



# Safeguarding & Child Protection Policy

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

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

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Reviewed and approved by Proprietor/Director:	Sophie Nelson
Reviewed and approved by Judicium Safeguarding:	Judicium
Reviewed and approved by (Strategic Advisory Partners)	<i>Currently recruiting</i>

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## Section 1: Introduction

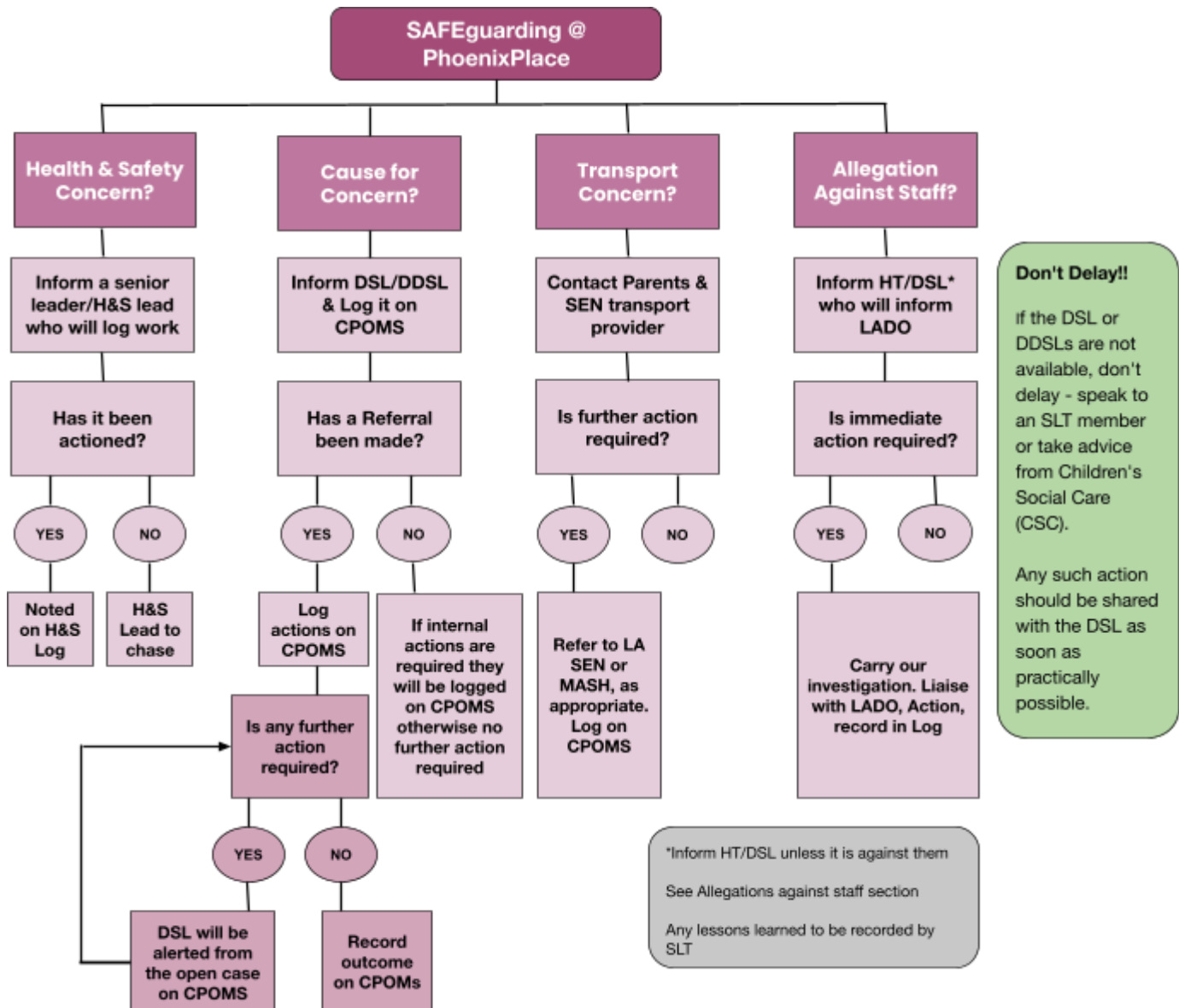
### Key Contacts @ PhoenixPlace

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
<b>Carl Samuels</b>	Designated Safeguarding Lead (DSL)	For any Safeguarding concerns, please email the safeguarding team directly at  <a href="mailto:safeguarding@phoenixplace.co.uk">safeguarding@phoenixplace.co.uk</a>
<b>Sophie Hallowes</b>	Deputy Designated Safeguarding Lead (DDSL) (LAC/PLAC)*	
<b>Sophie Nelson</b>	Deputy Designated Safeguarding Lead (DDSL)	
<b>tbc</b>	Safeguarding SAP member	<i>Recruitment process</i>
During school holidays the safeguarding 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		
Name	Role	Contact Details
<b>Eva Simcock</b>	Local authority designated officer (LADO)	<b>Tel:</b> 020 7525 0689 / <b>Mob:</b> 07943076608 <b>Email:</b> <a href="mailto:Eva.Simcock@southwark.gov.uk">Eva.Simcock@southwark.gov.uk</a>  LADO can also be contacted via <a href="mailto:Qau.Safeguarding@southwark.gov.uk">Qau.Safeguarding@southwark.gov.uk</a>
<b>Apo ÇAĞIRICI</b>	The LA's Schools Safeguarding Coordinator	Tel: 020 7525 2715
<b>Alasdair Smith</b>	The LA's Strategic Lead Officer for safeguarding in education services/the Director of Children's Services	Tel: 020 7525 0654
<b>Emma Geiringer</b>	The LA's Safeguarding in Schools Lead	Tel: 020 7525 5377
<b>Southwark Duty</b>	Enquiries/referrals	Tel: 020 7525 3297
<b>Channel helpline</b>	Prevent Helpline	Tel: 020 7340 7264
There is also a duty system and one of the CP Coordinators in the Quality Assurance Unit is on duty each day to deal with LADO issues when LADO is unavailable. Duty telephone number for enquiries/referrals is 020 7525 3297.		

## 'What do I do if I have a....???'



## Safeguarding Intent

PhoenixPlace is committed to a strong culture of safeguarding, ensuring that all staff embrace the concept of "it could happen here" and that they recognise that safeguarding is everyone's responsibility.

We are fully committed to creating a culture of vigilance. We expect everyone who works in and visits our school to share this commitment. We encourage staff, pupils, and visitors to report anything that concerns them, and we will always act in the best interest of the child.

Our pupils are taught how to stay safe, including when online, and to recognise when they may be at risk. We ensure our pupils know how to get help when they need it. In line with the latest [Working Together to Safeguard Children](#), we place importance on contextual safeguarding and consider risks in our local community when assessing the safety of our pupils.

The latest version of this policy is available on the school website and upon request.

## Definition of Safeguarding

In line with Keeping Children Safe in Education 2024, we define safeguarding 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
- Taking action to enable all children to have the best outcomes

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.

The purpose of safeguarding at PhoenixPlace is to:

- Outline the role of the Strategic Advisory Panel (SAP)
- Identify the names of responsible persons in the school and explain the purpose of their role
- Describe what should be done if anyone in the school has a concern about the safety and welfare of a child who attends the school
- Identify the particular attention that should be paid to those children who fall into a category that might be deemed “vulnerable”
- Set out expectations in respect of training
- Ensure that those responsible for recruitment are aware of how to apply safeguarding principles in employing staff
- Set out expectations of how to ensure children are safeguarded when there is potential to come into contact with non-school staff, e.g. volunteers, contractors etc.
- Outline how allegations against/concerns raised in relation to staff will be handled
- Set out expectations regarding record keeping
- Clarify how children will be kept safe through the everyday life of the school
- Outline how the implementation of this policy will be monitored.

## **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 Child Protection & Safeguarding Policy draws upon duties conferred by:

- the Children Acts 1989 and 2004,
- The Education & Inspections Act 2006,

- The Serious Crimes Act (2015),
- The Children and Families Act 2014,
- The Children and Social Work Act 2017,
- S175 of the 2002 Education Act (as amended),
- The Education (Independent School Standards) Regulations 2014 (for independent schools),
- The Non-Maintained Special Schools (England) Regulations 2015 (for non-maintained special schools),
- the Apprenticeships, Skills, Children and Learning Act 2009 (as amended),
- the Education and Training (Welfare of Children) Act 2021,
- The Mental Capacity Act 2005,
- The Care Act 2014, and the guidance contained in "[Working Together to Safeguard Children](#)",
- the DfE's statutory guidance "[Keeping children safe in education](#)",
- Ofsted Guidance and procedures produced by the London Safeguarding Children Partnership ([LSCP](#))
- the Southwark Safeguarding Children Partnership ([SSCP](#)). including Southwark's '[Neglect Strategy](#) and [Neglect Toolkit](#).
- We also have regard to the advice contained in DfE's "[What to do if you're worried a child is being abused](#)" and "[Information Sharing – Advice for practitioners](#)".

The policy is applicable to all on and site, off-site and online activities undertaken by pupils whilst they are the responsibility of the school, including pupils who might be placed in Alternative Provision.

We will ensure that those staff who work directly with children read at least **Part one** and those staff who do not work directly with children read either Part one or Annex A (a condensed version of Part one) of DfE guidance "[Keeping children safe in education](#)". This will depend on the assessment of which guidance will be most effective for the staff to safeguard and promote the welfare of children. We will also ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part one (or Annex A if appropriate) of the guidance.

## **POLICY AIMS**

The purpose of this policy is to:

- Outline the role of the governing body
- Identify the names of responsible persons in the school and explain the purpose of their role
- Describe what should be done if anyone in the school has a concern about the safety and welfare of a child who attends the school
- Identify the particular attention that should be paid to those children who fall into a category that might be deemed "vulnerable"
- Set out expectations in respect of training
- Ensure that those responsible for recruitment are aware of how to apply safeguarding principles in employing staff
- Set out expectations of how to ensure children are safeguarded when there is potential to come into contact with non-school staff, e.g. volunteers, contractors etc.
- Outline how allegations against/concerns raised in relation to staff will be handled
- Set out expectations regarding record keeping
- Clarify how children will be kept safe through the everyday life of the school

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.

### **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
- taking action to enable all children to have the best outcomes
- 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\*](#).



## Section 2: Responsibilities and immediate action

### Designated Safeguarding Lead (DSL) and deputies

- The DSL will take lead responsibility for safeguarding with the support of the Deputy DSLs.
- Be available during term time for staff to discuss any safeguarding concerns.
- Lead on referrals to local authority children's social care, the Channel Programme where there is a radicalisation concern, the DBS where relevant in relation to allegations of abuse made against staff, and where a crime has been committed to the Police as required with reference to the guidance [NPCC- When to call the police](#).
- Act as a source of support, advice and expertise for all staff.
- Act as a point of contact with the safeguarding partners and share information with them as required.
- If a child is in immediate danger or is at risk of harm, a referral will be made to 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 (see [when to call the police: guidance for schools and colleges](#)).
- DSL will 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.
- Liaise with the Headteacher to keep them informed of issues, especially police investigations and ongoing enquiries under section 47 of the Children Act 1989.
- Liaise with the case manager as required and the LADO for child protection concerns in cases which concern a staff member.
- Liaise with relevant staff in school, e.g., SENCO, Senior Mental Health Lead, attendance lead, online safety providers etc.
- Promote engagement with parents and/or carers in safeguarding and promoting the welfare of children.
- Take lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues of students and through identifying the impact these may have on attendance, engagement and achievement at school.
- Work with staff to ensure that the school knows the cohort of children who have or have had a social worker, their academic progress and attainment and maintain high aspirations for this cohort and support staff to enable these students to meet their potential.
- Ensure records are kept in line with good record-keeping practice as outlined in the latest Keeping Children Safe in Education.
- Ensure CP files are transferred to the new school within 5 days, ensuring safe transit and confirmation of receipt.
- Ensure that this policy and safeguarding procedures are accessible to all new and existing staff, that this is reviewed at least annually and is available publicly.
- Liaise with local safeguarding partners to ensure that staff are aware of any training opportunities and the latest local policies.
- Update training every two years covering the content outlined in KCSIE and ensure any Deputy DSLs also renew this training.

- Update own knowledge and skills at least annually.
- Work to understand the views of students and encourage a culture of listening to students.
- Hold and share information in line with Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) and the guidance around information sharing in KCSIE.
- Adopt a sensible reasonable force policy which outlines the procedures we follow

### 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).*

## Designated Prevent Lead

- Ensure compliance with the Prevent duty under section 26 of the Counter-Terrorism and Security Act 2015 ("the CTSA 2015"), to have due regard to the need to prevent people from being drawn into terrorism.
- Assess the risk of children being drawn into terrorism within PhoenixPlace, including support for extremist ideas with a specific understanding of how to identify individual children who may be at risk.
- Ensure that safeguarding arrangements consider the policies and procedures of Local Safeguarding Children Boards (LSCBs)
- Assess the training needs of staff considering their assessment of the risk to students at the PhoenixPlace being drawn into terrorism.
- Provide advice and support to other members of staff on protecting children from the risk of radicalisation.
- Ensure that children are safe from terrorist and extremist material
- Help to raise the awareness of the importance of online safety at PhoenixPlace to children, including when students have been asked to learn at home.

## All staff

- 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.<sup>1</sup>
- 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.
- Understand that the process for making referrals locally (see section 5)
- 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.

<sup>1</sup> E.g., has special educational needs (whether or not they have a statutory Education, Health and Care plan), has a mental health need, is a young carer, is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines, is frequently missing/goes missing from education, home or care, has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit, is at risk of modern slavery, trafficking, sexual and/or criminal exploitation, is at risk of being radicalised or exploited, has a parent or carer in custody, or is affected by parental offending, 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 alcohol and other drugs themselves, is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage, is a privately fostered child.

- Know the indicators of abuse and neglect and exercise professional curiosity and that such issues are rarely standalone ones.
- Be aware of extra-familial and/ or contextual risks which occur outside of the families e.g., sexual abuse, domestic abuse, criminal exploitation, serious youth violence, county lines and radicalisation.
- Be aware that technology is a significant component in many safeguarding and wellbeing issues and the risks young people face online.
- Know how to report concerns about safeguarding practices within the school via whistleblowing procedures or other means.
- Know how to report concerns if staff have a safeguarding concern, or an allegation is made about another member of staff (including supply staff, volunteers, and contractors) harming or posing a risk of harm to children through the following process:
  - o Headteacher
  - o Concerns about the Headteacher whilst awaiting a Chair of SAP should be reported directly to the LADO, and
  - o The ability to report directly to the LADO where there is a conflict of interest.
- Read and understand part 1, and Annex B of Keeping Children Safe in Education, and review this guidance at least annually.
- Attend and engage with induction training, including reading and understanding our:
  - o child protection policy
  - o behaviour policy and the measures taken to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying
  - o the staff behaviour policy/code of conduct
  - o safeguarding response to children who go missing from education

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

## Responding to and recording concerns

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 threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

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](#).

## Reporting and Recording concerns

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 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 abuse, 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 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.

### Online safety

We recognise that the use of technology has become a significant component of many safeguarding issues, including child-on-child abuse. We recognise that children need to be safeguarded from potentially harmful and inappropriate online material and the school's role within this. To address this, our school strives to:

- Have clear procedures in place to ensure the online safety of all staff and students
- Educate the school community in the safe and responsible use of online technology
- Set clear expectations for the use of online technology, including mobile phones

Our approach to online safety is framed by four main areas of risk:

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



**Contact:** being subjected to harmful online interaction with other users; 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:** personal 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 nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying

**Commerce** - risks such as online gambling, inappropriate advertising, phishing and or financial scams.

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
- Train all staff in online safety, including at induction

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.

### 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.

## **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 2012 state that all teachers, including headteachers, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties. We will endeavour to create and embed a culture of openness, trust and transparency in which the school's values and expected behaviour which are set out in the staff code of conduct are constantly lived, monitored and reinforced by all staff.

Children will be treated with respect and dignity and no punishment, detention, restraint, sanctions or rewards are allowed outside of those detailed in the school's Behaviour Management Policy. Whilst it would be unrealistic and undesirable to preclude all physical contact between adults and children, staff are expected to exercise caution and avoid placing themselves in a position where their actions might be open to criticism or misinterpretation. Where incidents occur which might otherwise be misconstrued, or in the exceptional circumstances where it becomes necessary to physically restrain a pupil for their own protection or others' safety, this will be appropriately recorded and reported to the Headteacher and parents. Any physical restraint used will comply with DfE guidance "[Use of reasonable force in schools](#)".

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

School staff should be alert to behaviours that may cause 'low-level' concerns such as being over friendly with children, having favourites, taking photographs of children on their mobile phone contrary to school policy, engaging with a child on a one-to-one basis in a secluded area or behind a closed door, humiliating pupils (Appendix 3).

School staff should also be alert to the possible risks that might arise from social contact with pupils outside of the school. Home visits to pupils or private tuition of pupils should only take place with the knowledge and approval of the Headteacher. Visits/telephone calls by pupils to the homes of staff members should only occur in exceptional circumstances and with the prior knowledge and approval of the Headteacher.

Any unplanned contact of this nature or suspected infatuations or "crushes" will 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 Headteacher. Staff will only use the approved school email, school learning platform or other school approved communication systems with pupils or parents/carers and only communicate with them on appropriate school business and will not disclose their personal telephone



numbers and email addresses to pupils or parents/carers. Staff will not use personal cameras (digital or otherwise) or camera phones for taking and transferring images of pupils or staff without permission and will not store images at home.

Staff 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 LADO 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](#).

### 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](mailto:help@nspcc.org.uk)).

### Staff Training

All staff members will 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) at induction, which is regularly updated.

In addition, all staff members will receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

All newly recruited staff (teaching and non-teaching) and [SAPs] will be apprised of this policy. In addition, all new staff and temporary staff will be required to attend an induction session with the Designated Safeguarding Lead or their deputy at the start of their employment (or induction day - before their start date).

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.

The DSL (and DDSL) 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).

## Section 3: Definitions

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

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

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

**Abuse:** 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

## Section 4: 'It can happen here!'

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

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

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

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

### 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](http://www.contextualsafeguarding.org.uk).

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

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

Risk	PhoenixPlace's actions to reduce risk
Mental Health and Wellbeing	<ul style="list-style-type: none"> <li>• We have a counsellor working at the school 3 days per week. Our counsellor is also available to parents/carers by arrangement.</li> <li>• We have an Child Educational Psychologist who also supports students in 1:1 sessions twice per month (by appointment)</li> <li>• Students are referred to CAMHS when appropriate.</li> <li>• Students are signposted to organisations who can offer support in PSHE/RSE lessons and through care cards and information posted around the school site.</li> </ul>
Sexual Harassment and Sexual violence	<ul style="list-style-type: none"> <li>• 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.</li> <li>• Through the personal development curriculum (eg PSHE/RSE) students undertake sessions on sexual violence and sexual harassment and how to report any concerns.</li> <li>• Students are signposted to organisations who can offer support in PSHE/RSE lessons and information posted around the school site.</li> </ul>
Online Safety and social media	<ul style="list-style-type: none"> <li>• Online Safety Page on Website with information for students, parents/carers</li> <li>• The school has recently purchased an online CPD platform to deliver training to staff and parent/carers with regards to how to keep students/their child safe online</li> <li>• Staff will receive a session on on-line safety.</li> <li>• 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.</li> </ul>
Child Criminal Exploitation	<ul style="list-style-type: none"> <li>• Students will receive ongoing information in theme days, tutor time and assemblies on criminal exploitation and how to report any concerns.</li> <li>• From time to time the school also organises workshops with guest speakers working within this field</li> <li>• 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.</li> </ul>
Looked After Children	<ul style="list-style-type: none"> <li>• We have a dedicated LAC Coordinator</li> <li>• Opportunities provided to support students academically but with a focus on extracurricular experience.</li> <li>• LAC students are a key vulnerable group and a standing priority agenda item</li> </ul>

## **Children potentially at greater risk of harm**

At PhoenixPlace, we recognise that children with social workers may potentially be at greater risk of harm and need further support. Children may need this support due to abuse, neglect, exploitation or complex family circumstances. Our staff are aware that these students may face additional barriers to their attendance, learning or behaviour. We take these needs into account and liaise regularly with the relevant social worker to put appropriate support in place.

We also recognise that low or erratic attendance and Children Missing Education (CME) may be an indicator of abuse or neglect. All staff should be aware that children being absent from school particularly repeatedly and/or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding possibilities which may include abuse, neglect, sexual abuse, exploitation, child criminal exploitation, county lines involvement, mental health problems, risk of substance misuse, so called 'honour' based violence.

We know that early intervention is essential to help prevent the risks of a child going missing in the future. Our pastoral teams track attendance thoroughly, addressing concerns without delay and liaising with our Attendance Lead/Outreach team where needed.

We ensure that pupils who are expected to attend the school, but fail to take up the place or cannot be located, are referred to the local authority in line with local procedures and guidance such as [Children Missing Education \(DfE, 2016\)](#). The DSL will be aware of any students who may be considered CME and will work with the Attendance Lead/Outreach Team to ensure any safeguarding concerns are reviewed, the advice of external agencies is sought, and local procedures are followed.

We also strongly encourage parents to supply us with two emergency contacts for their child, updating their contact details without delay if they are changed and share our procedures for how to notify the school of an absence with all parents. When a pupil leaves the school, we will record the name of the pupil's new school and their expected start date.

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

KCSIE 2024 stated the Cass review which identified caution is necessary for children questioning their gender. It recommends that when families/ carers are making decisions about support for gender questioning children, they should be encouraged to seek clinical help and advice. Schools are advised to take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying.

As a school we endeavour to reduce the additional barriers faced by pupils in this group and create a culture where pupils can speak out and share their concerns with members of staff.

Children with special educational needs (SEN), disabilities or certain health conditions can face additional safeguarding barriers when recognising abuse and neglect for reasons including:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- being more prone to peer group isolation than other children
- the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- communication barriers and difficulties in overcoming these barriers.
- Cognitive understanding- being able to understand the difference between fact and fiction in online content and then repeating the content/ behaviours in schools or the consequences of doing so.

At PhoenixPlace we identify students who may be more at risk of harm and take action to ensure their safety, including: What do we do for our pupils in relation to SEND needs when safeguarding eg curriculum, understanding signs of concern. all staff understand that all students have SEND., CPD, CiF meetings

For further detail please refer to the SEND policy.

### **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 5: Making a referral

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 other children.

Ultimately, all our systems and processes operate with the best interests of the child at heart. Referrals to services regarding concerns about a child or family typically fall into three categories:

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

### Referrals to MASH

#### Multi Agency Safeguarding Hub (MASH) Referrals

We note that Southwark's Multi Agency Safeguarding Hub (MASH) adopted the London Safeguarding Children Partnership (LSCP) Threshold Document, which provides a framework for professionals who are working with children, young people and families and aims to help identify when a child may need safeguarding or additional support to achieve their full potential.

It introduces a continuum of help and support, provides information on the levels of need and gives examples of some of the factors that may indicate a child or young person needs additional support.

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](#), the safeguarding referrals will be made to Southwark Multi Agency Safeguarding Hub (MASH) by submitting the online referral form via the Southwark portal which is accessible through [https://forms.southwark.gov.uk/ShowForm.asp?nc=VIJ4&fm\\_fid=2264](https://forms.southwark.gov.uk/ShowForm.asp?nc=VIJ4&fm_fid=2264).

### Referral to MASH

Safeguarding referrals should be made to Southwark Multi Agency Safeguarding Hub ([MASH](#)) via the [Referral Form](#) and copied to the LA's Schools Safeguarding Coordinator.

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

Prior to any written form being sent as a referral to social care, there should be a verbal consultation with the MASH social worker or manager, by calling the duty desk on **020 7525 1921**, to ensure that making a referral is an appropriate action out of hours phone **020 7525 5000**, to ensure that making a referral is an appropriate action

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 should be provided with the referral.

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

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

**This should then be sent to:**

[MASH@southwark.gov.uk](mailto:MASH@southwark.gov.uk)

Within one working day of a referral being received, local authority children's social care should acknowledge receipt to the referrer and a social work qualified practice supervisor or manager should decide next steps and the type of response required.

We will follow up if this information is not forthcoming.

If, after a referral, the child's situation does not appear to be improving, we will consider following [local escalation procedures](#) to ensure that the concerns have been addressed and, most importantly, that the child's situation improves.

When we are undecided about whether the circumstances require a referral or we require general advice and guidance about a situation, there should be a verbal consultation with the MASH social worker or manager, by calling the duty desk on **020 7525 1921**, to seek further guidance.

## 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.

### Early Help Referral

The [Early Help Referral Form](#) will be used to request additional early help for a family when the needs of a child are beyond the level of support that can be provided by universal services.

Southwark's [Family Early Help Service](#) Duty number is **020 7525 1922**, which will give four options:

1. General enquiries and signposting
2. Family Early Help Duty Manager for general advice including consultations around potential and new referrals and current casework
3. Education, Inclusion and Attendance support and advice including all enforcement activity

#### 4. Parenting support and advice and information on parenting course and group work programmes

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

**If a pupil is thought to be at immediate risk because of parental violence, intoxication, substance abuse, mental illness or threats to remove the child during the school day, for example, urgent Police intervention will be requested.**

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

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.

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

### Vulnerable Pupils

Particular vigilance will be exercised in respect of pupils who are subject to Child Protection Plan and any incidents or concerns involving these children will be reported immediately to the allocated Social Worker and confirmed in writing.

If the pupil in question is a Looked-After child, this will also be brought to the notice of the Designated Person with responsibility for children in public care.

The School's Designated Teacher for Looked-after and Previously Looked-after Children will work with the virtual school head, who manages pupil premium plus for looked after children, to discuss how funding can be best used to support the progress of looked after children in the 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 DfE's statutory guidance [Designated teacher for looked-after and previously looked-after children](#).

Where a child has an allocated social worker, we will liaise with the relevant LA's virtual school head who, in addition to their statutory duties, now has a non-statutory responsibility for the strategic oversight of the educational attendance, attainment, and progress of children with a social worker.

We also note that the role of Virtual School Heads was further extended to include a non-statutory responsibility to promote the educational achievement of all children in kinship care. The DfE's non-statutory guidance on [Promoting the education of children with a social worker and children in kinship care](#)

[arrangements: virtual school head role extension](#) contains further information on the roles and responsibilities of virtual school heads.

Local authorities should share with our school the fact a child has a social worker, and the DSL will hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes.

This will be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools and colleges to safeguard and promote the welfare of children.

Where children need a social worker, this will inform decisions about safeguarding (for example, responding to unauthorised absence or being absent from education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

We acknowledge that children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges.

We are aware that additional barriers can exist when recognising abuse and neglect in this group of children. This 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 outwardly showing any signs; and
- communication barriers and difficulties in managing or reporting these challenges.

Further information can be found in the DfE's [SEND Code of Practice 0 to 25](#) and [Supporting Pupils at School with Medical Conditions](#).

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

The School also acknowledges the additional need for support and protection of children who are vulnerable by virtue of homelessness, refugee/asylum seeker status, the effects of substance abuse within the family, those who are young carers, mid-year admissions, pupils who are excluded from school and pupils where English is an additional language, particularly for very young children, using the translation service if necessary.

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

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

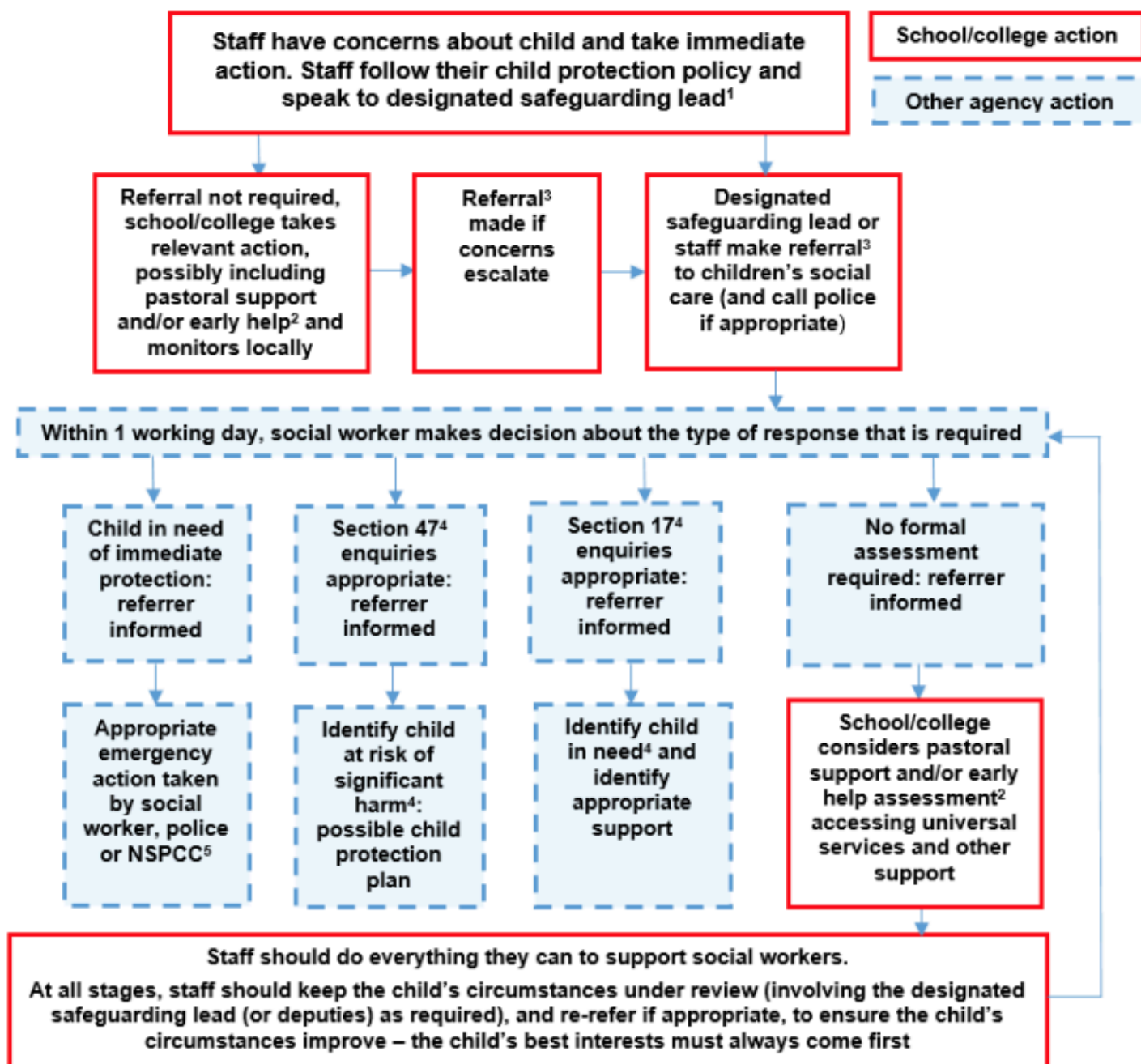
If the safeguarding/welfare concern is low level and does not require other agency involvement, the DSL or a DDSL will initiate early intervention with the following aims:

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

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

We aim to keep all our parents/carers informed of our safeguarding responsibilities and the existence of this policy. In situations where students sustain injury or are otherwise affected by an accident or incident whilst they are the responsibility of the School, parents will be notified of this as soon as possible.

**KCSIE Flow Chart Diagram:** So in summary this flowchart from KCSIE makes clear what should happen



<sup>1</sup> In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of this guidance.

<sup>2</sup> Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of Working Together to Safeguard Children provides detailed guidance on the early help process.

<sup>3</sup> Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of Working Together to Safeguard Children.

<sup>4</sup> Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of Working Together to Safeguard Children.

<sup>5</sup> This could include applying for an Emergency Protection Order (EPO).



## Section 6: Safeguarding in School

### Record Keeping and Information Sharing

We recognise the importance of information sharing between practitioners and local agencies. We are 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 the local authority children's social care.

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

Our safeguarding records include:

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

We have due regard to the relevant data protection principles, understanding that the Data Protection Act 2018 and the GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. At PhoenixPlace we understand that the Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe.

In line with our mandatory duty, PhoenixPlace will notify our local authority if we become aware of any private fostering, to allow the local authority to check the arrangement is suitable and safe for the child. Private fostering occurs when a child under the age of 16 (under 18, if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home.

All contact with parents and external agencies will be logged and these will be kept as CP 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 dangerous "secrets".

Child protection records are not open to pupils or parents. All CP 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 victims of abuse and have that support in place for when the child arrives.

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 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 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](#).

1. 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](#).
2. 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 Arbor for school number to indicate the destination is unknown, as per paragraph 2.4.2 of the [CTF 24 25 specification](#)
3. 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](mailto: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 a 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.

### **Safety In The School**

All staff members have a responsibility to ensure the buildings and school site are secure and to report any concerns that may occur.

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.

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 (or the visitor's employers have confirmed that their staff have appropriate checks). 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.

The identity of all visitors and volunteers coming into school is checked. Visitors are expected to sign in and out and to display a visitor's badge while on the school site. Any individual who is not known or identifiable will be challenged for clarification and reassurance by our staff.

The school will not accept the behaviour of any individual, parent or anyone else, that threatens the school security or leads others, child, or adult, to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse the person access to the school site and advice being sought from our local safeguarding partners.

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. Brief information about the incident will be sent to LA's Schools Safeguarding Coordinator with a view to alerting other local schools in liaison with the police and through appropriate systems.

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.

## Curriculum

PhoenixPlace acknowledges the important role that the curriculum can play in the prevention of abuse and in the preparation of our pupils for the responsibilities of adult life and citizenship.

We will ensure that children are taught about safeguarding, including online safety and will consider this as part of providing a broad and balanced curriculum.

It is expected that all curriculum co-ordinators will consider the opportunities that exist in their area of responsibility for promoting the welfare and safety of pupils. As appropriate, the curriculum will

- be used to build resilience,
- help pupils to keep safe and to know how to ask for help if their safety is threatened.

As part of developing a healthy, safer lifestyle, pupils will be taught, for example:

- to recognise and manage risks in different situations and then decide how to behave responsibly;
- to judge what kinds of physical contact are acceptable and unacceptable;
- to recognise when pressure from others (including people they know) threatens their personal safety and well-being; including knowing when and where to get help;
- to be aware of sexual harassment, online abuse, sexual violence and issues of consent and safeguarding risks, including online risks and what constitutes a healthy relationship, both online and offline via a carefully planned relationships, sex and health education curriculum.
- to use assertiveness techniques to resist unhelpful pressure;
- emotional literacy.

All computer equipment and internet access within the School will be subject to appropriate “parental controls” and Internet safety rules in accordance with our Online Safety Policy, which, amongst other things, will include appropriate filtering and monitoring on school devices and school networks.

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.

We will deliver the mandatory [Relationships & Sex Education \(RSE\) and Health Education](#). We note the current [Relationships Education, Relationships and Sex Education \(RSE\) and Health Education](#) guidance for teaching until 31 August 2026. We also note the revised guidance on [Relationships Education, Relationships and Sex Education \(RSE\) and Health Education](#) which will come into force 1 September 2026. Staff will continue to challenge everyday sexism, misogyny, homophobia, ‘toxic masculinity’ and stereotypes and that pupils will learn in an age appropriate way:

- How pornography can negatively influence sexual attitudes and behaviours
- How sub-cultures, such as ‘incels’ might influence their understanding of sexual ethics
- About the prevalence of AI-generated sexual imagery and ‘deepfakes’
- The role of consent, and awareness of power dynamics
- Who they might speak to about self-harming behaviours or suicidal ideations of their self or another pupil.

### Alternative provision

If we need to place a pupil off-site with an alternative provision provider, we will continue to be responsible for the safeguarding of that pupil and should be satisfied that the placement meets the pupil's needs. We will obtain written information from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at their establishment (i.e. those checks that we would otherwise perform on our own staff).

We will ensure that we always know where a child is based during school hours and will have systems in place to constantly monitor the child's attendance at the placement. This includes having records of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend. We will regularly review the alternative provision placements we make.

We note the DfE's two pieces of statutory guidance to which commissioners of Alternative Provision should have regard: [Alternative Provision](#) and [Education for children with health needs who cannot attend school](#).

### Remote Education

We understand the importance of keeping pupils, students and staff safe whilst learning remotely. We will reinforce in our contacts with parents/carers the importance of children being safe online.

Parents/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/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 also note the DfE guidance [Safeguarding and remote education](#).

### 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.
- Providing high quality Physical Education (PE) and sport to promote physical activity and fitness.
- 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/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 alert to the needs of parents/carers who do not have English as their first language and will utilise the translation services as necessary.
- We will distribute the LA's leaflet for parents, "[Protecting Children in Education Settings](#)".
- 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 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

**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 or adults or another child or children.

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. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

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

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

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

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

Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments.

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)

**In addition to these types of abuse and neglect, members of staff will also be alert to following specific safeguarding issues:**

### **Child Criminal Exploitation (CCE)**

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator and/or through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being;

- forced to work in cannabis factories,
- coerced into moving drugs or money across the country (county lines),
- forced to shoplift or pickpocket,
- forced to threaten other young people.

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.

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

### **Child Sexual Exploitation (CSE)**

CSE is a type of sexual abuse in which children are sexually exploited for money, power or status.

Children or young people may be tricked into believing they are in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed online.

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](#).

Where it comes to our notice that a child under the age of 13 is, or may be, sexually active, whether or not they are a pupil of this school, this will result in an immediate referral to Children's Services.

In the case of a young person between the ages of 13 and 15, an individual risk assessment will be conducted in accordance with the [London Safeguarding Children Procedures](#). This will determine how and when information will be shared with parents and the investigating agencies.

### **Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)**

Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is **illegal**. Sharing nudes and semi-nudes covers the incidents where

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

When such an incident involving nudes and semi-nudes comes to a member of staff's attention, this will be shared with the DSL 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 Advice](#) for schools.

### **Child abduction and community safety incidents:**

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members, by people known but not related to the victim (such as neighbours, friends and acquaintances) and by strangers.

### **Cybercrime:**

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). 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
- 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.

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

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

Risks can be compounded where children lack a trusted adults with whom they can be open. Our staff will endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff.

Lesbian, gay, or bisexual inclusion is part of the statutory [Relationships Education, Relationship and Sex Education and Health Education](#) curriculum. We will work with appropriate agencies to counter homophobic, biphobic and transphobic bullying and abuse and to provide support to lesbian, gay, or bisexual children.

We will have regard to appropriate DfE guidance concerning gender questioning children.

## **County lines**

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

Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children’s homes and care homes. Children are also increasingly being targeted and recruited online using social media.

Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. Some specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing 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 ‘traphouse or cuckooing’ or hotel room where there is drug activity; owe a ‘debt bond’ to their exploiters; have their bank accounts used to facilitate drug dealing.

## **Child on child abuse**

- Children are capable of abusing other children. This can happen both inside and outside of school and online and take different forms, such as
- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between children;
- physical abuse (such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm, which may include an online element that facilitates, threatens and/or encourages physical abuse;
- violence, particularly pre-planned, forcing other children to use drugs or alcohol, initiation/hazing type violence and rituals),
- emotional abuse (blackmail or extortion, threats and intimidation),
- sexual violence, such as rape, assault by penetration and sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, consensual and non-consensual sharing of nudes and semi-nudes images and/or videos (also known as sexting or youth produced sexual imagery), sexual abuse (indecent exposure, indecent touching or serious sexual assaults, forcing other children to watch pornography or take part in sexting) and sexual exploitation (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;

- having an older boyfriend/girlfriend, associating with unknown adults or other sexually exploited children, staying out overnight, photographing or videoing other children performing indecent acts) and upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm. Upskirting is now a criminal offence. 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".

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

As a school, we will minimise the risk of allegations against other pupils by

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

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

### **Domestic abuse**

Domestic violence and abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to psychological, physical, sexual, financial and emotional.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. If members of staff have a concern about or knowledge of any domestic abuse incidents, they will share it immediately with the DSL with

a view to referring to appropriate agencies. Information is available about [Domestic abuse and how to get help in Southwark](#).

If members of staff have a concern about or knowledge of any domestic abuse incidents, they will share it immediately with the DSL with a view to referring to appropriate agencies.

### **Harmful sexual behaviour (HSB)**

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage.

HSB can occur online and/or face-to-face and can also occur simultaneously between the two. We consider HSB in a child protection context.

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

We aim to have a good understanding of HSB, which will aid in planning preventative education, implementing preventative measures and incorporating the approach to sexual violence and sexual harassment into the whole school approach to safeguarding.

HSB can, in some cases, progress on a continuum. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

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

### **'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.

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

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

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

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

We note a new duty that was introduced on 31 October 2015 that requires teachers, which includes qualified teachers or persons who are employed or engaged to carry out teaching work in schools and other institutions to report 'known' cases of FGM in girls aged under 18 to the police. The duty applies to any teacher who is employed or engaged to carry out 'teaching work', whether or not they have qualified teacher status, in maintained schools, academies, free schools, independent schools, non-maintained special schools, sixth form colleges, 16-19 academies, relevant youth accommodation or children's homes in England. The duty does not apply in relation to suspected cases – it is limited to 'known' cases' (i.e. those which are visually identified or disclosed to a professional by the victim).

Potential risk factors may include:

- a female child is born to a woman who has undergone FGM
- a female child has an older sibling or cousin who has undergone FGM
- a woman/family believe FGM is integral to cultural or religious identity
- a parent or family member expresses concern that FGM may be carried out on the girl
- a girl talks about FGM in conversation, for example, a girl may tell other children about it

- being taken on a long holiday to country where FGM is prevalent

It will be rare for teachers to see visual evidence, and they should not be examining pupils or students. The duty does not apply in cases where the woman is over 18 at the time of the disclosure/discovery of FGM (even if she was under 18 when the FGM was carried out). Further information on this duty can be found in the document "[Mandatory Reporting of Female Genital Mutilation – procedural information](#)". A useful summary of the FGM mandatory reporting duty is available in [FGM Fact Sheet](#).

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

### Forced marriage

Forcing a person into a marriage is a crime in England and Wales and the law forbids formal or informal marriages involving anyone under the age of 18.

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 as a way to coerce a person into marriage.

We note The Forced Marriage Unit's statutory guidance [The right to choose: government guidance on forced marriage](#) and especially Chapter 8 of the [Multi-agency guidelines](#), which is specifically aimed at teachers, lecturers and other members of staff within schools, colleges and universities.

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

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

### Homelessness:

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property.

It should also be recognised in some cases that 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support.

## Mental Health

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

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

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood.

It is key that our staff members are aware of how these children's experiences can impact on their mental health, behaviour and education.

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

## Modern Slavery and the National Referral Mechanism:

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour.

Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

## Private Fostering

Private fostering is when a child under the age of 16 (under 18 if disabled) is cared for by someone who is not their parent or a 'close relative'.

This is a private arrangement made between a parent and a carer, for 28 days or more. Close relatives are defined as step-parents, grandparents, brothers, sisters, uncles or aunts (whether of full blood, half blood or by marriage). Great grandparents, great aunts, great uncles and cousins are not regarded as close relatives.

The law requires that the local authority should be notified if anyone is looking after someone else's child for 28 days or more. The purpose of the council's involvement is to support the child and private foster family (and wherever possible the biological parent/s) with any issues arising. These may be practical issues such as benefits, housing, immigration or emotional issues such as keeping contact with biological family, maintaining cultural identity.

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](mailto: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.



## Preventing Radicalisation

The Counter-Terrorism and Security Act 2015 places a duty on specified authorities, including local authorities and childcare, education and other children's services providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism ("the Prevent duty").

We recognise that children are vulnerable to extremist ideology and radicalisation in particular those via the internet and other social media. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection.

Our school adheres to the Prevent duty and we have "due regard to the need to prevent people from being drawn into terrorism". We build pupils' resilience to radicalisation by providing a safe environment for debating controversial issues, promoting fundamental British values.

Staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be susceptible to radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral.

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying or advocating violence, especially to other faiths or cultures
- intolerance of difference, including faith, culture, gender, race or sexuality

Example indicators that an individual is engaged with an extremist group, cause or ideology include:

- spending increasing time in the company of other suspected extremists;
- changing their style of dress or personal appearance to accord with the group;
- their day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause;
- loss of interest in other friends and activities not associated with the extremist ideology, group or cause;
- possession of material or symbols associated with an extremist cause (e.g. the swastika for far right groups);
- attempts to recruit others to the group/cause/ideology; or
- communications with others that suggest identification with a group/cause/ideology.

Example indicators that an individual has an intention to use violence or other illegal means include:

- clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills;
- using insulting or derogatory names or labels for another group;
- speaking about the imminence of harm from the other group and the importance of action now;
- expressing attitudes that justify offending on behalf of the group, cause or ideology;
- condoning or supporting violence or harm towards others; or
- plotting or conspiring with others.

Example indicators that an individual is capable of contributing directly or indirectly to an act of terrorism include:

- having a history of violence;
- being criminally versatile and using criminal networks to support extremist goals;
- having occupational skills that can enable acts of terrorism (such as civil engineering, pharmacology or construction);
- or having technical expertise that can be deployed (e.g. IT skills, knowledge of chemicals, military training or survival skills).

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

There is no single route to terrorism nor is there a simple profile of those who become involved. For this reason, any attempt to derive a 'profile' can be misleading. It must not be assumed that these characteristics and experiences will necessarily lead to individuals becoming terrorists, or that these indicators are the only source of information required to make an appropriate assessment about vulnerability.

We see the Prevent duty as part of our school's wider safeguarding obligations and note the revised [Prevent duty guidance: for England and Wales](#), especially paragraphs 141-210

All our staff receive training on the Prevent Duty at least annually.

If the school needs to make a Prevent referral;

- ↓ **We will refer children at risk of harm as a result of involvement or potential involvement in extremist activity to Southwark Multi Agency Safeguarding Hub ([MASH](#)).**
- ↓ The MASH will share the referral details of new referrals with the Prevent lead police officer and LA Prevent coordinator at the point the referral is received.
- ↓ The referral will then be processed through the MASH multi agency information sharing system and parallel to this the Prevent police officer will be carrying out initial screening checks.
- ↓ The Prevent police officer will make a referral to the Channel Practitioner if there are sufficient concerns.
- ↓ The individual referred will be discussed at the Channel panel to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required.
- ↓ A representative from our school will attend the Channel panel if and when we are asked to help with this assessment.

The following roles in the school have completed training in how to make a Prevent referral: DSL, DDSLs (free Prevent referral training for DSLs)

As part of managing the risk of radicalisation, we have clear protocols for ensuring that any visiting speakers, whether invited by staff or by children themselves, are suitable and appropriately supervised.

In England, the Prevent duty complements schools' other responsibilities for ensuring that speakers do not undermine the fundamental British values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs. Our protocols include;

- Requesting an outline of speakers notes
- PhoenixPlace staff supervising sessions
- Obtaining relevant ID documentation

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

### Serious violence

All staff will be made aware of indicators, which may signal that children are at risk from, or are involved with serious crime.

These may include

- increased absence from school,
- a change in friendships or relationships with older individuals or groups,
- a significant decline in performance,
- signs of self-harm or significant change in wellbeing,
- or signs of assault or unexplained injuries.

Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

We are aware that there are a range of risk factors which increase the likelihood of involvement in serious violence, such as

- being male,
- having been frequently absent or permanently excluded from school,
- having experienced child maltreatment and
- having been involved in offending, such as theft or robbery.

We are also aware that fear and a need for self-protection is a key motivation for children to carry a weapon – it affords a child a feeling of power.

Neighbourhoods with high levels of deprivation and social exclusion generally have the highest rates of gun and knife crime. Children are more likely to carry knives and other weapons than guns.

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

### Sexual harassment, online sexual abuse and sexual violence

Sexual harassment, online sexual abuse and sexual violence (including sexualised language) is unacceptable in our school and we have appropriate sanctions in place. We understand that sexual harassment, online sexual abuse and sexual violence are happening in and around the school, even when there are no specific reports.

We work actively to prevent sexual harassment, online sexual abuse and sexual violence through a whole-school approach that includes an effective behaviour policy, pastoral support and a carefully planned relationships, sex and health education curriculum, which specifically addresses sexual harassment, online abuse, sexual violence and issues of consent.

We will ensure that children are taught about safeguarding risks, including online risks and will support pupils to understand what constitutes a healthy relationship, both online and offline. Our staff members have been made aware and have appropriate knowledge of 'Part 5: Child on child sexual violence and sexual harassment' of DfE guidance "[Keeping children safe in education](#)".

All pupils are supported to report concerns about harmful sexual behaviour freely. We will take concerns seriously and deal with them swiftly and appropriately and will ensure pupils are confident that this is case.

We will be alert to factors that increase vulnerability or potential vulnerability such as mental ill health, domestic abuse, children with additional needs, and children from groups at greater risk of exploitation and/or of feeling unable to report abuse (for example, girls and LGBT children). We will identify and address any barriers that can prevent a pupil from making a disclosure, for example communication needs.

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

### Sexual violence and sexual harassment between children

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It can occur online and offline (both physically and verbally).

It is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. Children who are victims of sexual violence and sexual harassment will find the experience stressful and distressing. This will affect their educational attainment. We will handle reports of sexual violence and harassment between children, both on and outside school premises, in accordance with 'Part 5: Child on child sexual violence and sexual harassment' of DfE guidance "[Keeping children safe in education](#)" and train our staff members accordingly (including teachers delivering relationships, sex and health education).

Staff will share any concerns about or knowledge of such incidents immediately with the DSL with a view to ensuring that support systems are in place for victims (and alleged perpetrators). We take these incidents seriously and ensure that victims are protected, offered appropriate support and every effort is made to ensure

their education is not disrupted. Where necessary, we will work with relevant external agencies to address the issue, which may include a referral to MASH and reporting to the Police.

On one hand, we need to safeguard the victim (and the wider pupil/student body) and on the other hand provide the alleged perpetrator with an education, safeguarding support as appropriate and implement any disciplinary sanctions. Harmful sexual behaviours in young children may be (and often are) a symptom of either their own abuse or exposure to abusive practices and or materials.

We will take advice, as appropriate, from children's social care, specialist sexual violence services and the police. If the alleged perpetrator moves to another educational institution (for any reason), we will make the new educational institution aware of any ongoing support needs and where appropriate, potential risks to other children and staff. The DSL will take responsibility to ensure this happens as well as transferring the child protection file.

### **Violence Against Women and Girls (VAWG)**

VAWG is defined as any act of gender-based violence that results in, or is likely to result in

- physical, sexual or psychological harm or
- suffering to women including threats of such acts,
- coercion or arbitrary deprivation of liberty, whether occurring in public or private life.

VAWG is the umbrella term which brings together multiple forms of serious violence such as

- crimes committed in the name of "honour";
- domestic abuse;
- female genital mutilation (FGM);
- forced marriage;
- sexual violence, abuse,
- exploitation and rape;
- stalking;
- harassment;
- trafficking for sexual exploitation;
- prostitution.

If members of staff have a concern about or knowledge of any VAWG incidents, they will share it immediately with the DSL with a view to referring to appropriate agencies.

## Appendix 2: Safer Recruitment

PhoenixPlace is committed to the principles of safer recruitment and, as part of that, adopts 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 an online search as part of our due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which we may explore with the applicant at interview. We will inform shortlisted candidates that online searches may be done as part of due diligence checks.

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](#)".

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 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.

Our single central record (SCR) records information on the checks carried out on staff and volunteers. Copies of these checks, where appropriate, will be located in individuals' personnel files. We follow the guidance from Keeping Children Safe in Education and best practice, as outlined below.

PhoenixPlace is committed to the principles of safer recruitment and, as part of that, adopts 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.

### 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](#)".

### **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

## 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.

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.

Volunteers who on an unsupervised basis teach or look after children regularly, or provide personal care on a one-off basis in our school are deemed to be in regulated activity. We will obtain an enhanced DBS certificate (which will include barred list information) for all volunteers who are new to working in regulated activity. Existing volunteers in regulated activity do not have to be re-checked if they have already had a DBS check (which includes barred list information). However, we may conduct a repeat DBS check (which will include barred list information) on any such volunteer should we have any concerns.

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

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 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](#).

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## **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.

## **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.

## **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: Statement of procedures for dealing with Allegations of abuse against staff**

This appendix applies to all cases where it is alleged that a staff member, supply teacher or volunteer 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; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children

We will deal with any allegation of abuse against a member of staff or volunteer quickly, in a fair and consistent way that provides effective protection for the child and supports the person who is the subject of the allegation.

We recognise our duty of care to our employees and will provide effective support for anyone facing an allegation, including a named contact if the person is suspended. We will advise staff to contact their trade union representative.

Allegations of abuse against staff should be reported to the Headteacher. Where the concern is about the Headteacher this should currently be reported to the LADO. If the member of staff perceives there to be a conflict of interest, they can refer directly to the LADO. The contact details are available in the key contacts.

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

### **Initial consideration when dealing with an allegation**

The headteacher or (where the headteacher is the subject of an allegation) the chair of SAP, (whilst awaiting the Chair of SAP for allegations for where the HT is the subject of we will appoint an Independent person to investigate or allocate the DSL will fulfil the role of the case manager (the 'case manager'), should discuss the allegation immediately with the local authority designated officer (LADO).

This discussion will consider the nature, content and context of the allegation and agree on a course of action. There may be situations when the case manager will want to involve the police immediately, for example if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. Where there is no such evidence, the case manager will discuss the allegations with the designated officer in order to help determine whether police involvement is necessary. The case manager will inform the accused person about the allegation as soon as possible after consulting the designated officer. Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies.

If the initial sharing of information leads to a decision that no further action is to be taken in regard to the individual facing the allegation or concern, this decision and a justification for it will be recorded by both the case manager and the designated officer, and agreement reached on what information should be put in writing to the individual concerned and by whom.

The case manager will then consider with the designated officer what action should follow both in respect of the individual and those who made the initial allegation. If the allegation is about physical contact, the strategy discussion or initial evaluation will take into account that school staff are entitled to use reasonable force to control or restrain children in certain circumstances.

Where it is clear that an investigation by the police or children's social care services is unnecessary, or the strategy discussion or initial evaluation decides that is the case, the designated officer will discuss the next steps with the case manager. In those circumstances, the options open to the school depend on the nature and circumstances of the allegation and the evidence and information available. This will range from taking no further action to dismissal or a decision not to use the person's services in future. Suspension will not be the default position: an individual should be suspended only if there is no reasonable alternative.

In some cases, further enquiries will be needed to enable a decision about how to proceed. If so, the case manager will discuss with the designated officer how and by whom the investigation will be undertaken. In straightforward cases, the investigation should normally be undertaken by a senior member of our staff. In other circumstances, the allegation will require an independent investigator.

Parents or carers of the child or children involved will be told about the allegation as soon as possible if they do not already know of it. However, where a strategy discussion is required, or police or children's social care services need to be involved, the case manager will not do so until those agencies have been consulted and have agreed what information can be disclosed to the parents or carers.

Parent or carers will be kept informed about the progress of the case. Parents will be reminded of the requirement to maintain confidentiality about any allegations made against teachers whilst investigations are ongoing. If parents or carers wish to apply to the court to have reporting restrictions removed, they should be told to seek legal advice.

If the accused person resigns, or ceases to provide their services, this will not prevent an allegation being followed up. We will ensure that a referral to the DBS is made, if the four criteria at the start of this appendix are met. We will also consider whether a referral to the Secretary of State is appropriate.

Following a criminal investigation or prosecution, the police should inform the school and designated officer immediately when a criminal investigation and any subsequent trial is complete, or if it is decided to close an investigation without charge, or not to continue to prosecute the case after the person has been charged. In those circumstances, the case manager will discuss with the designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed.

If the allegation is substantiated and the person is dismissed or the person's services are no longer used, or the person resigns or otherwise ceases to provide his or her services, the designated officer will discuss with the case manager and their personnel adviser whether the school will decide to make a referral to the DBS for consideration of whether inclusion on the barred lists is required. In the case of a member of teaching staff, the case manager and personnel officer will discuss with the designated officer whether to refer the matter to the TRA to consider prohibiting the individual from teaching.

Where it is decided on the conclusion of a case that a person who has been suspended can return to work, the case manager will consider how best to facilitate this and consider how the person's contact with the child or children making the allegation can best be managed.

Allegations against a teacher who is no longer teaching will be referred to the police. Historical allegations of abuse will also be referred to the police.

### **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.

### **Record keeping and references**

Details of allegations that are found to have been malicious will be removed from personnel records. For all other allegations, a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken, and decisions reached, is kept on the confidential personnel file of the accused, and a copy provided to the person concerned. Records will be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.

Cases in which an allegation was proven to be false, unsubstantiated or malicious will not be included in employer references. A history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious will also not be included in any reference.

## **Timescales**

Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week.

If the nature of an allegation does not require formal disciplinary action, we will institute appropriate action within 3 working days.

If a disciplinary hearing is required and can be held without further investigation, we will hold this within 15 working days.

## **Suspension**

Suspension will not be an automatic response when an allegation is reported: all options to avoid suspension will be considered prior to taking that step. Suspension will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that it might be grounds for dismissal.

Based on assessment of risk, the following alternatives will be considered by the case manager before suspending a member of staff:

- redeployment within the school so that the individual does not have direct contact with the child or children concerned
- providing an assistant to be present when the individual has contact with children
- redeploying to alternative work in the school so the individual does not have unsupervised access to children
- moving the child or children to classes where they will not come into contact with the member of staff, making it clear that this is not a punishment and parents have been consulted; or
- temporarily redeploying the member of staff to another role in a different location, for example to an alternative school or work for the local authority

If immediate suspension is considered necessary, the rationale and justification for such a course of action will be agreed and recorded by both the case manager and the designated officer.

## **Supply staff**

We will ensure any allegations against an individual not employed by PhoenixPlace such as supply teachers, will be dealt with properly. We will not decide to stop using a supply teacher due to safeguarding concerns without finding out the facts and liaising with our local authority designated officer to determine a suitable outcome.

We will discuss with the agency whether it is appropriate to suspend the supply teacher. We will inform the agency of our process for managing allegations and invite the agency's human resource manager or equivalent to meetings as appropriate.



## Learning lessons

At the conclusion of a case in which an allegation is substantiated, we will review the circumstances of the case with the designated officer to determine whether there are any improvements to be made to the school's procedures or practice to help prevent similar events in the future.

## Non recent allegations

Abuse can be reported no matter how long ago it happened. Where an adult makes an allegation to our school that they were abused as a child, the individual will be advised to report the allegation to the police. We will report any non-recent allegations made by a child to the LADO.

## Low-level concerns

In line with Section 2 of Part 4 of Keeping Children Safe in Education, we recognise the importance of creating a culture of openness, trust, and transparency to encourage all staff to share low-level concerns with the right person so that they can be addressed appropriately.

The purpose of our approach to low-level concerns is to ensure that our values are constantly lived, monitored, and reinforced by staff. Our values are outlined in more detail in our Staff Code of Conduct.

The term 'low-level' concern does not mean that the concern is insignificant, it means that a staff member, supply teacher or volunteer does not seem to have:

- 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; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children

A low-level concern covers any concern no matter how small, even if it is no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school may have acted in a way that:

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

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

- being over friendly with children;
- having favourites;
- taking photographs of children on a personal mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or
- humiliating pupils.

Such behaviour can exist on a spectrum. Our school's response to low-level concerns is an extension of our Code of Conduct. Staff are able to share their concerns confidentially in a simple and easy manner. It is imperative that where staff do have concerns, they share them as outlined in this policy to support with building a culture of expected behaviour and promoting our school values.

Low-level concerns about a member of staff, supply staff, volunteer or contractor should be reported to the Headteacher in the first instance **OR** Designated Safeguard Lead if the Headteacher is absent.

The Headteacher will have oversight of all recorded concerns and has ultimate decision-making power in respect of all low-level concerns.

Any concerns about the Headteacher **OR** Designated Safeguard Lead should currently be reported to the LADO.

All low-level concerns will be recorded in writing. Each record will include details of the concern, the context in which the concern arose, and action taken. The name of the individual who raised the concern should be noticed, but if that individual wishes to remain anonymous, that will be respected to the extent it is reasonably possible to do so.

Records will be kept confidential, held securely, and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation.

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or by referring to the LADO, where a pattern of behaviour moves from a low level concern to meeting the harm threshold.

We will also consider whether there are wider cultural issues existing at the school that may have enabled the behaviour to occur. If this is found to be the case or a contributory factor, we may review our policies and deliver extra training where we consider this will minimise the events happening again.

Links to other policies:

- SEND Policy
- Staff Code of Conduct including acceptable use
- Online Safety Policy
- Anti-Bullying Policy
- Behaviour Policy