



## South Bank Academies

### Safeguarding Policy (Child Protection policy), for implementation from September 2024

The academies ('schools') within the SBA Trust are committed to providing a safe and secure environment for children, staff and visitors and promoting a climate where children and adults will feel confident about sharing any concerns which they may have about their own safety or the well-being of others. We aim to safeguard and promote the welfare of children by protecting them from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education \(2023\)](#) and [Working Together to Safeguard Children \(2018\)](#), and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our local safeguarding partners.

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This policy is also based on the following legislation:

- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the schools
- [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 schools 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

This policy also complies with our funding agreement and articles of association.

### **POLICY AIMS**

The purpose of this policy is to:

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

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

*Behaviour and Exclusions policy, Online Safety policy and Speak Up policy*

### SAFEGUARDING AND PROMOTING THE WELFARE OF CHILDREN

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

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

### **Equality statement**

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children’s diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities or health conditions (see section 10)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member’s mental health needs
- Are looked after or previously looked after (see section 12)

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

### **Culture**

We are committed to creating a culture of safeguarding. We promote an open and transparent culture in which all concerns about all adults working in or on behalf of the academies (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. It is an expectation of all staff that all concerns about adults (including allegations that do not meet the harms threshold) are shared responsibly and with the right person, recorded and dealt with appropriately. This will assist all involved to identify concerning, problematic or inappropriate behaviour early, minimise the risk of abuse and ensure that adults working in or on behalf of the academies are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution. Keeping children safe in education

Our academies have a zero tolerance approach to sexual violence and sexual harassment as part of our safeguarding culture. We do recognise that where there are no reports of sexual abuse or harassment, that does not meet it is not happening. We challenge physical behaviours including grabbing bottoms or lifting up skirts – dismissing such behaviours risks normalizing them.

Staff may have ‘nagging doubts’ about low-level safeguarding issues. It is important that all staff are aware that low-level issues are not insignificant. Low-level concerns include adult behaviours which are not in line with the staff code of conduct in or outside of work and which do not meet the threshold for reporting to the LADO. These might include for example being over-friendly, having ‘favourites’, using age-inappropriate language or taking photographs of children. It is critical that such issues are shared responsibly, with the right person, investigated and recorded appropriately.

We will ensure that all staff read at least Part one of KCSIE and that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part one.

We will continue to ensure that arrangements are in place to keep children not physically attending the academy safe, especially online. When we identify a child to be on the edge of social care support, or who would normally receive pastoral-type support in the academy, we will ensure that a robust communication plan is in place for that child or young person. Details of this plan will be recorded appropriately as will a record of contact. The communication plans can include remote contact, phone contact, door-step visits. Other individualised contact methods will be considered and recorded. All our staff who interact with children, including online, will continue to look out for signs a child may be at risk. Any such concerns will be dealt with as per this policy and where appropriate, referrals will continue to be made to relevant agencies.

### **RESPONSIBILITIES AND IMMEDIATE ACTION**

Safeguarding and promoting the welfare of children in our academies is the responsibility of both academy communities. All adults working in these academies (including visiting staff, supply teachers, contractors, volunteers, and students on placement) are required to report instances of actual or suspected child abuse or neglect to the Designated Safeguarding Lead who is a member of the

academy's leadership team, or any of the deputy DSLs. All staff must be aware of online safety including expectations, roles and responsibilities where it comes to filtering and monitoring content. All staff must have a zero tolerance culture towards transphobia.

The Designated Safeguarding Lead (DSL) takes lead responsibility for safeguarding and child protection (including online safety) and provides advice and support to other staff on child welfare and child protection matters, takes part in strategy discussions and inter-agency meetings, and/or supports other staff to do so, and contributes to the assessment of children. The DSL is the first point of contact for external agencies that are pursuing Child Protection investigations and co-ordinates the academy's representation at CP (Child Protection) conferences and Core Group meetings (including the submission of written reports for conferences). When an individual concern/incident is brought to the notice of the Designated Safeguarding Lead, they will be responsible for deciding upon whether this should be reported to other agencies as a safeguarding issue. Where there is any doubt as to the seriousness of this concern, or disagreement between the Designated Safeguarding Lead and the member of staff reporting the concern, advice will be sought from the Deputy Designated Safeguarding Leads (DDSLs) or the LA's Strategic Lead Officer for safeguarding in education services. If a child is in immediate danger or is at risk of harm, a referral will be made to its equivalent in another LA if the child resides in a different LA and/or the police immediately.

Although all staff should be aware of the process for making referrals to children's social care and for statutory assessments that may follow a referral, along with the role they might be expected to play in such assessments, the DSL (and any deputies) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns. The DSL or a deputy will always be available to discuss safeguarding concerns. If in exceptional circumstances, the DSL (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from local children's social care. In these circumstances, any action taken should be shared with the DSL (or deputy) as soon as possible.

Some children may not feel ready or know how to tell someone they're being exploited, abused or neglected, and may not recognise their experiences as harmful. They may feel embarrassed, humiliated or threatened, particularly if they have particular vulnerabilities. None of this should stop staff from having a professional curiosity and speaking to the DSL.

## **THE ROLE OF GOVERNANCE**

The South Bank Academies governance structure includes the SBA Board and School Advisory Boards (SABs) at school level. Trustees and school advisory board members are known as governors for the purpose of this policy. Responsibility for safeguarding ultimately sits with the SBA Board. The trustees will ensure that they comply with their duties under legislation and that the policies, procedures and training in the academies are effective and always comply with the law. Trustees and SAB members are expected to receive appropriate training on safeguarding at induction that is updated regularly. In addition, they should receive information (for example, via emails, e-bulletins, and newsletters) on safeguarding and child protection at least annually so that they can demonstrate knowledge of their responsibilities relating to the protection of children, young people, and vulnerable adults.

Governors will receive appropriate safeguarding and child protection training (including online) at

induction, which is regularly updated in order that they have the knowledge to provide strategic challenge, assure themselves that policy and systems are effective and support a whole school approach to safeguarding. Governors will be aware of their obligations under the Human Rights Act (1998), the Equality Act (2010) and the Public Sector Equality Duty.

Governors will make sure that the DSLs have the appropriate status and authority to carry out their job, giving time, resources and training as appropriate. They will make sure that there are procedures in place to manage **any** safeguarding concerns no matter how small they appear, or allegations which do not meet the harm threshold (low level concerns) about staff. They will make sure that the child protection policy reflects that children with SEND or medical conditions may face additional barriers including cognitive understanding. They will make sure that consideration is given to how students are supported regarding particular protected characteristics including disability, sex, sexual orientation, gender reassignment and race) under the Equality Act. They will make sure that leaders take positive action to deal with particular disadvantages affecting students in a proportionate manner, including reasonable adjustments for disabled students, as well as having due regard to eliminating unlawful discrimination in line with the Public Sector Equality Duty.

In relation to online safety there are a number of additions to the policy for 2024 in line with KCSIE 2023. Governors will make sure that the academies have effective and appropriate filtering and monitoring systems in place and will review their effectiveness. They will review DfE filtering and monitoring standards and discuss how to meet these standards with relevant staff. They will make sure the DSL takes lead responsibility for making sure filtering and monitoring systems are in place as part of their role. They will make sure that, under the responsibility of the principal, that all staff undergo safeguarding and child protection training including online safety, and that such training is regularly updated and aligned with safeguarding partners.

Governors will ensure that the academies contribute to inter-agency working in line with statutory guidance “ *Working Together to Safeguard Children*” and that the academies’ safeguarding arrangements consider the procedures and practice of the local authority as part of the inter-agency safeguarding procedures set up by the local authority.

Our governors recognise that whilst all children should be protected, some groups of children, such as children who need a social worker (Child in Need and Child Protection Plans); children who are absent from education; children requiring mental health support; looked after and previously looked after children; care leavers; children with special educational needs, disabilities or health issues, are potentially at greater risk of harm than others (both online and offline).

Our governors will do all that they reasonably can to limit children’s exposure to the risks from the school’s IT system. As part of this process, our governing body will ensure that the school has appropriate filters and monitoring systems in place and regularly review their effectiveness. They will ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified. Our governing body will consider the age range of our children, the number of children, those who are potentially at greater risk of harm and how often they access the IT system along with the proportionality of costs versus safeguarding risks.

In accordance with the DfE's filtering and monitoring standards, the Governing Body has assigned our Designated Safeguarding Lead(s) and our nominated Safeguarding Governor(s) to ensure that these standards are being met. We will identify and assign roles and responsibilities to manage filtering and monitoring systems; review filtering and monitoring provision at least annually; block harmful and inappropriate content without unreasonably impacting teaching and learning and have effective monitoring strategies in place that meet their safeguarding needs.

The Governing Body will ensure that the school contributes to inter-agency working in accordance with statutory guidance "Working Together to Safeguard Children" and that the school's safeguarding arrangements take into account the procedures and practice of the local authority as part of the inter-agency safeguarding procedures set up by the Southwark Safeguarding Children Partnership (SSCP).

The SBA Board has formally adopted this policy and will review its contents annually or sooner if any legislative or regulatory changes are notified to it by the link trustee, link governors, the Designated Safeguarding Leads (DSLs) or the Principal. A trustee takes on the role of link safeguarding trustee, with link safeguarding governors at each school.

Concerns about and allegations of abuse made against the Principal will be referred to the Executive Principal who will liaise with the LA's designated officer (LADO) and partner agencies and will attend any strategy meetings called in respect of such an allegation against the Principal.

As a good practice, the DSL will provide a termly report to the SAB outlining details of any safeguarding issues that have arisen during the term and the outcome of any cases identified. These reports will respect all issues of confidentiality and will not therefore identify any person(s) by name.

Detailed outlines of the structure and responsibilities of trustees and governors are found in the document Governance and Safeguarding at South Bank Academies (see appendix)

### **Types of child abuse and neglect**

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or another child or children.

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

**Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are

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

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

**Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the DSL and DDSLs will be considering whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence. This is known as *Contextual Safeguarding*, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

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

### **Mental Health**

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



attempt to make a diagnosis of a mental health problem. Our staff members, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood.

It is key that our staff members are aware of how these children's experiences can impact on their mental health, behaviour, and education. If staff have a mental health concern about a child that is also a safeguarding concern, this will be shared with the DSL with a view to referring to appropriate agencies following the referral procedures. We also note the DfE's advice and guidance on *Mental Health and Behaviour in Schools*.

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

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

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people. Some of the indicators of CCE are children who appear with unexplained gifts or new possessions; children who associate with other young people involved in exploitation; children who suffer from changes in emotional well-being; children who misuse drugs and alcohol; children who go missing for periods of time or regularly come home late; and children who regularly miss academy or education or do not take part in education. Any possible CCE case will be shared with the DSL with a view to referring to appropriate agencies following the referral procedures.

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

CSE is a type of sexual abuse in which children are sexually exploited for money, power or status. Children or young people may be tricked into believing they are in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed online. Some indicators of children being sexually exploited are: going missing for periods of time or regularly coming home late; regularly missing academy or education or not taking part in education; appearing with unexplained gifts or new possessions; associating with other young people involved in exploitation; having older boyfriends or girlfriends; suffering from sexually transmitted infections; mood swings or changes in emotional wellbeing; drug and alcohol misuse and displaying inappropriate sexualised behaviour.

A child under the age of 13 is not legally capable of consenting to sex (it is statutory rape) or any other type of sexual touching. Sexual activity with a child under 16 is also an offence. It is an offence for a person to have a sexual relationship with a 16- or 17-year-old if that person holds a position of trust or authority in relation to the young person. Non consensual sex is rape whatever the age of the victim. If the victim is incapacitated through drink or drugs, or the victim or his or her family has been subject to violence or the threat of it, they cannot be considered to have given true consent and therefore offences may have been committed. Child sexual exploitation is therefore potentially a child protection issue for all children under the age of 18. Further information on signs of a child's involvement in sexual

exploitation is available in Home Office guidance: *Child sexual exploitation: guide for practitioners*.

Where it comes to our notice that a child under the age of 13 is, or may be, sexually active, whether they are a pupil of this academy, this will result in an immediate referral to Children's Services. In the case of a young person between the ages of 13 and 16, an individual risk assessment will be conducted in accordance with the **London Safeguarding Children Procedures**. This will determine how and when information will be shared with parents and the investigating agencies.

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

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

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

When such an incident involving nudes and semi-nudes comes to a member of staff's attention, this will be shared with the designated safeguarding lead with a view to referring to appropriate agencies following the referral procedures. Further information and advice on nudes and semi-nudes is available in the non-statutory guidance produced by the UK Council for Internet Safety (UKCIS) '*Sharing nudes and semi-nudes: advice for education settings working with children and young people*'. We also note the DfE's *Searching Screening and Confiscation Advice* for schools.

### **Serious violence**

All staff will be made aware of indicators, which may signal that children are at risk from, or are involved with serious crime. These may include increased absence from academy, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or meaningful change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

We are also aware that fear and a need for self-protection is a key motivation for children to carry a weapon – it affords a child a feeling of power. Neighbourhoods with elevated levels of deprivation and social exclusion have the highest rates of gun and knife crime. Children are more likely to carry knives and other weapons than guns. All staff will be aware of the associated risks and will share any concerns about or knowledge of such children immediately with the DSL. Further advice on these is available in the Home Office documents *Advice to schools and colleges on gangs and youth violence* and *Criminal exploitation of children and vulnerable adults: county lines*.

### **County lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across the UK – no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children’s homes and care homes. Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. Some specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who: go missing from school or home and are subsequently found in areas away from their home; have been the victim, perpetrator or alleged perpetrator of serious violence (e.g. knife crime); are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs; are exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection; are found in accommodation that they have no connection with, often called a ‘traphouse or cuckooing’ or hotel room where there is drug activity; owe a ‘debt bond’ to their exploiters; have their bank accounts used to facilitate drug dealing.

### **Child on child abuse**

Children are capable of abusing other children. This can happen both inside and outside of school and online and take different forms, such as bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse in intimate personal relationships between children; physical abuse (such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm, which may include an online element that facilitates, threatens and/or encourages physical abuse; violence, particularly pre-planned, forcing other children to use drugs or alcohol, initiation/hazing type violence and rituals), emotional abuse (blackmail or extortion, threats and intimidation), sexual violence, such as rape, assault by penetration and sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, consensual and non-consensual sharing of nudes and semi-nudes images and/or videos (also known as sexting or youth produced sexual imagery), sexual abuse (indecent exposure, indecent touching or serious sexual assaults, forcing other children to watch pornography or take part in sexting) and sexual exploitation (causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party; having an older boyfriend/girlfriend, associating with unknown adults or other sexually exploited children, staying out overnight, photographing or videoing other children performing indecent acts) and upskirting, which typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm. Upskirting is now a criminal offence. Although it is more likely that girls will be victims and boys perpetrators, all child on child abuse is

unacceptable and will be taken seriously. We do not tolerate these or pass them off as “banter”, “just having a laugh” or “part of growing up”.

The academy has a strong commitment to an anti-bullying policy and will consider all coercive acts and child on child abuse within a Child Protection context. We recognise that some pupils will sometimes negatively affect the learning and wellbeing of other pupils and their behaviour will be dealt with under the school’s behaviour policy. As a school, we will minimise the risk of allegations against other pupils by providing a developmentally appropriate PSHE syllabus which develops pupils’ understanding of acceptable behaviour and keeping themselves safe, having systems in place for any pupil to raise concerns with staff, knowing that they will be listened to, believed and valued, delivering targeted work on assertiveness and keeping safe to those pupils identified as being at risk, developing robust risk assessments and providing targeted work for pupils identified as being a potential risk to other pupils. It is important that all our staff recognise the indicators and signs of child on child abuse and know how to identify it and respond to reports. Any possible child on child abuse case will be shared with the DSL with a view to referring to appropriate agencies following the referral procedures. We also note the DfE’s advice and guidance on *Preventing and Tackling Bullying*.

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

Sexual harassment, online sexual abuse and sexual violence (including sexualised language) is unacceptable in our school and we have appropriate sanctions in place. We understand that sexual harassment, online sexual abuse and sexual violence are happening in and around the school, even when there are no specific reports. We work actively to prevent sexual harassment, online sexual abuse and sexual violence through a whole-school approach that includes an effective behaviour policy, pastoral support and a carefully planned relationship, sex and health education curriculum, which specifically addresses sexual harassment, online abuse, sexual violence and issues of consent. We will ensure that children are taught about safeguarding risks, including online risks and will support pupils to understand what constitutes a healthy relationship, both online and offline. Our staff members have been made aware and have appropriate knowledge of ‘Part 5: Child on child sexual violence and sexual harassment’ of DfE guidance “*Keeping children safe in education*”. All pupils are supported to report concerns about harmful sexual behaviour freely. We will take concerns seriously and deal with them swiftly and appropriately and will ensure pupils are confident that this is case. We will be alert to factors that increase vulnerability or potential vulnerability such as mental ill health, domestic abuse, children with additional needs, and children from groups at greater risk of exploitation and/or of feeling unable to report abuse (for example, girls and LGBT children). We will identify and address any barriers that can prevent a pupil from making a disclosure, for example communication needs. Staff will share any concerns about or knowledge of such incidents immediately with the DSL with a view to ensuring that support systems are in place for victims. Where necessary, we will work with relevant external agencies to address the issue, which may include a referral to MASH and reporting to the Police. We will keep comprehensive records of all allegations.

### **Sexual violence and sexual harassment between children**

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It can occur online and offline (both physically and verbally). It is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. Children who are victims of sexual violence and sexual harassment will find the experience stressful and distressing. This will affect their educational attainment. We will handle reports of sexual violence and harassment between children, both on and outside school premises, in accordance with 'Part 5: *Child on child sexual violence and sexual harassment*' of DfE guidance "*Keeping children safe in education*" and train our staff members accordingly (including teachers delivering relationships, sex and health education). Staff will share any concerns about or knowledge of such incidents immediately with the DSL with a view to ensuring that support systems are in place for victims (and alleged perpetrators). We take these incidents seriously and ensure that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. Where necessary, we will work with relevant external agencies to address the issue, which may include a referral to MASH and reporting to the Police.

On one hand, we need to safeguard the victim (and the wider pupil/student body) and on the other hand provide the alleged perpetrator with an education, safeguarding support as appropriate and implement any disciplinary sanctions. Harmful sexual behaviours in young children may be (and often are) a symptom of either their own abuse or exposure to abusive practices and or materials. We will take advice, as appropriate, from children's social care, specialist sexual violence services and the police. If the alleged perpetrator moves to another educational institution (for any reason), we will make the new educational institution aware of any ongoing support needs and where appropriate, potential risks to other children and staff. The designated safeguarding lead will take responsibility to ensure this happens as well as transferring the child protection file.

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

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. HSB can occur online and/or face-to-face and can also occur simultaneously between the two. We consider HSB in a child protection context. When considering HSB, both ages and the stages of development of the children are critical factors. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature. We aim to have a good understanding of HSB, which will aid in planning preventative education, implementing preventative measures and incorporating the approach to sexual violence and sexual harassment into the whole school approach to safeguarding. HSB can, in some cases, progress on a continuum. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children displaying HSB have often experienced their

own abuse and trauma. We will work with appropriate agencies to address HSB and to support children displaying HSB.

### **Children who are lesbian, gay, bi, or trans (LGBT)**

We note that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. Our staff will endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff. LGBT inclusion is part of the statutory *Relationships Education, Relationship and Sex Education and Health Education* curriculum. We will work with appropriate agencies to counter homophobic, biphobic and transphobic bullying and abuse and to provide support to LGBT children.

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

### **Domestic abuse**

Domestic violence and abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to psychological, physical, sexual, financial and emotional. Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. If members of staff have a concern about or knowledge of any domestic abuse incidents, they will share it immediately with the DSL with a view to referring to appropriate agencies. Information is available about *Domestic abuse and how to get help in Southwark*.

### **Operation Encompass**

At South Bank University Academy, we are working in partnership with the Metropolitan Police and Children's Services to identify and provide appropriate emotional and practical help and support to pupils who have experienced domestic violence in their household; this scheme is called Operation Encompass.

The purpose of Operation Encompass is to safeguard and support children and young people who have been involved in or witness to a domestic abuse incident. Domestic abuse impacts on children in a number of ways. Children are at increased risk of physical injury during an incident, either by accident

or because they attempt to intervene. Even when not directly injured, children are greatly distressed by witnessing the physical and emotional suffering of a parent.

Encompass has been created to highlight this situation. It is the implementation of key partnership working between the police and schools. The aim of sharing information with local schools is to allow 'Key Adults' the opportunity of engaging with the child and to provide access to support that allows them to remain in a safe but secure familiar environment. Further information is available via [Operation Encompass](#).

In order to achieve this, the Multi-Agency Safeguarding Hub ([MASH](#)) will share police information of all domestic incidents where one of our pupils has been present, with the Designated Safeguarding Lead(s) (DSL). On receipt of any information, the DSL will decide on the appropriate support the child requires, this should be covert dependent on the needs and wishes of the child. All information sharing and resulting actions will be undertaken in accordance with the Metropolitan Police and MASH Encompass Protocol Data Sharing Agreement. We will record this information and store this information in accordance with the record keeping procedures outlined in this policy.

The purpose and procedures in Operation Encompass have been shared with all parents and governors, is detailed as part of the school's Safeguarding Policy and published on our school website.

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

VAWG is defined as any act of gender-based violence that results in, or is likely to result in physical, sexual or psychological harm or suffering to women including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or private life. VAWG is the umbrella term which brings together multiple forms of serious violence such as crimes committed in the name of "honour"; domestic abuse; female genital mutilation (FGM); forced marriage; sexual violence, abuse, exploitation and rape; stalking; harassment; trafficking for sexual exploitation; prostitution. If members of staff have a concern about or knowledge of any VAWG incidents, they will share it immediately with the DSL with a view to referring to appropriate agencies. We also note [Southwark's VAWG Strategy](#).

### **So-called 'honour-based' abuse (HBA) (including Female Genital Mutilation and Forced Marriage)**

HBA includes incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of HBV are abuse (regardless of the motivation) and will be handled and escalated as such. If members of staff have a concern about or knowledge of a child that might be at risk of HBA or who has suffered from HBA, they will share it immediately with the DSL with a view to referring to appropriate agencies.

### **Female Genital Mutilation (FGM)**

FGM is a procedure where the female genital organs are injured or changed and there is no medical reason for this. It is frequently a very traumatic and violent act for the victim and can cause harm in

many ways. The practice can cause severe pain and there may be immediate and/or long-term health consequences, including mental health problems, difficulties in childbirth, causing danger to the child and mother; and/or death.

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

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

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

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

We note a new duty that was introduced on 31 October 2015 that requires teachers, which includes qualified teachers or persons who are employed or engaged to carry out teaching work in schools and other institutions to report 'known' cases of FGM in girls aged under 18 to the police. The duty applies to any teacher who is employed or engaged to carry out 'teaching work', whether or not they have qualified teacher status, in maintained schools, academies, free schools, independent schools, non-maintained special schools, sixth form colleges, 16-19 academies, relevant youth accommodation or children's homes in England. The duty does not apply in relation to suspected cases – it is limited to 'known' cases' (i.e. those which are visually identified or disclosed to a professional by the victim). It will be rare for teachers to see visual evidence, and they should not be examining pupils or students. The duty does not apply in cases where the woman is over 18 at the time of the disclosure/discovery of FGM (even if she was under 18 when the FGM was carried out). Further information on this duty can be found in the document "[Mandatory Reporting of Female Genital Mutilation – procedural information](#)". A useful summary of the FGM mandatory reporting duty is available in [FGM Fact Sheet](#).

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

### **Forced marriage**



Forcing a person into a marriage is a crime in England and Wales and the law forbids formal or informal marriages involving anyone under the age of 18. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. We note The Forced Marriage Unit's statutory guidance *The right to choose: government guidance on forced marriage* and especially Chapter 8 of the *Multi-agency guidelines*, which is specifically aimed at teachers, lecturers and other members of staff within schools, colleges and universities.

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

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

### **Preventing Radicalisation**

The Counter-Terrorism and Security Act 2015 places a duty on specified authorities, including local authorities and childcare, education and other children's services providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism ("the Prevent duty"). Young people can be exposed to extremist influences or prejudiced views, in particular those via the internet and other social media. Schools can help to protect children from extremist and violent views in the same ways that they help to safeguard children from drugs, gang violence or alcohol.

Examples of the ways in which people can be vulnerable to radicalisation and the indicators that might suggest that an individual might be vulnerable:

- **Example indicators** that an individual is engaged with an extremist group, cause or ideology include: spending increasing time in the company of other suspected extremists; changing their style of dress or personal appearance to accord with the group; their day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause; loss of interest in other friends and activities not associated with the extremist ideology, group or cause; possession of material or symbols associated with an extremist cause (e.g. the swastika for far right groups); attempts to recruit others to the group/cause/ideology; or communications with others that suggest identification with a group/cause/ideology.
- **Example indicators** that an individual has an intention to use violence or other illegal means include: clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills; using insulting or derogatory names or labels for another group; speaking about the imminence of harm from the other group and the importance of

action now; expressing attitudes that justify offending on behalf of the group, cause or ideology; condoning or supporting violence or harm towards others; or plotting or conspiring with others.

- **Example indicators** that an individual is capable of contributing directly or indirectly to an act of terrorism include: having a history of violence; being criminally versatile and using criminal networks to support extremist goals; having occupational skills that can enable acts of terrorism (such as civil engineering, pharmacology or construction); or having technical expertise that can be deployed (e.g. IT skills, knowledge of chemicals, military training or survival skills).

The examples above are not exhaustive and vulnerability may manifest itself in other ways. There is no single route to terrorism nor is there a simple profile of those who become involved. For this reason, any attempt to derive a 'profile' can be misleading. It must not be assumed that these characteristics and experiences will necessarily lead to individuals becoming terrorists, or that these indicators are the only source of information required to make an appropriate assessment about vulnerability. We see the Prevent duty as part of our school's wider safeguarding obligations and note the revised *Prevent duty guidance: for England and Wales*, especially paragraphs 141-210.

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

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

### **Private Fostering**

Private fostering is when a child under the age of 16 (under 18 if disabled) is cared for by someone who is not their parent or a 'close relative'. This is a private arrangement made between a parent and a carer, for 28 days or more. Close relatives are defined as step-parents, grandparents, brothers, sisters, uncles or aunts (whether of full blood, half blood or by marriage). Great grandparents, great aunts, great uncles and cousins are not regarded as close relatives.

The law requires that the local authority should be notified if anyone is looking after someone else's child for 28 days or more. The purpose of the council's involvement is to support the child and private

foster family (and wherever possible the biological parent/s) with any issues arising. These may be practical issues such as benefits, housing, immigration or emotional issues such as keeping contact with biological family, maintaining cultural identity.

If we become aware of a child in a private fostering arrangement within Southwark, we will notify the council's Multi Agency Safeguarding Hub (*MASH*) or Lambeth Safeguarding Children Partnership (LSCP) by emailing [MASH@southwark.gov.uk](mailto:MASH@southwark.gov.uk) or calling **020 7525 1921**, by emailing [HelpandProtection@lambeth.gov.uk](mailto:HelpandProtection@lambeth.gov.uk) or calling **020 7926 3344** . Advice about whether there is a need to notify the council can also be obtained by contacting MASH/LSCP. In the case of a non-Southwark child, we will notify the relevant LA.

## **REFERRALS**

Where there is a safeguarding concern, we take into account the child's wishes and feelings when determining what action to take and what services to provide. We have systems in place for children to express their views and give feedback. We acknowledge that children who are affected by abuse or neglect may demonstrate their needs and distress through their words, actions, behaviour, demeanour, schoolwork or other children. Ultimately, all our systems and processes operate with the best interests of the child at heart.

Referrals to services regarding concerns about a child or family typically fall into three categories:

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

We note that Southwark's Multi Agency Safeguarding Hub (*MASH*) adopted the London Safeguarding Children Partnership (LSCP) *Threshold Document*, which provides a framework for professionals who are working with children, young people and families and aims to help identify when a child may need additional support to achieve their full potential. It introduces a continuum of help and support, provides information on the levels of need and gives examples of some of the factors that may indicate a child or young person needs additional support. We also note the LSCP's *The Continuum of Need Matrix*, which is not an exhaustive list but provides examples that can be used as a tool to assist assessment, planning and decision making for professionals working to safeguard and promote the welfare of children. Safeguarding indicators will always be considered alongside a child's other needs. We will refer to LSCP's Threshold Document and Continuum of Need Matrix when assessing the children's needs and making referrals to Southwark MASH or the Lambeth Safeguarding Children Partnership .

Safeguarding referrals should be made to relevant Local Authority and copied to the LA's Schools Safeguarding Coordinator. Prior to any written form being sent as a referral to social care, there should be a verbal consultation with the Local Authority duty manager, by calling the duty desk, to ensure that making a referral is an appropriate action. The parent/carer will normally be contacted to obtain their consent before a referral is made. However, if the concern involves, for example alleged or suspected

child sexual abuse, Honour Based Abuse, fabricated or induced illness or the Designated Safeguarding Lead has reason to believe that informing the parent at this stage might compromise the safety of the child or a staff member, nothing should be said to the parent/carer ahead of the referral, but a rationale for the decision to progress without consent should be provided with the referral.

Within one working day of a referral being received, local authority children's social care should acknowledge receipt to the referrer and a social work qualified practice supervisor or manager should decide next steps and the type of response required. We will follow up if this information is not forthcoming.

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

### **Early help**

Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. Early help may be appropriate for children and families who have several needs, or whose circumstances might make them more vulnerable. It is a voluntary approach, requiring the family's consent to receive support and services offered. These may be provided before and/or after statutory intervention. Our staff will be alert to the potential need for early help for a child who is disabled; has special educational needs (whether or not they have a statutory education; health and care (EHC) plan); is a young carer; is bereaved; is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime; is frequently missing/goes missing from care or from home; is at risk of modern slavery, trafficking, sexual and/or criminal exploitation; is at risk of being radicalised; is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online; is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse; is misusing drugs or alcohol themselves; is suffering from mental ill health; has returned home to their family from care; is a privately fostered child; has a parent or carer in custody; is missing education, or persistently absent from school, or not in receipt of full time education; has experienced multiple suspensions and is at risk of, or has been permanently excluded.

The *Early Help Referral Form* will be used to request additional early help for a family when the needs of a child are beyond the level of support that can be provided by universal services. Southwark's *Family Early Help Service* Duty number is **020 7525 1922 (Southwark)**, **0207 926 3344 (Lambeth)** which will give four options:

- General enquiries and signposting
- Family Early Help Duty Manager for general advice including consultations around potential and new referrals and current casework
- Education, Inclusion and Attendance support and advice including all enforcement activity
- Parenting support and advice and information on parenting course and group work programmes

In circumstances where a child has an unexplained or suspicious injury that requires urgent medical attention, the CP referral process should not delay the administration of first aid or emergency medical assistance. **If a pupil is thought to be at immediate risk because of parental violence, intoxication, substance abuse, mental illness or threats to remove the child during the school day, for example, urgent Police intervention will be requested.**

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

All parents applying for places at this school will be informed of our safeguarding responsibilities and the existence of this policy. In situations where pupils sustain injury or are otherwise affected by an accident or incident whilst they are the responsibility of the school, parents will be notified of this as soon as possible.

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

### **VULNERABLE PUPILS**

Particular vigilance will be exercised in respect of pupils who are subject to Child Protection Plan and any incidents or concerns involving these children will be reported immediately to the allocated Social Worker (and confirmed in writing; copied to the LA's Schools Safeguarding Coordinator). If the pupil in question is a Looked-After child, this will also be brought to the notice of the Designated Person with responsibility for children in public care. The School's Designated Teacher for Looked-after and Previously Looked-after Children will work with the virtual school head, who manages pupil premium plus for looked after children, to discuss how funding can be best used to support the progress of looked after children in the school and meet the needs identified in the child's personal education plan. The designated teacher will also work with the virtual school head to promote the educational achievement of previously looked after children. We note the DfE's statutory guidance *Designated teacher for looked-after and previously looked-after children*. Where a child has an allocated social worker, we will liaise with the relevant LA's virtual school head who, in addition to their statutory duties, now has a non-statutory responsibility for the strategic oversight of the educational attendance, attainment, and progress of children with a social worker. We also note the DfE's non-statutory guidance on *promoting the education of children with a social worker* that contains further information on the roles and responsibilities of virtual school heads.

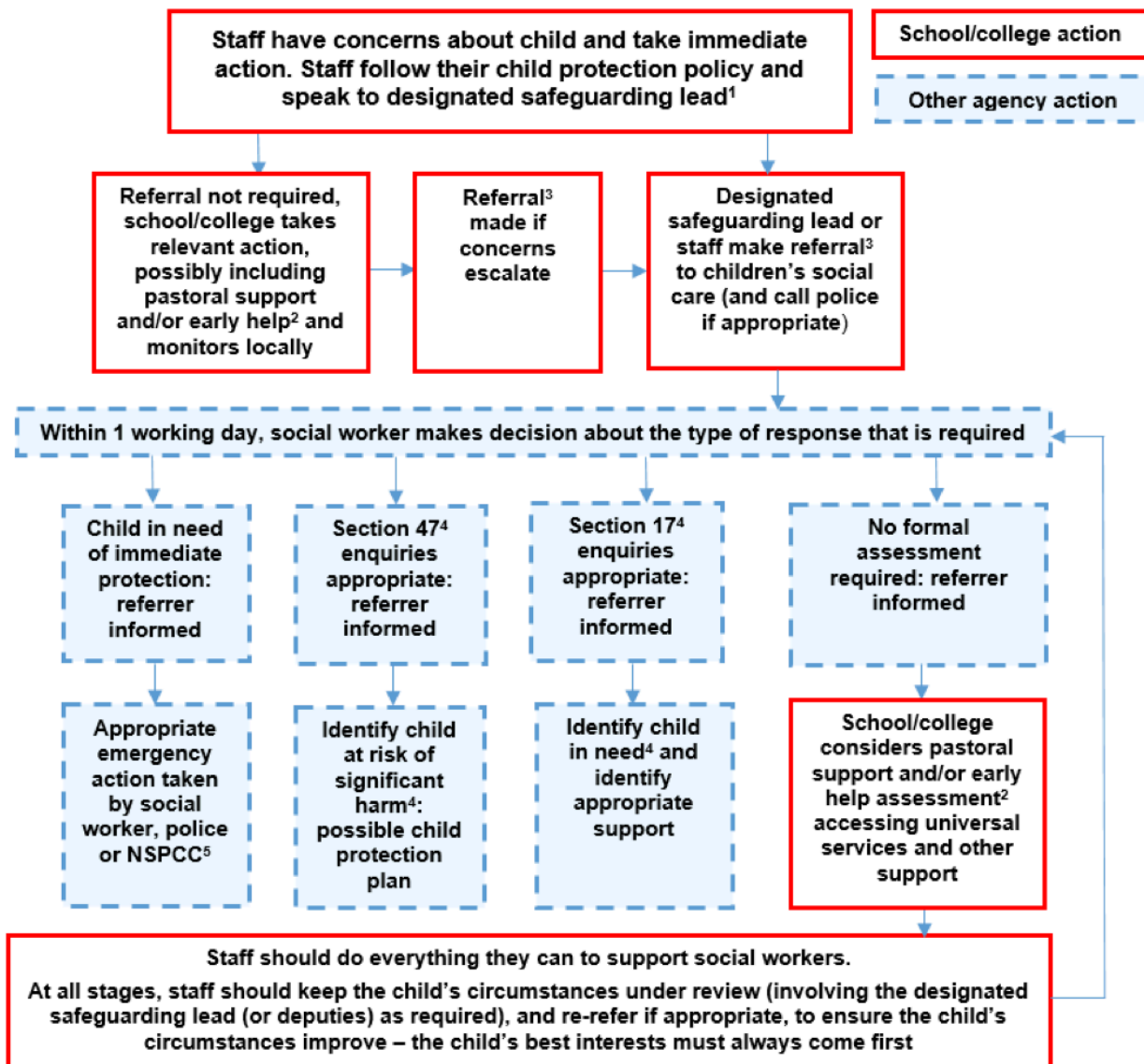
Local authorities should share with our school/setting the fact a child has a social worker, and the DSL will hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This will be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools and colleges to safeguard and promote the welfare of children. Where children need a social worker, this will inform decisions about safeguarding (for example, responding to unauthorised absence or being absent from education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

We acknowledge that children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges. We are aware that additional barriers can exist when recognising abuse and neglect in this group of children. This can include assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration; these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children; the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and communication barriers and difficulties in managing or reporting these challenges. Further information can be found in the DfE's *SEND Code of Practice 0 to 25* and *Supporting Pupils at School with Medical Conditions*.

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

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

## Actions where there are concerns about a child



### TRAINING

All staff members will receive appropriate safeguarding and child protection training (including online safety, which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) at induction, which is regularly updated. In addition, all staff members will receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. All newly recruited staff (teaching and non-teaching) and Governors will be apprised of this policy and will be required to attend relevant LA

DSL safeguarding training. In addition, all new staff and temporary staff will be required to attend an induction session with the Designated Safeguarding Lead or their deputy on their first day in the school.

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

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

## **RECRUITMENT**

South Bank Academies is committed to the principles of safer recruitment and, as part of that, adopts recruitment procedures that help deter, reject and/or identify people who might abuse children. Safe recruitment processes are followed and all staff recruited to the school will be subject to appropriate identity, qualification and health checks. As part of the shortlisting process we will consider carrying out an online search as part of our due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which we may explore with the applicant at interview. We will inform shortlisted candidates that online searches may be done as part of due diligence checks. References will be verified and appropriate criminal record checks [Disclosure and Barring Service (DBS) checks], barred list checks and prohibition checks will be undertaken. The level of DBS check required, and whether a prohibition check is required, will depend on the role and duties of an applicant to work in the school, as outlined in Part three of the DfE guidance "[Keeping children safe in education](#)". We will also have regard to DfE's statutory guidance for schools about the employment of staff disqualified from childcare "[Disqualification under the Childcare Act 2006](#)", which also contains information about 'disqualification by association'.

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

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

## **VOLUNTEERS**

Any parent or other person/organisation engaged by the school to work in a voluntary capacity with pupils will be subject to all reasonable vetting procedures and Criminal Records Checks.



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

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

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

Further information on checks on volunteers can be found in Part three of the DfE guidance "[Keeping children safe in education](#)".

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

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

If it comes to our attention that an allegation or complaint of mistreatment has been made against an employee or volunteer of such an organisation, this will be reported by the academy to the Local Authority's Designated Officer (LADO).

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

We note the DfE's [non-statutory guidance for providers running out-of-school settings](#).

### **STAFF CODE OF CONDUCT**

All staff (paid and voluntary) are expected to adhere to a code of conduct in respect of their contact with pupils and their families. The Teachers' Standards 2012 state that all teachers, including headteachers, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties. We will endeavour to create and embed a culture of openness, trust and transparency in which the school's values and expected behaviour which are set out in the staff code of conduct are constantly lived, monitored and reinforced by all staff.

Children will be treated with respect and dignity and no punishment, detention, restraint, sanctions or rewards are allowed outside of those detailed in the school's Behaviour Management Policy. Whilst it would be unrealistic and undesirable to preclude all physical contact between adults and children, staff are expected to exercise caution and avoid placing themselves in a position where their actions might

be open to criticism or misinterpretation. Where incidents occur which might otherwise be misconstrued, or in the exceptional circumstances where it becomes necessary to physically restrain a pupil for their own protection or others' safety, this will be appropriately recorded and reported to the Headteacher and parents. Any physical restraint used will comply with DfE guidance "[Use of reasonable force in schools](#)".

Except in cases of emergency, first aid will only be administered by qualified First Aiders. If it is necessary for the child to remove clothing for first aid treatment, there will, wherever possible, be another adult present. If a child needs help with toileting, nappy changing or washing after soiling themselves, another adult should be present or within earshot. All first aid treatment and non-routine changing or personal care will be recorded and shared with parents/carers at the earliest opportunity.

Children requiring regular medication or therapies for long-term medical conditions will be made the subject of a Medical Plan that has been agreed with the parents and health authority.

For their own safety and protection, staff should exercise caution in situations where they are alone with pupils. Other than in formal teaching situations; for example during musical instrument tuition, the door to the room in which the 1:1 coaching, counselling or meeting is taking place should be left open. Where this is not practicable because of the need for confidentiality, another member of staff will be asked to maintain a presence nearby and a record will be kept of the circumstances of the meeting. All rooms that are used for the teaching or counselling of pupils will have clear and unobstructed glass panels in the doors.

Academy staff should be alert to behaviours that may cause 'low-level' concerns such as being over friendly with children, having favourites, taking photographs of children on their mobile phone contrary to school policy, engaging with a child on a one-to-one basis in a secluded area or behind a closed door, humiliating pupils (see below about what a 'low-level' concern is and how to share these concerns).

Academy staff should also be alert to the possible risks that might arise from social contact with pupils outside of the school. Home visits to pupils or private tuition of pupils should only take place with the knowledge and approval of the Principal. Visits/telephone calls by pupils to the homes of staff members should only occur in exceptional circumstances and with the prior knowledge and approval of the Principal. Any unplanned contact of this nature or suspected infatuations or "crushes" will be reported to the Principal. Staff supervising off-site activities or school journeys will be provided with a school mobile phone as a point of contact for parents and carers.

Staff will only use the school's digital technology resources and systems for professional purposes or for uses deemed 'reasonable' by the Head and Governing Body. Staff will only use the approved school email, school learning platform or other school approved communication systems with pupils or parents/carers and only communicate with them on appropriate school business and will not disclose their personal telephone numbers and email addresses to pupils or parents/carers. Staff will not use personal cameras (digital or otherwise) or camera phones for taking and transferring images of pupils or staff without permission and will not store images at home.

Staff should be aware of the school's whistle-blowing procedures and share immediately any disclosure or concern that relates to a member of staff with the Headteacher or one of the Designated Safeguarding Leads if the Principal is not available and nothing should be said to the colleague involved. It should be shared with the CEO if it relates to the Principal.

We note the non-statutory [Guidance for Safer Working Practice for professionals working in education settings](#) published by the [Safer Recruitment Consortium](#).

## **CONTRACTORS**

Building contractors who are engaged by or on behalf of the school to undertake works on site will be made aware of this policy and the reasons for this. Long-term contractors who work regularly in the school during term time will be asked to provide their consent for DBS checks to be undertaken. These checks will be undertaken when individual risk assessments by the Leadership Team deem this to be appropriate. During major works, when large numbers of workers and subcontractors may be on site during term time, Health and Safety risk assessments will include the potential for contractors or their employees to have direct access to pupils in non-teaching sessions. All contractors and subcontractors will be issued with copies of the school's code of conduct for staff.

Individuals and organisations that are contracted by the school to work with or provide services to pupils will be expected to adhere to this policy and their compliance will be monitored. Any such contractors will be subject to the appropriate level of DBS check, if any such check is required (for example because the contractor is carrying out teaching or providing some type of care for or supervision of children regularly). Contractors engaging in regulated activity relating to children will require an enhanced DBS check (including children's barred list information). For all other contractors who are not engaging in regulated activity relating to children, but whose work provides them with an opportunity for regular contact with children, an enhanced DBS check (not including children's barred list information) will be required. Contractors for whom an appropriate DBS check has not been undertaken will be supervised if they will have contact with children. Under no circumstances we will allow a contractor in respect of whom no checks have been obtained to work unsupervised, or engage in regulated activity relating to children. We will determine the appropriate level of supervision depending on the circumstances. If an individual working at our school is self-employed, we will consider obtaining the DBS check, as self-employed people are not able to make an application directly to the DBS on their own account.

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

## **SAFEGUARDING CONCERNS AND ALLEGATIONS MADE ABOUT STAFF, INCLUDING SUPPLY TEACHERS, VOLUNTEERS AND CONTRACTORS**

South Bank Academies takes seriously all safeguarding concerns or allegations against those working in or on behalf of our school in a paid or unpaid capacity. We will ensure that we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the academy are dealt with promptly and appropriately. Procedures are in place for pupils, parents and staff to share any concern that they may have about the actions of any member of staff, including supply teachers, volunteers and contractors. All such allegations and concerns will be brought immediately to the attention of the Principal or one of the Designated Safeguarding Leads if the Headteacher is not available and nothing should be said to the colleague involved. In cases where the Principal is the subject of the allegation or concern, they will be reported to the (CEO), in order that they may activate the appropriate procedures.

There may be two levels of allegation/concern:

1. Allegations that may meet the harms threshold.
2. Allegation/concerns that do not meet the harms threshold – known as 'low level concerns'.

### **Allegations that may meet the harms threshold**

These procedures are for managing cases of allegations that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in the school and will be used in respect of all cases in which it is alleged that anyone working in the school or college that provides education for children under 18 years of age, including supply teachers, volunteers and contractors has:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes behaviour that may have happened outside of school that might make an individual unsuitable to work with children, which is known as transferable risk.

The Local Authority Designated Officer (LADO) should be informed of all such allegations that come to an academy's attention and appear to meet the above criteria. Contact can also be made with LA's Schools Safeguarding Coordinator who will liaise with the LADO. Where we identify a child has been harmed, that there may be an immediate risk of harm to a child or if the situation is an emergency, we will contact the relevant Local Authority Safeguarding Hub (or its equivalent in another LA if the child resides in a different LA) and/or the police immediately as per the referral process contained in this policy.

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

Some rare allegations will be so serious they will require immediate intervention by children's social care services and/or police. In such cases, referral to the LADO will lead to a Strategy Meeting or Discussion being held in accordance with the DfE guidance and [London Safeguarding Children Partnership \(LSCP\) procedures](#). This process will agree upon the appropriate course of action and the time-scale for investigations.

The academy has a legal duty to refer to the DBS when an individual is removed from regulated activity (or would have been removed had they not left), and we believe the individual has engaged in relevant conduct in relation to children and/or adults, satisfied the harm test in relation to children and/or vulnerable adults or been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence. The DBS will consider whether to bar the person. Referrals will be made as soon as possible when an individual is removed from regulated activity. Where we dismiss or cease to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, we will consider whether to refer the case to the Secretary of State, as required by law.

### **Concerns and/or allegations that do not meet the harms threshold – known as 'low level concerns'**

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

However, as a good practice, we will contact the LADO for consultation to ensure that we follow the appropriate and correct procedures even when the concern seems to be ‘low-level’.

All ‘low-level’ concerns will be brought immediately to the attention of the Principal or one of the Designated Safeguarding Leads if the Principal is not available and nothing should be said to the colleague involved. In cases where the Principal is the subject of the concern, they will be reported to the CEO.

The full procedures about dealing with allegations of abuse made against/concerns raised in relation to teachers and other staff can be found in Part Four of the DfE guidance “[Keeping children safe in education](#)”.

**The Chair of Governors is: Trevor Gordon (SBUSixth) and Safia Barikzai (SBUA)**

**The Vice-chair is: (TBC)**

**Southwark’s LADO is:** Eva Simcock – Tel: 020 7525 0689; Mob: 07943076608; Email: [Eva.Simcock@southwark.gov.uk](mailto:Eva.Simcock@southwark.gov.uk). LADO can also be contacted via [Qau.Safeguarding@southwark.gov.uk](mailto:Qau.Safeguarding@southwark.gov.uk).

There is also a duty system and one of the CP Coordinators in the Quality Assurance Unit is on duty each day to deal with LADO issues when LADO is unavailable. Duty telephone number for enquiries/referrals is 020 7525 3297

The LA’s Strategic Lead Officer for safeguarding in education services is: the Director of Children’s Services Alasdair Smith 020 7525 0654

The LA’s Schools Safeguarding Coordinator is: Apo ÇAĞIRICI 020 7525 2715

We also note the ‘[Safeguarding information for professionals and the community in Southwark](#)’ on Southwark Council’s website.

## **RECORDS**

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

Child protection records are not open to pupils or parents. All CP records are kept securely by the Designated Safeguarding Lead and separately from educational records. They may only be accessed by the Designated Safeguarding Lead, their Deputies and the senior managers of the school.

The content of Child Protection Conference or Review reports prepared by the school will follow the headings recommended by Children’s Services and will, wherever possible, be shared with the parents/carers in advance of the meeting.

Child Protection records will be sent to receiving schools separately from the main pupil file and under a confidential cover when pupils leave the school as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term ensuring secure transit and a confirmation of receipt will be obtained.

In addition to the child protection file, the DSL will also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

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

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

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

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

When a pupil transfers from our academy and we do not know to which school they have gone, we will generate CTF for each pupil using XXXXXXXX for school number to indicate the destination is unknown, as per paragraph 2.4.2 of the [CTF 24 specification](#). Given that schools cannot search the "lost pupils database", if a pupil arrives in our school and we do not know the previous school, we will contact the LA's Education Data Manager, who will be able to search the database for a matching record using gender, names or former names and date of birth and forward it to our school.

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

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

## **SAFETY IN THE SCHOOL**

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

Entry to school premises will be controlled by doors that are secured physically or by constant staff supervision or video surveillance. Our principal will use their professional judgement about the need to escort or supervise visitors such as children's relatives or other visitors attending a sports day. In the case of individuals visiting the school in a professional capacity e.g. educational psychologists, social workers etc., we will check their ID and be assured that the visitor has had the appropriate DBS check (or the visitor's employers have confirmed that their staff have appropriate checks). They will be logged into and out of the premises and will be asked to wear their identity badges or be issued with school visitor badges. Unidentified visitors will be challenged by staff or reported to the Headteacher or school office. Carelessness in closing any controlled entrance will be challenged.

The presence of intruders and suspicious strangers seen loitering near the school or approaching pupils, will be reported to the Police by calling 101 or 999, depending on the circumstances and the urgency of the case so that if police stops these individuals they can be spoken to about what they were doing and dealt with accordingly. Brief information about the incident will be sent to LA's Schools Safeguarding Coordinator with a view to alerting other local schools in liaison with the police and through appropriate systems.

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

## **CURRICULUM**

South Bank Academies acknowledge the important role that the curriculum can play in the prevention of abuse and in the preparation of our pupils for the responsibilities of adult life and citizenship. We will ensure that children are taught about safeguarding, including online safety and will consider this as part of providing a broad and balanced curriculum. It is expected that all curriculum co-ordinators will consider the opportunities that exist in their area of responsibility for promoting the welfare and safety of pupils. As appropriate, the curriculum will be used to build resilience, help pupils to keep safe and to know how to ask for help if their safety is threatened. As part of developing a healthy, safer lifestyle, pupils will be taught, for example:

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

All computer equipment and internet access within the School will be subject to appropriate "parental controls" and Internet safety rules in accordance with our Online Safety Policy, which, amongst other

things, will include appropriate filtering and monitoring on school devices and school networks. We will be careful that “over blocking” does not lead to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding.

### **Remote education**

We understand the importance of keeping pupils, students and staff safe whilst learning remotely. We will reinforce in our contacts with parents and carers the importance of children being safe online. Parents and carers are likely to find it helpful to understand what systems our school uses to filter and monitor online use. It is especially important for parents and carers to be aware of what their children are being asked to do online, including the sites they are asked to access and be clear who from our school (if anyone) their child is going to be interacting with online. We also note the DfE guidance [Safeguarding and remote education](#).

### **HEALTHY SCHOOLS LONDON and SOUTHWARK’S WELLBEING FIRST: IMPROVING MENTAL HEALTH AND RESILIENCE IN SCHOOLS (IMHARS) PROGRAMME**

South Bank University Academy will work with partners to promote a whole, healthy, inclusive school approach and achieve the *Healthy Schools London* status as well as the local Wellbeing First: *Improving Mental Health & Resilience in Schools (IMHARS) Programme* award – including a focus on the curriculum as part of Personal Development (PD) - with the aim of:

- “Closing the gaps” and inequalities over time, through using the full capacity and flexibility of the curriculum to help pupils to be safe, confident, healthy, happy and active citizens;
- Developing a school ethos, culture and environment as well as provision for spiritual, moral, social and cultural (SMSC) education that encourage a safe and healthy lifestyle for all children and young people, including the most disadvantaged and vulnerable;
- Delivering the mandatory Relationships & Sex Education (RSE) and Health Education (HE) and/or where delivered, through Personal, Social, Health and Economic (PSHE) Education – including specifically safeguarding content like consent, sexual harassment and sexual violence, including online;
- Providing high quality Physical Education (PE) and sport to promote physical activity and fitness;
- Promoting an understanding of the full range of issues, attitudes and behaviours which impact upon lifelong health and wellbeing, including emotional wellbeing, mental health and safety;
- Working in partnership with parents/carers, local communities, external agencies and volunteers to support the wellbeing, health and personal development of all pupils including the most disadvantaged (including those with SEND), “closing the gaps” over time;
- Ensuring that food and drink are available across the school day reinforce the healthy lifestyle message;

### **WORKING IN PARTNERSHIP WITH PARENTS**

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

- We will use clear statements in our brochures and correspondence.
- We will liaise with agencies in the statutory, voluntary and community sectors and locality teams that are active in supporting families.
- We will be alert to the needs of parents/carers who do not have English as their first language and will utilise the translation services as necessary.
- We will distribute the LA’s leaflet for parents, “*Protecting Children in Education Settings*”.



- We will make available a copy of this policy to any parent who requests it. The policy will also be available through the school's web site.
- We will keep parents informed as and when appropriate.

### **MONITORING AND EVALUATION**

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

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

### **COMPLAINTS**

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

### **Review**

The safeguarding policy will be reviewed annually, led by the executive principal, in light of statutory and other guidance, best practice as identified as well as the context and requirements of schools in the trust. External review and inputs will be sought.

## Appendix A

Each academy works differently operationally within Safeguarding and they also are in different boroughs in London. Therefore, it is important note the differences within each academy below:

**South Bank University Sixth Form (SBUSixth), 56 Brixton Hill, Brixton, London SW2 1QS**

**Principal:** Kishan Pithia

**DSL:** Sharon Carnegie

**DDSLs:** Mrs Delma Russell

**Safeguarding Governor:** Calista Francis

**Local Authority contacts:** Lambeth Council Safeguarding Partnership

[www.helpandprotection@lambeth.gov.uk](mailto:www.helpandprotection@lambeth.gov.uk)

**LADO:** Andrew Zachariades, on [020 7926 4679](tel:02079264679) or [07720 828 700](tel:07720828700) or

[LADO@lambeth.gov.uk](mailto:LADO@lambeth.gov.uk)

**Other local authority external agencies:**

[Lambeth safeguarding external agencies](#)

### **Internal reporting procedures for safeguarding concerns by staff:**

All staff will always report concerns via the academy's CPOMS system. If a child is at harm or in danger it is imperative the staff member speaks to a member of the Safeguarding immediately. Concerns and worries should not be reported after the child has left the academy.

### **Internal and external reporting procedures for safeguarding concerns by students:**

Students can send emails to any member of staff about any safeguarding concerns. The staff member will then report this as above. Students, parents, and external agencies can also email [safeguarding@SBUSixth.ac.uk](mailto:safeguarding@SBUSixth.ac.uk) or [safeguarding@sbua.org.uk](mailto:safeguarding@sbua.org.uk) . This email is monitored during office hours by the Safeguarding team. Students can also speak to any member of staff if they have any worries or concerns, and the staff member will follow the academy's reporting procedures.

**South Bank University Academy, Trafalgar St, London SE17 2TP**

**Principal:** Annette Moses

**DSL:** Lisa Wellington

**DDSLs:** Radiyah Begum

**Safeguarding Governor:** Aisha Kimbugwe

**Local Authority contacts:** The Southwark Safeguarding Board

<https://www.southwark.gov.uk/childcare-and-parenting/children-s-social-care/child-protection/southwark-safeguarding-children-board>

Southwark's LADO is: Eva Simcock – Tel: 020 7525 0689; Mob: 07943076608; Email: [Eva.Simcock@southwark.gov.uk](mailto:Eva.Simcock@southwark.gov.uk). LADO can also be contacted via [Qau.Safeguarding@southwark.gov.uk](mailto:Qau.Safeguarding@southwark.gov.uk).

There is also a duty system and one of the CP Coordinators in Quality Assurance Unit is on duty each day to deal with LADO issues when LADO is unavailable. Duty telephone number for enquiries/referrals is 020 7525 3297

The LA's Strategic Lead Officer for safeguarding in education services is: the Director of Children's Services Alasdair Smith 020 7525 0654

The LA's Schools Safeguarding Coordinator is: Apo ÇAĞIRICI 020 7525 2715

[Children-missing-from-education Southwark](#)

We also note the '[Safeguarding information for professionals and the community in Southwark](#)' on Southwark Council's website.

**Internal reporting procedures for safeguarding concerns by staff:**

All staff will always report concerns via the academy's CPOMS system. If a child is at harm or in danger it is imperative the staff member speaks to a member of the Safeguarding immediately. Concerns and worries should not be reported after the child has left academy.

## Appendix B

# Governance and safeguarding within South Bank Academies

## Structure

- Named link trustee on South Bank Academies Board – Joanne Young – see below
- Executive Principal/CEO (Fiona Morey) is Trust’s safeguarding lead
- Named link governor on each School Advisory Board
- Designated Safeguarding Lead at each school
- Termly meeting between Designated Safeguarding Lead (DSL) and link SAB governor in advance of safeguarding discussion at 2<sup>nd</sup> SAB meeting each term
- Safeguarding on SAB agendas for 2<sup>nd</sup> SAB meeting each term
- Safeguarding internal audit in summer term.
- Safeguarding on all SBA agendas for noting and annual report discussed as a major item at Summer SBA Board

## Link Trustee

The Trust is required to appoint a senior board member, or a ‘link trustee’ to take leadership responsibility for the Trust’s safeguarding arrangements (paragraph 60 of KCSIE). The SBA Link Trustee is Joanne Young

## Roles and responsibilities: Link trustee

You should:

- keep the board up to date with statutory safeguarding and child protection guidance, including anything issued locally by the Trust’s safeguarding partners
- Inform the board whether it needs to make any changes (e.g. in light of new regulations)
- Ensure safeguarding training is attended by regularly by staff, trustees and governors
- Attend regular safeguarding training and encourage other members of the board to develop their understanding of their safeguarding responsibilities
- Co-ordinate with the governance team the annual meeting of safeguarding governors to facilitate monitoring, discussion and sharing of best practice ideas and review of the annual safeguarding report in advance of submission to the Summer Board meeting

You should make sure the Trust has an effective:

- Child protection policy – reviewed annually in September
- Staff code of conduct –
- Policy for handling allegations against staff and volunteers
- Safeguarding response to children who go missing from education

- Online monitoring system and online filters

## Link Governor

The School Advisory Board retains local responsibility for safeguarding within their own school. Appointing a link governor allows sufficient support and monitoring to take place at a local level, while creating a central trust responsibility and a scalable solution to support Trust growth.

### Roles and responsibilities: Link governor

You should:

- Make sure your school has appointed a DSL
- Meet them regularly to make sure policies and procedures are effective
- Make sure the DSL has sufficient time, resources and training to carry out their role effectively
- Ask the DSL the right monitoring questions
- Make sure the school has appointed a designated teacher to promote the educational achievement of looked after children
- Make sure the curriculum covers safeguarding, including online safety
- Update the School Advisory Board on how the monitoring is going
- Make sure that checks of the single central record are happening but not check it yourself
- Attend regular safeguarding training and encourage other members of the board to develop their understanding of their safeguarding responsibilities
- Attend the annual (more?) meeting of safeguarding governors to facilitate monitoring, discussion and sharing of best practice ideas and review of the annual safeguarding report in advance of submission to the Summer Board meeting

The link trustee and link governors should not:

- Be expected to deal with specific safeguarding incidents, but should be notified when of a serious nature
- Receive any specific details about incidents
- Produce the school safeguarding report; the trustee's and governors' visit records and monitoring checklists are their records of evidence, along with the relevant meeting minutes

## Governance output requirements

- Termly monitoring visit checklist (appendix 1) for 2<sup>nd</sup> SAB meeting of the term
- Termly visit report for 2<sup>nd</sup> SAB meeting of the term
- Governance input at annual link safeguarding meeting added to annual safeguarding report

## Operational output requirements

- Termly safeguarding report (DSL) for 2<sup>nd</sup> SAB meeting of the term

- Termly reports (above) to be collated and presented to each SBA Board meeting for noting (EP)
- In-depth focus (expanded narrative) on safeguarding completed by DSLs for 2<sup>nd</sup> Summer SAB meeting
- Completion of annual audit using NSPCC audit tool to be completed by Executive Principal and to be reviewed at annual link safeguarding meeting
- Annual safeguarding report written by EP & DSLs, reviewed at link safeguarding meeting in advance of submission to Summer SBA Board meeting

## Monitoring questions

The Key have produced a safeguarding monitoring checklist that can be used to ensure that the school has appropriate safeguarding arrangements in place. This checklist is contained in [Appendix 1](#).

The NSPCC have also produced an online audit tool found [here](#). This report should be completed over the course of the year in conjunction with the school DSL and the Trust's safeguarding lead. The results of the audit should be included in the annual safeguarding report.

## Trustee/governors safeguarding visit report

Trustees and governors should complete a visit report for any safeguarding visit in which they participate. This is the standard visit report that is in use at the Trust.

## Monitoring the Single Central Register

Link trustees and governors are responsible for the strategic task of monitoring that school leaders are keeping up with their statutory duties. They do this by asking the right questions about how complete the record is, how frequently it is reviewed and how it is stored. Principals are held accountable for ensuring that the SCR meets all requirements and that they manage checks and audits on a termly basis.

## Questions to ask your school leaders about the SCR

- How and where do we store the SCR?
- Is it secure?
- How frequently do you check the SCR?
- When is the last time you checked the SCR?
- Have you checked the information recorded on the SCR for errors?
- Are all new staff recorded?

- Are current volunteers (for whom a DBS check has been conducted) recorded? (This is not a requirement under KCSIE but OFSTED will want to see this, as explained in its safeguarding guidance – page 25 and 29)
- Are all relevant fields on the register completed for each listed person?

It is worth being aware of what should be on the SCR so that you can be more informed and confident when discussing it with the school leaders. Please see [Appendix 2](#) for this information.

## Appendix C: Safeguarding monitoring questions

### Roles and responsibilities

SAFEGUARDING POLICY OR PROCEDURE	HOW OFTEN TO DO IT	COMPLIANT?	ACTION (IF APPLICABLE)
<i>A senior member of staff has been appointed as the designated safeguarding lead</i>	As necessary		
<i>A designated teacher has been appointed to promote the educational achievement of looked after children (LAC) and previously looked after children, and this person has appropriate training</i>	As necessary		

### Training

SAFEGUARDING POLICY OR PROCEDURE	HOW OFTEN TO DO IT	COMPLIANT?	ACTION (IF APPLICABLE)
<i>The designated safeguarding lead and any deputies undergo updated child protection training</i>	Every 2 years		
<i>The designated safeguarding lead and any deputies also refresh their knowledge and skills regularly (at least annually)</i>	In line with advice from your local safeguarding partners		
<i>The designated safeguarding lead and any deputies (as a minimum) have Prevent awareness training</i>	In line with advice from your local safeguarding partners		



SAFEGUARDING POLICY OR PROCEDURE	HOW OFTEN TO DO IT	COMPLIANT?	ACTION (IF APPLICABLE)
<i>All staff members have child protection training which is regularly updated, and they receive safeguarding and child protection updates as required (at least annually)</i>	In line with advice from your local safeguarding partners		
<i>All staff have the skills, knowledge and understanding to keep looked after and previously looked after children safe</i>	Trust to determine		
<i>At least 1 of the people conducting an interview has done safer recruitment training (this is a requirement for maintained schools and good practice for academies)</i>	As necessary		
<i>All School Advisory Board members have training about safeguarding</i>	In line with advice from your local safeguarding partners		

## Policies and procedures

SAFEGUARDING POLICY OR PROCEDURE	HOW OFTEN TO DO IT	COMPLIANT?	ACTION (IF APPLICABLE)
<p data-bbox="203 1094 808 1150"><i>An effective child protection policy is in place and available publicly</i></p> <p data-bbox="203 1206 808 1350"><i>(The policy should describe procedures which are in accordance with government guidance and refer to locally agreed multi-agency safeguarding arrangements put in place by the local safeguarding partners)</i></p>	Review annually		

SAFEGUARDING POLICY OR PROCEDURE	HOW OFTEN TO DO IT	COMPLIANT?	ACTION (IF APPLICABLE)
<p><i>There are procedures in place to handle allegations of peer-on-peer abuse and to minimise the risk of peer-on-peer abuse</i></p> <p>(See paragraph 106 of Keeping Children Safe in Education for a list of what your child protection policy should include on this)</p>	Review annually		
<p><i>A statement of procedures is in place for dealing with allegations of abuse against staff, including supply staff and volunteers (this might be included in your child protection policy)</i></p>	Review annually		
<p><i>There are clear procedures in place for protecting children at risk of radicalisation (these might be included in your child protection policy)</i></p>	Review annually		
<p><i>There are clear safeguarding procedures in place for protecting children who go missing from education (these might be included in your child protection policy)</i></p>	Review annually		
<p><i>There are clear procedures in place for identifying possible pupil mental health problems, including routes to escalate concerns and clear referral and accountability systems</i></p>	Review annually		
<p><i>There is a clear policy on the use of mobile technology in the school (this might be included in your child protection policy)</i></p>	Review annually		

SAFEGUARDING POLICY OR PROCEDURE	HOW OFTEN TO DO IT	COMPLIANT?	ACTION (IF APPLICABLE)
<i>There are procedures in place to make a referral to the Disclosure and Barring Service (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns (or would have been if they had not resigned)</i>	Trust to determine frequency of review		
<i>A staff behaviour policy (code of conduct) is in place</i>	Trust to determine frequency of review		
<i>Written recruitment and selection policies and procedures are in place</i>	Trust to determine frequency of review		
<i>Appropriate whistle-blowing procedures are in place</i>	Group to determine frequency of review		
<i>All staff are aware that they must raise concerns related to female genital mutilation (FGM) with the designated safeguarding lead (or deputy), and that there is a specific legal duty on teachers to report known cases of FGM to the police</i>	Ongoing		
<i>There are clear processes and principles for sharing information within the school and with the local safeguarding partners, other organisations, agencies, and practitioners as required</i>	Trust to determine frequency of review		

SAFEGUARDING POLICY OR PROCEDURE	HOW OFTEN TO DO IT	COMPLIANT?	ACTION (IF APPLICABLE)
<p><i>Relevant staff:</i></p> <ul style="list-style-type: none"> <li>● <i>Have due regard to the data protection principles, which allow them to share personal information</i></li> <li>● <i>Are confident of the processing conditions which allow them to store and share information for safeguarding purposes</i></li> <li>● <i>Are aware that, if they need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information</i></li> </ul>	Ongoing		

## Safer recruitment

SAFEGUARDING POLICY OR PROCEDURE	HOW OFTEN TO DO IT	COMPLIANT?	ACTION (IF APPLICABLE)
<p><i>The single central record (SCR) is up-to-date, and all staff, trustees and governors have had the relevant checks where applicable</i></p> <p>(Please note checks carried out on maintained school governors and local governors in an academy trust don't need to be recorded on the SCR under the latest version of Keeping Children Safe in Education, but we recommend they are included.)</p>	<p>This is a live document, and so should be updated immediately. Governors need to make sure the SCR is being monitored rather than checking it themselves – they could do this termly or when new staff join the school</p>		

SAFEGUARDING POLICY OR PROCEDURE	HOW OFTEN TO DO IT	COMPLIANT?	ACTION (IF APPLICABLE)
<i>The school is meeting its duties with respect to the childcare disqualification requirements (early years/primary)</i>	<i>Ongoing</i>		

## Teaching and learning

SAFEGUARDING POLICY OR PROCEDURE	HOW OFTEN TO DO IT	COMPLIANT?	ACTION (IF APPLICABLE)
<i>Children are taught about safeguarding, including online safety, as part of a broad and balanced curriculum</i>	Trust to determine how often this is reviewed		
<i>Appropriate internet filters and online safety monitoring systems are in place (without 'over blocking')</i>	Trust to determine		

## Appendix D: What should be recorded in the Single Central Register

Information must be recorded for:

- All staff who work at the school (including supply staff and teacher trainees on salaried routes)
- All members of the proprietor body (i.e. the members and trustees of the trust in academies and free schools)

Schools must record:

- Identity checks
- Barred list checks
- Enhanced DBS checks
- Prohibition from teaching checks (for those carrying out teaching work)
- Section 128 checks
- Further checks on people who've lived or worked outside the UK, including checks for restrictions or sanctions imposed by a European Economic Area (EEA) regulating authority
- Checks of professional qualifications (for example, qualified teacher status)
- Checks to establish individuals' right to work in the UK

In respect of these checks, the SCR must record:

- Whether each check has been carried out, or a certificate obtained
- The date on which each check was carried out, or the certificate obtained

For supply staff, schools must also record:

- Whether they have written confirmation that the employment business supplying the member of supply staff has carried out the relevant checks and obtained the appropriate certificates
- Whether any enhanced DBS check certificate has been provided
- The date that confirmation was received (independent schools, academies, free schools and non-maintained special schools should also include the date on which any certificate was obtained)

This information is based on The Key's [article](#) on safeguarding and the Single Central Register.

Policy approved by South Bank Academies trust board. Date: October 2024  
Date of last review: September 2024  
Date of next review: September 2025