship abuse', and can also perpetrate abuse or violence towards parents / carers or other family members. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures will be followed and both young victims and young perpetrators will be offered support.

If members of staff in our school 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. Information is available about *Domestic abuse and how to get help in Southwark*.

Extra familial harm

All staff, but especially the DSL and DDSLs will consider 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.

Contextual Safeguarding promotes that assessments of children should consider whether wider environmental factors in a child's life may pose risk to their safety and/or welfare.

We also note Southwark's *Child exploitation risk and vulnerability checklist tool for professionals* which can be used alongside MASH referrals or as a standalone tool when there are concerns about exploitation to collate information, help determine the level of risk, and plan next steps.

Harmful sexual behaviour (HSB)

The umbrella term 'harmful sexual behaviour' (HSB) is widely used in child protection and applies to behaviour occurring online, face-to-face, or both. HSB will always be considered within a child protection context.

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive or violent.

Problematic, abusive and violent behaviour is developmentally inappropriate and may cause developmental damage. When considering HSB, both ages and the stages of development of the children are critical factors. Sexual behaviour between children may be considered harmful if there is a significant age difference, typically more than two years' difference or if one is pre-pubescent and the other is not. However, a younger child may also abuse an older child, especially if they hold power over them, e.g., due to a disability or physical size.

Advice on responding to children who display sexualised behaviour is available in *Responding to children who display sexualised behaviour*.

HSB can occur between two or more children of any age and sex, from primary through to secondary stage and into college. It can occur also through a group of children towards a single child or towards another group of children. HSB exists on a continuum and may escalate into sexual harassment or sexual violence, it can occur online or face-to-face (both physically and verbally) and is never acceptable.

'Honour-based' abuse (HBA) (including Female Genital Mutilation and Forced Marriage)

HBA includes incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBV are abuse (regardless of the motivation) and will be handled and escalated as such. If members of staff have a concern about or knowledge of a child that might be at risk of HBA or who has suffered from HBA, they will share it immediately with the DSL with a view to referring to appropriate agencies.

Female Genital Mutilation (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 tradition practised for a variety of complex reasons, not necessarily tied to any specific religion. not required by any religion. FGM is an unacceptable practice for which there is no justification. It is child abuse, a form of violence against women and girls, and is illegal in the UK.

Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers (which includes qualified teachers or persons who are employed or engaged to carry out teaching work in schools and other institutions) that requires a different approach. Teachers, along with regulated health and social care professionals in England and Wales, have a duty to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases may face disciplinary sanctions.

It will be rare for teachers to see visual evidence, and they should not be examining pupils or students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at: *Mandatory reporting of female genital mutilation procedural information*.

Teachers must **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 should still consider and discuss any such case with our DSL (or a deputy) and involve local authority children's social care as appropriate.

The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures. The *FGM Fact Sheet* is a useful summary of the FGM mandatory reporting duty.

Further information about FGM can be found in the *Multi-agency statutory guidance on female genital mutilation* and the *FGM resource pack* particularly section 13.

Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage.

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

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.

We are aware that schools can play an important role in safeguarding children from forced marriage. Any (possible) forced marriage case in our school will be shared with the DSL with a view to referring to appropriate agencies following the referral procedures.

We note that The Forced Marriage Unit (FMU) has created: *Multi-agency practice guidelines: handling cases of forced marriage* (chapter 8 provides guidance on the role of schools and colleges) and, multi-agency statutory guidance for dealing with forced marriage, which can both be found at *The right to choose: government guidance on forced marriage*.

Honour or faith-based abuse

Honour or faith-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the perceived honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing.

Abuse committed in the context of preserving honour often involves a wider network of family or community pressure and can include multiple perpetrators.

It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and will be handled and escalated as such.

We will be alert to the possibility of a child being at risk of HBA, or already having suffered HBA. If and when our staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they will speak to the DSL (or a deputy).

As appropriate, the DSL (or a deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with the police and local authority children's social care. (See Female genital multilation (FGM) and Forced Marriage)

Online safety

We acknowledge that children need to be safeguarded from potentially harmful and inappropriate online material and an effective whole school approach to online safety empowers the school to protect and educate pupils, students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

Content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories

Contact: being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

Conduct: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of self-generated intimate images and/or videos including those generated using AI e.g. deepfakes, sharing other explicit images and online bullying, and

Commerce - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If we feel that our pupils, students or staff are at risk, we will report it to the *Anti-Phishing Working Group*.

To address the risks above, as a school we will:

- Teach students about online safety through computing and PSHE lessons and other relevant subjects
- Inform parents about what their child is being asked to do online by the school
- Train all staff on online safety, including filtering and monitoring

We have clear guidance for our school community on acceptable use of technology and the use of mobile phones and smart technology and our behaviour policy and staff code of conduct aligns with this.

Mobile phone policy

We are proud to say as a school we have adopted a 'No personal devices/phones' policy for the last 11 years. We note DfE's statutory guidance on *Mobile phones in schools* which says that all schools should be mobile phone-free environments by default; anything other than this should be by exception only.

The guidance is clear that the schools are expected to implement a policy whereby pupils do not have access to their mobile phone throughout the school day including during lessons, the time between lessons, breaktimes and lunchtime.

Private Fostering

Private fostering is when a private arrangement is made by a parent for a child under the age of 16 (under 18 if disabled) to be cared for by someone who is not their parent or a 'close relative' for 28 days or more. Close relatives are defined as stepparents, 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 notified of any (suspected) private fostering arrangements so as to support the child and private foster family (and wherever possible the biological parent/s) with any issues arising such as benefits, housing, immigration or emotional issues such as keeping contact with biological family, maintaining cultural identity.

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 also be obtained by contacting MASH. In the case of a non-Southwark child, we will notify the relevant LA. We note the information about *Private fostering in Southwark*.

Preventing Radicalisation

Children may be susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is part of our school's safeguarding approach.

Extremism is the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.

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

Although there is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism, there are *factors that may indicate concern*. It is possible to protect people from extremist ideology and intervene to prevent those at risk of radicalisation being drawn into terrorism. As with other safeguarding risks, our staff will be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff will use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the DSL (or a deputy) *Making a Prevent referral*.

The Prevent duty

All schools and colleges are subject to a duty under section 26 of the Counter- Terrorism and Security Act 2015, in the exercise of their functions, to have "due regard to the need to prevent people from becoming terrorists or supporting terrorism. This duty is known as the Prevent duty. The Prevent duty is seen as part of our school's' wider safeguarding obligations. The DSL (and deputies) and other senior leaders in our school will familiarise themselves with the revised *Prevent duty guidance: for England and Wales*, especially paragraphs 141-210, which are specifically concerned with education (and also covers childcare). The guidance is set out in terms of three general themes: leadership and partnership, capabilities and reducing permissive environments. Our school's DSL (and any deputies) are aware of local procedures for making a Prevent referral.

Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism.

Prevent referrals are first assessed by police and may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are at risk of being drawn into terrorism and consider the appropriate support required.

Whilst the referral is being assessed, should any further or new information come to light, this should also be passed to police. A representative from our school may be asked to attend the Channel panel to help with this assessment. An individual will be required to provide their consent before any support delivered through the programme is provided. The DSL (or a deputy) will consider if it would be appropriate to share any information with the new school in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse, incidents that may indicate concerns about serious violence or harmful behaviours and/or details of those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives.

Statutory guidance on Channel is available at: *Channel guidance* and *Channel training from the Home Office*. We also note the DfE's guidance *The Prevent duty: safeguarding learners vulnerable to radicalisation* to support those working in education settings with safeguarding responsibilities.

Remote Education

We understand the importance of keeping pupils, students and staff safe whilst learning remotely. We will reinforce in our contacts with parents and carers the importance of children being safe online. Parents and carers are likely to find it helpful to understand what systems our school uses to filter and monitor online use.

It is especially important for parents and carers to be aware of what their children are being asked to do online, including the sites they are asked to access and be clear who from our school (if anyone) their child is going to be interacting with online.

We note the DfE guidance *Safeguarding and remote education* and *Providing remote education: guidance for schools* to support schools and colleges understand how to help keep pupils, students and staff safe whilst learning remotely.

Serious violence

Serious violence may involve physical assault, carrying, threatening with, or using weapons, often in the context of peer conflict or bullying, and it can also be associated with criminal exploitation.

It is a safeguarding concern and schools play a key role in protecting children from violence, safeguarding victims, and also supporting those who may be at risk of, or are involved in committing violence (who may also be victims themselves).

There are a number of indicators which may signal children are at risk from, or are involved in committing serious violence, including:

- increased absence from school,
- a change in friendships or relationships with older individuals or groups,
- a significant decline in educational performance,
- signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries, and
- unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

The likelihood of involvement in serious violence may be increased by factors such as:

- being male,
- having been suspended, spent time in Alternative Provision or permanently excluded from school,
- having experienced child maltreatment,
- having been involved in offending, such as theft or robbery,
- having used drugs or alcohol in early adolescence, and
- having previously been a victim or previously perpetrated violence

A fuller list of risk factors can be found in the Home Office's *Serious Violence Strategy*.

We are aware that violence can often peak in the hours just before or just after school, when pupils are travelling to and from school and can concentrate in particular places, meaning these times can be particularly risky for young people involved in serious violence. We try to understand where these places are, with a view to working with partners to promote safety for children.

We will listen to children and consult with staff, as it can help establish when and where they feel unsafe. We are aware that working with wider partners can also help build understanding of the local context beyond our school and help co-ordinate a collective safeguarding response around the school day.

We note the advice for schools and colleges that is provided in the Home Office's *Criminal exploitation of children and vulnerable adults: county lines* guidance and the *practical guidance for schools and colleges* produced by the Youth Endowment Fund (YEF) (the "what works" centre for preventing violence) and an accompanying *self-assessment tool* to help introduce evidenced practice for preventing children becoming involved in violence.

Sexual harassment

Sexual harassment refers to 'unwanted conduct of a sexual nature' which can occur both online and offline and inside and outside of school.

In this context it specifically relates to child-on-child sexual harassment. Such behaviour can violate a child's dignity, make them feel intimidated, degraded or humiliated, and create a hostile, offensive or sexualised environment.

Examples of sexual harassment can include sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothing or appearance and using sexualised names, sexual "jokes" or taunting, physical behaviour, such as deliberately brushing against someone, or interfering with someone's clothes.

Schools and colleges should assess when such behaviour crosses into sexual violence – it is important to talk to and consider the experience of the victim, displaying pictures, photos or drawings of a sexual nature, upskirting (this is a criminal offence) and online sexual harassment, which may occur independently, or as a broader pattern of sexual harassment and/or sexual violence. This may include consensual and non-consensual making or sharing of nudes or semi-nudes. sharing of unwanted explicit content, sexualised online bullying, unwanted sexual comments and messages, including, on social media, sexual exploitation; coercion and threats, and coercing others into sharing images of themselves or performing acts they're not comfortable with online.

We will consider sexual harassment in broad terms and are aware that if left unchallenged, it can foster a culture that normalises inappropriate behaviour and increases the risk of leading to sexual violence.

Sexual violence

We are aware that child-on-child sexual violence can and does occur, both inside and outside of school. Sexual violence refers to specific sexual offences under the Sexual Offences Act 2003 as described below:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration, and A does not reasonably believe that B consents.

Assault by penetration: A person (A) commits an offence if: they intentionally penetrate the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual assault: A person (A) commits an offence of sexual assault if: they intentionally touch another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents. Sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.

Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: they intentionally cause another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity, and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if they agree by choice to that penetration and has the freedom and capacity to make that choice:

- a child under the age of 13 can never consent to any sexual activity,
- the age of consent is 16, and
- sexual intercourse without consent is rape.

For further guidance: *What is sexual consent?*

Preventing abuse: We are aware that effective safeguarding is demonstrated when schools are clear, in advance, about what local processes are in place and available support for incidents involving HSB, sexual harassment or sexual violence. We will review this information on a regular basis to ensure it is up to date.

As such: if required, the DSL (or a deputy) will discuss the local response with police and local authority children's social care to inform the school's policies (particularly the child protection policy) and response, and the DSL (and their deputies) will be familiar with local specialist support services for all children involved (including victims and alleged perpetrators) and know how to access them when needed.

Responding to reports of HSB, sexual harassment and/or sexual violence: HSB, sexual harassment and sexual violence can happen anywhere, so all staff working with children will maintain an attitude of 'it could happen here' and respond appropriately to all reports and concerns whether they occur online, offline, or outside of the school/college.

All staff will always act in the best interests of the child and follow general safeguarding principles. Immediate steps will be taken to support and protect the victim, the alleged perpetrator(s) and any other affected children.

We will have clear, well-promoted, and accessible systems that enable children to confidently report abuse, knowing their concerns will be taken seriously. Reports of HSB, sexual harassment and sexual violence are likely to be complex and may require swift, difficult professional decisions to be made.

To respond to reports effectively, we will invest in pre-planning, effective staff training and robust safeguarding policies, which will provide our schools with the foundation for a calm, and considered approach when incidents arise. We will ensure that our school contributes to multi-agency working in line with the statutory guidance *Working Together to Safeguard Children*. We will make decisions on a case-by-case basis, led by the DSL (or a deputy) using their professional judgement, supported by external agencies, such as local authority children's social care and the police, as needed.

Children may struggle to verbally disclose abuse. Instead, they may show signs or behave in ways that signal distress and indicate something is wrong, or disclosures may come indirectly, for example, through a friend, or

an overheard conversation that suggests a child has been harmed. Our staff will act immediately on any concerns about a child's welfare, rather than wait to be told.

The initial response to a report from a child is incredibly important: a supportive and respectful response can empower victims to come forward, whilst a poor response may discourage further disclosures. We will reassure all victims that they are being taken seriously, and that they will be supported and kept safe.

Abuse that occurs online or outside the school environment will be treated with equal seriousness. Victims will never be made to feel that they are causing a problem by reporting or ever be made to feel ashamed for coming forward. Staff will explain that the law exists to protect children and young people, not criminalise them, and will do so in such a way that is reassuring and avoids alarming or distressing them.

The DSL (or a deputy) is likely to have a complete safeguarding picture and will lead the initial response by our school considering:

- the victim's wishes regarding how they want to proceed. Victims will be given as much control as reasonably possible regarding how an investigation will be progressed and what support they are offered, balanced against the school's duty to protect others,
- the nature of the alleged incident(s), including whether a crime may have been committed and/or whether HSB was displayed,
- the ages and developmental stages of the children involved,
- any power imbalance between the children such as differences in age, maturity, or social status. We will consider if the victim has a disability or learning difficulty,
- whether the alleged incident was isolated or part of a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature),
- that sexual violence and sexual harassment can take place within intimate relationships between children,
- importance of understanding intrafamilial harm and support for siblings if needed,
- any ongoing risks to the victim, other children, adult students or school staff, and
- wider contextual concerns, including links to child sexual exploitation (CSE) or child criminal exploitation (CCE).

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.

Appendix 2: Safer Recruitment

We are committed to the principles of safer recruitment and, as part of that, adopt recruitment procedures that help deter, reject and/or identify people who might abuse children. Safe recruitment processes are followed and all staff recruited to the school will be subject to appropriate identity, qualification and health checks.

As part of the shortlisting process, we will consider carrying out a search (via an online search engine) 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.

References will be verified and appropriate criminal record checks [Disclosure and Barring Service (DBS) checks], barred list checks and prohibition checks will be undertaken. The level of DBS check required, and whether a prohibition check is required, will depend on the role and duties of an applicant to work in the school, as outlined in Part three of the DfE guidance *Keeping children safe in education* and in line with the Crime and Policing Act. We will also have regard to DfE's statutory guidance for schools about the employment of staff disqualified from childcare *Disqualification under the Childcare Act 2006*, which also contains information about 'disqualification by association'.

Relevant members of staff and governors who are involved in recruitment will undertake appropriate safer recruitment training. The school will ensure that at least one person on any appointment panel has undertaken safer recruitment training in accordance with staffing regulations.

This school will only use employment agencies which can demonstrate that they positively vet their supply staff. Any alleged misconduct of temporary or agency staff will be reported to the employer concerned and to the LA's Designated Officer (LADO). Staff joining the school on a permanent or temporary basis will be given a copy of this policy. Additionally, the Staff Handbook issued to all staff confirms the school's safeguarding procedures, the Staff Code of Conduct and the allegations against staff procedures.

New staff

When appointing new staff, we will:

- verify a candidate's identity, including checking the name on a birth certificate where this is available
- obtain (via the applicant) an enhanced DBS certificate (including barred list information, for those who will be engaging in regulated activity)
- obtain a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available
- verify the candidate's mental and physical fitness to carry out their work responsibilities
- verify the person's right to work in the UK
- if the person has lived or worked outside the UK, make any further checks the school consider appropriate
- verify professional qualifications, as appropriate
- ensure a candidate to be employed to carry out teaching work is not subject to a prohibition order issued by the Secretary of State
- check that a person taking up a management position is not subject to a section 128 direction made by the Secretary of State
- Seek two references, including from the current employer, before interview and ask specific questions about the suitability of the candidate to work with children
- Conduct online searches on shortlisted candidates, reviewing publicly available material for any incidents or issues and notify applicants of this process

References will be verified and appropriate criminal record checks [Disclosure and Barring Service (DBS) checks], barred list checks and prohibition checks will be undertaken. The level of DBS check required, and whether a prohibition check is required, will depend on the role and duties of an applicant to work in the school, as outlined in Part three of the DfE guidance "*Keeping children safe in education*".

Volunteers

Any parent or other person/organisation engaged by the school to work in a voluntary capacity with pupils will be subject to all reasonable vetting procedures and Criminal Records Checks. We will obtain an enhanced DBS check with children's barred list information for any person volunteering in our school in a role that involves teaching, training, instructing or supervising children frequently (on more than 3 days in a 30-day period) or overnight, as they are now in regulated activity as per The Crime and Policing Act 2026.

In case of an existing volunteer who will now be in regulated activity because of the changes brought in by the Crime and Policing Act 2026, we will check their children's barred list status. This should be done by obtaining an enhanced DBS check with children's barred list information.

Under no circumstances a volunteer in respect of whom no checks have been obtained will be left unsupervised or allowed to work in regulated activity.

Further information on checks on volunteers can be found in Part three of the DfE guidance *Keeping children safe in education*.

Volunteers will be subject to the same code of conduct as paid employees of the school.

Voluntary and third sector groups that operate within this school or provide off-site services for our pupils or use school facilities will be expected to adhere to this policy or operate a policy which is compliant with the procedures adopted by the Southwark Safeguarding Children Partnership (SSCP). Premises lettings and loans are subject to acceptance of this requirement.

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 our School to the Local Authority's Designated Officer (LADO).

Where services or activities are provided separately by another body, we will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with our school on these matters where appropriate. We will also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

We note the DfE's guidance on *Out-of-school settings: safeguarding guidance for providers*, which has been produced to help out-of-school settings operate safely and protect the children attending them from harm.

Contractors

Building contractors who are engaged by or on behalf of the school 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 pupils in non-teaching sessions. All contractors and sub-contractors will be issued with copies of the school's code of conduct for staff.

Individuals and organisations that are contracted by the school to work with or provide services to pupils 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 children regularly).

Contractors engaging in regulated activity relating to children will require an enhanced DBS check (including children's barred list information). For all other contractors who are not engaging in regulated activity relating to children, but whose work provides them with an opportunity for regular contact with children, an enhanced DBS check (not including children's barred list information) will be required. Contractors for whom an appropriate DBS check has not been undertaken will be supervised if they will have contact with children.

Under no circumstances we will allow a contractor in respect of whom no checks have been obtained to work unsupervised, or engage in regulated activity relating to children. 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.

We will always check the identity of contractors and their staff on arrival at the school.

Governors

All SAP members will have an enhanced DBS check without barred list information. A barred list check will be completed if a governor is in regulated activity. All governors will also have a Section 128 check.

Agency And Third Party Staff

For agency and third party staff, we will include written confirmation that the employment business supplying the member of supply staff has carried out the relevant checks and obtained the appropriate certificates, the date the confirmation was received and whether an enhanced DBS certificate check has been provided.

Trainee/Student Teachers

Where applicants for initial teacher training are salaried by the school, we will carry out all necessary checks. Where trainee teachers are fee-funded, we will ensure that the training provider has carried out the necessary checks and obtain written confirmation that these checks have been carried out.

Existing Staff

If we have any concerns about an existing member of staff's suitability to work with children, we will carry out the relevant checks as if the member of staff were a new member of staff. If a member of staff moves from a post that is not in regulated activity to a post in regulated activity, we will ensure the relevant checks for that regulated activity have been carried out.

We will follow our legal duty to refer to the DBS if a member of staff has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- the harm test is satisfied in respect of that individual
- the individual has received a caution or conviction for a relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence
- the individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left

Visiting Groups/Organisations

Voluntary and third sector groups that operate within this school or provide off-site services for our pupils or use school facilities will be expected to adhere to this policy or operate a policy which is compliant with the procedures adopted by the Southwark Safeguarding Children Partnership (SSCP).

Premises lettings and loans are subject to acceptance of this requirement.

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).

Where services or activities are provided separately by another body we will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with our school on these matters where appropriate. We will also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

We note the DfE's *non-statutory guidance for providers running out-of-school settings*.

Appendix 3: Procedures for dealing with Allegations of abuse against staff

SAFEGUARDING CONCERNS AND ALLEGATIONS MADE ABOUT STAFF, INCLUDING AGENCY TEACHERS AND TEACHING ASSISTANTS, SUPPORT STAFF, VOLUNTEERS, SCHOOL GOVERNORS AND CONTRACTORS

We take 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 agency teaching staff, volunteers and contractors.

All such allegations and concerns will be brought immediately to the attention of the Headteacher or the Designated Safeguarding Lead 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 governors, in order that they may activate the appropriate procedures.

There may be two levels of concerns and allegations:

1. Concerns or allegations that **may** meet the harm threshold.
2. Concerns or allegations that **do not** meet the harm threshold – referred to as 'low-level concerns' or 'concerns' in *London Safeguarding Children Procedures.*

Concerns or allegations that may meet the harms threshold

The procedures, as contained in Part four of the *Keeping children safe in education*, which should be read in conjunction with Core Procedure 7 of the London Safeguarding Procedures *Allegations Against Staff or Volunteers (People in Positions of Trust), who Work with Children* should be applied when there is an allegation that any person who works with children, in connection with their employment, voluntary activity or personal life, 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 he or she 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 that may have happened outside of school that might make an individual unsuitable to work with children, which is known as transferable risk.

We also note that *London Safeguarding Children Procedures* states that, in addition to the above, the procedures should be applied when there is an allegation that any person who works with children, in connection with their employment, voluntary activity or personal life:

- behaves in a manner that discriminates against a child on the basis of one or more of their protected characteristics, as defined by the *Equality Act 2010*.

The Local Authority Designated Officer (LADO) will be informed of all such allegations that come to the school's attention and appear to meet the above criteria. 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.

When dealing with allegations, we will apply common sense and judgement; deal with allegations quickly, fairly and consistently; and provide effective protection for the child and support the person subject to the allegation.

Some rare allegations will be so serious they will require immediate intervention by children's social care and/or police. In such cases, following a referral, the LADO may arrange an-'Allegations against Staff and Volunteers'

(ASV) meeting/discussion being held in accordance with the DfE guidance and *Core Procedure 7 of the London Safeguarding Children Procedures*. This process will agree upon the appropriate course of action and the timescale for investigations.

The school has a legal duty to refer to the DBS when an individual is removed from regulated activity/work with children (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, and/or satisfied the harm test in relation to children and/or vulnerable adults and/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 sections 141D and 141E of *the Education Act 2002*. The Secretary of State may investigate the case, and if there is a case to answer, must then decide whether to make a prohibition order in respect of the person. We will also consider whether to refer the matter to the Teacher Regulation Agency (TRA), as per guidance on *Referrals to the TRA*, to consider whether the individual should be prohibited from teaching.

The following definitions will be used when determining the outcome of any investigation:

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
False: there is sufficient evidence to disprove the allegation
Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence
Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made

Concerns or allegations that do not meet the harms threshold – known as 'low level concerns' in KCSIE and as 'concerns' in *Core Procedure 7 of the London Safeguarding Children Procedures*.

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

All 'low-level' concerns will be brought immediately to the attention of the Headteacher or the Designated Safeguarding Lead 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 governors or chair of the management committee.

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*" and in Chapter 7 of the London Safeguarding Children Procedures on *Allegations Against Staff or Volunteers (People in Positions of Trust), who Work with Children*.

WhistleBlowing

At PhoenixPlace we recognise that adults working in a school may cause harm, including agency staff, visitors, and governors. Any concerns about a member of staff posing a risk of harm to children should immediately be referred to the Headteacher. These concerns could include where anyone working in the school has:

- behaved in a way that has harmed a child, or may have harmed a child
- possibly committed a criminal offence against or related to a child
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children
- behaved or may have behaved in a way that indicates they may not be suitable to work with children

Where there are concerns about the headteacher (who is also the Proprietor), these currently should be referred directly to the LADO.

Any member of staff or volunteer with concerns about poor or unsafe practice and potential failures in our school's safeguarding regime should contact: The NSPCC whistleblowing helpline can also be contacted via telephone (0800 028 0285) or email (help@nspcc.org.uk).

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. Remember if unsure speak to the DSL/DDSLs
- 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

Confidentiality

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 designated officer, police and children's social care services to agree the following:

- who needs to know and, importantly, exactly what information can be shared
- how to manage speculation, leaks and gossip
- what, if any, information can be reasonably given to the wider community to reduce speculation
- how to manage press interest if, and when, it should arise.

Complaints

All complaints arising from the operation of this policy will be considered under the school's complaint procedure, with reference to the LA's Strategic Lead Officer for safeguarding in education services, as necessary. Please refer to our WhistleBlowing policy.