

# Newham Community Learning Safeguarding Policy

Last updated: March 2024

Applies to: Newham Community Learning

Version control: v6.2 (as per the Document History)

Approved by: Trust Board, December 2023 [with points of clarification added subsequently as per the document history table]

## Contents

<b>1. Overview of the Policy Management Process</b>	<b>4</b>
1.1. Document history	4
1.2. Review and approval	6
<b>2. Newham Community Learning Policy - Safeguarding Policy</b>	<b>7</b>
2.1. Aims and introduction	7
2.2. Statutory framework	8
2.3. The Trust Board	9
2.4. School Governing Bodies	10
2.5. The Designated Safeguarding Lead (and Deputy)	11
2.6. The Headteacher	12
2.7. All school staff	12
2.8. External use of any Trust school site	13
2.9. Types of abuse / specific safeguarding issues	13
2.10. Child on child abuse	15
2.11. Sexual Violence and Harassment	15
2.12. Children who are absent from/Missing from Education (CME)	15
2.13. Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) including County Lines	16
2.14. Serious Violence	17
2.15. Domestic Abuse	17
2.16. Operation Encompass	17
2.17. Honour Based abuse	17
2.18. Female Genital Mutilation (FGM)	17
2.19. Forced marriage	18
2.20. Prevention of radicalisation	18
2.21. Mental Health	18
2.22. Contextual Safeguarding	19
2.23. Children potentially at greater risk of harm	20
2.23.1. Children with special educational needs and disabilities	20
2.23.2. Children who need a social worker	21
2.23.3. Looked after Children and previously looked after children	21
2.23.4. Private Fostering	21
2.23.5. Children requiring mental health support	22
2.24. Procedures	22
2.25. Practice when police are called to the school	23
2.26. Training	24
2.27. Professional confidentiality	24
2.28. Information sharing, record keeping and risk assessment	25
2.28.1. Information sharing	25

2.28.2. Record keeping	26
2.28.3. Risk assessment - sexual abuse and harrassment	26
2.29. Opportunities to teach Safeguarding	27
2.30. Multi-agency working	27
2.31. Allegations about members of the workforce	28
2.31.1. Low level concerns	29
2.32. Whistleblowing	31
2.33. Appendix 1 - Filtering and Monitoring - The Standards	32
2.34. Annex 1 - Contact details - all Trust schools	33
2.34.1. Eastlea Community School	33
2.34.2. Lister Community School	33
2.34.3. Portway Primary School	34
2.34.4. Rokeby School	35
2.34.5. Sarah Bonnell School	35
2.34.6. Selwyn Primary School	36
2.35. Annex 2 - Summary of how Safeguarding matters are escalated within the Trust	38
2.35.1. Procedures for staff to raise concerns	38
2.35.2. Reporting from schools to the Central Team and to Trustees	38
2.36. Annex 3 - Lister Community School - Safeguarding arrangements on site	39

# 1. Overview of the Policy Management Process

## 1.1. Document history

Date	Revision	Version number (substantive revisions are allocated a new whole number; minor revisions are designated by the addition of a consecutive decimal point)
Sept 2021	Trust level Safeguarding Policy in place	v1.0
June 2022	Revisions further to Child Q case, including police involvement  Formatted for NCST use	v.1.1
July 2022	Revisions to reflect changes to KCSiE - 01 September 2022  Extracts from the guidance are presented in italics  Released as a Newham Community Learning Policy	v.2.0
August 2022	Eastlea contact details updated	v.2.1
Sept 2022	Sarah Bonnell contact details updated	v.2.2
Nov 2022	Lister contact details updated	v.2.3
Nov 2022	Lister Safeguarding Arrangements added (Annex 2)	v.3.0
March 2023	Overview of Trust arrangements in place to ensure that safeguarding concerns are appropriately escalated (Annex2); Lister arrangements have now become Annex 3.	v.4.0
July 2023 Key changes	Key changes due to republication of KCSiE in July 2023:  Revisions to reflect changes to KCSiE - effective 01 September 2023 [detailed table of changes in KCSiE and associated changes to the text in this Policy is on	v.5.0

Date	Revision	Version number (substantive revisions are allocated a new whole number; minor revisions are designated by the addition of a consecutive decimal point)
	file - Annex F of KCSiE has been used for this exercise]	
July 2023 Supporting changes	<p>Page numbers added to document.</p> <p>Newham Safeguarding Children Partnership - pathways to help and support: chart linked in the policy AND published on the policies page of the Trust website.</p> <p>Appendix 1 added: specific information regarding the Filtering and Monitoring Standards added.</p> <p>Annex 1 - all contact details for the safeguarding teams at every school are updated annually in line with this review.</p> <p>Any changes during the academic year are advised to the Central Team, which is responsible for updating and re-publishing the policy.</p>	
July 2023	<p>Changes to KCSiE were reviewed by the Trust Board at their meeting on 06 July 2023.</p> <p>The Board was advised that:</p> <ul style="list-style-type: none"> <li>• The Central Team was finalising mapping the KCSiE changes to the Trust Policy</li> <li>• The updated Policy would be published on the Trust website for 01 September 2023</li> </ul>	
Sept 2023	<p>Update to Selwyn Safeguarding Team - Annex 1</p> <p>Updated reference to KCSiE - September 2023</p>	
October 2023	Update to Portway Safeguarding Team - Annex 1	
January 2024	Update to Portway Safeguarding Team - Annex 1	
February 2024	<p>Section 2.28 - Information sharing, record keeping and risk assessments</p> <p>- Added three sub-headings</p>	v.6.0

Date	Revision	Version number (substantive revisions are allocated a new whole number; minor revisions are designated by the addition of a consecutive decimal point)
	- Added information from the ICO in 2.28.1	
March 2024	Section 2.31 - addition of low-level concerns guidance in a sub-section  Section 2.32 - additional clarification regarding the scope of the Whistleblowing Policy	v6.1
March 2024	Section 2.2 - Working Together to Safeguard Children - updated reference to this document to the updated guidance in 2023	v6.2

## 1.2. Review and approval

The Safeguarding Policy applies to the whole Trust. It is reviewed by the Executive Team (and/or their delegates) and is then presented to the Trust Board for approval (via a relevant board committee if appropriate) annually.

It is also updated throughout the year should this be necessary and subject to evolving safeguarding practice. Unless such changes are significant, they are published further to approval by the Trust Director of Safeguarding and do not require Trust Board approval.

## 2. Newham Community Learning Policy - Safeguarding Policy

### 2.1. Aims and introduction

*“Schools and colleges and their staff are an important part of the wider safeguarding system for children. Safeguarding and promoting the welfare of children is everyone’s responsibility. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child.*

*No single practitioner can have a full picture of a child’s needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.”*

(Keeping Children Safe in Education – DfE, September 2023)

This Safeguarding Policy is for all Trust employees, and agency staff, parents, governors, volunteers and the wider school community. It forms part of the safeguarding arrangements for each of our schools and should be read along with the Trust’s Staff Code of Conduct, as well as various school policies including: Anti-Bullying Policy, Behaviour Policy, Educational Visits Policy, Allegations against staff Policy, Online Safety policy for students and the Attendance Policy.

The Trust recognises that the local community of each school may mean that context-specific additions to this Trust level Policy are deemed appropriate. If this is the case, DSLs and the school leadership teams will add annexes as appropriate (noting that each school’s Safeguarding Team Contact Details are included in this document).

All staff are given a copy of Part One and/or Annex A of the statutory guidance at the start of their work with the Trust and annually thereafter.

Our Trust is committed to safeguarding children and to create a culture of vigilance in school. This policy should also be read in conjunction with Keeping Children Safe in Education (DfE, 2023).

Safeguarding and promoting the welfare of children is defined in Keeping Children Safe in Education 2023 as:

- 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 For the purposes of this policy children includes everyone under the age of 18.

## 2.2. Statutory framework

The Education Act 2002 Section 175, places a statutory responsibility on each governing body to have policies and procedures in place that safeguard and promote the welfare of children who are students of the school.

The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to be trained in safer recruitment techniques.

- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)
- [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination



For the primaries:

- The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the “2018 Childcare Disqualification Regulations”) and [Childcare Act 2006](#), which set out who is disqualified from working with children

For the primaries:

- This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#)

The development of appropriate procedures and the monitoring of good practice in the London Borough of Newham are the responsibilities of the Newham Safeguarding Children Partnership (NSCP). In Newham all professionals must work in accordance with the London Children Safeguarding Procedures.

Our schools also work in accordance with the following legislation and guidance:

London Children Safeguarding Procedures

<https://www.londonsafeguardingchildrenprocedures.co.uk/> & <https://contextualsafeguarding.org.uk/>

Keeping Children Safe in Education (DfE September 2023)

Working Together to Safeguard Children (HMG, 2023)

Education Act 2002

Counter-Terrorism and Security Act (HMG, 2015)

The Prevent duty Departmental advice for schools and childcare providers (DfE 2015) Prevent Duty

Guidance for Further Education Establishments in England and Wales (HMG 2015)

Serious Crime Act 2015 (Home Office, 2015) Sexual Offences Act (2003)

Education (Pupil Registration) Regulations 2006

General Data Protection Regulations 2018 (GDPR)

What to do if you're worried a child is being abused (HMG, 2015)

Searching, screening and confiscation (DfE, 2018)

Children and Social Work Act 2017 Modern Slavery Act 2015

The Homelessness Reduction Act 2017 Preventing and Tackling Bullying (DfE, 2017),

Information Sharing Advice for practitioners providing safeguarding services to children, young people, parents and carers. (DfE July 2018)

Advice on Whistleblowing in Maintained Schools (DfE 2014)

<https://www.gov.uk/guidance/whistleblowing-procedure-for-maintained-schools> Voyeurism (Offences) Act 2019

Review of sexual abuse in schools and colleges (Ofsted 2022)

## 2.3. The Trust Board

The Trust Board has a responsibility to ensure that the policies, procedures and professional development and training in each Trust school are effective and comply with the statutory

requirements at all times. It does so by monitoring Safeguarding reports from each school, and through the work of the Chief Executive and Executive Group. In addition, the Trust has appointed a Trust Director of Safeguarding who will provide strategic oversight of Safeguarding across the Trust.

In addition to this, the Trust Board appoints a Lead Trustee for Safeguarding who meets at least once per year with the Governing Body Safeguarding Leads, Trust Director of Safeguarding and with the Designated Safeguarding Leads for each school, as part of the Trust's Annual Review of Effective Safeguarding Practice.

All governors and trustees receive appropriate safeguarding and child protection training at induction. This training is designed to ensure that they are able to provide the board and local governing bodies with strategic challenge to test and assure themselves that the policies and procedures in place are effective and support a robust whole school/whole Trust approach to safeguarding.

The Safeguarding governor/trustee checks that safeguarding is included in Behaviour, Online and all related policies including the staff Code of Conduct and is highlighted in all policies as the overarching responsibility of all staff at all times, particularly in procedures involving sanctions or searches, in school and out.

The Chief Executive of the Trust is also responsible for ensuring that Safeguarding issues are regularly reviewed at the Executive Group, and for ensuring that any employees of the Trust who are not school-based are also included on the Trust's Single Central Record, and that they receive regular safeguarding and child protection updates, at least annually.

A member of the Executive Group with extensive Safeguarding experience chairs the Trust Safeguarding Working Group, which meets half termly and includes all DSLs. The Trust Director of Safeguarding supports the work of this Group, and ensures that local best practice forms part of strategic oversight.

## 2.4. School Governing Bodies

The governing body has a responsibility to ensure that the policies, procedures and professional development and training in each Trust school are effective and comply with the statutory requirements at all times. The governing body will ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information as provided for in the Data Protection Act 2018 and the UK GDPR.

It ensures that all required policies relating to child protection and safeguarding are in place and that the child protection and safeguarding policy reflects statutory and local guidance and is reviewed at least annually.

The governing body also ensures there is a named Designated Safeguarding Lead and Deputy Designated Safeguarding Lead(s) in place and that they have their safeguarding role explicitly in the job description and are trained for the role as set out in Keeping Children Safe in Education 2023..

The governing body ensures the school contributes fully to inter-agency working, in line with statutory and local guidance. It ensures that information is stored and shared appropriately and in accordance with the statutory requirements as set out in the Data Protection Act 2018 and in line with UK GDPR requirements.

The governing body monitors to ensure that all staff members and volunteers undergo safeguarding training at induction and that it is then regularly updated. All staff members receive regular safeguarding and child protection updates, at least annually, to provide them with the relevant skills and up to date knowledge to keep our children safe. The governing body will also ensure that staff have the knowledge, skills and understanding of children who have an allocated social worker; looked after and previously looked after children in order to recognise their additional vulnerabilities and keep them safe.

The governing body ensures that children are taught to keep themselves safe, including online, ensuring that appropriate filters and monitoring systems for online usage are in place in school. This will include children that are accessing on-line learning at home.

The governing body of each school ensures that the school has appropriate filtering and monitoring systems in place, and reviews their effectiveness. This includes:

- Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training;
- Reviewing the [DfE's filtering and monitoring standards](#), and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards

Our children will be taught how to keep themselves safe through teaching and learning opportunities as part of a rich and balanced curriculum.

The governing body and school leadership team are responsible for robust safer recruitment procedures that help to deter, reject or identify people who may abuse children. It adheres to statutory responsibilities to check adults working with children and has recruitment and selection procedures in place (see the Trust's 'Safer Recruitment policy for further information). It also ensures that volunteers are appropriately supervised in school. We will ensure that we obtain an enhanced DBS certificate for any volunteer undertaking unregulated activity.

## 2.5. The Designated Safeguarding Lead (and Deputy)

The Designated Safeguarding Lead (DSL) in school takes the lead responsibility for managing the child protection referrals, safeguarding training and raising awareness of all child protection policies

and procedures in school. The DSL will ensure that everyone in school, including temporary staff, volunteers and contractors are aware of these procedures and that they are followed at all times.

The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place).

The DSL is a source of advice and support to other staff on child protection matters and makes sure that timely referrals to Newham multi-agency Safeguarding Hub (MASH) are made in accordance with current London Child Protection Procedures. The Designated Lead works with the local authority, the Channel programme and other agencies as required. If for any reason the Designated Safeguarding Lead (DSL) is unavailable, the Deputy Designated Safeguarding Lead will act in their absence.

The Designated Safeguarding Lead (DSL) will also be alert to the additional vulnerabilities of children with a social worker, ensuring that staff know who those children are, understand their academic progress and attainment and maintain a culture of high aspirations for these children. The Designated Lead will also support staff to identify the challenges that children in this group may face and any additional support and/or adjustments that can be made to best support them.

In addition, in most cases homelessness would be considered in the context of children living with their families, however the Designated Safeguarding Lead (DSL) will be alert that some children may be homeless independently and this will require a different level of intervention and support.

## 2.6. The Headteacher

The Headteacher works in accordance with the requirements of all school staff. In addition, The Headteacher ensures that all safeguarding policies and procedures adopted by the governing body are followed by all staff. The Headteacher will ensure that children are taught about safeguarding, including on-line as part of the broad and balanced curriculum. This may include covering relevant issues through Relationships Education and Relationships and Sex and Health Education (RSHE)

The Headteacher will make sure that they are satisfied that any children on the school roll placed with an alternative education provider can meet the needs of the child(ren) and obtain written confirmation that the appropriate safeguarding checks have been carried out.

## 2.7. All school staff

Everyone at any Trust school has a responsibility to provide a learning environment in which our children can feel safe to learn. All staff members are prepared to identify children who may benefit from early help and understand their role and responsibilities within this process. This includes identifying any emerging problems so appropriate support may be provided and in liaison with the Designated Safeguarding Lead (DSL) report any concerns. All staff members are aware of and

follow school processes as set out in this policy and are aware of how to make a referral to the Newham Multi-Agency Safeguarding Hub (MASH) when there is a need to do so.

As part of safeguarding children, all staff are aware of the Trust Behaviour Principles (available on the Policies Page of the Trust website) and of any local associated Behaviour Policy and Anti-Bullying Policy. Further support for behaviour is provided through the Behaviour Working Group, which regularly reviews and works to implement best practice.

Staff undergo 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). Staff are aware of the filtering and monitoring tools in place at the schools at which they work, and know how to report and escalate concerns.

Staff receive regular training around cyber security which ensures that they understand their responsibilities.

All staff in our schools are familiar with the Newham Safeguarding Children Partnership's [Pathways to Help and Support Chart](#).

## 2.8. External use of any Trust school site

In the case of any use of the school site by third parties (eg. lettings arrangements), our Trust policies ensure that the associated contractual arrangements include our requirement to seek assurances that appropriate safeguarding and child protection policies and procedures are in place.

In the case of any allegation against an adult received during such use of the school site, where the user of the site is running activities for children or young people, Trust schools follow the arrangements in this policy and inform the LADO.

## 2.9. Types of abuse / specific safeguarding issues

*All staff should be aware of indicators of abuse and neglect (see below), understanding that children can be at risk of harm inside and outside of the school/college, inside and outside of the home and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.*

*All school and college staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another.*

*All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not*

*limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.*

*All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.*

***In all cases, if staff are unsure, they should always speak to the designated safeguarding lead or deputy.***

Keeping Children Safe in Education (DfE, 2023 - p10, para 25)

The four main types of abuse referred to in Keeping Children Safe in Education are:

- Physical
- Emotional
- Sexual
- Neglect

Our schools are aware of the signs of abuse and neglect so we are able to identify children who may be in need of help or protection. Within those four main types of abuse there are specific types of abuse that our schools are alert to.

Importantly, in all circumstances where there may be abuse or neglect, staff understand that children may not feel ready or know how to speak to a trusted adult. Staff understand the concept of 'professional curiosity' in such instances. As outlined in KCSiE - September 2023, p9, para 19:

*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. For example, children may feel embarrassed, humiliated, or being 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.*

All staff recognise that risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. Staff ensure that they work to reduce any additional barriers that these children might face, and that children know they can share any concerns they might have with staff.

*All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, deliberately missing education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk.*

Keeping Children Safe in Education (DfE, 2023 - p11/12, para 31)

## 2.10. Child on child abuse

Our schools may be the only stable, secure and safe place in the lives of children at risk of, or who have suffered harm. However, on occasions their behaviour may be challenging and defiant, or they may instead be withdrawn, or display abusive behaviours towards other children.

Child on child abuse can manifest itself in many ways. This may include bullying (including cyber bullying), on-line abuse, gender-based abuse, physical abuse, sexual violence, sexual harassment, upskirting, sexting and initiation type violence. We do not tolerate any harmful behaviour in school and will take swift action to intervene where this occurs. We use the curriculum and assemblies to help children understand, in an age-appropriate way, what abuse is and we encourage them to tell a trusted adult if someone is behaving in a way that makes them feel uncomfortable.

The arrangements for prevention of and response to issues at each school are set out in the school Behaviour Policy and Anti-Bullying Policy.

## 2.11. Sexual Violence and Harassment

Sexual violence and harassment can occur between children of any age individually or in groups. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing, and in all likelihood will adversely affect their educational attainment. Our schools take all victims seriously and they will be offered the appropriate support.

Our schools will ensure that sexual violence and sexual harassment is not acceptable in any circumstances. We do not accept that it is 'just part of growing up' or a joke. Our schools will manage such incidents in the same way by considering the need to undertake an immediate risk and needs assessment and as with any other child protection concern we will follow the same procedures.

This also includes '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. It is now a criminal offence under the Voyeurism (Offences) Act 2019.

## 2.12. Children who are absent from/Missing from Education (CME)

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All children, regardless of their age, ability, aptitude and any special education needs they may have are entitled to a full-time education. Our schools recognise that a child absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. Our schools' approach to persistently absent pupils and children missing in education support the identification of such abuse, and, in the case of absent pupils, helps prevent the risk of them becoming a child missing in education in the future.

Parents should always inform us of the reason for any absence by phoning the attendance line on the first day of absence. If this does not happen the school will contact home. 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 numbers change. Where contact is not successfully made, a referral may be made to another appropriate agency (Newham Attendance Management Service (NAMS), Social Care or Police).

Our schools will inform the local authority of any pupil who fails to attend school regularly or has been absent without school permission for a continuous period of 10 days or more in line with the requirements for Children Missing Education.

## **2.13. Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) including County Lines**

Both CSE and CCE are forms of abuse and power and both occur when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual or criminal activity. This can happen to boys and girls from any background or community. This power imbalance can also be due to a range of factors including age, gender, sexual identity, cognitive ability, physical strength, status and access to economic or other resources. In some cases, the abuse will be in exchange for something the child needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals, groups, males or females and children or adults. Abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve enforcement or enticement-based methods of compliance and may, or may not be accompanied by violence or threats of violence. Children can be exploited even when the activity appears consensual.

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, weapons and money for them. Key to identifying potential involvement may be 'missing episodes' when the victim may have been trafficked for the purpose of transporting drugs, weapons or money.

Our schools are alert to the signs and indicators of a child becoming at risk of, or subject to, CSE and CCE and will take appropriate action to respond to any concerns. The Designated



Safeguarding Lead (DSL) will lead on any concerns and work with other agencies as appropriate. The DSL will consider a referral using the Newham pathways or a direct referral using the National Referral mechanism for human trafficking.

## 2.14. Serious Violence

There are a number of indicators, which may signal that a child is at risk from, or involved with serious violent 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 a significant change of attitude or well-being or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that a child has been approached by, or is involved with, individuals associated with criminal networks or gangs.

## 2.15. Domestic Abuse

Domestic abuse is defined as “any incident or pattern of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 and 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: physical; sexual; financial and emotional.”

Children can witness and be adversely affected by domestic abuse. Exposure to domestic abuse and/or violence can have a serious long lasting emotional and psychological impact on children. Section 3 of the Domestic Abuse Act 2021 came into force on 31 January 2022 and specifically provides that a child (under 18 years old) who sees, hears, or experiences the effects of domestic abuse and is related to the victim or the suspect is also to be regarded as a victim.

## 2.16. Operation Encompass

Our schools work together with the police to support children who have been exposed to domestic violence. If the police attend an incident of domestic abuse and a student is present they should inform school before the child arrives at school the following day. The Safeguarding Team then works with the Pastoral Team to put a support plan in place.

## 2.17. Honour Based abuse

So-called honour based abuse (HBA) encompasses 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 such practices such as breast ironing.

## 2.18. Female Genital Mutilation (FGM)

Female Genital Mutilation comprises all procedures involving partial or total removal of the external female genitalia or other injury to female genital organs. It is illegal in the UK and a form of child abuse. From October 2015, the Serious Crime Act 2015 (Home Office, 2015) placed a duty on

teachers to notify the police of any known cases of female genital mutilation where it appears to have been carried out on a girl under the age of 18. Our schools will operate in accordance with the statutory requirements relating to FGM in line with the London Safeguarding Children Procedures.

## 2.19. Forced marriage

A forced marriage is one that is entered into without the full consent of one or both parties. It is where violence, threats or other forms of coercion is used and is a crime. Our staff understand how to report concerns where this may be an issue.

## 2.20. Prevention of radicalisation

Children can be vulnerable to extremist ideology and radicalisation. Protecting children from this risk is similar to protecting them from other forms of harm and abuse. The Counter-Terrorism and Security Act (HMG, 2015) Section 26 places a duty on schools in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the PREVENT duty.

It requires schools to:

- teach a broad and balanced curriculum which promotes spiritual, moral, cultural, mental and physical development of children and prepares them for the opportunities, responsibilities and experiences of life and must promote community cohesion;
- be safe spaces in which children and young people can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, and learn how to challenge these ideas and;
- be mindful of their existing duties to forbid political indoctrination and secure a balanced presentation of political issues.

CHANNEL is a national programme which focuses on providing support at an early stage to people identified as vulnerable radicalisation and being drawn into terrorism. All staff

members understand how to identify those who may benefit from this support and are aware of relevant agencies to contact in circumstances where an individual demonstrates indicators of concern, as well as how to make a referral using the Newham referral pathways.

See Prevent Risk Assessment for further information.

## 2.21. Mental Health

All staff are aware that mental health can in some cases be an indicator that a child has or is suffering from or at risk of abuse. Staff are able to observe children day-to-day and identify those whose behaviour suggests they may be experiencing a mental health problem. Where there are

mental health concerns about a child that is also a safeguarding concern, immediate action will be taken following the school child protection policy.

Our schools work to protect the emotional wellbeing and resilience of all children and staff, as well as provide specific support for those with additional needs. We understand that there are risk factors which increase someone's vulnerability and protective factors that can promote or strengthen resilience. The more risk factors present in an individual's life, the more protective factors or supportive interventions are required to promote further growth and resilience. It is recognised that young people that may be suffering from mental ill-health and are at risk of self harm or suicide may present in school as making good progress and achieving well. It is therefore vital that we work in partnership with parents and carers to support the well-being of our children. It is equally important that parents share any concerns about the well-being of their child with school, so appropriate support and interventions can be identified and implemented.

Where there are concerns that a child or young person may be self-harming, it will be taken seriously as this may indicate an increased risk of suicide either intentionally or by accident. If a child discloses self-harm or is found to be self-harming the Designated Safeguarding Lead (DSL) or relevant key person will take the time to establish any underlying concerns.

The child will be supported to access services using the appropriate Newham help and support pathways.

## 2.22. Contextual Safeguarding

All staff are aware that safeguarding incidents and/or behaviours can be associated with factors outside of the school and can occur between children outside of the school environment. The Designated Safeguarding Lead (DSL) and all staff will consider whether children are at risk of abuse or exploitation in situations outside their families. Contextual abuse takes different forms and children are vulnerable to multiple harms including but not limited to sexual exploitation, criminal exploitation and serious youth violence.

Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm and risk beyond their families. It recognises that the relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers may have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships.

Our school staff need to engage with individuals and groups who do have influence over/within extra-familial contexts, and we recognise that risk assessment of, and intervention with, such sources of influence on our students are a critical part of our safeguarding practices. Contextual Safeguarding, therefore, expands the objectives of our child protection systems in school in recognition of the fact that young people are vulnerable to abuse in a range of social contexts.

Contextual abuse takes different forms and children can be vulnerable to multiple harms including but not limited to sexual exploitation, criminal exploitation and serious youth violence. If, as a school, we are concerned a child is being exploited in an extra-familiar context, as previously outlined, we will follow the procedures set out in this document and consult or refer to the MASH, from where they are likely to be referred to the PCEHH.

### Newham PCEHH – Preventing Child Exploitation and Harm Hub

The PCEHH is a weekly multi-disciplinary meeting chaired by the Director of Early Help and Children's Health. The PCEHH helps to identify and engage with children and young people who may be potentially at risk from any form of exploitation by responding to earlier 'critical moments' indicated via referrals from MASH. The PCEHH forms part of Newham's understanding and response to Child Sexual Exploitation (CSE), Missing, Criminal exploitation / gangs and county lines, serious youth violence (SYV), harmful sexual behaviour (HSB) and modern slavery in the borough.

It is well documented that focusing on prevention, early identification and intervention helps disrupt activity that might increase the probability of children and young people being exploited. Where there are low or emerging risks of child exploitation with no safeguarding concerns but heightened vulnerabilities, the child or young person is referred to the PCEHH for a multiagency discussion to agree a co-ordinated package of support for the whole family. Involving all family members can be a key determinant in supporting children and young people to remain safe and achieve good outcomes.

The PCEHH sits within the Early Help service, which works with the whole family. This means that the PCEHH also considers both inter-familial as well as intra-familial concerns as part of a co-ordinated and contextual safeguarding approach. All cases must have followed existing child protection procedures prior to being discussed at the PCEHH, including strategy meeting/discussion where appropriate.

## 2.23. Children potentially at greater risk of harm

Some children have an increased risk of abuse, both online and offline, 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.

### 2.23.1. Children with special educational needs and disabilities

Our schools understand that children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Our schools recognise that additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability, without further exploration;
- Be more prone to peer group isolation than other children;
- Children with SEN and disabilities can be disproportionately impacted by things like bullying, without outwardly showing signs
- Communication barriers that make telling an adult difficult and
- The requirement of personal or intimate care

Our schools will consider these additional vulnerabilities and challenges in considering the safeguarding of our children.

Our schools are also all aware of the additional guidance signposted in para 202 of KCSiE.

### **2.23.2. Children who need a social worker**

Children may need a social worker due to safeguarding or welfare needs. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning behaviour and mental health.

To support children with social workers, school Safeguarding Teams work in partnership with the Year Teams and the SENCO.

### **2.23.3. Looked after Children and previously looked after children**

The most common reason for children becoming looked after is as a result of abuse and/or neglect. Previously looked after children potentially remain vulnerable.

The DSL is the Designated Teacher for Looked after Children and works closely with the local authority to promote the educational achievement of registered students who are looked after and liaises with the Virtual School to discuss how the pupil premium funding can be best used to meet the needs identified in the child's personal education plan.

### **2.23.4. Private Fostering**

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

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. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.

School staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The school itself has a duty to inform the local authority of the private fostering arrangements.

On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered.

### **2.23.5. Children requiring mental health support**

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. We have systems in place for identifying possible mental health problems and work in partnership with external agencies including School Counsellors, Newham HeadStart and CAMHs to support children and their families.

## **2.24. Procedures**

All staff members have a duty to identify and respond to suspected and actual abuse or disclosures of harm. Any member of staff, volunteer or visitor to our schools who receives a disclosure or allegation of abuse, or suspects that abuse may have occurred must report it immediately to the Designated Safeguarding Lead (DSL) or, in their absence, the Deputy Designated Safeguarding Lead or a Safeguarding Officer.

Any concerns about a child or young person at risk of radicalisation or extremism will be raised with the PREVENT and Designated Safeguarding Lead (DSL).

All action is taken in accordance with the following guidance:

- Newham Children Safeguarding Partnership guidelines / London Safeguarding Children Procedures
- Keeping Children Safe in Education (DfE, 2023)

- Working Together to Safeguard Children (DfE, 2018)
- PREVENT Duty - Counter-Terrorism and Security Act (HMG, 2015)

Any staff member or visitor to the school will refer concerns to the Designated Safeguarding Lead (DSL) or Deputy Designated Safeguarding Lead or a Safeguarding Officer.

Where there is risk of immediate harm, concerns will be referred by telephone using the Newham Multi-Agency Hub or the Police.

Less urgent concerns or requests for support will be referred via the Newham Referral Pathways for consideration of Early Help support as appropriate.

Wherever possible, the school will share any safeguarding concerns, or an intention to refer a child to Children's Social Care, with parents or carers. However, we will not do so where it is felt that to do so could place the child at greater risk of harm or impede a criminal investigation. On occasions, it may be necessary to seek advice from the Newham Multi-Agency Safeguarding Hub or the Police in making decisions about when it is appropriate to share information with parents or carers.

If a member of staff continues to have concerns about a child and feels the situation is not being addressed or does not appear to be improving, the staff member concerned should press for reconsideration of the case with the Designated Safeguarding Lead (DSL) who will escalate the concern as appropriate.

If, for any reason, the Designated Safeguarding Lead (DSL) or Deputy Designated Safeguarding Lead is not available, this should not delay appropriate action being taken. Safeguarding contact details are displayed in the school to ensure that all staff members have unfettered access to safeguarding support, should it be required. Any individual may refer using [Newham's Safeguarding Children Partnership - pathways to help and support chart](#) where there is suspected or actual risk of harm to a child.

When new staff, volunteers or regular visitors join our schools they are informed of the safeguarding arrangements in place, the name of the Designated Safeguarding Lead (DSL) and deputy and how to share concerns with them.

## 2.25. Practice when police are called to the school

Before calling police to the school, the DSL and senior staff will reflect upon the proportionality of this response, being aware of the child's rights under the Equalities Act and Human Rights Act and if necessary, identifying and addressing concerns such as adultification if it is suspected of being present in staff decision making processes thus far.

Best practice is to consult the Safer Schools Officer before contacting police directly, unless the risk is considered to be escalating at a rate that precludes contacting the SSO. This school will prioritise contacting the SSO for advice before asking for other officers to attend.

In the event that a child is interviewed on site by police, the DSL will act in loco parentis at that interview to provide support to the child. Parents/carers will be informed directly that the police have been called to the school in connection with their child, subject to the safeguarding guidelines below. A suitably trained Appropriate Adult must be present if the child is subsequently arrested and/or taken to a police station and the DSL will ensure that arrangements for such support are in place before the child leaves the school premises, with the reason for the arrest and the name of the appropriate adult concerned, confirmed. Appropriate Adult | Youth Justice Legal Centre (yjlc.uk); DRAFT GUIDE FOR (publishing.service.gov.uk) (role and responsibilities of an Appropriate Adult).

No child / student may be subject to a search by police on school premises. Any such search should be carried out at the police station with an AA in attendance to the search.

Wherever possible, the school will share any safeguarding concerns, or an intention to refer a child to the MASH with parents or carers. However, we will not do so where it is felt that to do so could place the child at greater risk of harm or impede a criminal investigation. On occasions, it may be necessary to seek advice from the MASH or the Police in making decisions about when it is appropriate to share information with parents or carers.

## 2.26. Training

The Designated Safeguarding Lead (DSL) and deputy undertake advanced safeguarding training appropriate to the role every two years as a minimum. Headteacher, all staff members and governors receive appropriate safeguarding and child protection training that is regularly updated. In addition, all staff members receive safeguarding and child protection updates as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. Records of any safeguarding and child protection training undertaken is kept for all staff and governors.

Each school ensures that the Designated Safeguarding Lead (DSL) and deputy also undertake training in inter-agency working and other matters as appropriate.

## 2.27. Professional confidentiality

Confidentiality is an issue that needs to be discussed and fully understood by all those working with children, particularly in the context of child protection. A member of staff must never guarantee confidentiality to anyone about a safeguarding concern (including parents / carers or children) or promise to keep a secret. In accordance with statutory requirements, where there is a child protection concern, this must be reported to the Designated Safeguarding Lead (DSL) or deputy and may require further referral and subsequent investigation by appropriate authorities.

Information on individual child protection cases may be shared by the Designated Safeguarding Lead (DSL) or deputy with other relevant staff members. This will be on a 'need to know' basis only and where it is in the child's best interests to do so.



## 2.28. Information sharing, record keeping and risk assessment

### 2.28.1. Information sharing

Where there are concerns about the safety of a child, the sharing of information in a timely and effective manner between organisations can reduce the risk of harm. Whilst practitioners must have due regard for the Data Protection Act 2018 and UK GDPR, **these do not prevent the sharing of information for the purposes of keeping children safe.**

Our schools are confident of the processing conditions that allow us to store and share information for safeguarding purposes. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children. Furthermore, *practitioners may share information without consent where there is a good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner. It would be legitimate to share information without consent where: it is not possible to gain consent; it cannot reasonably be expected that a practitioner gains consent; and, if to gain consent would place a child at risk.* (DfE - KCSiE 2023, p.31).

Staff at our schools are clear that data protection and the associated information rights is regulated by the ICO - the Information Commissioner's Office. Our Trust Data Protection Policy, available on the [Policies Page](#) of the Trust website, provides more detailed information. Our staff use guidance on information sharing published by the ICO in order to support the safeguarding of children, including this [published 10 step guide](#). The way in which the guidance supports the safeguarding of children and young people is provided in the introduction, replicated below in italics:

*'Data protection law allows you to share information when required to identify children at risk of harm and to safeguard them from harm. Data protection law doesn't prevent you from doing this. It simply helps you to share information in a fair, proportionate and lawful way.*

*It can be more harmful not to share information that is needed to protect a child or young person.*

*Appropriate information sharing is central to effectively safeguarding children from harm and promoting their wellbeing. There have been many reviews of cases where children have died or been seriously harmed through abuse or neglect. The case reviews frequently identify gaps in information sharing as a factor contributing to failures to protect the children involved.*

*Data protection law has an enabling role, supporting you to share information'. (ICO, September 2023)*

This can be particularly relevant in cases of sexual abuse or sexual harassment. Where the victim does not want to tell anyone about the incident, the DSL's advice must always be sought. Ultimately, the DSL (or deputy) will have to balance the victim's wishes against their duty to protect the victim and other children, taking a range of considerations into account. Staff are made aware that the role that social media might play in exposing identities must also be carefully considered.

## 2.28.2. Record keeping

Well-kept records are essential to good child protection practice. Our schools are clear about the need to record any concern held about a child or children within our school, the status of such records and when these records should be shared with other agencies.

Any member of staff receiving a disclosure of abuse or noticing signs or indicators of abuse, will record it as soon as possible on Safeguard, noting what was said or seen, if appropriate, using a body map to record, with the date, time and location. This is then presented to the Designated Safeguarding Lead (DSL) or deputy, who will decide on the appropriate action and record it accordingly.

In cases of sexual abuse or harassment, if the designated safeguarding lead (or a deputy) decide to go ahead and make a referral to local authority children's social care and/or a report to the police against the victim's wishes, this should be handled extremely carefully, the reasons should be explained to the victim and appropriate specialist support should be offered.

Any records related to child protection are kept in an individual child protection file for that child, separate to the pupil file. All child protection records are stored securely and confidentially and will be retained for 25 years after the pupil's date of birth.

Where a pupil transfers from any Trust school to another school or educational setting including colleges, their child protection records will be forwarded to the new educational setting either by hand, recorded delivery or via secure transmission if sent electronically. These will be marked 'Confidential' and for the attention of the receiving school's Designated Safeguarding Lead (DSL) with a return address on the envelope so it can be returned to us if it goes astray. We will obtain evidence that the paperwork has been received by the new school and retain a copy of the file for our records.

Where a pupil joins our school, we will request all child protection records from the previous educational establishment if none are received.

## 2.28.3. Risk assessment - sexual abuse and harassment

When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) ensures that there is an immediate risk assessment undertaken. Where there has been a report of sexual harassment, the need for a risk assessment is considered on a case-by-case basis. The risk and needs assessment for a report of sexual violence should consider:

- the victim, especially their protection and support;
- whether there may have been other victims;
- the alleged perpetrator(s);

- all the other children, (and, if appropriate, adult students and staff) at the school or college, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms; and
- the time and location of the incident, and any action required to make the location safer.

Risk assessments are recorded and are kept under review. At all times, the staff consider the risks posed to children and put adequate measures in place to protect them and keep them safe.

The DSL (or deputy) ensures that the local authority's children's social care and specialist services are engaged. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required - which will be in addition to the risk assessment undertaken at the school.

## 2.29. Opportunities to teach Safeguarding

Across our schools, we ensure that children are taught how to keep safe (including online). Safeguarding is taught as part of the curriculum - and it is primarily delivered through the RHSE Policy.

Our Trust understands the key role that our schools have in preventative education. We ensure that we prepare our children for life in modern Britain, and that at all our schools, we create a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. We have clear age appropriate standards for behaviour across all our schools, articulated in our Behaviour Policies, which are available on the schools' websites.

Our children are taught:

- 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, and
- what constitutes sexual harassment and sexual violence and why these are always unacceptable.

## 2.30. Multi-agency working

Schools often hold crucial information and as such our schools are an essential partner in strategy discussions, child protection conferences and core groups. Our schools will be proactive and prioritise multi-agency working to contribute to safeguarding children. It is the responsibility of the Designated Safeguarding Lead (DSL) to ensure that the school is represented at, and a report is submitted, to any child protection conference or core group meeting for children on the school roll or

previously known to them. Where possible and appropriate, any report will be shared in advance with the parent(s) and/or carer(s). Whoever represents the school will be fully briefed on any issues or concerns the school has and will be prepared to contribute to the discussions at the meeting(s).

If a child is subject to a Child Protection or a Child In Need plan, the Designated Safeguarding Lead (DSL) will ensure the child is monitored regarding their school attendance, emotional well-being, academic progress, welfare and presentation. The Designated Safeguarding Lead (DSL) will ensure the school prioritises attendance at core group meetings and provide appropriate information to contribute to the plan at these meetings. Any concerns about the Child Protection plan and/or the child's welfare will be discussed and recorded at the core group meeting, unless to do so would place the child at further risk of significant harm. In this case the Designated Safeguarding Lead (DSL) will inform the child's key worker immediately and then record that they have done so and the actions agreed.

When we become aware that a child or young person who is being, or is going to be, privately fostered our schools have a duty under Section 10 of the Children Act 2004 to inform the Local Authority to ensure the appropriate safeguards are in place. The Designated Safeguarding Lead (DSL) will make appropriate referrals using the Newham Referral pathway.

## **2.31. Allegations about members of the workforce**

The aim of our schools is to provide a safe and supportive environment that secures the well-being and best learning outcomes for children. All staff members including supply teachers and visitors are made aware of the boundaries of appropriate behaviour and conduct. These matters form part of staff induction and are outlined in the Staff Code of Conduct and Visitor Information Leaflet. We do, however, recognise that sometimes allegations of abuse are made and when they occur they are distressing and difficult for all. We also understand that some allegations are genuine and that there are adults who deliberately seek to harm or abuse children. Our schools take all possible steps to safeguard our children and ensure that the adults in our schools are safe to work with children.

Supply staff, whilst not employed by the school are under the supervision, direction and control of the governing body when working in school. If we receive an allegation about an individual that is not directly employed by the school for example, supply teachers we will discuss with the employer/agency whether it is appropriate to suspend the supply teacher or to redeploy them to another part of the school, whilst they carry out an investigation. We will usually take the lead in collecting the facts from children and other staff and work in partnership with the employer and LADO to manage the process.

We will always ensure that the procedures outlined in Chapter 7 of the London Child Protection Procedures are adhered to and will seek appropriate advice from the Local Authority Designated Officer (LADO) by telephone 0203 373803 or email [cprt.lado@newham.gov.uk](mailto:cprt.lado@newham.gov.uk)

If an allegation is made or information is received about any member of staff, supply teacher, agency staff, governor or volunteer who works with children 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 they may pose a risk of harm to children; and
- behaved or may have behaved in a way that indicates they may not be suitable to work with children

The member of staff receiving the information should inform the Headteacher immediately. This includes concerns relating to agency and supply staff. In addition, staff should also alert Headteacher if an individual has behaved in a way in their personal life that raises safeguarding concerns. These concerns do not need to relate directly to a child.

Should an allegation be made against Headteacher or Executive Headteacher, this will be reported to the CEO of the Trust, who will seek advice from the LADO within one working day. In the event the CEO of the Trust is not contactable the same day, the information must be passed to a senior member of the Trust's Central Team, who will seek advice from the LADO within one working day. No member of staff will undertake further investigations before seeking advice from the LADO.

Any allegation about staff working for the Trust central services team who are not school-based must be referred to the Chief Executive of the Trust, and any allegation about the Chief Executive of the Trust must be referred to the Chair of the Trust.

Any member of staff or volunteer who does not feel confident to raise their concerns within the school should contact the LADO directly. Please refer to section 11 of this policy.

The schools have a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person from regulated activity. If these circumstances arise in relation to a member of staff at one of our schools, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or HR.

### **2.31.1. Low level concerns**

In line with Section Two of Part Four of Keeping Children Safe in Education, the Trust recognises 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 the Trust's values are constantly lived, monitored and reinforced by staff.

At Newham Community Learning, we have a robust Staff Code of Conduct, which is provided to all new starters as part of their onboarding and induction. In addition, our annual September Refresher ensures that staff review and acknowledge this Code as it is key ensuring that expectations are clearly and consistently communicated to all staff. The Trust's approach to low-level concerns is clearly articulated through the Code.

The term 'low-level' concern does not mean that the concern is insignificant, it means that a staff member, supply teacher or volunteer seems 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 or Trust 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 or young people
- having favourites
- taking photographs of children or young people on a personal mobile phone
- engaging with a child or a young person on a one-to-one basis in a secluded area or behind a closed door
- using inappropriate sexualised, intimidating or offensive language.

Such behaviour can exist on a spectrum.

Low-level concerns about a member of staff, supply staff, volunteer or contractor should be reported to the Headteacher. Any concerns about the headteacher should be reported to the CEO.

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. 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 concern to meeting the harm threshold.

Our Trust Safeguarding Working Group ensures that reporting of concerns are shared at Trust level to enable overall analysis of any patterns.

## 2.32. Whistleblowing

Whistleblowing is defined as ‘making a disclosure in the public interest’ and occurs when a worker (or member of the wider school community) raises a concern about danger or illegality that affects others, for example children in the school or members of the public. Whistleblowers are covered by legislation to ensure their protection. Newham Community Learning is committed to the highest possible standards of openness, probity and accountability and aims to comply with the requirements of the Public Interest Disclosure Act, 1998.

The Act provides protection for staff who disclose information which might otherwise be regarded as confidential, **if the disclosure falls into one of the categories outlined below:**

- A criminal offence has been, is being or is about to be committed.
- The employer has failed, is failing, or is about to fail to comply with his legal obligations.
- A miscarriage of justice has happened, is happening, or is likely to happen.
- An individual’s health and safety has been, is likely to be, or is being jeopardised.
- The environment is, has been, or is likely to be, damaged
- Information falling into any of the above categories has been, is being or is likely to be deliberately concealed.

All staff members are made aware of the duty to raise concerns about the attitude or actions of staff when they fall into one of the categories above in line with the Whistleblowing policy and the Trust’s Staff Code of Conduct.

All safeguarding concerns, including allegations against adults and low-level concerns, are reported as per the arrangements in this Safeguarding Policy and in line with the Trust’s Code of Conduct. More information is available called Advice for Whistleblowing in Maintained Schools (DfE 2014). However, for members of staff who feel unable to raise these concerns internally, they can contact the NSPCC whistleblowing helpline on: 0800 028 0285 or email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

Parents or others in the wider school community with concerns can contact the NSPCC general helpline on: 0808 800 5000 (24 hour helpline) or email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

## 2.33. Appendix 1 - Filtering and Monitoring - The Standards

The DfE has published a set of [filtering and monitoring standards for schools](#), which are referred to in KCSiE 2023. The standards cover four main areas:

- You should identify and assign roles and responsibilities to manage your filtering and monitoring systems;
- You should review your filtering and monitoring provision at least annually;
- Your filtering system should block harmful and inappropriate content, without unreasonably impacting teaching and learning; and
- You should have effective monitoring strategies that meet the safeguarding needs of your school or college.

A key part of the Standards are the roles and responsibilities, which are provided below:

Senior Leaders	DSL	IT Service Provider	Partnership
<ul style="list-style-type: none"> <li>• procuring filtering and monitoring systems;</li> <li>• documenting decisions on what is blocked or allowed and why;</li> <li>• reviewing the effectiveness of your provision;</li> <li>• overseeing reports</li> </ul> <p>AND for making sure that staff:</p> <ul style="list-style-type: none"> <li>• understand their role;</li> <li>• are appropriately trained;</li> <li>• follow policies, processes and procedures;</li> <li>• act on reports and concerns</li> </ul>	<p>The DSL should take lead responsibility for safeguarding and online safety, which could include overseeing and acting on:</p> <ul style="list-style-type: none"> <li>• filtering and monitoring reports;</li> <li>• safeguarding concerns;</li> <li>• checks to filtering and monitoring systems</li> </ul>	<p>The IT service provider should have technical responsibility for:</p> <ul style="list-style-type: none"> <li>• maintaining filtering and monitoring systems;</li> <li>• providing filtering and monitoring reports;</li> <li>• completing actions following concerns or checks to systems</li> </ul>	<p>The IT service provider should work with the senior leadership team and DSL to:</p> <ul style="list-style-type: none"> <li>• procure systems;</li> <li>• identify risk;</li> <li>• carry out reviews;</li> <li>• carry out checks</li> </ul>



## 2.34. Annex 1 - Contact details - all Trust schools

### 2.34.1. Eastlea Community School

Name	Email	Job Title	Phone Number
Deborah Hegan	deborah.hegan@eastlea.ncltrust.net	Designated Safeguarding Lead	0207 540 0400 07889 352884
Jess Carter	jess.carter@eastlea.ncltrust.net	Deputy Designated Safeguarding Lead	0207 540 0400 07711 595775
Amelia Aiken	amelia.aiken@eastlea.ncltrust.net	Deputy Designated Safeguarding Lead / SENCo	0207 540 0400
Helena Loizou	safeguarding@eastlea.ncltrust.net	Safeguarding Officer	0207 540 0400
Eastlea Safeguarding Team	safeguarding@eastlea.ncltrust.net	Safeguarding Team Email	0207 540 0400
Julianne Marriott	julianne.marriott@ncltrust.net	Safeguarding Link Governor and Chair	020 7540 0400
Nick Pratt	lado@newham.gov.uk	Newham Local Authority Designated Officer (LADO)	0203 373 3803

### 2.34.2. Lister Community School

Name	Email	Job Title	Phone Number
Sara Voisey	sara.voisey@lister.ncltrust.net	Designated Safeguarding Lead	07508191109
Tessa Hall	tessa.hall@lister.ncltrust.net	Deputy Designated Safeguarding Lead	07904838266
Carla Colquhoun	carla.colquhoun@lister.ncltrust.net	Child Protection Officer	07956 433081

Name	Email	Job Title	Phone Number
Amanda Davies	amanda.davies@lister.ncltrust.net	Child Protection Officer	07950505685
Lister Safeguarding Team	safeguarding@lister.ncltrust.net	Safeguarding Team Email	0208 471 3311 ex 6001/2
Pam Chadha	pam.chadha@ncltrust.net	Safeguarding Link Governor	Via Trust Office - 0330 053 4810
Nick Pratt	lado@newham.gov.uk	Newham Local Authority Designated Officer (LADO)	0203 373 3803

### 2.34.3. Portway Primary School

Name	Email	Job Title	Phone Number
Andrew Sellers	andrew.sellers@portway.ncltrust.net	Designated Safeguarding Lead	020 84727142 Ext. 207
Gemma Wood	gemma.wood@portway.ncltrust.net	Designated Safeguarding Lead	020 84727142
Jalina Belle	jalina.belle@portway.ncltrust.net	Designated Safeguarding Lead	020 84727142
Patricia McCartney	Patricia.McCartney@portway.ncltrust.net	Designated Safeguarding Lead	020 84727142
Portway Safeguarding Team Bradley Smith Louise Frempong	safeguard.portway@portway.ncltrust.net	Safeguarding Team	020 84727142
Jennifer Rhodes	jennifer.rhodes@ncltrust.net	Chair of Governors	020 84727142
James Johnston	james.johnston@ncltrust.net	Link Governor	020 84727142
Nick Pratt	lado@newham.gov.uk	Newham Local Authority Designated Officer (LADO)	020 3373 3803

### 2.34.4. Rokeby School

Name	Email	Job Title	Phone Number
Sarah Black	sarah.black@rokeby.ncltrust.net	Designated Safeguarding Lead	02075405620
Paula Springfield	paula.springfield@rokeby.ncltrust.net	Deputy Designated Safeguarding Lead	02075405620
Mariam Abdulkadir	mariam.abdulkadir@rokeby.ncltrust.net	Safeguarding Officer	02075405620
Rokeby Safeguarding Team	safeguarding@rokeby.ncltrust.net	Safeguarding Team Email	02075405620
Farzana Khan	farzana.khan@ncltrust.net	Safeguarding Link Governor	02075405620
Alex Mihu	lado@newham.gov.uk	Newham Local Authority Designated Officer (LADO)	02033736706

### 2.34.5. Sarah Bonnell School

Name	Email	Job Title	Phone Number
Becks Clark	rebecca.clark@sarahbonnell.ncltrust.net	Designated Safeguarding Lead	0208 534 6791 ext 177
Jodie Whitfield	jodie.whitfield@sarahbonnell.ncltrust.net	Deputy Designated Safeguarding Lead	0208 534 6791 ext 182
Jade Brown	jade.brown@sarahbonnell.ncltrust.net	Deputy Designated Safeguarding Lead	0208 534 6791 ext 181

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Name	Email	Job Title	Phone Number
Sahdia Fayyaz	sahdia.fayyaz@sarahbonnell.ncltrust.net	Safeguarding Officer	0208 534 6791 ext 157
Sharmin Aziz	sharmin.aziz@sarahbonnell.ncltrust.net	Safeguarding Officer	0208 534 6791 ext 205
Nasima Aktar	nasima.aktar@sarahbonnell.ncltrust.net	Safeguarding Officer	0208 534 6791 ext 155
Sarah Bonnell Safeguarding Team	safeguarding@sarahbonnell.ncltrust.net	Safeguarding Team Email	
Paul Leslie	paul.leslie@ncltrust.net	Safeguarding Link Governor and Chair	Via Trust Office: 0330 053 4810
Nick Pratt	lado@newham.gov.uk	Newham Local Authority Designated Officer (LADO)	0203 373 3803

### 2.34.6. Selwyn Primary School

Name	Email	Job Title	Phone Number
Mark Shuker	mark.shuker@selwyn.ncltrust.net	Designated Safeguarding Lead AHT	020 84716173
Mike Boxall	michael.boxall@selwyn.ncltrust.net	Deputy Designated Safeguarding Lead DHT	020 84716173
Daniyal Iqbal	daniyal.iqbal@selwyn.ncltrust.net	Safeguarding Team AHT	020 84716173
Susan Potter	susan.potter@selwyn.ncltrust.net	Safeguarding Team AHT	020 84716173

Name	Email	Job Title	Phone Number
Elaine Pyke	elaine.pyke@selwyn.ncltrust.net	Deputy Designated Safeguarding Lead DHT	020 84716173
Julie Liburd	julie.liburd@selwyn.ncltrust.net	Family Support Worker	020 84716173
Sarah Leahy	sarah.leahy@selwyn.ncltrust.net	Assistant SENCo	020 84716173
Selwyn Safeguarding Team	safeguarding.selwyn@selwyn.ncltrust.net	Safeguarding Team Email	Via school office - 020 84716173
Siddhant Menezes	siddhant.menezes@ncltrust.net	Safeguarding Link Governor	Via school office - 020 84716173
Nick Pratt	lado@newham.gov.uk	Newham Local Authority Designated Officer (LADO)	0203 373 3803

## 2.35. Annex 2 - Summary of how Safeguarding matters are escalated within the Trust

### 2.35.1. Procedures for staff to raise concerns

- As set out in the full Safeguarding policy, within each school all staff receive annual Safeguarding training and are made aware of the need to report any potential safeguarding concerns to the relevant staff (Designated Safeguarding Lead, Deputy DSL and/or Child Protection staff)
- Staff are also informed on the need to refer any concerns they have about staff to the Headteacher, or the Chair of Governors and the CEO.

### 2.35.2. Reporting from schools to the Central Team and to Trustees

- Data on Child Protection referrals is included each term in the Headteacher's Report to the Local Governing Body, and summaries of this information are included in reports to the Trust Board.
- LGBs also complete an annual Safeguarding report and a copy of this is shared with the Standards Committee of the Trust.
- The Trust DSL network meets half-termly to review Safeguarding issues across the Trust, and is chaired by a member of the Executive Group (currently Sarah Morgan, Chair of Eastlea)
- Headteachers in the Trust must inform the Central Team immediately of any of the following:
  - i. Death or serious injury of a child who is on roll at a Trust school, or who has left a Trust school in the previous two years
  - ii. Any incident on school premises where there has been a serious injury (e.g. requiring someone to go to A&E) or a 'near miss'.
  - iii. Any other major newly identified general risk (ie not specific to an individual child protection case) to the safety of young people or staff on the school site
  - iv. The link member of the Executive Group should be consulted in the case of any referral to the Local Authority Designated Safeguarding Officer
  - v. Any parental or public complaint regarding Safeguarding

The CEO of the Trust will inform the Chair of the Trust Board and also the Lead Safeguarding Trustee of any examples of (i) or (ii) above, and will then determine whether to ask the school to complete an evaluation of the school's processes to support the Trust identifying how effectively its processes operated in such a case. These evaluations will then be made available to the Standards Committee of the Trust at its next meeting, but may also be referred to the Trust Board if that is judged appropriate.

## 2.36. Annex 3 - Lister Community School - Safeguarding arrangements on site

### **Reporting safeguarding concerns at Lister Community School**

#### **Employees of Lister Community School**

Any concern about the safety or welfare of a child **must** be reported to the Designated Safeguarding Lead by logging a 'concern' using 'Safeguard'. All staff are given a 'Safeguard' account when they commence employment at the school. All members of staff must ensure that they are able to access their account and immediately report if they are unable to do so. The 'Safeguard' app can be found via the school website under 'Staff Apps' or by clicking [here](#)<sup>1</sup>.

#### **Visitors**

Visitors to the school should report any concerns about the safety or welfare of a child by completing the paper safeguarding concern reporting form which can be found at reception.

#### **Immediate risk of harm**

If you have reason to believe that the child has suffered or is at risk of suffering from significant harm they **should not** be allowed to leave the building, and should be brought to a member of the safeguarding and child protection team where the concern is reported in person. An email, voicemail or an online report is not acceptable in these circumstances.

### **In the absence of the safeguarding and child protection team**

During school hours the DSL, the Deputy DSL or a Child Protection Officer will always be available to report concerns. If, however, there is a rare occasion when any of these members of staff are unavailable then the concerned member of staff can do the following:

- Attempt to contact the DSL or Deputy DSL via mobile phone
- Speak to the Headteacher
- Speak to another member of the Leadership Team
- Call Newham Children's Social Care (MASH: **0203 373 4600**; or out of hours: **020 8430 2000**)
- Call the Police: 999 or 101 depending on the level of emergency.

### **Out of hours activities**

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<sup>1</sup> Link only available to staff with accounts in the Lister Google Domain.

During out of hours activities there are always arrangements for staff to contact a member of the safeguarding and child protection team. For educational visits the visit lead will have a visit phone which holds the contact number for the Educational Visits Coordinator (EVC) or the DSL, one of whom will be on call.

### **Other colleagues with key roles for safeguarding students**

- Heads of house and Pastoral managers play a key role in:
  - Working with families to agree Early Help action plans to improve the outcomes for vulnerable young people.
  - Liaising with class teachers, sharing only information that needs to be shared to ensure that vulnerable young people can be appropriately supported in their lessons.
  - Being a point of contact for young people to find support and assistance when they seek it.
  - Regularly liaise with the safeguarding and child protection team.
  
- The Attendance team play a key in:
  - Monitoring attendance and taking appropriate action when a young person is absent from school or has poor attendance and/or punctuality.

### **Screening of student phones**

As stated in [Searching, Screening and Confiscation guidance from the Department for Education](#), “Electronic devices, including mobile phones, can contain files or data which relate to an offence, or which may cause harm to another person. This includes, but is not limited to, indecent images of children, pornography, abusive messages, images or videos, or evidence relating to suspected criminal behaviour. Staff may examine any data or files on an electronic device they have confiscated as a result of a search, if there is good reason to do so”. Phone checks should only be conducted by the DSL (or deputy in their absence) in the presence of the Headteacher.

### **Restraint**

DfE guidance on [use of reasonable force in schools](#) provides several scenarios whereby reasonable force may be used in schools. At Lister Community School reasonable force is only used to restrain a student who is at risk of harming either another member of the school community, or themselves. Staff should use their professional judgement when restraining students and only do so if it doesn't compromise their safety. When restraining students, staff should not use excessive force e.g. staff may stand in between students fighting and gently move each of them away from each other, or staff may place their hands on a students arms to encourage them to stop harming themselves or another student. When restraint has been used, the member of staff should promptly



communicate the reason for restraint and a description of the restraint used with the Lead Pastoral Manager, who maintains the restraint log and shares each time with the DSL for review.

## **Visitors**

Visitors who come to the school during a normal school day, will be required to sign in at reception and wear a visitor's pass. Visitors are only permitted on site where prior approval has been gained from a member of the senior leadership team.

There are two types of visitor:

- Type One: Those who have an enhanced DBS which has been verified by Lister Community School.
- Type Two: Those who do not have an enhanced DBS which has been verified by Lister Community School.

Whilst a visitor is on the school site they will be expected to wear a lanyard with a visitor's pass. Those visitors who are provided with a green lanyard, have an enhanced DBS which has been verified by the school. These visitors are, within reason, permitted to be moved around the school site unescorted. Any visitor who does not have an enhanced DBS verified by the school will be required to wear a visitor's pass with a red lanyard. **These visitors must be escorted by a member of Lister staff at all times.** If a member of staff sees a visitor on the school site, who is unescorted and wearing a red lanyard, it is their duty to escort that person back to reception. Staff must **never** ask a student to escort a visitor wearing a red lanyard.

## **Concerns about another staff member**

If staff members have concerns about another staff member then this should be referred to the Headteacher. The Headteacher will decide on the next steps which may include an investigation, even when the member of staff is employed by an agency. Where there are concerns about the Headteacher this should be referred to the Chair of Governors.

## **External Speakers**

We welcome the opportunity for our students to hear from a range of speakers with differing views and experiences. We believe that this can be an enriching experience and open the eyes of students to a world that exists beyond the school gates. We also recognise the need to safeguard our students from those with dangerous or extremist ideologies that may spread hatred or incite violence.

We therefore expect all visiting speakers to adhere to the following guidance:

- Political impartiality should be maintained-this means that there should be a balanced presentation of opposing views on political issues when they are brought to the attention of pupils.
- Respect for the fundamental British values of democracy, the rule of law, individual liberty

and mutual respect and tolerance of those with different faiths and beliefs must be demonstrated.

- The speaker is not permitted to encourage, glorify or promote any acts of terrorism including individuals, groups or organisations that support such acts.
- The speaker is not permitted to raise or gather funds for any external organisation or cause without express permission of the Headteacher.

We expect all staff arranging visitors to:

- Discuss the proposed visit with their line manager including sharing the biography of the speaker, the audience and the purpose of the visit and then seek approval for the visit to take place to ensure it fits with the ethos of the school.
- Ensure that before the speaker arrives the proposed content of the speech and resources have been screened to ensure the above, and that they are age appropriate.
- Arrange for at least one member of Lister staff to be present at all times who will ensure that in the event that the speaker says something that we regard as inappropriate, a balanced view is presented and the inappropriate content is challenged.
- Follow up with organisations whereby we deem the content shared to be inappropriate.