

## Safeguarding and Child Protection Policy



Trust Safeguarding & Child Protection Lead: Hazel Hughes



Safeguarding and Child Protection Lead: Haley Yearwood  
Principal: Mariella Wilson  
Safeguarding Governor: Daniela Lawson



Safeguarding & Child Protection Lead: John Cadogan  
Principal: Jay Lockwood  
Safeguarding Governor: Richard Jones

**SAFEGUARDING CHILDREN**

- **CHILD PROTECTION**
- **CHILD SEXUAL EXPLOITATION**
- **RADICALISATION**
- **FGM**
- **YOUTH PRODUCED SEXUAL IMAGERY**
- **ALLEGATIONS OF PEER ON PEER ABUSE**
- **CHILDREN MISSING EDUCATION**

Person(s) Responsible:	Principal
Status:	Statutory
Date last approved:	28 September 2019
Date of review:	Board of Directors September 2020
Review period:	Annually

**This policy should be read alongside the following policies:**

- The school's Behaviour Policy
- The school's Anti-Bullying Policy
- The Trust's Staff Code of Conduct
- The Trust's Allegations of Abuse Against Staff Policy
- The Trust's Safer Recruitment Policy
- The Trust's Visiting Speakers Policy
- The Trust's Whistle Blowing Policy

**This policy has been drawn up as a response to:**

*DFE guidance 'Keeping Children Safe in Education' - September 2019, 'Working Together' – July 2018, Counter-Terrorism and Security Act - July 2015, Prevent and Channel duty guidance - June 2015, IRSC's Document 'Guidance for Safe Working Practice for the Protection of Children & Staff in Education Settings.', The Children Act 1989 defines a child as anyone who has not reached their 18<sup>th</sup> birthday*

## INTRODUCTION

Our policy applies to all staff, governors and volunteers working in the school. Safeguarding young people is the legal responsibility of us all. Springwest Academy is determined to ensure that all necessary steps are taken to protect the young people in our community. We are committed to safeguarding children and young people and we expect everyone who works in our school to share this commitment.

Adults in our school take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them.

We will always act in the best interest of the child.

At Tudor Park Education Trust students are taught about safeguarding, including online, through various teaching and learning opportunities offered as part of a broad and balanced curriculum.

### The overarching aims of this Policy are:

- to provide the safest possible environment for young people to enjoy their learning and develop safe practices
- to create a culture which recognises and understands the importance of safeguarding; including listening to and discussing with young people
- to ensure that young people who are suffering or likely to suffer significant harm are identified and appropriate action is taken to make sure they are kept safe.
- to prevent unsuitable people from working with our young people
- to ensure that safe practice is rigorously promoted and any poor practice is investigated and challenged
- to identify instances in which there are grounds for concern about a child's welfare and initiating or taking appropriate actions to keep them safe
- to contribute to effective partnership working between all those involved with providing safeguarding services for young people

### Springwest Academy will ensure that:

- The welfare of the child remains paramount
- All our students, whatever their age, culture, disability, gender, language, racial origin, religious beliefs and/or sexual identity have the right to be protected from harm.
- All our students will be taught about Safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- **All** staff (paid or unpaid) have a duty to keep students safe and to protect them from physical and emotional harm.
- All staff have a duty to report **without delay** any concerns about a person's safety to Hazel Hughes who is the designated person for child protection or the deputy designated person for child protection. Staff also have a duty to take care of themselves. (Health & Safety At Work Act 1974).

- Where no specific guidance exists, staff make professional judgements about their behaviour in order to secure the best interests and welfare of students and, in so doing, will be deemed to be acting **REASONABLY**.

## Safeguarding and promoting the welfare of all young people in our community

### Confidentiality

- We recognise that all matters relating to child protection are confidential.
- The Director of Safeguarding named as Safeguarding and Child Protection Lead and/or the Principal will disclose any information about a student to other members of staff on a need to know basis only.
- All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard young people.
- All staff must be aware that they **cannot promise a child to keep secrets**.

### Supporting Children

We recognise that children who are abused or witness violence may find it difficult to develop a sense of self worth. They may feel helplessness, humiliation and some sense of blame. School may be the only stable, secure and predictable element in the lives of children at risk. When at school their behaviour may be challenging and defiant or they may be withdrawn. The School will endeavour to support the student through;

- The content of the curriculum;
- The school ethos which promotes a positive, supportive and secure environment and gives students a sense of being valued;
- Personalised learning provision;
- The school behaviour policy which is aimed at supporting vulnerable students in the school. The school will ensure that the student knows that some behaviour is unacceptable but they are valued and not to be blamed for any abuse which has occurred;
- Liaison with other agencies that support the student such as Children's Services, Child and Adolescent Mental Health Service (CAMHS), education welfare service and educational psychology service and those agencies involved in the safeguarding of children;
- Notifying Children's Social Care immediately there is a significant concern;
- Providing continuing support to a student about whom there have been concerns who leaves the school by ensuring that appropriate information is forwarded under confidential cover to the student's new school.

### Child Protection Policy and Procedures

All staff should be alert to the signs of abuse and neglect and know to whom they should report concerns or suspicions.

This policy is to be read in conjunction with the general duty – section 175 of the Education Act 2002

The School follows the London Child Protection Procedures 5<sup>th</sup> edition 2017 updated May 2018.

The policy outlines those procedures for this School.

As part of this Policy the School will

- ensure that it has a designated senior person for child protection who has received appropriate training and support for the role
- ensure that there is a nominated governor responsible for child protection
- ensure every member of staff and governor knows the name of the designated senior person for child protection and their role

### Definition

The term 'abuse' is intended to include any situation where there is grave concern regarding the well-being of a student, including neglect as well as physical, sexual and emotional abuse. All school staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

**Abuse:** a form of maltreatment of a child. Someone may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate off line abuse. They may be abused by an adult or adults or by another child or children.

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

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

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

place online, and technology can facilitate off line abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education (see Peer on Peer abuse).

**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 or shelter (including exclusion from home or abandonment); protect a child from physical or 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 or, or unresponsiveness to, a child's basic emotional needs.

Please see the Appendix for the flow chart for raising safeguarding concerns about a child.

### **School's Responsibility**

It is part of the School's responsibility of care to be alert to signs of abuse. This may include:

- sudden changes in behaviour
- withdrawal from social relationships
- sudden change in attendance patterns and other causes of concern about
- change in attendance
- change in working patterns
- loss of concentration
- lack of homework
- lack of motivation
- tearfulness, listlessness
- physical bruising

### **Children with special educational needs or disabilities**

Children with special educational needs and disabilities can face additional safeguarding challenges.

- It is important not to make assumptions that that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability.
- Children with SEN and disabilities are disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- They may find communicating their worries difficult and these barriers need to be considered.
- At Tudor Park Education Trust we identify students who might need more support to be kept safe or to keep themselves safe through the work of the SEND teams, tailored safeguarding programmes and the provision of key workers/personal coaches.

### **Procedures**

Staff should be receptive to any attempt a student may make to report that s/he, or another student is being or has been abused.

- They should also be observant.
- All concerns should be discussed with the DSL.
- If someone discloses to you that they are being abused either physically, emotionally or sexually you should:

- React calmly
  - Reassure the child that they were right to tell and that they are not to blame and take what the child say seriously.
  - Be careful not to be deemed as putting words into their mouths. It is better not to ask questions – leave that to the child protection team.
  - REMEMBER not to promise confidentiality right from the beginning. You should advise the child that you will have to pass information on if there is any suggestion of harm to themselves or somebody else.
  - Inform the child what you will do next
  - Do not delay in passing on the information. This may be verbally initially, but a full and written record of what has been said must be made as soon as possible and passed to the DSL.
- All suspicious observations of staff should be immediately reported to the Designated Person Responsible for Child Protection - Hazel Hughes (SA), John Cadogan (LSS) or in their absence to the Principal.
  - The Designated Person for Child Protection will, if student does not dispel suspicions, refer the student to the Child Protection Team. **It is not our responsibility to decide whether abuse has taken place or not, however it is our responsibility to pass on any concerns to the appropriate authority immediately.**
  - The Designated Person for Child Protection will inform the parents or guardians, if appropriate, and record responses, statements and observations in connection with the alleged abuse.
  - The Education Welfare Officer will also be informed.
  - Staff, if appropriate, will be informed of the need to monitor a student in his/her tutor group.
  - Emergency action – In some cases you may need to protect a child immediately – in these situations dial 999. The police are the only agency with statutory powers for the immediate protection of children.
  - The London Child Protection Procedure Handbook is available in the SENDCO's office (SA) and the Principal's office (LSS).

## Monitoring

The Achievement Co-ordinator or Head of Year for each year group will keep an 'at risk register' for students in their year and with the help of the Form Tutor will monitor the progress and well-being of the student within the school. They will discuss students "at risk" regularly during line management meetings with the member of SLT responsible for the year.

Staff may be asked to attend case conferences.

The designated Teacher for Child Protection will hold a whole school register of students "at risk" and students will be discussed at Student in Need Meetings as appropriate to assist the monitoring of their well-being.

## Staff Issues

Staff involved cannot promise confidentiality and a student should always be warned that the information will need to be shared with the Designated Teacher for Child Protection.

Although staff will feel considerable sympathy for students when disclosing sensitive information, it is inadvisable to touch a student at any time.

Staff will receive training during their Induction programme and will undertake annual formal training to provide relevant skills and knowledge to safeguard children effectively, through an online training programme, alongside regular training throughout the year.

### **Supporting Staff**

We recognise that staff working in the school who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting. We will support such staff by providing an opportunity to talk through their anxieties with the Child Protection Officer and to seek further support as appropriate

#### **Responsibilities**

Staff must report to a member of the Senior Leadership Team any behaviour by colleagues that gives cause for concern in relation to safeguarding the wellbeing of students.

If any incident occurs which may result in an action being misinterpreted and / or an allegation being made against a member of staff, then the relevant information should be recorded promptly and reported to senior staff. See separate safeguarding policy 'Allegations against Staff'.

#### **Parents**

Parents will be informed of the College Policy via the website and hard copies will be available on request from the Principal's PA or your child's Pastoral Mentor.

### **Children Missing from Education**

Knowing where children are during school hours is an extremely important aspect of Safeguarding. Missing school can be an indicator of abuse and neglect and may also raise concerns about other safeguarding issues, including the criminal exploitation of children.

We monitor attendance carefully and address poor or irregular attendance without delay.

We will always follow up with parents/carers when students are not at school. This means we need to have at least two up to date contact numbers for parents/carers. Parents should remember to update the school as soon as possible if the contact numbers change.

In response to the guidance in Keeping Children Safe in Education (2019) the Trust has:

1. Staff who understand what to do when children do not attend regularly
2. Appropriate policies, procedures and responses for students who go missing from education (especially on repeat occasions)
3. Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage
4. Procedures to inform the local authority when we plan to take students off-roll when they:
  - a. Leave school to be home educated
  - b. Move away from the school's location
  - c. Remain medically unfit beyond compulsory school age
  - d. Are in custody for four months or more (and will not return to school afterwards) or

- e. Are permanently excluded.

We will ensure that students who are expected to attend the school, but fail to take up the place will be referred to the local authority.

When a student leaves the school, we will record the name of the pupil's new school and their expected start date.

The Safeguarding Lead will consider further actions / support should it be required. Should a student go missing from school (education) the Attendance Officer will inform the Safeguarding Lead. Hazel Hughes or John Cadogan and CME Officer at the LA with all relevant information regarding the child. A child will not be deleted from the school register until the new school is aware or a referral has been acknowledged and advice to remove agreed with the LA. See further guidance *Children Missing Education September 2016*.

### **Private fostering**

A private fostering arrangement is where a child under the age of 16 (or 18 if disabled) is provided care and accommodation by someone to whom they are not related in that person's home. It is made privately (without the involvement of the LA), with the intention that it should last for 28 days or more.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.

Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement.

If a member of staff becomes aware of this arrangement for students they should inform the DSL (Hazel Hughes or John Cadogan).

The DSL will inform the LA to check they are aware of the arrangement.

### **Child Sexual Exploitation Policy**

Child sexual exploitation [CSE] is child sexual abuse and child protection procedures should be followed when there are concerns that a child is at risk of CSE or is already the victim of CSE.

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

Indicators of child sexual exploitation may include:

- Acquisition of money, clothes, mobile phones, etc. without plausible explanation;
- Gang-association and/or isolation from peers/social networks;
- Exclusion or unexplained absences from school, college or work;
- Leaving home/care without explanation and persistently going missing or returning late;

- Excessive receipt of texts/phone calls;
- Returning home under the influence of drugs/alcohol;
- Inappropriate sexualised behaviour for age/sexually transmitted infections;
- Evidence of/suspicions of physical or sexual assault;
- Relationships with controlling or significantly older individuals or groups;
- Multiple callers (unknown adults or peers);
- Frequenting areas known for sex work;
- Concerning use of internet or other social media;
- Increasing secretiveness around behaviours; and
- Self-harm or significant changes in emotional well-being.

## Grooming

Sexual exploitation is commonly characterised by the grooming of young people. This process is carried out by perpetrators to gain their trust. Perpetrators often target children who are already vulnerable – who may have troubled family histories and/or be bullied outside of the home and socially isolated. Once the young people are thought to be sufficiently emotionally involved, violence and intimidation is often used to ensure compliance. In addition, perpetrators may give drugs and alcohol to victims and encourage addiction in order to ensure they become dependent on them for the supply of these substances.

## Vulnerability

Sexually exploited children come from a range of backgrounds and may have no additional risk factors or vulnerabilities, therefore, professionals should always keep an open mind to the possibility that a child may be at risk of exploitation. However, children can be at increased risk of sexual exploitation if they have any additional vulnerabilities, as perpetrators may target them and try to exploit these vulnerabilities. The following are examples of factors that can make a young person more vulnerable to exploitation:

- Living in a chaotic or dysfunctional household (including parental substance use, domestic violence, parental mental health issues, parental criminality).
- A history of abuse (including familial child sexual abuse, physical and emotional abuse and neglect).
- Having a physical or learning disability.
- Learning disabilities.
- Bereavement or loss.
- Being lesbian, gay, bisexual or transgender.
- Boys and girls whose gender identity differs from the sex they were given at birth or who question their gender identity [someone who is or feels they may be trans or trans-gender]
- Having temporary leave to remain or being in the UK illegally.
- There are indications that the child has been trafficked into the UK.
- Homelessness, including living in a hostel, bed and breakfast accommodation or a foyer.
- Being a young carer.
- Being in care (particularly those in residential care and those with interrupted care histories).
- Living in residential care.
- Lacking friends from the same age group.
- Having low self-esteem or self-confidence.
- Social isolation or social difficulties

- Absence of a safe environment to explore sexuality
- Economic vulnerability
- Connections with other children and young people who are being sexually exploited
- Family members or other connections involved in adult sex work.

### Never giving up on a child

The provision of consistent, non-judgemental support will give more confidence to victims to disclose and give evidence. Victims talk about the importance of having a professional who listened and showed that they cared. Students at Springwest have very trusting and important relationships with staff who are there to support them. There is an ethos and culture of listening to our students

### Disclosure

It is important to be aware that children might disclose indirectly – it is quite common for children to say that the abuse is happening to a friend or someone they know when in fact it is they themselves who are being abused.

If you have any concerns, however vague, you should alert the Safeguarding and Child Protection Lead – Hazel Hughes or in her absence the Deputy Designated Safeguarding Lead.

### Female Genital Mutilation (FGM) Policy and Procedure

***Female Genital Mutilations is child abuse and is illegal. It is the personal duty of staff who identifies FGM or receives a disclosure to make a crime report to the police.***

If a staff member has either been told by a girl that she has had FGM or has observed a physical sign appearing to show that a girl has had FGM, s/he should personally report the matter to the police by calling 101.

If the girl informs you she is at imminent risk or has been recently cut, you should take immediate action which may include calling 999.

If a parent /carer disclose that a girl has had FGM or if you consider the girls to be at risk of FGM take immediate advice from the Safeguarding Lead (Hazel Hughes or John Cadogan) or the Principal.

If you in are ever in any doubt about any form of abuse always ask the Safeguarding Lead.

### Information on FGM

FGM involves cutting, and sometimes sewing the girl's genitalia, normally without anaesthetic, and can take place at any time from birth onwards. It is sometimes referred to as 'female circumcision' but this misnomer belies the invasive and irreversible nature of the procedure. It is now more correctly termed female genital mutilation.

The procedure has a cultural, rather than religious, origin and is practised by disparate ethnic communities in many countries, including Ethiopia, Somalia, Sudan, Egypt, Nigeria, India, Pakistan, Yemen and Iraq.

The Female Genital Mutilation Act 2003 makes it a criminal offence, not only to carry out FGM in England, Scotland and Wales on a girl who is a UK national or permanent resident, but also to take a girl out of the UK to have FGM performed abroad, even to countries where FGM is legal.

The indicators of FGM may initially mirror those of sexual abuse. You may notice, for example, that a girl or young woman shows signs of pain or discomfort, needs to visit the toilet constantly, has vaginal blood loss or is unable to sit comfortably. She may make excuses to avoid PE and other physical activity or refuse to use the school showers. She may also become evasive or fearful if you enquire if she is unwell, and assure you that she is fine when she is clearly not. If she is a BME child, has recently arrived back from a 'holiday' abroad or a period of absence from school, seems to be in pain and has not been taken by her family to see a doctor, you should consider FGM, alongside other possible explanations.

### **Forced marriage**

Forced marriage occurs when a young person is forced into a marriage that they do not want with someone they have not chosen, following coercion, intimidation, threats and possibly physical and sexual abuse. It is very different from an arranged marriage, where both young people can make the decision to accept or decline the partner chosen for them by their parents.

Once again, schools can be seen to be in the front line in protecting young people from this type of abuse. A student who fears that they are likely to be forced into a marriage may disclose to a member of staff. Their initial approach, in common with many disclosures of abuse, may be seemingly innocuous, such as talking about taking a holiday abroad. Their fear that the proposed holiday will result in a forced marriage may only become apparent after a number of conversations.

These young women may also become victims of what is termed honour-based violence. This type of violence is described in 'The Right to Choose' guidance as: 'A variety of crimes of violence (mainly but not exclusively against women), including assault, imprisonment and murder where the person is being punished by their family or their community'.

### **So-called 'honour based' violence**

So-called honour based violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, include Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the designated safeguarding lead (Hazel Hughes or John Cadogan). Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HPV, or already having suffered HBV.

#### **Actions**

If staff have a concern regarding a child that might be at risk of HBV, they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers that requires a different approach (see FGM section).

## Extremism/ Radicalisation / PREVENT Policy and Procedure

### Definition of extremism

The government has defined extremism as: Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. We also regard calls for the death of members of our armed forces as extremist.

### The Prevent strategy

Terrorist groups seek to radicalise and recruit people to their cause. The aim of Prevent is to stop people becoming or supporting terrorists by challenging the spread of terrorist ideology, supporting vulnerable individuals, and working in key sectors and institutions.

The Prevent Strategy sets out the following responsibilities for staff. They should:

- Understand what radicalisation means and why people may be vulnerable to being drawn into terrorism as a consequence of it.
- Be aware of what the government means by the term 'extremism' and the relationship between extremism and terrorism.
- Know what measures are available to prevent people from becoming drawn into terrorism and how to challenge the extremist ideology that can be associated with it.
- Understand how to obtain support for people who may be being exploited by radicalising influences.

The school is committed to actively promoting the fundamental British values of democracy, the rule of law, individual liberty, mutual respect and tolerance of those with different faiths and beliefs. We actively challenge prejudice, and discrimination. We do not tolerate the expression or promotion of extremist views of any kind from any member of the school community (students, staff, parents/carers or governors), or from external the external community, such as external agencies or visitors to the school.

We recognise that extremism and exposure to extremist materials and influences can lead to poor educational outcomes and life chances and can involve serious risks for young people. Extremists of all persuasions aim to develop destructive relationships between different communities by promoting division, fear and mistrust of others based on ignorance or prejudice and thereby limiting the life chances of young people. We therefore address such issues as a safeguarding concern as set out in this policy. If we fail to challenge extremist views we are failing to protect our students.

### Our Approach

We aim to protect our students from being vulnerable to extremist views and radicalisation by:

- Building a cohesive community. The ethos of Springwest Academy is one of mutual respect and consideration. Our ethos and curriculum promotes respect, tolerance and diversity.
- Equipping young people with the knowledge, skills to challenge and debate in an informed way. Through our focus on developing speaking and listening students are encouraged to share their views in a respectful, considered way.
- Encouraging students to be inquisitive, explore their identities and express their views through our Culture and Society Programmes. Teachers provide a safe space for students to be able to take place in discussions which may include controversial issues.

- Valuing and promoting diversity and equal opportunities. We encourage students to understand and show empathy for others. We aim to ensure that students feel a sense of belonging in a community and wider society in which the diversity of people's backgrounds and circumstances is appreciated and valued in which strong and positive relationships.
- Supporting students' character development through our Springwest Learner Skills in order to develop resilience – independence, inquisitiveness, reflection and collaboration. Our core values underpin all that we do: courage and determination, excellence and inspiration, friendship and equality.
- Ensuring that students are taught in a way that is consistent with the UK law and the British values of tolerance, democracy and liberty. We take extremely seriously our key role in preparing all our young people for life in modern Britain and the wider world. We promote awareness of human rights and the responsibility to uphold and defend them, to develop the skills of participation and responsible action.
- Enabling students to explore issues like terrorism and the use of violence in a considered and informed way, facilitating understanding of wider issues within the context of learning about the values on which our society is founded and our system of democratic government. Students see the school as a safe place where they can explore controversial issues safely.
- Making it clear that violent extremism is not part of any faith. Our RE and Cultural Studies curriculum prepares students to live and work in a diverse society. It supports students in gaining knowledge and understanding of a range of religious beliefs and encourages them to understand and respect the cultures, faith and backgrounds of others.
- Ensuring that staff have an awareness of students' circumstances and backgrounds, including an understanding of the local context.
- Training staff to identify children who are at risk and to know where and how to refer children at risk. Assessing whether any students are at risk of being drawn into terrorism.
- Checking that visiting speakers are suitable (and seeing presentations ahead of time).
- Teaching students about E-safety, how to protect themselves online and having a robust E-Safety Policy.
- Protecting all students from harm through the implementation of a rigorous Safeguarding Policy.

## Responsibilities of Staff

It is not the responsibility of staff to investigate concerns, disclosures or allegations of potential extremism or radicalisation. Staff have a duty to recognise concerns and maintain an open mind. Any concerns matter, concerns about extremist views or radicalisation should be recorded and reported immediately to the Prevent Leads Hazel Hughes or the Deputy DSLs, or in their absence, a member of SLT.

Where a student is thought to be vulnerable or at risk of significant harm, and/or where investigations need to be carried out, the Safeguarding Lead will make a referral to Channel. Social services may also be contacted in line with the School's Child Protection Policy.

If a staff member becomes aware that a parent/carer or visitors to the Academy has expressed extremist views, he/she must report it immediately to the Prevent Lead.

At the point of referral, agencies such as PREVENT (part of the government's counter-terrorism strategy) may become involved.

### **Procedures**

Procedures to follow if a member of staff has concerns about a student being vulnerable to extremist views/radicalisation:

The member of staff should:

- a) Write up an objective account of the concern. Any notes taken should be kept safe and confidential
- b) Contact the Prevent Lead
- c) Pass your written notes to the Prevent Lead
- d) Maintain confidentiality and do not discuss the issue further with other members of staff or outside of the Academy

The Prevent Lead will make a referral to Channel and/or contact and take advice from the Prevent Officer for Hounslow, depending on the level of concern.

If there concerns about imminent danger to life then 999 should be called.

### **Channel Referral**

**Email the Prevent Engagement Officer Angela Rusby PC 165so**

**Email: [angela.rusby@met.pnn.police.uk](mailto:angela.rusby@met.pnn.police.uk) putting Channel Referral as the subject**

Angela's mobile 07769 934659

The Counter Terrorism Officer is Gary McGinn Constable

Email: [gary.McGinn@met.pnn.police.uk](mailto:gary.McGinn@met.pnn.police.uk)

Gary's mobile 07879 493035

Local Authority Prevent Lead: Mrs Joan Conlon

Email: [joan.conlan-GCSX@hounslow.gscx.gov.uk](mailto:joan.conlan-GCSX@hounslow.gscx.gov.uk)

Joan's mobile 07817 079190

### **Complaints or concerns expressed by students, parents, staff or volunteers**

We recognise that listening to children is an important and essential part of safeguarding them against abuse and neglect. To this end any expression of dissatisfaction or disquiet in relation to an individual child will be listened to and acted upon in order to safeguard his/her welfare.

We will also seek to ensure that the child or adult who makes a complaint is informed not only about the action the school will take but also the length of time that will be required to resolve the complaint. The school will also endeavour to keep the child or adult regularly informed as to the progress of his/her complaint.

### **Child criminal exploitation – county lines**

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs or money from urban areas to suburban and rural areas. This abuse is typified by some form of power imbalance in favour of those perpetrating the exploitation and may involve age, gender, cognitive ability, physical strength, status or access to economic or other resources.

### **Domestic abuse**

The cross-government definition of 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

Exposure to 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. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

### **Youth produced sexual imagery (sexting)**

If a young person has shared imagery consensually, such as when in a romantic relationship, or as a joke, and there is no intended malice, it is usually appropriate for the school to manage the incident directly.

In contrast any incidents with aggravating factors, for example, a young person sharing someone else's imagery without consent and with malicious intent, should generally be referred to the designated safeguarding lead who will refer on to police and/or children's social care.

If they have any doubts about whether to involve other agencies, they will make a referral to the police.

#### **Assessing the risks**

The Designated Safeguarding Lead with the help of pastoral mentor, personal coach or year leader will conduct a review (including an interview with the young people involved) to establish the facts and assess the risks.

When assessing the risks the following should be considered:

Why was the imagery shared?

Was the young person coerced or put under pressure to produce the imagery?

Who has shared the imagery?

Where has the imagery been shared?

Was it shared and received with the knowledge of the pupil in the imagery?

Are there any adults involved in the sharing of imagery?

What is the impact on the pupils involved?

Do the pupils involved have additional vulnerabilities?

Does the young person understand consent?

Has the young person taken part in this kind of activity before?

The DSL will always use their professional judgement along with their colleagues to assess the risk.

### **Informing parents (or carers)**

Parents (or carers) will be informed and involved in the process at an early stage unless informing the parent will put the young person at risk of harm.

## Reporting incidents to the police

If it is necessary to refer to the police, contact our safer schools officer or dial 101. Once a report is made to the police, the report has to be recorded and the police will conduct an investigation. This may include seizure of devices and interviews with the young people involved.

## Securing and handing over devices to the police

If any devices need to be seized and passed onto the police then the device(s) should be confiscated and the police should be called. The device should be turned off and placed under lock and key until the police are able to come and retrieve it.

## Searching devices, viewing and deleting imagery

### Viewing the imagery

Adults should **not** view youth produced sexual imagery unless there is good and clear reason to do so.

Wherever possible responses to incidents should be based on what DSLs have been told about the content of the imagery.

The decision to view imagery should be based on the professional judgement of the DSL. Imagery should never be viewed if the act of viewing will cause significant distress or harm to the student.

If it is necessary to view the imagery then the DSL should:

- Never copy, print or share the imagery; this is illegal.
- Discuss the decision with the Principal.
- Ensure viewing is undertaken by the DSL or another member of the safeguarding team with delegated authority from the Principal.
- Ensure viewing takes place with another member of staff present in the room, ideally the Principal or a member of the senior leadership team. This staff member does not need to view the images.
- Wherever possible ensure viewing takes place on school or college premises, ideally in the Principal or a member of the senior leadership team's office.
- Ensure wherever possible that images are viewed by a staff member of the same sex as the young person in the imagery.
- Record the viewing of the imagery in the school's safeguarding records including who was present, why the image was viewed and any subsequent actions. Ensure this is signed and dated.

If youth produced sexual imagery has been unavoidably viewed by a member of staff either following a disclosure from a young person or as a result of a member of staff undertaking their daily role the DSL should complete a safeguarding viewing form explaining how the image/s happened to be viewed.

### Deletion of images

If it has been decided that other agencies do not need to be involved, then it is recommended that imagery is deleted from devices and online services to limit any further sharing of the imagery.

This policy gives the school the power to search students for devices, search data on devices and delete youth produced sexual imagery.

However, it is not recommended that school staff view imagery, it is recommended that schools should not search through devices and delete imagery unless there is good and clear reason to do so. It is recommended that in most cases young people are asked to delete imagery and to confirm that they have deleted the imagery. The student/s should be given a deadline for deletion across all devices, online storage or social media sites.

Students should be reminded that possession of youth produced sexual imagery is illegal. They should be informed that if they refuse or it is later discovered they did not delete the image they are committing a criminal offence and the police may become involved. All of these decisions need to be recorded, including times, dates and reasons for decisions made and logged in the safeguarding records. Parents and carers should also be informed.

### **Preventative measures**

There is a strict mobile phone policy in place banning the use of student mobile devices during the school day. Where devices are seen to be used they are confiscated and not returned until the end of the day and a conversation is held with the parents, and only returned in accordance with the policy.

### **An allegation of child abuse made against another student or students (Peer on Peer Abuse)**

(This policy should be read alongside the Anti-Bullying Policy)

Children and young people may be harmful to one another in a number of ways which would be classified as peer on peer abuse. The purpose of this policy is to explore the many forms of peer on peer abuse and include a planned and supportive response to the issues.

Abusive behaviour can happen to pupils in schools.

Abuse is abuse and should never be tolerated or passed off as 'banter' or 'part of growing up'. Equally, abuse issues can sometimes be gender specific e.g. girls being sexually touched/assaulted and boys being subject to initiation/hazing type violence

### **Types of abuse:**

There are many forms of abuse that may occur between peers and this list is not exhaustive.

#### **Physical abuse e.g. (biting, hitting, kicking, hair pulling etc.)**

Physical abuse may include, hitting, kicking, nipping, shaking, biting, hair pulling, or otherwise causing physical harm to another person. There may be many reasons why a child harms another and it is important to understand why a young person has engaged in such behaviour, including accidentally before considering the action or punishment to be undertaken.

#### **Sexually harmful behaviour/sexual abuse e.g. (inappropriate sexual language, touching, sexual assault etc.)**

Sexually harmful behaviour from young people is not always contrived or with the intent to harm others. There may be many reasons why a young person engages in sexually harmful behaviour and it may be just as distressing to the young person who instigates it as well as the young person it is intended towards. Sexually harmful behaviour may range from inappropriate sexual language, inappropriate role play, to sexually touching another or sexual assault/abuse.

### Bullying (physical, name calling, homophobic etc.)

Bullying is unwanted, aggressive behaviour among school aged children that involves a real or perceived power imbalance. The behaviour is repeated, or has the potential to be repeated, over time. Both young people who are bullied and who bully others may have serious, lasting problems.

In order to be considered bullying, the behaviour must be aggressive and include:

- An Imbalance of Power: Young people who bully use their power—such as physical strength, access to embarrassing information, or popularity—to control or harm others. Power imbalances can change over time and in different situations, even if they involve the same people.
- Repetition: Bullying behaviours happen more than once or have the potential to happen more than once.

Bullying includes actions such as making threats, spreading rumours, attacking someone physically or verbally or for a particular reason e.g. size, hair colour, gender, sexual orientation, and excluding someone from a group on purpose.

### Cyber bullying

Cyberbullying is the use of phones, instant messaging, e-mail, chat rooms or social networking sites such as Facebook and Twitter to harass threaten or intimidate someone for the same reasons as stated above.

### Sexting

Sexting is when someone sends or receives a sexually explicit text, image or video. This includes sending 'nude pics', 'rude pics' or 'nude selfies'. Pressuring someone into sending a nude picture can happen in any relationship and to anyone, whatever their age, gender or sexual preference.

### Initiation/Hazing

Hazing is a form of initiation ceremony which is used to induct newcomers into an organisation such as a private school, sports team etc. There are a number of different forms, from relatively mild rituals to severe and sometimes violent ceremonies.

Many rituals involve humiliation, embarrassment, abuse, and harassment.

### Prejudiced Behaviour

The term prejudice-related bullying refers to a range of hurtful behaviour, physical or emotional or both, which causes someone to feel powerless, worthless, excluded or marginalised, and which is connected with prejudices around belonging, identity and equality in wider society – in particular, prejudices to do with disabilities and special educational needs, ethnic, cultural and religious backgrounds, gender, home life, (for example in relation to issues of care, parental occupation, poverty and social class) and sexual identity (homosexual, bisexual, transsexual).

### Teenage relationship abuse

Teenage relationship abuse is defined as a pattern of actual or threatened acts of physical, sexual, and/or emotional abuse, perpetrated by an adolescent (between the ages of 13 and 18) against a current or former partner. Abuse may include insults, coercion, social sabotage, sexual harassment, threats and/or acts of physical or sexual abuse. The abusive teen uses this pattern of violent and coercive behaviour, in a heterosexual or same gender relationship, in order to gain power and maintain control over the partner.

### Expected action to be taken by all staff:

Although the type of abuse may have a varying effect on the victim and initiator of the harm, these simple steps can help clarify the situation and establish the facts before deciding the consequences for those involved in perpetrating harm.

It is important to deal with a situation of peer abuse immediately and sensitively. It is necessary to gather the information as soon as possible to get the true facts around what has occurred as soon after the child(ren) may have forgotten. It is equally important to deal with it sensitively and think about the language used and the impact of that language on both the children and the parents when they become involved. For example; do not use the word perpetrator, this can quickly create a 'blame' culture and leave a child labelled.

In all cases of peer on peer abuse it is necessary that staff dealing with such incidents, talk to the young people and instigating immediate support in a calm and consistent manner. Staff should not be prejudiced, judgemental, dismissive or irresponsible in dealing with such sensitive matters.

#### 1. Gather the Facts

Speak to all the young people involved separately, gain a statement of facts from them and use **consistent language** and **open questions** for each account. The easiest way to do this is not to have a line of questioning but to ask the young people to tell you what happened. Only interrupt the young person from this to gain clarity with open questions, 'where, when, why, who'. (What happened? Who observed the incident? What was seen? What was heard? Did anyone intervene?)

- **What is the age of the children involved?**

How old are the young people involved in the incident and is there any age difference between those involved?

- **Where did the incident or incidents take place?**

Was the incident in an open, visible place to others? If so was it observed? If not, is more supervision required within this particular area?

- **What was the explanation by all children involved of what occurred?**

Can each of the young people give the same explanation of the incident and also what is the effect on the young people involved? Is the incident seen to be bullying for example, in which case regular and repetitive? Is the version of one young person different from another and why?

- **What is each of the children's own understanding of what occurred?**

Do the young people know/understand what they are doing? E.g. do they have knowledge of body parts, of privacy and that it is inappropriate to touch? Is the young person's explanation in relation to something they may have heard or been learning about that has prompted the behaviour? Is the behaviour deliberate and contrived? Does the young person have understanding of the impact of their behaviour on the other person?

In dealing with an incident of this nature the answers are not always clear cut. If you are concerned or unsure as to whether or not there is any risk involved, please seek advice from the Designated Child Protection Officer.

#### Repetition

Has the behaviour been repeated to an individual on more than one occasion? In the same way it must be considered has the behaviour persisted to an individual after the issue has already been discussed or dealt with and appropriately resolved?

## **2. Consider the Intent (begin to Risk Assess)**

Has this been a deliberate or contrived situation for a young person to be able to harm another?

## **3. Decide on your next course of action**

If from the information that you gather you believe any young person to be at risk of significant harm you must make a safeguarding referral immediately (where a crime has been committed the police should be involved also).

If social care and the police intend to pursue this further they may ask to interview the young people in school or they may ask for parents to come to school to be spoken to also. It is important to be prepared for every situation and the potential time it may take.

It may also be that social care feel that it does not meet their criteria in which case safeguarding lead may challenge that decision, with that individual or their line manager. If on discussion however, the safeguarding lead agrees with the decision, you may then be left to inform parents.

### **Informing parents**

If, once appropriate advice has been sought from police/social care you have agreement to inform parents or have been allocated that role from the other services involved then you need to inform the parents as soon as possible. If services are not going to be involved then equally, this information may need to be shared with parents. If a young person is deemed to be 'Gillick Competent' following the 'Fraser' guidelines and does not wish you to share the information with parents, then the school must consider this especially for example if the young person is pregnant and this is why they are being bullied (unless this has occurred through significant harm in which case a criminal/social care case is likely or the young person is under the age of 13).

In all circumstances where the risk of harm to the child is evident then you will encourage the young person to share the information with their parent or even with them (they may be scared to tell parents that they are being harmed in any way). Where the school can evidence they are acting in the best interests of the young person they would not be criticised, however this would be the case if they actively breached the rights and choices of the young person.

The best way to inform parents is face to face.

### **Next Steps**

Once the outcome of the incident(s) has been established it is necessary to ensure future incidents of abuse do not occur again and consider the support and intervention required for those involved.

### **For the young person who has been harmed**

What support they require depends on the individual young person. It may be that they wish to seek counselling or one to one support via a mentor. It may also be that they feel able to deal with the incident(s) on their own or with support of family and friends. In which case it is necessary that this young person continues to be monitored and offered support should they require it in the future. If the incidents are of a bullying nature, the young person may need support in improving peer

groups/relationships with other young people or some restorative justice work with all those involved may be required.

Other interventions that could be considered may target a whole class or year group for example a speaker on cyber bullying, relationship abuse etc. It may be that through the continued curriculum of PHSE and SMSC that certain issues can be discussed and debated more frequently.

If the young person feels particularly vulnerable it may be that a risk assessment can be put in place for them so that they have someone named that they can talk to, support strategies for managing future issues and identified services to offer additional support.

### **For the young person who has displayed harmful behaviour**

In this circumstance it is important to find out why the young person has behaved in such a way. It may be that the young person is experiencing their own difficulties and may even have been harmed themselves in a similar way. In such cases support such as one to one mentoring or counselling may also be necessary. Particular support from identified services may be necessary and the young person may require additional support from family members.

Once the support required to meet the individual needs of the young person has been met, it is important that young person receives a consequence for their behaviour. This may be in the form of restorative justice e.g. making amends with the young person they have targeted if this has been some form of bullying. In the cases of sexually harmful behaviour it may be a requirement for the young person to engage in one to one work with a particular service or agency (if a crime has been committed this may be through the police or youth offending service). If there is any form of criminal investigation ongoing it may be that this young person cannot be educated on site until the investigation has concluded. In which case, the young person will be provided with appropriate support and education whilst off site.

Even following the conclusion of any investigation the behaviour that the young person has displayed may continue to pose a risk to others in which case an individual risk assessment may be required. This should be completed via a multi-agency response to ensure that the needs of the young person and the risks towards others are measured by all of those agencies involved including the young person and their parents. This may mean additional supervision of the young person or protective strategies if the young person feels at risk of engaging in further inappropriate or harmful behaviour.

The school may also choose a punishment as a consequence such as exclusion or internal exclusion/inclusion/seclusion for a period of time to allow the young person to reflect on their behaviour.

### **After care**

It is important that following the incident the young people involved continue to feel supported and receive help even if they have stated that they are managing the incident. Sometimes the feelings of remorse, regret or unhappiness may occur at a much later stage than the incident. It is important to ensure that the young people do not engage in any further harmful behaviour either towards someone else or to themselves as a way of coping (e.g. self-harm). In which case, regular reviews with the young people following the incident(s) are imperative

### **Preventative Strategies**

Firstly, and most importantly is recognition that peer on peer abuse can and will occur even with the most stringent of policies and support mechanisms. In which case it is important to continue to recognise

and manage such risks and learn how to improve and move forward with strategies in supporting young people to talk about any issues and through sharing information with all staff.

The school has an open and supportive ethos where young people feel safe to share information about anything that is upsetting or worrying them. This is strengthened through a strong and positive PHSE/SMSC curriculum that tackles such issues as prejudiced behaviour and gives children an open forum to talk things through rather than seek one on one opportunities to be harmful to one another.

To enable such an open and honest environment it is necessary to ensure that every member of staff feels confident and enabled to talk about issues and challenge perceptions of young people including use of inappropriate language and behaviour towards one another. **It is incredibly important that staff do not dismiss issues as 'banter' or 'growing up' or compare them to their own experiences of childhood. It is necessary that staff consider each issue and each individual in their own right before taking action. If staff minimise the concerns raised it may result in a young person seeking no further help or advice.**

**APPENDIX: FLOW CHART FOR RAISING SAFEGUARDING CONCERNS  
ABOUT A CHILD**

