

# Newham Community Learning Safeguarding Policy

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Applies to: Newham Community Learning

Version control: v9 (as per the Document History)

Approved by: Pending approval by the Trust Board - September 2026 [minor updates after this date will be logged in the Document History section]

## Contents

|                                                                                                   |           |
|---------------------------------------------------------------------------------------------------|-----------|
| <b>1 Overview of the Policy Management Process</b>                                                | <b>4</b>  |
| 1.1 Document history                                                                              | 4         |
| 1.2 Review and approval                                                                           | 9         |
| <b>2 Newham Community Learning Policy - Safeguarding Policy</b>                                   | <b>11</b> |
| 2.1 Aims and introduction                                                                         | 11        |
| 2.2 Statutory framework                                                                           | 12        |
| 2.3 The Trust Board                                                                               | 14        |
| 2.4 School Governing Bodies                                                                       | 15        |
| 2.5 The Designated Safeguarding Lead (and Deputy)                                                 | 16        |
| 2.6 The Headteacher                                                                               | 17        |
| 2.7 All school staff                                                                              | 18        |
| 2.8 External use of any Trust school site                                                         | 19        |
| 2.8.1 Visitor Management and Site Security                                                        | 19        |
| 2.9 Types of abuse / specific safeguarding issues                                                 | 20        |
| 2.10 Child on child abuse (including harassment and violence)                                     | 22        |
| 2.11 Sexual Violence and Harassment                                                               | 23        |
| 2.11.1 Harmful sexual behaviour (HSB)                                                             | 25        |
| 2.12 Children who are absent from/Missing from Education (CME)                                    | 26        |
| 2.13 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) including County Lines | 26        |
| 2.14 Serious Violence                                                                             | 28        |
| 2.15 Domestic Abuse                                                                               | 29        |
| 2.16 Operation Encompass                                                                          | 29        |
| 2.17 Honour Based abuse                                                                           | 30        |
| 2.18 Female Genital Mutilation (FGM)                                                              | 30        |
| 2.19 Forced marriage                                                                              | 31        |
| 2.20 Prevention of radicalisation                                                                 | 31        |
| 2.20.1 External Speakers and Impartiality Protocol                                                | 32        |
| 2.21 Mental Health                                                                                | 33        |
| 2.22 Contextual Safeguarding                                                                      | 34        |
| 2.22.1 Newham PCEHH – Preventing Child Exploitation and Harm Hub                                  | 35        |
| 2.23 Children potentially at greater risk of harm                                                 | 35        |
| 2.23.1 Children with special educational needs and disabilities                                   | 36        |
| 2.23.2 Children who need a social worker                                                          | 36        |
| 2.23.3 Looked after Children and previously looked after children                                 | 37        |
| 2.23.4 Private Fostering                                                                          | 37        |
| 2.23.5 Children requiring mental health support                                                   | 38        |
| 2.23.6 Young Carers                                                                               | 38        |
| 2.23.7 Safeguarding children with medical conditions                                              | 39        |

|                                                                                                            |    |
|------------------------------------------------------------------------------------------------------------|----|
| 2.23.8 Children who are lesbian, gay or bisexual (LGB)                                                     | 39 |
| 2.23.9 Children who are questioning their gender / Considering requests for support with social transition | 39 |
| 2.24 Procedures                                                                                            | 41 |
| 2.25 Practice when police are called to the school                                                         | 42 |
| 2.26 Training                                                                                              | 43 |
| 2.27 Professional confidentiality                                                                          | 43 |
| 2.28 Information sharing, record keeping and risk assessment                                               | 44 |
| 2.28.1 Information sharing                                                                                 | 44 |
| 2.28.2 Record keeping                                                                                      | 44 |
| 2.28.3 Risk assessment - sexual abuse and harrassment                                                      | 46 |
| 2.28.4 Mobile Device Screening Protocol                                                                    | 46 |
| 2.29 Opportunities to teach Safeguarding                                                                   | 47 |
| 2.30 Multi-agency working                                                                                  | 47 |
| 2.31 Allegations about members of the workforce                                                            | 48 |
| 2.31.1 Low level concerns                                                                                  | 50 |
| 2.32 Whistleblowing                                                                                        | 51 |
| 2.33 Appendix 1 - Filtering and Monitoring - The Standards                                                 | 53 |
| 2.33.1 The Standards                                                                                       | 53 |
| 2.33.2 Operational arrangements for monitoring                                                             | 54 |
| 2.34 Annex 1 - Contact details - all Trust schools                                                         | 55 |
| 2.34.1 Eastlea Community School                                                                            | 55 |
| 2.34.2 Lister Community School                                                                             | 55 |
| 2.34.3 Portway Primary School                                                                              | 56 |
| 2.34.4 Rokeby School                                                                                       | 57 |
| 2.34.5 Sarah Bonnell School                                                                                | 57 |
| 2.34.6 Selwyn Primary School                                                                               | 58 |
| 2.35 Annex 2 - Summary of how Safeguarding matters are escalated within the Trust                          | 60 |
| 2.35.1 Procedures for staff to raise concerns                                                              | 60 |
| 2.35.2 Reporting from schools to the Central Team and to Trustees                                          | 60 |
| NCLTrust.net                                                                                               | 2  |
| NCLTrust.net                                                                                               | 1  |

# 1 Overview of the Policy Management Process

## 1.1 Document history

| Date                     | Revision                                                                                                                                                                                                                       | Version number<br>(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<br><br>Formatted for NCST use                                                                                                                                  | v.1.1                                                                                                                                                     |
| July 2022                | Revisions to reflect changes to KCSiE - 01 September 2022<br><br>Extracts from the guidance are presented in italics<br><br>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<br>Key changes | Key changes due to republication of KCSiE in July 2023:<br><br>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<br>(substantive revisions are allocated a new whole number; minor revisions are designated by the addition of a consecutive decimal point) |
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|                                 | file - Annex F of KCSiE has been used for this exercise]                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                           |
| July 2023<br>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<br>(substantive revisions are allocated a new whole number; minor revisions are designated by the addition of a consecutive decimal point) |
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|            | - Added information from the ICO in 2.28.1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                           |
| March 2024 | Section 2.31 - addition of low-level concerns guidance in a sub-section<br><br>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                                                                                                                                                      |
| June 2024  | UPDATE further to KCSiE draft release in June 2024<br><br>Key documents referenced<br>LGfL - slides re key changes from September 2024<br>Safeguarding Network [Andrew Hall] - slides re key changes from September 2024<br><br><b>NOTE - Gender questioning guidance and Prevent guidance</b> - which includes radicalisation - currently under review. These sections of this version of the NCL Policy, v7.0, will not be updated until these are finalised, and remain as per v6.2.<br><br>NOTE - any changes to personnel as per Annex 1 are updated and approved by the Trust Director of Safeguarding/Director of Student Support<br><br>Appendix 1 - Filtering and Monitoring - updated to include detail of the operation of the Trust's monitoring arrangements | v7.0                                                                                                                                                      |
| Sept 2024  | Clarification of wording in 2.31.1 and republication of the policy on the website.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | v7.0                                                                                                                                                      |
| Sept 2024  | Update of all links to KCSiE - September 2024 throughout the policy<br><br>Eastlea contact details Annex - email addresses                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | v7.1                                                                                                                                                      |

| Date      | Revision                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Version number<br>(substantive revisions are allocated a new whole number; minor revisions are designated by the addition of a consecutive decimal point) |
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|           | updated as requested<br>Portway contact details Annex - email address corrected; website updated<br>Selwyn contact details Annex - email address corrected; website updated                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                           |
| July 2025 | <p>Updated further to draft KCSiE</p> <ul style="list-style-type: none"> <li>- Additional updates may be required once finalised</li> </ul> <p>All DSLs have reviewed their Annex and confirmed that names and contact details are correct. Standard approach to listing of the school main office number in all cases.</p> <p>Reference to the Trust Director of Student Support role has been removed as the post no longer exists.</p> <p>Note of updates:</p> <p><i>Gender questioning children</i> - awaiting publication of DfE guidance</p> <p><i>Misinformation, Disinformation, and Conspiracy Theories as Safeguarding Harms</i> - added to section 2.9</p> <p><i>Filtering and monitoring</i> - reference to the DfE's tool: Plan Technology for your School - self assessment tool - added to section 2.4</p> <p><i>Generative AI guidance</i> - section 2.4</p> <p><i>Cyber security</i> - section 2.7; training video specifically mentioned</p> <p><i>Alternative Provision</i> - section 2.6; redrafting and additional details provided</p> <p><i>CME - Working together to improve school</i></p> | v8.0                                                                                                                                                      |

| Date           | Revision                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Version number<br>(substantive revisions are allocated a new whole number; minor revisions are designated by the addition of a consecutive decimal point) |
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|                | <p><i>attendance</i> - section 2.12 - addition of explicit link to this guidance. ALSO - link to the Statutory Guidance provided in section 2.2</p> <p><i>Expansion of the role of Virtual Head</i> - 2.23.3 to include children in kinship care</p> <p><i>Record keeping with respect to allegations against a member of staff</i> - section 2.31 - Trust's Record Mgt System explicitly referenced</p> <p><i>Harmful Sexual Behaviour (HSB)</i> - new section 2.11.1 added</p> <p><i>Child Exploitation Disruption Toolkit</i> - new link added to 2.2</p>                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                           |
| Nov 2025       | Operation Encompass - additional section added to the Lister annex [Annex 3] as requested by the DSL                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | v8.1                                                                                                                                                      |
| September 2026 | <p>Full trust-wide review and comprehensive update to secure absolute alignment with the final statutory guidance <i>Keeping Children Safe in Education (KCSIE) 2026</i> and interacting legislation. Major updates include:</p> <p><b>Legal &amp; Statutory Frameworks:</b> Legal &amp; Statutory Frameworks: Integrated Section 49A of the Domestic Abuse Act 2021 (Operation Encompass police notification duties), the Data (Use and Access) Act 2025, and the Children's Wellbeing and Schools Act 2026. All Safer Recruitment-specific provisions (Part Three of KCSIE) are explicitly maintained under the separate Trust-wide <i>Safer Recruitment Policy</i></p> <p><b>1 September 2026 Final Statutory Updates:</b> Aligned Section 2.9 and Section 2.10 to establish racism, faith-targeted abuse, and other discrimination as standalone safeguarding harms and child-on-child abuse categories. Widened the Section 2.11 sexual</p> | v.9.0                                                                                                                                                     |



| Date | Revision                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Version number<br>(substantive revisions are allocated a new whole number; minor revisions are designated by the addition of a consecutive decimal point) |
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|      | <p>abuse definition to "forcing, causing or inciting". Hardened Section 2.2 and Section 2.8.1 to strictly prohibit any EYFS volunteers from starting work prior to physical DBS receipt. Fully integrated the proactive duty to promote an inclusive, anti-discriminatory whole-school culture under Section 2.29</p> <p><b>Vulnerable Cohorts (Section 2.23):</b> Added dedicated sections for Young Carers (2.23.6), Medical Conditions (2.23.7), LGB (2.23.8), and a supportive, child-centred, fully compliant protocol for Gender-Questioning/Social Transition requests (2.23.9) requiring immediate, concurrent parental collaboration from the outset.</p> <p><b>Operational Safe Practice:</b> Standardised universal/targeted Mental Health (2.21 &amp; 2.21.1) (warning signs, NHS 111 protocols), Serious Violence (2.14) (safety plans, travel vigilance), and Record Keeping (2.28.2) (mandatory 5-day secure CP file transfer timeline and Structured Summaries)</p> <p><b>Trust-Wide Consolidation:</b> Dismantled the previous <i>Lister Annex (Annex 3)</i>. Standardised procedures to the main Trust policy body: Visitor Lanyards (2.8.1), External Speakers (2.20.1), and Mobile Device Screening (2.28.4). Restraint procedures relocated to the School Behaviour Policies.</p> |                                                                                                                                                           |

## 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 Lead for Safeguarding and do not require Trust Board approval.

DRAFT

## 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. This system is described in the statutory guidance Working Together to Safeguard Children. Safeguarding and promoting the welfare of children is everyone’s responsibility. ‘Children’ includes everyone under the age of 18. 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 2026)

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, 2026).

Safeguarding and promoting the welfare of children is defined in Keeping Children Safe in Education 2026 as:

- Providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing the impairment of children’s mental and physical health or development

- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes.

## 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
- [Working together to improve school attendance \(August 2024\)](#) - which outlines how schools and local partners should work together to support families in order to improve school attendance of the children in their care, applying a framework of: expect, monitor, listen and understand, facilitate support, formalise support, enforce.
- [Child Exploitation Disruption Toolkit \(September 2022\)](#) - guidance to support frontline practitioners to safeguard children and young people under the age of 18 from sexual and criminal exploitation. This includes social workers, police officers, housing officers, education staff, healthcare staff, charity staff, and others.

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](#). In strict accordance with this framework and Keeping Children Safe in Education 2026, volunteers working within EYFS settings must not under any circumstances be permitted to begin working until the school has received their enhanced DBS certificate containing barred list information.

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 2026)

Working Together to Safeguard Children (HMG, 2023)

Education Act 2002

Counter-Terrorism and Security Act (HMG, 2015)

Prevent Duty guidance: England and Wales (2023)

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

Education (Pupil Registration) Regulations 2006

Data Protection Laws (2018, 2025)  
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 for children, young people, parents and carers (DfE 2024)  
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)  
Crime and Policing Act (2026)  
Children's Wellbeing and Schools Act (2026)

## 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 Lead for 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, the Trust Lead for Safeguarding and 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 (including online) training at induction, which is regularly updated. This training is designed to equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding and online safety policies and procedures in place across the Trust are effective, and support the delivery of a robust, whole school/whole Trust approach to safeguarding.

The Safeguarding governor/trustee checks that safeguarding is integrated into Behaviour, Online and all related policies (including the staff Code of Conduct) and is highlighted 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 responsible for ensuring that Safeguarding issues are regularly reviewed by the Executive Group, and for ensuring that any employees of the Trust who are not school-based are included on the Trust's Single Central Record, and that they receive regular safeguarding and child protection updates, at least annually.

The Trust Lead for Safeguarding supports the work of the Trust DSL 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 data protection laws (collectively referring to the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR), and the Data (Use and Access) Act 2025).

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 2026.

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 data protection laws.

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:

- Ensuring that a review of the effectiveness of filtering and monitoring systems is carried out at least once every academic year, led by the SLT member responsible for filtering and monitoring, with the support of the school's Designated Safeguarding Lead (DSL) and IT support. These reviews must include checks that filtering is working appropriately on all



internet-connected devices in all relevant locations, and a written record must be kept of these checks.

- 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;
- Ensuring that the Trust and its schools make use of the [DfE's Plan Technology for your School](#) service, which contains recommendations as to how to meet the DfE's Digital Standards<sup>1</sup>
- Ensuring that where generative AI products are used, they meet the [DfE's Product Safety Expectations](#). Newham Community Learning is aware of the risks and benefits of AI products, and is focussed on ensuring that they are accessed via a range of Google applications already available in user accounts. Work is ongoing across a wide range of stakeholders in this rapidly developing area.

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, as well as carry out any other necessary checks, for any volunteer undertaking unregulated activity since the Trust is responsible for ensuring that the volunteer does not pose a risk to children.

## 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, trainee teachers, 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).

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<sup>1</sup> The Trust has appointed Joskos, a single managed service provider, to ensure a consistent, professional and fit for purpose provision across the Trust, from September 2025. The contract includes working with the Trust to support appropriate filtering and monitoring measures.



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 (who is trained to the same standard as the DSL) will act in their absence. To ensure continuity of safeguarding responsibilities, schools will implement robust cover arrangements for periods when the DSL is unavailable due to illness, leave, or other circumstances. This will include a clear, reliable, and known arrangement, such as a confidential shared mailbox or equivalent system, to ensure that safeguarding concerns are received, monitored, and acted upon without delay.

The Designated Safeguarding Lead (DSL) (or another designated strategic lead) will also be alert to the additional vulnerabilities of children who have or have had 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 (or strategic 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. The DSL will also act as the key contact for notifications under the temporary accommodation notification duty (from local housing authorities when a child is placed in temporary accommodation), ensuring that the school can safeguard and promote the welfare of these children at the earliest opportunity.

## 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), in accordance with the statutory curriculum (introduced for September 2026).

Where a school places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and should be satisfied that the placement meets the pupil's needs. At Newham Community Learning, we recognise that where we feel that our provision cannot adequately meet the needs of any pupil on our school roll, an Alternative Provision place is sought to ensure that what are often a complex set of needs are met. Our Trust wide policies and procedures around the management of pupils on an AP placement ensures that we are always aware of the location of our students during school hours (including keeping records of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend), and continue to actively ensure that their wellbeing is safeguarded.

Where any NCL pupil is at an Alternative Provision facility, we ensure that:

- We have assured ourselves that all appropriate safeguarding checks have been carried out on the provider's staff;
- That we are advised of any changes at the AP that may affect our pupils - eg. change in staffing arrangements;
- That we ensure that regular reviews are held (at least half-termly) to provide assurance that the child is regularly attending, and the placement continues to be safe and meets the child's needs; and
- That should we have any safeguarding concerns, the placement will be immediately reviewed and terminated, if necessary, unless or until those concerns have been satisfactorily addressed.

## 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.

Any child may benefit from early help, but all school and college staff should be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs;
- has special educational needs (whether or not they have a statutory Education, Health and Care plan);
- has a mental health need;
- is a young carer;
- is pregnant and/or is a parent themselves;
- has exhibited early signs of abusive, violent and/or harmful behaviours;
- is showing signs of being drawn in to anti-social or criminal behaviour;
- including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from education, home or care;
- has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit;
- is at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage

- is a privately fostered child.

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. Details of these operational arrangements are provided in Appendix 1 to this document.

Staff receive regular training around cyber security which ensures that they understand their responsibilities. This includes review of the NCSC video, [available on this webpage](#), by all staff annually.

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 (and ensure that safeguarding requirements are included in any transfer of control, lease, or hire agreement as a condition of use, with a clear provision that failure to comply will lead to the immediate termination of the agreement). These arrangements must align with the Department for Education's guidance on *Keeping children safe in out-of-school settings*.

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.

### 2.8.1 Visitor Management and Site Security

To maintain a safe environment, all visitors arriving at any Trust school site during the normal school day must report directly to reception, present official photographic identification, sign in, and be issued a visitor's pass. Our schools operate a standardized two-tier visitor lanyard system to ensure site-wide safeguarding transparency:

- Green Lanyards (in some schools these are blue, grey or black) - (Verified / Unescorted): Issued to visitors whose identity and Enhanced DBS check (including a children's barred list check where they are in regulated activity) have been formally verified by the school. These professional visitors (such as educational psychologists, social workers, or NHS staff) are permitted to move around the school site unescorted. Staff must check their professional ID but must not ask to see their physical DBS certificate.
- Red Lanyards (Unverified / Escorted): Issued to visitors who do not have an enhanced DBS verified by the school (such as parents, family members, or one-off suppliers). Red lanyard wearers must be escorted by a member of school staff at all times and must never be left unsupervised with children. Under no circumstances must a pupil be asked to escort a visitor wearing a red lanyard.

Any member of staff who spots an unescorted visitor wearing a red lanyard (or anyone without a visible pass) has a duty to immediately challenge them and escort them back to reception.

**EYFS Volunteer Restriction:** While unverified volunteers in other school phases may occasionally be on-site under strict supervision (wearing red lanyards), this exception does not apply to early years settings. To comply with the EYFS framework, volunteers must not be permitted to begin working within any settings covered by the EYFS framework until the school has physically received their enhanced DBS certificate containing barred list information.

## 2.9 Types of abuse / specific safeguarding issues

*"All staff should be aware of the indicators of abuse, neglect and exploitation and modern slavery (see below), understanding that children can be at risk of harm inside and outside of the school/college, inside and outside of 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, exploitation, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap.*

*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 - including physical, sexual, emotional abuse and stalking), criminal exploitation (including financial 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 consensual and non-consensual making or sharing of nudes or semi-nudes (including those generated or digitally altered using generative AI / deepfakes), especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.*

The breadth of online safety risks is considerable and ever-evolving, and is categorised into four areas of risk (the 4Cs):

- Content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, and misinformation, disinformation (including fake news), and conspiracy theories.
- Contact: being subjected to harmful online interaction with other users or generative AI applications that simulate this (for example: peer-to-peer pressure, commercial advertising, or adults posing as children/young adults to groom or exploit them for sexual, criminal, financial, or other purposes).
- Conduct: online behaviour that increases the likelihood of, or causes, harm; for example: making, sending, and receiving explicit images, including those generated using AI, and online bullying.
- Commerce: risks such as online gambling, inappropriate advertising, phishing, and financial scams.

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

*(Keeping Children Safe in Education 2026)*

The four main types of abuse referred to in Keeping Children Safe in Education 2026 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 2026,:

*“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 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 school staff must recognise that racism, faith-based prejudice, and other forms of discriminatory behaviour constitute harm in their own right, rather than just behavioral issues. Staff must exercise professional curiosity and remain highly alert to how prejudice-based discrimination can severely impact a child's welfare, mental wellbeing, and overall sense of safety. 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, unexplainable and/or persistent absences from education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual making or sharing of nudes or semi-nudes can be signs that children are at risk.”*

Keeping Children Safe in Education (DfE, 2026)

## 2.10 Child on child abuse (including harassment and violence)

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;
- racism, faith-targeted abuse, and other forms of discriminatory behaviour;
- physical abuse;
- serious physical assault and harm, or the threat of harm with a weapon;
- sexual violence and sexual harassment;
- upskirting;
- consensual and non-consensual making or sharing of nudes and semi-nudes (including those generated or digitally altered using AI) and
- initiation type violence and rituals.

We do not tolerate any harmful behaviour in school and will take swift action to intervene where this occurs. All staff must understand that even if there are no reports in our schools, it does not mean child-on-child abuse is not happening. Staff must recognize that child-on-child abuse is a safeguarding issue for both the victim and the alleged perpetrator, and that it is preventable.



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. Additionally, schools will be alert to when children might be at the highest risk around the school day, particularly immediately after school.

The arrangements for prevention of and response to issues at each school are set out in the school Behaviour Policy and Anti-Bullying Policy. Early help can be particularly useful to address non-violent HSB and may prevent escalation of sexual violence.

## 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 this will adversely affect their educational attainment and well-being which is further exacerbated if the alleged perpetrator(s) attend the same school. Our schools take all victims seriously and they will be offered immediate, appropriate support and kept safe.

Our schools will ensure that sexual violence and sexual harassment are not acceptable in any circumstances. We do not accept that they are ‘just part of growing up’, “banter”, “just having a laugh”, or “boys being boys”. Downplaying or tolerating these behaviours risks normalising them, creating a hostile, sexualised environment, and establishing a culture that prevents children from coming forward to report abuse. All staff must understand the escalatory nature of misogyny and the benefits of early identification to minimise these risks.

Our schools define these behaviours in line with statutory definitions:

- **Sexual Harassment:** refers to ‘unwanted conduct of a sexual nature’ which can occur both online and offline. This includes sexual comments or jokes, physical behaviour (such as interfering with clothes or deliberately brushing against someone), displaying sexual images, upskirting (which is a criminal offence under the Voyeurism (Offences) Act 2019), and online sexual harassment (such as sending unwanted explicit content, sexualised online bullying, or coercing others into sharing images).
- **Rape:** A person commits rape if they intentionally penetrate the vagina, anus or mouth of another person with their penis, without consent, and without a reasonable belief in consent.
- **Assault by Penetration:** A person commits this offence if they intentionally penetrate the vagina or anus of another person with a part of their body or anything else, where the penetration is sexual, without consent, and without a reasonable belief in consent.
- **Sexual Assault:** A person commits sexual assault if they intentionally touch another person, where the touching is sexual, without consent, and without a reasonable belief in consent (noting that this covers a wide range of behaviour from kissing to touching bottom/breasts/genitalia).

- **Causing someone to engage in sexual activity without consent:** intentionally forcing someone to engage in an activity that is sexual, such as stripping or touching themselves.

**Consent Guidelines:** Staff, and especially the DSL team, must understand consent, which is about having the freedom and capacity to choose. In line with the final statutory definition of sexual abuse, staff must recognise that:

- Sexual abuse involves forcing, causing, or inciting a child to participate in sexual activities (whether or not there is physical contact).
- Children are statistically far more likely to be abused by an individual they already know rather than a stranger.
- A child under the age of 13 can never consent to any sexual activity.
- The age of consent is 16.
- Sexual intercourse without consent is rape.

**Safeguarding Response to Nude and Semi-Nude Images:** Our schools take a safeguarding approach in response to all incidents involving the making or sharing of nude or semi-nude images, regardless of whether the sharing was consensual or non-consensual. All such incidents require a safeguarding response that considers the age, development, and circumstances of the children involved, as well as elements of coercion, exploitation, or vulnerability.

**Immediate Risk, Needs Assessment, and Classroom/Premises Separation:** Our schools will manage such incidents by considering the need to undertake an immediate risk and needs assessment. For any report of sexual violence, the DSL (or deputy) must carry out an immediate risk and needs assessment, while for sexual harassment, the need for a risk assessment will be decided on a case-by-case basis.

When a report is made, schools must carefully manage classroom sharing and shared spaces:

- **Immediate Classroom Separation:** In any case of a criminal investigation into rape or assault by penetration, the alleged perpetrator(s) must be immediately removed from any shared classes with the victim.
- **Physical Separation:** The school will also carefully consider how to maintain a reasonable physical separation between the victim and the alleged perpetrator(s) across school premises (including before and after school-based activities), and on transport to and from school, where appropriate.
- **No Judgement of Guilt:** It must be made clear to all parties that these separation actions are taken in the best interests of safeguarding all children involved and must not be perceived as a judgement on the guilt of the alleged perpetrator(s).
- **Disciplinary Sanctions:** Schools can take disciplinary action on the balance of probabilities under our Behaviour Policy while external investigations are ongoing, provided it does not prejudice the police investigation or children's social care enquiries. If a criminal investigation leads to a conviction or caution for rape or assault by penetration, in all but the most exceptional circumstances, this will constitute a serious breach of discipline and lead to permanent exclusion



### 2.11.1 Harmful sexual behaviour (HSB)

Harmful sexual behaviour (HSB) exists on a continuum, ranging from developmentally expected behaviour to problematic, abusive, or violent behaviour. HSB must always be considered within a child protection context.

**Critical Assessment Factors:** When assessing HSB, the ages and developmental stages of the children involved are critical. Sexual behaviour between children may be considered harmful if:

- There is a significant age difference, typically more than two years' difference.
- One child is pre-pubescent and the other is not.
- A power imbalance exists, such as differences in maturity, social status, physical size, or if one child has a disability

Schools have a delicate balancing act to consider in supporting both parties. Age and the developmental stage of the alleged perpetrator, as well as formulating a proportionate response based on the individual case are both essential. Important to note is research referenced in KCSiE that many alleged perpetrators have themselves been subject to 'some kind of abuse or trauma'.

Staff at Newham Community Learning are aware of age appropriate sexual behaviour and use this information to formulate appropriate responses. As per KCSiE, staff recognise that it is possible to both provide support and to implement disciplinary sanctions at the same time; this may well be necessary in such cases.

**Support Services and Resources:** Our schools will actively signpost children and families to specialist support services, including:

- The Lucy Faithfull Foundation's [HSB toolkit](#), which provides support, advice and information.
- 'Shore Space' (run by the Lucy Faithfull Foundation and Home Office), which provides a safe, anonymous place and a confidential chat service for young people concerned about their own or someone else's sexual thoughts or behaviour.
- The NSPCC helpline (0808 800 5000 or [help@nspcc.org.uk](mailto:help@nspcc.org.uk)) and the NSPCC Harmful Sexual Behaviour Framework.
- Specialist NHS support via a Sexual Assault Referral Centre (SARC) for medical, practical, and emotional care following an assault.
- Children and Young People's Independent Sexual Violence Advisors (ChISVAs) to provide emotional and practical support through the criminal justice process.
- The Centre of Expertise on Child Sexual Abuse, which has additional resources available.

**Working with Parents and Carers:** The school will engage with the parents or carers of both the victim and the alleged perpetrator when there is a report of sexual violence (and on a case-by-case basis for sexual harassment), unless doing so would put a child at additional risk. The DSL will meet with the victim's parents/carers with the victim present to discuss support and safety measures. The DSL will also meet with the alleged perpetrator's parents/carers to discuss any arrangements in place, such as classroom moves, and explain the rationale.

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

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, but also mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, honour or faith-based abuse, or risk of forced marriage. This is especially critical when a child is already known to local authority children's social care and needs a social worker (such as a child who is a child in need, has a child protection plan, or is a looked after child), as being absent from education may increase known safeguarding risks within the family or in the community.

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. To support this, and in line with statutory guidance, our schools will, where reasonably possible, hold more than one emergency contact number for each pupil. This goes beyond the legal minimum and provides the school with additional options to make contact with a responsible adult when a child missing education is also identified as a welfare and/or safeguarding concern. 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 ensure that our processes and procedures ensure that we follow the statutory guidance *Working Together to Improve School Attendance*.

We are always aware of the additional safeguarding risks to children who are absent/CME.

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. This can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group.

In line with statutory guidance, our schools define an "organised network" in accordance with the Independent Inquiry into Child Sexual Abuse (IICSA):

- "An organised network is characterised by two or more individuals (whether identified or not) who are known to (or associated with) one another and are known to be involved in or to facilitate the sexual exploitation of children. Being involved in the sexual exploitation of children includes introducing them to other individuals for the purpose of exploitation, trafficking a child for the purpose of sexual exploitation, taking payment for sexual activities with a child or allowing their property to be used for sexual activities with a child"

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. It is not possible for a child to consent to be exploited, abused, or trafficked, and they may not recognise that it is happening to them.

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 recognise that child criminal and sexual exploitation are forms of child abuse and trafficking, and that this exploitation may constitute modern slavery. Under no circumstances should we allow a child's actions under coercion to prevent us from recognizing them as a victim; victims are not always recognized and can be criminalised for actions they take whilst under coercion. This remains a significant concern, as professionals continue to encounter cases where children are manipulated, groomed, and exploited without fully understanding the abuse they are experiencing

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. Where a potential victim of CCE or CSE is identified, the DSL will ensure that a relevant child protection and modern slavery referral is completed in accordance with the Modern Slavery statutory guidance. The DSL will consider a referral using the Newham pathways or a direct referral using the National Referral Mechanism (NRM) 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.

Serious violence is a continuing safeguarding concern. It may involve physical assault, carrying, threatening with, or using weapons, often in the context of peer conflict or bullying, and it can also be associated with criminal exploitation. Schools play a key role in protecting children from violence, safeguarding victims, as well as those who may be at risk of, or are involved in committing violence (who may also be victims themselves).

Our school procedures and strategic responsibilities around serious violence are as follows:

- **Reporting Concerns:** Staff must report any concerns about a child carrying or using a weapon (or expressing intent to do so) immediately to the Designated Safeguarding Lead (DSL) or a deputy.
- **DSL Risk Assessment & Planning:** The DSL (or deputy) must assess the risk to both the individual pupil and others in the school, considering wider information or concerns, and take appropriate action. Depending on the risk, they must put in place a formal "safety and support plan" and, where relevant, consider action to de-escalate peer conflict.
- **Vigilance with Heightened Risk Groups:** Staff should be highly alert to signs of serious violence risk, recognizing that these risks are statistically higher for children with disrupted education (e.g. suspensions, permanent exclusions, time spent in Alternative Provision) or a history of offending.
- **Vigilance Over Times and Locations:** Staff must be alert to when children might be at the highest risk around the school day, particularly immediately after school (as well as just before school). This is when pupils are travelling to and from school and can concentrate in particular places. Our schools will consult with pupils and staff to identify these unsafe locations and work with wider partners (including local Violence Reduction Units) to coordinate a collective safeguarding response around the school day.
- **Proactive and Evidence-Based Support:** Early, evidence-based support for those considered at risk, as well as at critical points when concerns emerge, is vital. This includes ensuring access to trusted adults, social and emotional skill support, and, where available, targeted interventions such as mentoring or therapeutic support, drawing on practical guidance from the Youth Endowment Fund (YEF).
- **Referrals and Police Liaison:** The DSL (or deputy) will use the national NPCC 'When to call the police' guidance and local procedures to determine when to escalate concerns to the police.

## 2.15 Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse - including physical, sexual, emotional abuse, and stalking). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

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 in their own right. Where there are concerns about a child under 18 experiencing domestic abuse or teenage relationship abuse, standard child safeguarding procedures must be followed immediately, and both young victims and young perpetrators will be offered support.

## 2.16 Operation Encompass

Our schools work together with the police to support children who have been exposed to domestic violence. In November 2025, a new statutory duty was placed on police forces in England and Wales (under Section 49A of the Domestic Abuse Act 2021) to notify a child's education setting, and where relevant, local authorities, if they have reasonable grounds to believe a child may be a victim of domestic abuse. This statutory duty, operated through Operation Encompass, ensures that our schools receive timely, confidential notifications about any domestic abuse incidents connected to our pupils (from reception up to age 17). This includes incidents where a child was physically present, as well as where they were not present but reside in the household.

The Designated Safeguarding Lead (DSL) in each school acts as the 'Key Adult' for receiving and managing these notifications. To ensure compliance with data protection laws, all notifications are treated as highly confidential, stored securely alongside child protection records, and processed in strict accordance with data protection laws. DSLs may utilise a secure central safeguarding inbox to maintain strategic oversight.

Operation Encompass notifications provide vital context to enable immediate school support, including the 'voice of the child' and the circumstances of the incident, but they must never include any reference to, or details of, sexual offences disclosed during the incident. This is a strict legal requirement designed to preserve victim anonymity under the Sexual Offences (Amendment) Act 1992.

It is important to note that Operation Encompass notifications do not replace statutory safeguarding procedures or referrals. Where there are concerns about a child's safety or welfare, the school will immediately make a statutory referral to Newham Children's Social Care (MASH) in accordance with local thresholds, independent of the Operation Encompass process.

## 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.

Abuse committed in the context of preserving honour often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

All forms of HBA are abuse (regardless of the motivation) and must be handled and escalated as such. All staff need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA. If staff have any concern regarding a child who might be at risk of HBA or who has suffered from HBA, they must speak to the Designated Safeguarding Lead (DSL) or a deputy immediately. The DSL (or deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with the police and local authority children's social care.

## 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 with long-lasting harmful consequences.

Under Section 5B of the Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015), there is a specific mandatory reporting duty placed on teachers. Teachers must personally report to the police (via 101) cases where they "discover" that an act of FGM appears to have been carried out on a girl under the age of 18. A teacher "discovers" this either through direct disclosure by the victim or through visual evidence. It is important to note:

- It is extremely rare for teachers to see visual evidence, and staff must never examine pupils or students.
- Unless a teacher has good reason not to (such as knowing another teacher has already reported it), they must personally make the report to the police.
- The teacher should still consider and discuss the case with the school's Designated Safeguarding Lead (DSL) or a deputy, and involve local authority children's social care as appropriate.
- The mandatory reporting duty does not apply to "at-risk" or suspected cases of FGM (where FGM has not been discovered through disclosure or visual evidence). In these suspected



cases, teachers must follow standard school safeguarding procedures by reporting immediately to the DSL

## 2.19 Forced marriage

A forced marriage is one that is entered into without the full and free consent of one or both parties. It is where violence, threats or other forms of coercion is used and is a crime. Threats can be physical, or emotional and psychological. A lack of full and free consent can also be where a person cannot consent (for example, if they have learning disabilities).

Our staff understand how to identify and report concerns where this may be an issue. In addition, staff must be aware of the following statutory provisions:

- Since February 2023, it is a crime in England and Wales to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats, or other forms of coercion are not used.
- This law applies to non-binding, unofficial, or religious 'marriages' as well as legal marriages.
- If staff are concerned about a child being forced into marriage, or being married under 18, they must report this to the DSL.
- Staff and DSLs can contact the joint Home Office and Foreign, Commonwealth & Development Office Forced Marriage Unit (FMU) for confidential advice and information at 020 7008 0151 or [fmf@fcdo.gov.uk](mailto:fmf@fcdo.gov.uk).

## 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.

The Prevent duty must be approached as an integral part of each school's wider safeguarding obligations, and our leadership operates in accordance with the revised Prevent duty guidance themes of: (1) leadership and partnership, (2) capabilities, and (3) reducing permissive environments.

In line with statutory guidance, we define these risks as follows:

- **Extremism:** the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs.
- **Radicalisation:** the process of a person legitimising support for, or use of, terrorist violence.
- **Terrorism:** an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system, where



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

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 to 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.

DSLs and staff must be aware that while a Prevent or Channel referral is being assessed by the police and multi-agency panel, should any further or new information come to light, this must be immediately passed on to the police.

When a pupil who is currently receiving support through the Channel programme transitions to another educational setting, the Designated Safeguarding Lead (DSL) will consider sharing this information with the new school in advance of the child leaving. This ensures that the receiving setting can have appropriate, continuous support in place for when the child arrives

The Trust Prevent Risk Assessment provides further information.

### **2.20.1 External Speakers and Impartiality Protocol**

Our schools welcome the opportunity for pupils to hear from a range of visiting speakers with differing views and experiences. This is an enriching educational experience that prepares pupils for life in modern Britain; however, our schools must carefully consider the suitability of all external organisations and guest speakers before allowing them onto school premises.

Each school must operate a formal vetting and screening process for all external speakers, ensuring a written assessment is made of the educational value and age-appropriateness of the proposed content.

All visiting speakers must adhere to the following strict statutory guidelines:

- **Political Impartiality:** Visiting speakers must maintain strict political impartiality. Staff must ensure that there is a balanced presentation of opposing views on political issues when such issues are brought to the attention of pupils, in accordance with the school's legal duties.
- **Fundamental British Values:** Speakers must actively promote and show 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.
- **Prevention of Extremism:** Speakers are strictly prohibited from encouraging, glorifying, or promoting any acts of terrorism, extremist ideologies, or supporting proscribed organizations.
- **Financial Solicitations:** Speakers must not raise, solicit, or gather funds for any external organisation, political party, or cause without the express, prior written consent of the Headteacher.

**Respect for Religion and Beliefs:** While our schools will take a strong, proactive stand against all forms of bullying and harassment, visiting speakers must remain fully conscious of, and respectful toward, the rights of pupils and staff in relation to their religion or belief. Staff arranging visits are responsible for ensuring that the speaker's biography and resources are screened in advance, that at least one member of school staff is present throughout the presentation to monitor and challenge any inappropriate content, and that any concerns are immediately escalated to the Designated Safeguarding Lead (DSL).

## 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.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. However, school staff are uniquely placed to support the fulfilment of four key roles:

- Promoting good mental wellbeing and preventing the onset of mental illness.
- Observing pupils and identifying early those who may be experiencing mental health problems or are at risk of developing one.
- Ensuring early targeted support is provided.
- Liaising with, and referring to, specialist services where needed.

**Warning Signs for Staff to Look Out For:** Staff must be vigilant to potential warning signs that a child is struggling with their mental health, contemplating suicide, or self-harming, including:

Significant changes in behaviour.

Ongoing difficulty sleeping.

Withdrawing from social situations.

Not wanting to do things they usually like.

Physical signs of self-harm or severe self-neglect.

### **Emergency and Urgent Response Protocol:**

- Immediate Danger: If a member of staff feels a child is in immediate danger or poses an active risk to themselves (such as having an active suicide plan), they must call 999 or arrange for them to be taken to A&E immediately by a parent/carer or other suitable person.
- Urgent but Non-Emergency Support: If a child needs help urgently for their mental health but is not in immediate danger, staff must seek help from NHS 111 online or call 111 and select the mental health option.
- Parental Involvement: Where mental health support is needed, the DSL (or deputy) will consider whether to inform parents or carers to support the child's wellbeing, provided that doing so does not place the child at additional risk

## **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.

Extra-familial harms take a variety of different forms, and children can be vulnerable to multiple overlapping harms. These include (but are not limited to):

- sexual abuse (including sexual harassment and sexual exploitation),
- domestic abuse in their own intimate relationships (teenage relationship abuse—including physical, sexual, and emotional abuse, and stalking),
- criminal exploitation (including financial exploitation),
- serious youth violence,
- county lines, and
- radicalisation.

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.

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

The PCEHH is a weekly multi-disciplinary meeting chaired by the Director of Family 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 Family Help and 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. Our governing bodies and school leaders recognise that some groups of children are potentially at greater risk of harm than others, and this is actively reflected in our school safeguarding policies, training, and preventative procedures.

### **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;
- Being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- The potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges, which risks that they do not understand that what is happening to them is abuse.
- The requirement of personal or intimate care or that these children are isolated from others.
- The fact that these children are more likely to be dependent on adults for care; and
- Cognitive understanding barriers—where children may be unable to understand the difference between fact and fiction in online content, and may repeat harmful content or behaviours in school without understanding the consequences of doing so.

Our schools will consider these additional vulnerabilities and challenges in considering the safeguarding of our children. Any reports of abuse involving children with SEND will require close, immediate liaison between the Designated Safeguarding Lead (DSL) (or deputy) and the Special Educational Needs Coordinator (SENCO).

Our schools are also all aware of the additional guidance signposted in KCSiE 2026:

- NSPCC - Safeguarding children with special educational needs and disabilities (SEND) and
- NSPCC - Safeguarding child protection/deaf and disabled children and young people

### 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.

Our Designated Safeguarding Leads (or another designated strategic lead within the school) take strategic, lead responsibility for promoting the educational outcomes of children who have or have had a social worker. This strategic duty includes:

- Ensuring the school knows who its cohort of children who have or have had a social worker are;
- Understanding their academic progress, attainment, and attendance, and maintaining a culture of high aspirations for this cohort;
- Supporting teaching staff to provide additional academic support or reasonable adjustments to help these children reach their potential; and
- Recognising that even when statutory social care intervention has ended, there is still a lasting, long-term impact on a child's educational outcomes.

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 Head (VSH) to discuss how the pupil premium plus funding can be best used to meet the needs identified in the child's personal education plan (PEP).

The role of the Virtual School includes a strategic, non-statutory strategic oversight of the educational attendance, attainment, and progress of all children with a social worker, as well as promoting the educational achievement of children in kinship care. Recognising attendance as a key factor in safeguarding, Virtual School Heads work collaboratively with schools and local authorities to set and report on ambitious targets to improve the attendance of these vulnerable cohorts

### 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 person with parental responsibility) 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.

To ensure our interventions are safe, evidence-based, and appropriate for the school phase, we actively engage with local support structures and signpost families to key databases, including:

- Mental Health Support Teams (MHSTs): Where available, MHSTs provide early evidence-based interventions for mental health issues, advise our designated mental health leads, and help coordinate timely referrals to specialist NHS services.
- NHS Every Mind Matters: For practical, statutory-backed guidance on supporting a young person's mental health.
- The Hub of Hope: The UK's leading mental health support database, which brings together local, national, peer, charity, private, and NHS mental health services in one accessible place

### **2.23.6 Young Carers**

Our schools are highly alert to the specific needs of young carers, recognising that their significant caring responsibilities can have a direct, detrimental impact on their school attendance, academic attainment, behaviour, and overall physical and mental wellbeing. Early identification is essential. Our staff work proactively to identify young carers early to ensure they receive sensitive, tailored support at the right time from within the school's pastoral systems, as well as coordinating additional support from external partners, the local authority, and health services.

### **2.23.7 Safeguarding children with medical conditions**

The fact that there has been an incident relating to the management of a child's medical condition or allergies does not in itself warrant a safeguarding referral. A safeguarding referral will only be made where an incident highlights a wider concern that the child is at an increased risk of being neglected, abused, or exploited because of their medical condition. This includes circumstances where critical information about a child's medical condition is deliberately withheld from the school,



or where a child is repeatedly sent to school without essential, life-saving medication, thereby putting them at active risk. All school-based procedures operate in strict accordance with the statutory guidance on *Supporting Pupils at School with Medical Conditions* and *Allergy safety in schools*.

### 2.23.8 Children who are lesbian, gay or bisexual (LGB)

A child's sexual orientation is not in itself a risk factor for harm; however, children who are LGB, or who are perceived by their peers to be LGB, can sometimes be highly vulnerable to discriminatory, prejudice-based bullying, harassment, and social isolation. Our schools take a proactive stand against LGBT-related bullying, ensuring that robust reporting mechanisms are in place, that bullying is tackled at the earliest opportunity, and that appropriate disciplinary sanctions are applied. Staff also recognise that LGBT children may lack a trusted adult at home with whom they can be open, and we work to reduce barriers by ensuring they can confidently access supportive, trusted relationships with staff in school.

### 2.23.9 Children who are questioning their gender / Considering requests for support with social transition

We recognise that a child questioning their gender, or how they feel about their biological sex, may be experiencing a period of significant personal and emotional challenge. Our schools are committed to being respectful, safe, and inclusive environments where every young person is valued and where bullying or discrimination of any kind is never tolerated. In considering any requests or support for gender-questioning children, we will always prioritise the child's safety, mental wellbeing, and broader developmental needs, while acting in full compliance with our statutory safeguarding duties, school premises regulations, and equality obligations.

To support our pupils and staff, our schools operate under the following principles:

- **A Responsive, Child-Centred Approach:** Our staff are encouraged to build trusted relationships with pupils and to take time to listen sensitively to their thoughts, feelings, and experiences. It is not for the school to initiate social transition. Instead, our procedures are activated responsively when a child or parent makes a specific request for support or changes (such as names, pronouns, or uniform).
- **Trust and Confidential Conversations:** If a pupil confides in a member of staff about their gender identity or feelings but does not request any changes to how they are treated or addressed in school, there is no automatic expectation to share this information or involve parents, unless a conversation raises a specific safeguarding risk or safety concern. We respect the pupil's confidence and will offer gentle, supportive pastoral care.
- **Collaborative Partnership with Parents and Carers:** Parents and carers play the leading role in their children's lives. Except in exceptionally rare circumstances where there is a documented, credible risk of direct harm to the child, our schools will engage parents or carers as a matter of priority when a child requests support with social transition. We aim to work collaboratively and supportively with families to establish what is in the best interests of the child.

- **A Careful, Supportive Pathway:** Accommodating requests for social transition is an active step that can have significant effects on a child's psychological development and long-term outcomes. We therefore adopt a highly careful, supportive, and documented approach to ensure that a child's options are kept open and flexible, avoiding pressure to commit to an irrevocable path. We will seek expert non-clinical advice (such as from the SENCO and DSL) and consider any clinical advice to inform our decisions.
- **Phase-Appropriate Care in Primary Schools:** In primary schools, we exercise particular caution and sensitivity. Support for full social transition in prepubertal children is rare, reflecting clinical evidence (such as from the Cass Review) that early social transition can significantly influence a child's future developmental pathway. Primary staff will support children in a gentle, non-directive way that keeps options flexible.
- **Ensuring Dignity, Privacy, and Single-Sex Spaces:** In accordance with our safeguarding duties and the School Premises Regulations, pupils must not be permitted to use toilets, changing rooms, or overnight residential accommodation designated for the opposite biological sex.
  - To support gender-questioning children, we will work sensitively to offer suitable, separate alternative arrangements (such as lockable single-user facilities or private rooms) wherever possible.
  - These alternative arrangements must be designed to maximise the child's safety, dignity, comfort, and privacy, without compromising single-sex spaces for other pupils.
- **Inclusivity in Sport and PE:** To ensure safety and fairness, gender-questioning children will not participate in single-sex competitive sports designated for the opposite biological sex where physical strength, stamina, or physique would create a clear safety risk or competitive disadvantage. We will seek to keep PE and sport as inclusive as possible for all pupils, taking safety and fairness into account.
- **Accuracy in Register Recording:** We are legally required to record a child's biological sex accurately in our official school registers. All staff who need to know will be aware of a child's biological sex to ensure effective safeguarding and medical oversight.
- **Support for Detransition:** We recognise that a child's feelings and needs may evolve over time. If a child wishes to reverse or partially reverse a previous social transition request, we will work closely and sensitively with the pupil and their parents to ensure they are fully supported throughout this period.
- **Vigilance against Bullying:** All staff must remain highly vigilant to ensure that gender-questioning pupils, including those who may be "living in stealth" (where peers are unaware of their biological sex), are protected from discriminatory bullying, harassment, or social isolation

## 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, 2026)
- Working Together to Safeguard Children (DfE, 2023)
- 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 universal services, community based early help or the targeted early help level of Family Help 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 local Community Policing team (noting that Safer Schools Officers no longer exist and are now part of the wider Community Policing team, rather than being designated to individual schools) before contacting the police directly, unless the risk is considered to be escalating at a rate that precludes doing so. This school will prioritise contacting the Community Policing team 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. The school and the Designated Safeguarding Lead will operate in strict accordance with the statutory guidance under PACE Code C 2019 regarding the requirement for children to have an Appropriate Adult [This guidance](#) from the Youth Justice Legal Centre defines what is meant by 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 Newham Children's Social Care (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, and also undertake Prevent awareness training. In addition, their knowledge and skills are refreshed at regular intervals, and at least annually, to keep up with any developments relevant to their role.

The Headteacher, all staff members and governors receive appropriate safeguarding and child protection (including online safety) training at induction, which is regularly updated.

Safeguarding and online safety training (which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) is

integrated, aligned, and considered as part of the whole-school safeguarding approach and wider staff training and curriculum planning

In addition, all staff members receive safeguarding and child protection updates (for example, via email, e-bulletins, and staff meetings) as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. This training supports staff to consider how safeguarding, welfare, and educational outcomes are linked, including to inform the provision of academic and pastoral support.

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.

Staff must be reassured that data protection laws do not prevent the sharing of information for the purposes of keeping children safe. 'Safeguarding of children and individuals at risk' is a legal processing condition under data protection laws that allows practitioners to share sensitive, special category personal data without consent where there is a good reason to do so (for example, if attempting to gain consent would place a child at risk, or cannot be reasonably expected)

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 General Data Protection Regulation (UK GDPR), **these do not prevent the sharing of information for the purposes of keeping children safe**. The Trust's Data Protection Policy, published on the [Policies Page](#) of the website.

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 2026).

Under data protection laws (collectively referring to the Data Protection Act 2018, the UK General Data Protection Regulation, and the Data (Use and Access) Act 2025), 'safeguarding of children and individuals at risk' is an explicit legal processing condition that allows practitioners to share sensitive, special category personal data without consent where there is a valid safeguarding reason. In addition, staff will operate in accordance with the new statutory Information Sharing Duty, which is designed to give school staff greater confidence to share information appropriately and in a timely way.

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](#). Appropriate information sharing is central to effectively safeguarding children from harm and promoting their wellbeing. 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 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 of the role that social media might play in exposing identities, and this 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.

The designated safeguarding lead should be equipped to be able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc.

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. The designated safeguarding lead (or a deputy) must ensure that the child protection file is transferred to the new school or college as soon as possible, and strictly within 5 days for an in-year transfer, or within the first 5 days of the start of a new term, to ensure the receiving setting has the necessary support in place for when the child arrives.

The transfer must be carried out securely, separately from the main pupil file, and confirmation of receipt must be obtained. When child protection files are transferred, the exporting school must include a clear, structured summary identifying current safeguarding concerns, relevant context, and any ongoing support needs. Exporting schools must take particular care to distinguish between current safeguarding concerns and historical information, presenting past issues with appropriate context to ensure they support, and do not unfairly disadvantage, the child.

Receiving schools and colleges must ensure that incoming child protection files and safeguarding information are immediately reviewed by an appropriately trained member of staff (such as the DSL or SENCo) so that key risks and needs are fully understood. Where the receiving school considers that the safeguarding information is unclear or incomplete, key staff must proactively seek clarification from the exporting school to support effective safeguarding

### **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's safety and support needs;
- whether there may have been other victims;
- the alleged perpetrator(s);
- all 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, with steps taken to improve safety in that area.



Risk and needs assessments must be recorded in writing (or digitally), kept confidential, stored securely, and reviewed regularly to inform ongoing safeguarding decisions. The DSL (or deputy) will engage with local authority children's social care and specialist services as needed. In cases of sexual violence, professional risk assessments by social workers or sexual violence specialists are likely to be required; school-level risk assessments are vital for immediate safety but do not replace these expert external assessments

#### 2.28.4 Mobile Device Screening Protocol

In line with statutory *Searching, Screening and Confiscation* guidance, electronic devices, including mobile phones, can contain files or data that relate to a safeguarding offence, or which may cause direct harm to another person. This includes, but is not limited to, the making or sharing of nude or semi-nude images, pornography, abusive messages, or evidence of criminal behavior.

Where there is a good reason to suspect a device contains harmful or illegal data, authorized staff may confiscate the device. However, our schools operate under strict legal and safeguarding constraints when screening student phones:

- **Authorized Personnel Only:** Phone screenings must only be conducted by the Designated Safeguarding Lead (DSL) (or a deputy in their absence) and must always take place in the presence of the Headteacher (or another member of the Senior Leadership Team).
- **Absolute Prohibition on Viewing Illegal Images:** Under no circumstances must any member of staff view, download, screenshot, or forward illegal images of a child (including any nude or semi-nude images, regardless of whether they are self-generated or AI-generated). Viewing or distributing these images is a criminal offence.
- **Preservation of Evidence:** If staff suspect that a confiscated device contains illegal images or evidence of a serious crime, they must immediately cease any screening, turn off or isolate the device to preserve forensic evidence, and pass it directly to the police for inspection.
- **Consent and Transparency:** Staff must keep a detailed, written record of the rationale behind any device search and screening, the outcomes, and any subsequent actions taken. Parents or carers must be informed of the device search as soon as possible

### 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 is primarily delivered through each school's Relationships and Health Education (for all primary pupils) and Relationships, Sex and Health Education (RSHE) (for all secondary pupils) policies. In teaching these subjects, our schools operate in strict accordance with the statutory RSHE guidance revised for introduction in September 2026.

Our Trust understands the key role that our schools have in preventative education. In accordance with statutory expectations, our schools actively promote an inclusive, anti-discriminatory

whole-school culture where safeguarding and child protection are at the forefront. 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, racism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment, derogatory behaviour, or other forms of physical violence and conflict. We have clear age appropriate standards for behaviour across all our schools, articulated in our Behaviour Policies, which are available on the schools' websites.

To deliver effective, evidence-based preventative education, our regularly timetabled RSHE lessons and wider curriculum tackle age-appropriate issues, including supporting children to:

- develop the skills that form the building blocks of all positive relationships;
- understand healthy and respectful relationships;
- understand boundaries, consent, and kindness in relationships;
- confront stereotyping, prejudice, and promote equality;
- build body confidence and self-esteem;
- recognise and report concerns about an abusive relationship, including coercive and controlling behaviour;
- understand the concepts of, and laws relating to, all forms of sexual harassment and abuse, and know how to access support;
- understand what constitutes sexual harassment and sexual violence and why these are always unacceptable, emphasising that it is never the fault of the person experiencing it; and
- understand online harms, such as the risks of sharing images, the prevalence of deepfakes, pornography, and the influence of misogynistic influencers, and know when and where to seek help.

## 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. As a trust, we recognise that all schools (including those in multi-academy trusts) are named as relevant agencies under local safeguarding arrangements and are under a statutory duty to co-operate with published multi-agency arrangements.

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.

To support multi-agency assessments, all Trust schools will allow prompt access for local authority children's social care from the host local authority and, where appropriate, from a placing local authority, to conduct, or to consider whether to conduct, a Section 17 or a Section 47 assessment.

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, trainee 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 and trainee teachers, whilst not directly 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 or trainee teachers, we will discuss with the employer/agency or teacher training provider 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 the London Child Protection Procedures are adhered to. The Case Manager will immediately consider whether an onward referral to the LADO is required, and will seek appropriate advice from the Local Authority Designated Officer (LADO) by telephone 0203 373803 or email [cppt.lado@newham.gov.uk](mailto:cppt.lado@newham.gov.uk)

If an allegation is made or information is received about any member of staff, supply teacher, agency staff, trainee teacher, 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, and trainee teachers. 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. This duty applies equally to paid staff, trainee teachers, and volunteers. 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.

The Trust has a comprehensive Records Management and Processing of Personal Data Schedule in place, which notes the record keeping requirements in such instances. In line with statutory requirements, if an allegation is determined to be malicious or false, all records must be removed and destroyed post-investigation, unless the accused individual gives their express consent for the retention of the information.

| Allegation and outcome                                                                                                                                          | Associated Records management action                                                                                                      |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------|
| Where the allegation is <i>malicious or false</i>                                                                                                               | Destroy all records post investigation - <i>unless</i> the person accused gives their express consent for the retention of these records. |
| Allegation which is child protection in nature against a member of staff, including where the allegation is <i>substantiated, unsubstantiated, or unfounded</i> | Until the person's normal retirement age OR 10 years from the date of the allegation, whichever is longer, then REVIEW                    |

### 2.31.1 Low level concerns

In line with Section Two of Part Four of Keeping Children Safe in Education 2026, 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 it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college (including supply teachers, trainee teachers, volunteers, and contractors) 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; or
- humiliating children

Such behaviour can exist on a spectrum.

Low-level concerns about a member of staff, supply staff, trainee teacher, 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 Trust's Whistleblowing Policy is available on the [Policies Page](#) of the website.

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. However, for members of staff who feel unable to raise these concerns internally, they can use the NSPCC [Whistleblowing Advice Line](#). The helpline can be contacted on 0800 028 0285 and is available from 08:00 to 20:00, Monday to Friday, and from 09:00 to 18:00 at weekends. The email address is [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

### 2.33.1 The Standards

The DfE has published a set of [filtering and monitoring standards for schools](#), which are referred to in Keeping Children Safe in Education 2026. 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 & Governing Bodies Partnership                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 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>• ensuring that a review of the effectiveness of the filtering and monitoring provision is carried out at least once every academic year. This review must be carried out by the Senior Leadership Team (SLT) member responsible for filtering and monitoring, with the active support of the school's DSL and IT support.</li><li>• ensuring that these annual reviews include physical checks that filtering is working appropriately on all internet-connected devices in all relevant locations.</li><li>• ensuring that a detailed, written</li></ul> | <p>The DSL should take lead responsibility for safeguarding and online safety, which includes taking lead responsibility for understanding the filtering and monitoring systems and processes in place. This includes overseeing and acting on:</p> <ul style="list-style-type: none"><li>• filtering and monitoring reports;</li><li>• safeguarding concerns;</li><li>• conducting regular 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> |

| Senior Leaders & Governing Bodies Partnership                                                                                                                                                                                                                                                                                         | DSL | IT Service Provider | Partnership |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|---------------------|-------------|
| <p>record is kept of all filtering and monitoring checks• overseeing reports</p> <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> |     |                     |             |

### 2.33.2 Operational arrangements for monitoring

All online activity on school issued devices - ie. Chromebooks, which are simple Google laptops - will be monitored. The Trust's current provider, which provides real time monitoring, overseen by personnel, is Smoothwall, through the procurement of the Smoothwall Monitor product in use across all our schools.

Any online activity on personal Chromebooks, Windows or MacBook devices will be monitored by this product, *providing users are signed into a Google Chrome profile using a school-issued Google Workspace account.*

When users are logged in to devices in the ways described above, at any time, staff will be alerted to any activity of concern via the arrangements in place.

The Trust's policy is that school staff will respond to these alerts during term time, between the hours of 08:00 and 18:00, Monday to Friday. Activity outside of these hours will not be reviewed by school staff. In addition, a formal review of the effectiveness of these monitoring arrangements will be completed at least once every academic year by the designated SLT lead, with the support of the DSL and our IT provider, and a secure log of these reviews will be maintained

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

### 2.34.1 Eastlea Community School

| Name                      | Email                             | Job Title                                        | Phone Number  |
|---------------------------|-----------------------------------|--------------------------------------------------|---------------|
| Amelia Aiken              | safeguarding@eastlea.ncltrust.net | Designated Safeguarding Lead / SENCo             | 0207 540 0400 |
| Gemma Anderson            | safeguarding@eastlea.ncltrust.net | Deputy Designated Safeguarding Lead              | 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 |
| Alex Mihu                 | lado@newham.gov.uk                | Newham Local Authority Designated Officer (LADO) | 0203 3736 706 |

### 2.34.2 Lister Community School

| Name            | Email                            | Job Title                           | Phone Number  |
|-----------------|----------------------------------|-------------------------------------|---------------|
| Matthew Copping | safeguarding@lister.ncltrust.net | Designated Safeguarding Lead        | 0208 471 3311 |
| Jassi Johal     | safeguarding@lister.ncltrust.net | Deputy Designated Safeguarding Lead | 0208 471 3311 |
| Nargis Akuji    | safeguarding@lister.ncltrust.net | Deputy Designated Safeguarding Lead | 0208 471 3311 |
| Nur Uddin       | safeguarding@lister.ncltrust.net | Deputy Designated Safeguarding Lead | 0208 471 3311 |
| Carla Colquhoun | safeguarding@lister.ncltrust.net | Child Protection Officer            | 0208 471 3311 |

| Name                     | Email                            | Job Title                                        | Phone Number                      |
|--------------------------|----------------------------------|--------------------------------------------------|-----------------------------------|
| Amanda Davies            | safeguarding@lister.ncltrust.net | Child Protection Officer                         | 0208 471 3311                     |
| Lister Safeguarding Team | safeguarding@lister.ncltrust.net | Safeguarding Team Email                          | 0208 471 3311                     |
| Pam Chadha               | pam.chadha@ncltrust.net          | Safeguarding Link Governor                       | Via Trust Office - 0330 0153 4810 |
| Alex Mihu                | lado@newham.gov.uk               | Newham Local Authority Designated Officer (LADO) | 0203 3736 706                     |

### 2.34.3 Portway Primary School

| Name                      | Email                               | Job Title                           | Phone Number |
|---------------------------|-------------------------------------|-------------------------------------|--------------|
| Andrew Sellers            | andrew.sellers@portway.ncltrust.net | Designated Safeguarding Lead        | 020 84727142 |
| Gemma Wood                | gemma.wood@portway.ncltrust.net     | Deputy Designated Safeguarding Lead | 020 84727142 |
| Jalina Belle              | jalina.belle@portway.ncltrust.net   | Deputy Designated Safeguarding Lead | 020 84727142 |
| Rebecca Nyamah            | rebecca.nyamah@portway.ncltrust.net | Deputy Designated Safeguarding Lead | 020 84727142 |
| Portway Safeguarding Team | safeguarding@portway.ncltrust.net   | Safeguarding Team                   | 020 84727142 |
| Bradley Smith             | safeguarding@portway.ncltrust.net   | Safeguarding Team                   | 020 84727142 |
| Louise Frempong           | safeguarding@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 |

| Name      | Email              | Job Title                                        | Phone Number  |
|-----------|--------------------|--------------------------------------------------|---------------|
| Alex Mihu | lado@newham.gov.uk | Newham Local Authority Designated Officer (LADO) | 0203 3736 706 |

#### 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  |
| 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 |
| Jodie Whitfield | jodie.whitfield@sarahbonnell.ncltrust.net | Deputy Designated Safeguarding Lead | 0208 534 6791 |
| Sahdia Fayyaz   | sahdia.fayyaz@sarahbonnell.ncltrust.net   | Safeguarding Officer                | 0208 534 6791 |
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| Name                            | Email                                   | Job Title                                        | Phone Number                       |
|---------------------------------|-----------------------------------------|--------------------------------------------------|------------------------------------|
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| Sarah Bonnell Safeguarding Team | safeguarding@sarahbonnell.ncltrust.net  | Safeguarding Team Email                          |                                    |
| Paul Leslie                     | paul.leslie@ncltrust.net                | Safeguarding Link Governor                       | Via Trust Office:<br>0330 053 4810 |
| Alex Mihu                       | lado@newham.gov.uk                      | Newham Local Authority Designated Officer (LADO) | 0203 3736 706                      |

#### 2.34.6 Selwyn Primary School

| Name             | Email                                | Job Title                               | Phone Number |
|------------------|--------------------------------------|-----------------------------------------|--------------|
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| Mike Boxall      | michael.boxall@selwyn.ncltrust.net   | Deputy Designated Safeguarding Lead DHT | 020 84716173 |
| Elaine Pyke      | elaine.pyke@selwyn.ncltrust.net      | Deputy Designated Safeguarding Lead DHT | 020 84716173 |
| Daniyal Iqbal    | daniyal.iqbal@selwyn.ncltrust.net    | Safeguarding Team AHT                   | 020 84716173 |
| Laura Partington | laura.partington@selwyn.ncltrust.net | Safeguarding Team AHT                   | 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 |

| Name                     | Email                            | Job Title                                        | Phone Number                     |
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| Selwyn Safeguarding Team | safeguarding@selwyn.ncltrust.net | Safeguarding Team Email                          | Via school office - 020 84716173 |
| Martha Endhoven          | martha.endhoven@ncltrust.net     | Safeguarding Link Governor                       | Via school office - 020 84716173 |
| Alex Mihu                | lado@newham.gov.uk               | Newham Local Authority Designated Officer (LADO) | 0203 3736 706                    |

## 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 (LADO)
  - 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.