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Safeguarding and Child Protection Policy

2026 – 2027

Mission Statement

To inspire our family of schools to provide opportunities for our pupils, staff and leaders to be the best they can be; to create a passion for lifelong learning; to enable our pupils to become kind, confident and impactful world citizens.

Safeguarding and Child Protection Policy

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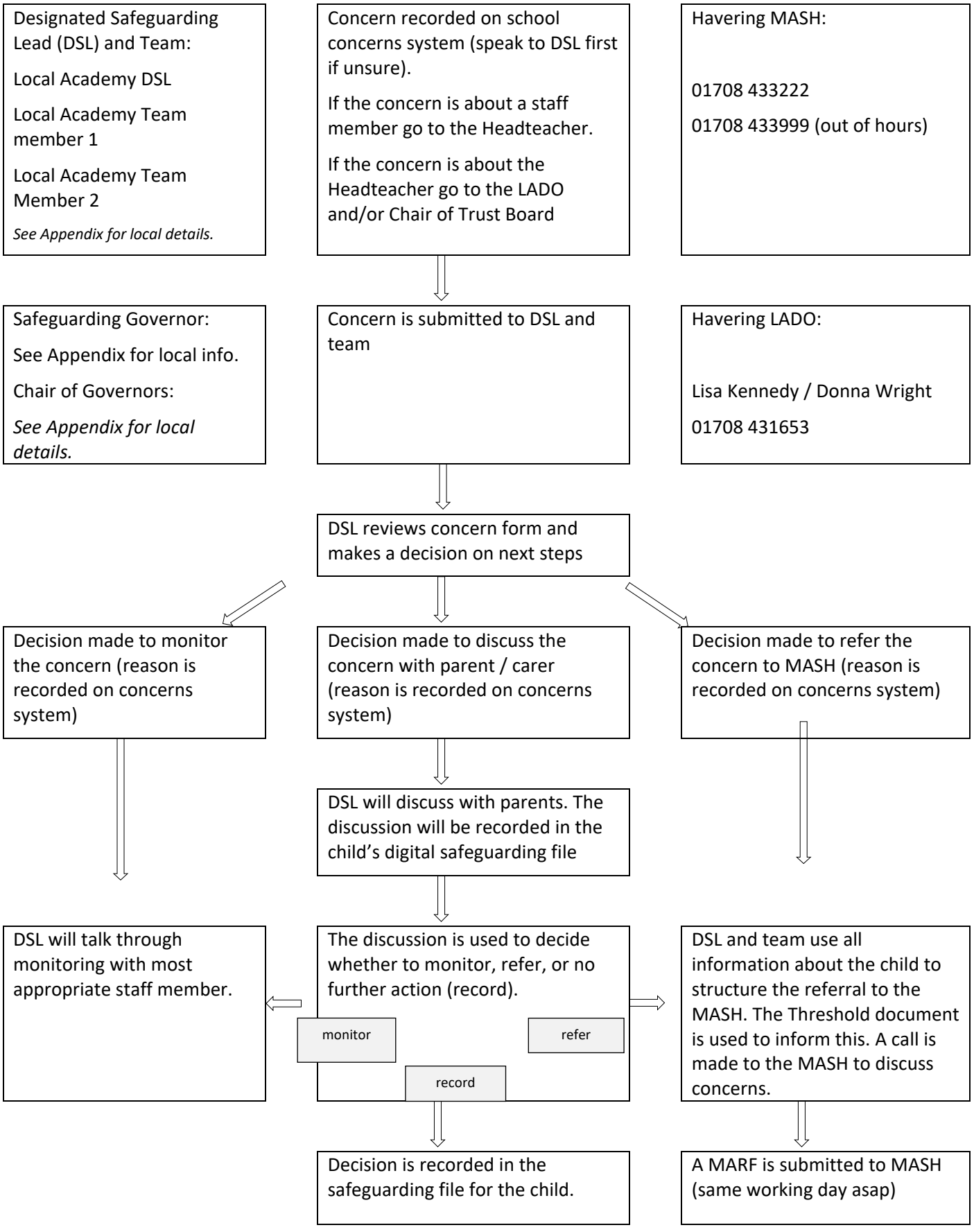
1.0 Raising concerns about a child



If the Designated Safeguarding Lead and team are not available the staff member should, with the support of the most senior member of staff available, make a direct referral to MASH.

2.0 Overview

2.1 Safeguarding and promoting the welfare of children is defined in Working Together to Safeguard Children 2026 as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing 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
- 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

2.2 The purpose of this document is to assist all staff

- to safeguard and protect children who are at risk of abuse or neglect
- to promote the well-being of all children.

2.3 At Empower Learning Academy Trust (ELAT) we are committed to safeguarding children and young people and we expect everyone who works in our academies to share this commitment. Adults in our academies take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them. Ultimately, all systems, processes and policies in our academies operate with the best interests of the child at their heart.

School must be a safe place for all children attending. Children not attending school during this time must also be safeguarded, including when online, staff must identify and the academy must action any concerns brought to them.

2.4 This policy and procedures should be read in conjunction with

- London Safeguarding Children Procedures 8th edition (2026)
- Working Together to Safeguard Children 2026
- DfE Keeping children safe in education 2026
- DfE Teaching Online Safety in schools 2023
- Trust online safety policy (including filtering and monitoring)
- Academy Code of Conduct – Safeguarding children
- Staff Acceptable Use Agreement

2.5 The safeguarding of children is everyone's business and schools have a responsibility under Section 175 of the Education Act 2002 to safeguard and promoting the welfare of children. This includes

- Preventing the impairment of children's mental or physical health or development
- Protecting children from maltreatment
- Ensuring children grow up in circumstances consistent with the provision of safe and effective care.

Keeping Children Safe in Education (KCSIE), 2026 states that:

> *'Governing bodies and proprietors should ensure they facilitate a whole school or college approach to safeguarding. This means involving everyone in the school or college, and ensuring that safeguarding, and child protection are at the forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart.'*

It also emphasises that the voice of the child must be heard

> *'Where there is a safeguarding concern, governing bodies, proprietors and school or college leaders should ensure the child's wishes and feelings are taken into account when determining what action*

to take and what services to provide.'

This policy and the following procedures apply to all paid staff, supply staff, volunteers and trustees/Local Governance Committee (LGC) members working with or in Empower Learning Academy Trust.

3.0 Legal framework

3.1 This policy is supported by the key principles of the Children's Act, 1989 that the child's welfare is paramount. Another key document is Working Together, 2026, highlighting that every assessment of a child, *'must be informed by the views of the child as well as the family'.* (Working Together, 2026) This is echoed by Keeping Children Safe in Education, 2025 through ensuring procedures are in place in schools and settings to hear the voice of the child.

3.2 The Children Act 1989 defines a child as being up to the age of 18 years; it also defines significant harm and the roles and responsibilities of Children's Social Care and the Police.

3.3 **Legislation related to safeguarding in schools**

- Keeping Children Safe in Education (September 2026)

3.4 **Education**

- The Children Act 1989 and 2004
- Education Act 2002
- The Education (Health Standards) (England) Regulations 2003
- The Further Education (Providers of Education) (England) Regulations 2006
- The Education (Pupil Referral Units) (Application of Enactments) (England) Regulations 2007 as amended by SI 2010/1919, SI 2012/1201, SI 2012/1825, SI 2012/3158
- The School Staffing (England) Regulations 2009 as amended by SI 2012/1740 and SI 2013/1940
- The Education (Non-Maintained Special Schools) (England) Regulations 2011 as amended by SI 2015/387
- The Education (School Teachers' Appraisal) (England) Regulations 2012
- The Children and Families Act 2014
- The Education (Independent School Standards) Regulations 2014
- The Children's Wellbeing and Schools Act 2026

4.0 Significant harm

4.1 There are no absolute criteria on which to rely when judging what constitutes significant harm. Consideration of the severity of ill-treatment may include the degree and the extent of physical harm, the duration and frequency of abuse and neglect, the extent of premeditation and the presence or degree of threat, coercion, sadism, and bizarre or unusual elements. Each of these elements has been associated with more severe effects on the child and/or relatively greater difficulty in helping the child overcome the adverse impact of the maltreatment. Sometimes, a single traumatic event may constitute significant harm (e.g. a violent assault, suffocation or poisoning). More often, significant harm is a compilation of significant events, both acute and longstanding, which interrupt, change or damage the child's physical and psychological development. Some children live in family and social circumstances where their health and development are neglected. For them, it is the corrosiveness of long-term emotional, physical or sexual abuse that causes impairment to the extent of constituting significant harm. In each case, it is necessary to consider any maltreatment alongside the family's strengths and support.

4.2 This policy outlines the action to be taken if it is suspected that a child may be being abused, harmed or neglected.

There are four categories of abuse:

- Physical Abuse
- Emotional Abuse

- Sexual Abuse
- Neglect

All staff should be aware that child sexual and child criminal exploitation are forms of child

abuse.

4.3 It is acknowledged that a child can be abused, harmed or neglected in a family, institution or community setting or online by someone known to them or, less commonly, by a stranger; this includes someone in a position of trust such as a school staff member or professionals in other services around the child.

4.4 All staff should also be 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. 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 staff are aware of how these children's experiences can impact on their mental health, behaviour and education.

4.5 Safeguarding and the promotion of a child's welfare covers all aspects of the child's life and each academy within ELAT is committed to ensuring that all its actions in respect of a child are compatible with this aim. If there are concerns about a child's welfare that do not meet the thresholds for significant harm, the academy will consider whether the Early/Family Help approach should be considered to support families. Early identification of concerns and the use of Early/ Family Help to develop a multi-agency plan for the child can reduce the risk of subsequent abuse.

5.0 Context

5.1 The content of this policy is applicable to all paid staff, supply staff, volunteers, trustees and LGC members.

5.2 All adults in ELAT's academies have a full and active part to play in protecting our children from harm.

5.3 All adults in ELAT's academies believe that our academies should provide a caring, positive, safe and stimulating environment which promotes the social, physical and moral development of the individual child.

5.4 The aims of this policy are:

- To support the child's development in ways that will foster security, confidence and independence.
- To raise the awareness of both teaching and support staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse.

5.5 Adopting child protection guidelines through procedures and a code of conduct for staff, supply staff and volunteers:

- To provide a systematic means of monitoring children known or thought to be at risk of harm.
- To support pupils who have suffered abuse in accordance with their agreed Child Protection Plan.
- To emphasise the need for good levels of appropriate communication between all members of staff, and with external agencies.
- By strictly following safer recruitment requirements, ensuring that all adults within our academies who have access to children have been checked as to their suitability.
- To set out a structured procedure within the school community in cases of suspected abuse.
- By sharing information about child protection and good practice with children, parents and carers, staff, supply staff and volunteers.
- To promote effective working relationships with other agencies, especially the Police, Social Care and Health. Sharing information about concerns with agencies who need to know, and involving parents and children appropriately.
- To ensure all staff are aware of the trust's code of conduct.
- To ensure all staff have signed the trust's acceptable use policy
- By providing effective management for staff and volunteers through support, supervision and training.

5.6 Equality

Some children's circumstances mean they are more vulnerable to abuse and/or less able to easily access services. These children often require a high degree or awareness and co-operation between professionals in different agencies, both in recognising and identifying their needs and in acting to meet those needs

6.0 Local academy safeguarding and child protection procedures

6.1 Our academy procedures for safeguarding children will be in line with the London Borough of Havering and Havering Local Safeguarding Partnership procedures; Edition 8 of the London Child Protection Procedures provides comprehensive guidance. The trust will ensure that in each academy:

- We have a Designated Safeguarding Lead (DSL) who has responsibility for Child Protection and who undertakes regular training for this role.
- We have at least two designated Safeguarding deputies who will act in the Designated Safeguarding Lead's absence.

  (Throughout this policy 'Designated Safeguarding Lead' refers to the DSL or any team members. All team members are able to act equally. They work as a team.).
- The Safeguarding and child protection team are:
  Local Designated Safeguarding Lead
  Local Child Protection Officer(s)
  The Designated Safeguarding Lead is a member of the Senior Leadership Team of his/her local academy.
- Those named above have received appropriate training. The Designated Safeguarding Lead and their deputies will attend all whole staff in school training and undertake additional formal training at least every two years. The Safeguarding Team will keep themselves up to date throughout the year. (for example, meetings with other DSL, via e-bulletins, keeping up to date with safeguarding developments).
- All academy staff will receive training at least every year, with ongoing updates through the year. Training will always include a reminder of in school referral processes. Topics may include:
  - Signs and symptoms of abuse
  - Prevent
  - Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)
  - Online Safety noting that safeguarding and online safety must be taught across the curriculum
  - Female Genital Mutilation (FGM)
- The Trust has a designated Trustee for Child Protection/Safeguarding and each Academy has a designated member of the Local Governance Committee responsible for Child Protection and Safeguarding. The designated Trustee is Mr Keith Stewart.

6.2 All staff will have access to and understand the process for logging a concern about a child.

See appendix for local policy recording systems

6.3 In the event that there are concerns about a child, the Designated Safeguarding Lead will access the London Borough of Havering MASH indicators of need and the London Child Protection Procedures 8th edition to inform their decision-making process with regard to the presenting of safeguarding concerns.

6.4 The Children Act 1989 introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interests of the children, and gives local authorities a duty to make enquiries to decide whether they should take action to safeguard or promote the welfare of a child who is suffering, or likely to suffer, significant harm.

6.4.1 <u>All members of staff</u> will develop their understanding of the signs and indicators of abuse and of their responsibility for referring any concerns.

6.4.2 <u>Induction for all new members of staff, trustees, LGC members, supply staff and volunteers</u> will include:

- safeguarding and child protection policy, which includes peer on peer abuse
- staff code of conduct and staff acceptable use policy
- behaviour policy , which includes measures to prevent bullying, including cyber bullying, prejudice based and discriminatory bullying.
- procedures for managing children who are absent/missing from education, particularly repeatedly and/or for prolonged periods.

6.4.3 All LGC members and trustees receive appropriate safeguarding and child protection (including online) training at induction equipping them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a robust whole school approach to safeguarding. The training is regularly updated.

6.4.4 All members of staff will read Keeping Children safe in Education 2026 part 1 and those working directly with children will read Annex A. Senior Leadership will support all staff in understanding this key document and implementing it in their practice.

6.4.5 All members of staff will be expected to know how to access edition 8 of the London Child Protection Procedures at http://www.londoncp.co.uk/.

6.4.6 All members of staff will know how to respond to a pupil who discloses abuse. It is vital that our actions do not abuse the child further or prejudice further enquiries, for example:

- Recognise that a child is likely to disclose to someone they trust: this could be anyone on the academy staff. It is important that the person receiving the disclosure recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child.
- Recognise that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so children may not be able to recall all details or timeline of abuse.
- Stay calm, listen to the child and if you are shocked by what is being said try not to show it.
- Do not promise confidentiality; you can however promise privacy, reassure the child they have done the right thing. Explain who you will have to tell and why.
- Reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.
- Keep in mind that certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.
- If a child is making a disclosure the pace should be dictated by the child. Listen carefully to the child, reflect back, use the child's language, be non-judgmental, be clear about boundaries and how the report will be progressed, do not ask leading questions and only prompt the child where necessary with open questions – where, when, what, etc. It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was.
- Accept what they are telling you; do not make judgements.
- Reassure the child that they have done the right thing in telling you. Do acknowledge how hard it was for them to tell you.
- Do not criticise the perpetrator; this may be someone they love.
- Tell them what you will do next and with whom the information will be shared.
- Pass this information on immediately to your Designated Safeguarding Lead.

6.5 All staff, in the absence of a member of the safeguarding team, may raise concerns directly with MASH (MASH includes Children's social care and Police)

6.6 After a child has disclosed abuse, the Designated Safeguarding Lead should take immediate action to contact MASH (MASH includes Children's Social Care and Police).

6.6.1 All staff must report all information **immediately**, on the same working day, to the Designated Safeguarding Lead.

6.6.2 The conduct of staff when in a 1:1 situation with a child should be managed in a way that would not lead any reasonable person to question their motives or intentions. All staff must ensure that their behaviour and actions do not place children or themselves at risk of harm or of allegations of harm to children. All staff must be aware of the Trust's 'Whistleblowing and Managing Allegations Policy' and how to access it.

6.6.3 All parents/carers will be made aware of the possibilities of staff members' actions with regard to child protection procedures.

6.6.4 All parents/carers, as part of the child induction process, will be made aware of the Safeguarding and Child Protection Policy, which is on the Trust and academy website.

6.7 **Human Rights Act 1998**

Under the HRA, it is unlawful for schools and colleges to act in a way that is incompatible with the Convention. The specific convention rights applying to schools and colleges are:

- Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)
- Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity
- Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination
- Protocol 1, Article 2: protects the right to education

6.8 Equality Act 2010

The trust's academies have obligations under the Equality Act 2010. We must not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics). The trust's academies and their Local Governing Committees will carefully consider how we are supporting our pupils with regard to the protected characteristics. We have a duty to make reasonable adjustments for disabled children and young people, including those with long term conditions.

6.9 Public Sector Equality Duty

The Public Sector Equality Duty (PSED) is found in the Equality Act. Compliance is a legal requirement for state-funded schools. The trust has a duty to eliminate unlawful discrimination, harassment and victimisation, to advance equality of opportunity and foster good relations between those who share a relevant protected characteristic and those who do not. Good record-keeping and monitoring of all forms of abuse and harassment is essential.

Some pupils may be more at risk of harm from specific issues such as sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination. The trust is conscious of disproportionate vulnerabilities and integrate this into our safeguarding policies and procedures.

6.10 Police involvement in concerns raised by an academy

ELAT academies understand their key role is to safeguard children and young people and that a proportionate response to addressing issues and concerns is essential. It is important to have good curiosity by staff and an alertness to potential indicators of risk. It is important that the academy maintains a focus on the safeguarding needs of the child, even when there are behaviour issues, or police involvement.

Where police involvement is considered following concerns about a child:

- We will be clear, when contacting the police directly rather than via the Multi-Agency Support Hub (MASH), what our reason is and what the desired outcome might be – we will identify the potential safeguarding factors underlying the reason for the referral and what role might the police take in safeguarding the child.

- If we contact the police about a named child's activities, we will also submit a Multi-Agency Referral Form (MARF).
- The academy will seek clarity about the actions Police intend to take. All practitioners need to be mindful of their duties to uphold the best interests of children.
- If we are unsure whether or not to contact the police about an individual child, we will frame our question to police in a hypothetical form without mentioning any names in the first instance.
  The police may give hypothetical advice for anonymous cases but as soon as the name of an individual is mentioned, police are duty bound to record the information and conduct an investigation.
- An Appropriate Adult - usually a parent, carer, close relative or social worker - should be present when any child is suspected of a criminal offence. It is their role to ensure the child is treated in a fair and just manner, not just as a chaperone but as 'an active participant'. In order to be effective, they need to be assertive and speak up. Very occasionally, a member of academy staff may need to fulfil this role if no one else is available.
- If police come into the academy with regard to a child that is suspected of a criminal offence, the law around the use of an Appropriate Adult will be explained to the child and to academy staff who may not be aware.
- The decision to have an appropriate adult will not rest on the child who may choose not to have an appropriate adult because they may not understand the situation or may be frightened, embarrassed or otherwise seeking privacy. The child will always have an Appropriate Adult.
- The child will be supported before, during and after a police visit where the child is interviewed.
- We are aware of racial profiling where the adult's view of the child is, albeit not consciously, based on their ethnicity or background. This includes 'adultification bias', where children from Black, Asian and other minority ethnic communities are perceived as being more 'streetwise', more 'grown up', less innocent and less vulnerable than other children. This particularly affects Black children, who might be viewed primarily as a threat rather than as a child who needs support.
- Academy record keeping will include all contact with safeguarding partners, parents/carers. It will also include discussions and outcomes of all actions; this will include the voice of the child.

We will review our Safeguarding and Child Protection Procedures at least annually and each academy will complete a London Borough of Havering section 175 audit. A copy of the audit will be sent to the School Safeguarding Lead in Havering and also shared with the Quality Assurance Inspector.

7 Additional safeguarding responsibilities

7.1 Keeping in touch with children including children not in school Contact details for parents and carers, and additional emergency contact numbers should be kept up to date. There is a recognition that there may be changes in details about family circumstances over this time. The academy will do everything possible to update contact and welfare information for children and their families.

If children are at home, first day calling will be in place and children working at home should have reporting routes for raising concerns, including worries about being online.

The academy will have regular contact arrangements with families and children when they are learning at home.

7.2 Reporting concerns about children (face to face or via phone, video or similar)

All staff, in school or working from home, must understand how to raise a concern. This should be reported immediately to the DSL / Team using existing school processes. Staff could (face to face or digitally)

- Talk to a DSL/Team member if they are in school
- If DSL/team are not in school go to the SLT member in school; additionally, contact the DSL or team member by phone, video or similar
- Use counselling / pastoral / Thrive / ELSA practitioners to support a disclosure in school if the DSL/team are not on site.

When children return to school disclosures can rise.

Staff should be aware that some risk areas are likely to have increased:

- Domestic violence and domestic abuse
- Child criminal exploitation
- Prevent
- Welfare concerns because of bereavement, poverty or job loss

7.3 Mental Heath

Mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

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 staff are aware of how these children's experiences, can impact on their mental health, behaviour, and education.

Whilst only appropriately trained professionals should attempt to make a diagnosis of a mental health problem, education staff 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.

Appropriate support for children's mental health and well-being may be delivered in school, or from specialist staff or multi agency support services.

7.4 **Learning online**

In the case of extended school closures, the school will continue to provide learning opportunities. This will be a blend of activities to undertake at home, online activities and live virtual opportunities. There will be protocols for participation, for school staff and for the children at home. School staff should be aware that if they observe anything or concern, or if a disclosure is made in a virtual environment, the usual procedures apply, and the concern will be taken straight to the DSL.

Links to school trust policies

- Behaviour policy
- Online safety policy (including filtering and monitoring)
- Online learning policy
- Teams Acceptable Use policy

Key information | Empower Learning Academy Trust | Havering | Inspiring Learners, Changing Lives (elatrust.co.uk)

7.5 **Children who are questioning their gender**

The school is aware of the need to take time to understand the thoughts and feelings of children who are questioning their gender and to maintain professional curiosity around the full range of the child's experiences. We also recognise the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs, for example relating to relationships with family, peers or their broader social environment, including discriminatory bullying.

Accommodating social transition is an active intervention requiring a very careful whole-school approach. The views of parents/carers should be properly considered except for in rare circumstances where this would constitute a greater risk than not involving them. The school will always consider how best to fulfil their statutory safeguarding duty ensuring that any agreed course of action takes account of the impact on all of those affected.

Detailed guidance on children who are questioning their gender is set out in Part two of Keeping Children Safe in Education 2026. The guidance outlines the need to balance the individual's wishes alongside obligations under the School Premises (England) Regulations 2012 and the Education (Independent School Standards) Regulations 2014, whereby schools must not allow pupils into toilets, changing rooms, or boarding or residential accommodation designated for the opposite sex. Similarly, where schools have implemented

single-sex sports as being necessary for safety reasons, pupils must not be allowed to participate in sports designated for the opposite biological sex.

7.6 Private fostering: A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and stepparents; it does not include great-aunts or uncles, great grandparents or cousins.

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

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

7.6.3 Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers, to inform the school. However, it should be clear to the school who has parental responsibility.
On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered
School staff should notify the DSL when they become aware of private fostering arrangements. The DSL will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The school itself has a duty to inform the local authority of the private fostering arrangements.

7.7 Young Carers: Staff will receive regular training to ensure awareness of the needs of young carers, recognising that caring responsibilities can impact on their attendance, attainment, behaviour and wellbeing. Referrals will be made in a timely fashion to ensure that Young Carers receive appropriate support.

7.8 Homestay / Exchange hosts: If children are staying with a family as part of an exchange, the parents and over 18s need to have an enhanced DBS check (as a volunteer). The school will also decide whether they will do an enhanced DBS check for 16 and 17 year olds who also live in the house

8 Types of abuse, neglect and other safeguarding concerns

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

These definitions are from 'Working Together' (2026) and 'Keeping Children Safe in Education' (2026):

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. 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 by another child or children; children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

8.1 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.

8.2 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 / online bullying), 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.

8.3 Sexual abuse: involves forcing, causing 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. Sexual abuse can take place online as well as offline, and technology can be used to facilitate offline. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Children can be sexually abused within the family, an institution or a community setting, and are more likely to know their abuser than not. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it. There are specific offences for children under 13, who can never provide valid consent to sexual activity and there are specific offences which make clear that sexual activity with a child under 16 is an offence, regardless of whether they agreed to that activity.

8.4 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**.

8.5 Extra-familial/multiple harms

Children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to), sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation. Technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

8.6 Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)

Both CCE and CSE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator.

The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears

consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

Children that are victims of exploitation and modern slavery will be referred for support via Children's Social Care and the National Referral Mechanism (NRM): Modern slavery: how to identify and support victims - GOV.UK

8.6.1 Child Criminal Exploitation (CCE)

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country, forced to shoplift or pickpocket, or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

8.6.2 **Child Sexual Exploitation (CSE**)

CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex;

CSE is a form of child sexual abuse. Sexual abuse 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 clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g., through others sharing videos or images of them on social media. Financially Motivated Sexual Extortion (Sextortion) (sextortion) is a serious form of blackmail that involves the exploitation of nude, explicit or sensitive images or videos to coerce victims into unwanted actions such as sharing further explicit imagery or paying to prevent further sharing.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

8.6.3 **County lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line". Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] 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 criminal activity in a number of locations including schools, colleges, pupil referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes, (both from home and school).

Staff must inform the Designated Safeguarding Lead if they have concerns about a child.

8.7 **Child Sexual Abuse Material (CSAM), including Technology-Assisted CSAM:** The making, taking, sending or sharing of indecent, sexually explicit images or videos of children (under the age of 18) is a criminal offence. CSAM may be shared via social networking sites and instant messaging apps and services and may include digitally manipulated and AI-generated nudes and semi-nudes.

Where a child shares a nude or semi-nude image as a result of grooming by a perpetrator, the police should be contacted immediately.

Behaviours linked to consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk. CSAM may have extremely damaging and long-lasting consequences for the victim.

Where incidents of consensual and non-consensual making and sharing of nude and semi-nude images are initiated by a child, this may be a demonstration of body confidence, body positivity, or maybe as part of an age-appropriate relationship. We have a responsibility to work with children, their parents and carers in ensuring that all pupils are fully aware of the risks, dangers and possible repercussions of sharing nude images and videos.

Incidents of consensual and non-consensual making and sharing of nude and semi-nude images can also be a form of child-on-child abuse.

8.8 Upskirting: typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim. Where this occurs between children, it should be treated as a form of child-on-child abuse/HSB.

8.9 Honour or faith-based abuse (HBA) - which includes FGM, Forced Marriage and Breast Ironing: encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of honour-based abuse are abuse (regardless of the motivation) and should be handled and escalated as such. Staff need to be alert to the possibility of a child being at risk of honour-based abuse, or already having suffered honour-based abuse. Staff must inform the DSL if they have concerns about a child.

8.10 Female Genital Mutilation (FGM): FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 4 and 10.

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon professionals (including teachers) to immediately report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. It will be rare for teachers to see visual evidence, and they should not be examining pupils.

Teachers must 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 should take the concern to the Designated Safeguarding Lead and together they would go to the Police. A MASH referral would also be made.

If there are concerns that a girl is at risk or there is a suspected case, the in-school procedures should be followed, taking the concern immediately to the Designated Safeguarding Lead.

8.11 Breast ironing: is where young pubescent girls' breasts are ironed, massaged and/or pounded down through the use of hard or heated objects in order for the breasts to disappear or delay the development of the breasts entirely. The custom uses large stones, a hammer or spatulas that have been heated over scorching coals to compress the breast tissue, or an elastic belt to press the breasts so as to prevent them from growing in girls as young as 9 years old. Much like Female Genital Mutilation (FGM), breast-ironing has been identified by the UN as one of five under-reported crimes relating to female-to-female/gender-based violence.

The practice is performed usually by mothers and female relatives and it is believed that by carrying out this act:

- young girls will be protected from harassment, rape, abduction
- it will prevent early pregnancy that would tarnish the family name

- it will allow the girl to pursue education rather than be forced into early marriage
- it will delay pregnancy by "removing" signs of puberty
- girls may not appear sexually attractive to men

Most at risk: Young pubescent girls usually aged between 9 – 15 years old. It is a well-kept secret between the young girl and her female relatives who are likely to carry out the practice.

8.12 Forced marriage: Forcing a person into a marriage is a crime in England and Wales. 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 communities use religion and culture as a way to coerce a person into marriage. Schools can play an important role in safeguarding children from forced marriage.

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.

8.13 Prevent, Radicalisation and Extremism: As part of the Counter Terrorism and Security Act 2015, schools have a duty to 'prevent people from becoming terrorists or supporting terrorism'. This is the 'Prevent Duty' (updated in 2023). Where staff are concerned that children and young people are developing extremist views or show signs of becoming radicalized, they should discuss this with the DSL.

Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs.

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Preventing radicalisation: Children are vulnerable to extremist ideology and radicalisation. There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media) and settings (such as the internet).

As with other safeguarding risks all staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation taking their concerns to the DSL.

School staff should receive training about the Prevent Duty and tackling extremism and the DSL is able to support staff with any concerns they may have.

We use the curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet.

We are committed to ensuring that our pupils are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the school's core values alongside the fundamental British Values, supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

8.14 Absent/Missing: A child going absent/missing from education, particularly repeatedly and/or for prolonged periods, is a potential indicator of abuse or neglect. Staff should follow the school's procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions.

All staff should be aware that children who are absent, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM or risk of forced marriage. Staff should be aware of the school unauthorised absence and children absent/missing from education procedures.

The school holds at least two contact numbers for every child. These will be used as part of the First Day Calling process.

8.15 **Children and the court system:** All staff should be aware that any child involved in legal proceedings should be made known to the DSL. Children are sometime required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. Where there is a family break up making child arrangements via the family courts following separation can be stressful and entrench conflict in families. KCSIE 2026 recommends the following guides to support young people: Young witness booklet for 5 to 11 year olds - GOV.UK (www.gov.uk) and Young witness booklet for 12 to 17 year olds - GOV.UK (www.gov.uk)

8.16 **Children with family members in prison:** Approximately 193,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. Staff must inform the DSL if they know a child has a family member in prison.

8.17 **Serious Violence**: All staff should be aware of the indicators, which may signal that children are at risk from, or are involved in serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in well-being 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.

The likelihood of involvement in serious violence may be increased by factors such as - being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

Staff should report any concerns about a child carrying or using a weapon (or expressing intent to do so) to the designated safeguarding lead (or a deputy), who will assess the risk and take appropriate action. Where relevant this will include any action needed to de-escalate peer conflict.

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

In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

The Domestic Abuse Act 2021 legally defines Domestic Abuse (DA) as follows:

Behaviour of person A (Perpetrator) towards person B (Victim) could be domestic abuse if:

- they are both aged 16 or over;
- are personally connected to each other; and
- the behaviour is abusive.

All 3 elements need to be present.

Behaviour is “abusive” if it consists of any of the following:

a) physical or sexual abuse;
b) violent or threatening behaviour;
c) controlling or coercive behaviour;
d) economic abuse;
e) psychological, emotional;
f) other abuse such as: Stalking and Harassment, Technology Facilitated Abuse, Abuse relating to faith / Spiritual Abuse, Honour Based Abuse, Forced Marriage, Female Genital Mutilation and Perpetrator Tactics.

It does not matter whether the behaviour consists of a single incident or a course of conduct.

Two people are ‘personally connected’ to each other if any of the following applies:-

- they are, or have been, married or been civil partners of each other;
- they have previously agreed to marry or have entered into a civil partnership agreement;
- they are, or have been, in an intimate personal relationship with each other;

- they have or there has previously been a time when they each have had, a parental relationship in relation to the same child
- they are relatives

Any reference in the Act to a victim of domestic abuse includes a reference to a child (under 18) who:

- sees or hears, or experiences the effect of, the abuse, and
- is related to A or B.

Staff must inform the DSL if they have concerns about a child.

Where a parent/carer or child discloses Domestic Abuse, a MARF should be submitted to children's social care to identify whether the concern requires further CYPS or EH intervention.

If the abuse identified carries a high-risk of harm to the victim and their children, a MARAC referral can be made in addition to a MARF. Where possible, consent should be sought from the victim when completing a MARAC in order that a DASH RIC can be completed. In the case of immediate high risk concerns, consent is not essential.

If there is uncertainty whether the case meets threshold or if advice is required, the MARAC inbox DomesticViolenceMARAC@havering.gov.uk should be contacted. The Havering IDVA (Independent Domestic Violence Advocate) team should also be contacted if a victim requires immediate crisis intervention: havering.IDVA@havering.gov.uk

MARACs (Multi Agency Risk Assessment Conference) take place regularly in Havering and schools can refer directly, including young people aged 16-17, whether they are survivors or perpetrators in abuse in personal relationships or towards their parents / carers.

MARAC referral form:
https://www.havering.gov.uk/info/20096/community/550/domestic_violence

Further Information:

https://safeguardinghavering.org.uk/adultsboard/home/residents/recognising-abuse-and-neglect/domestic-abuse/

https://safeguardinghavering.org.uk/adultsboard/wp-content/uploads/sites/3/2022/05/Final-DA_DV-MARAC-7-Minute-Briefing.pdf

8.18.1 Operation Encompass

Operation Encompass is an information-sharing scheme between the police and relevant education settings operating in all police forces across England and Wales. In November 2025, a new statutory duty was placed on the police to notify a child's education setting, and where relevant, local authorities, if they have reasonable grounds to believe a child has been present during a domestic abuse incident. The police are required to inform (via a secure email) the DSL before the child or children arrive at school the following day.

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. Operation Encompass allows '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.

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.

See local variations for our key Operation Encompass link

8.19 **Homelessness**: Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL has contact details and referral routes into Havering Housing so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. There should always be a MASH referral if a child has been harmed or is at risk of harm.

In most cases school staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it is also be recognised that in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the DSL will ensure appropriate referrals are made based on the child's circumstances.

Staff must inform the DSL if they have concerns about a child.

9 Possible signs and symptoms of abuse

The following signs may or may not be indicators that abuse has taken place, but the possibility should be considered. This is not an exclusive list and many of the signs and symptoms could fall into more than one category. Guidance on recognising signs and symptoms of abuse can be found in Working Together to Safeguard Children 2026. Also, students with learning difficulties often exhibit some of these signs (e.g. reluctance to get undressed for PE, constant tiredness) which are not necessarily signs of abuse but symptoms of their condition; however, it must also be remembered that disabled children are 3 times more likely to experience abuse or neglect than non-disabled peers.

Children with special educational needs and disabilities (SEND) can face additional safeguarding challenges. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- being more prone to peer group isolation than other children
- the potential for children with SEN and disabilities being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs
- communication barriers and difficulties in overcoming these barriers
- need for intimate care and likely dependence on adults

Children who are lesbian, gay, bisexual or questioning their gender (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. It is therefore vital that staff 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.

9.1 Physical abuse

- Unexplained injuries, bites, bruises or burns, particularly if they are recurrent
- Improbable excuses given to explain injuries
- Refusal to discuss the causes of injuries
- Untreated injuries
- Disclosure of punishment which appears excessive
- Withdrawal from physical contact/aggressive behaviour
- Arms & legs kept covered in hot weather (excluding for reasons of cultural dress)
- Fear of returning home
- Fear of medical help
- Self-destructive tendency
- Running away

9.2 Emotional abuse

- Physical, mental, emotional or developmental lag
- Domestic violence
- Disclosure of punishment which appears excessive
- Over-reaction to making mistakes or fear of punishment
- Continual self-deprecation
- Sudden speech disorders
- Fear of new situations
- Inappropriate responses to painful situations
- Neurotic behaviours
- Self-harm
- Fear of parents being contacted

- Extremes of passivity or aggression
- Drug or solvent abuse
- Running away
- Compulsive stealing, scavenging

9.3 Sexual abuse

- Sudden changes in behaviour
- Displays of affection which are inappropriate
- Alleged promiscuity or sexualised behaviour
- Fear of undressing
- Regression to younger behaviour
- Inappropriate internet use and possible 'grooming' concerns
- Genital itching or other genital/anal pain/injury
- Distrust of familiar adult
- Unexplained gifts of money, mobile phones etc.
- Depression and withdrawal
- Apparent secrecy about social activities or the identity of "special friends"
- Wetting or soiling, day and night
- Sleep disturbances or nightmares
- Chronic illness, especially throat infections and sexually transmitted disease

9.4 Neglect

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Poor state of clothing
- Frequent lateness or non-attendance at school
- Untreated medical problems or unmet special needs
- Low self-esteem
- Neurotic behaviour
- Poor social relationships
- Deterioration in school performance
- Running away
- Compulsive stealing or scavenging

9.5 Child Criminal Exploitation (CCE)

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional well-being
- Misusing drugs and alcohol
- Going missing for periods of time or regularly come home late
- Children who regularly miss school or education or do not take part in education

9.6 Child Sexual Exploitation (CSE)

- Going missing for periods of time or regularly coming home late
- Regularly absent from school or education or not taking part in education
- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Having older boyfriends or girlfriends
- Suffering from sexually transmitted infection
- Mood swings or changes in emotional wellbeing
- Drug and alcohol misuse
- Displaying inappropriate sexualised behaviour

Staff should also be aware that many children and young people who are victims of sexual exploitation do not recognise themselves as such.

9.7 Female Genital Mutilation (FGM)

The World Health Organisation identify girls between 4 and 10 as being the most at risk.
FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to

become a woman, or parents wish to take their daughter out-of-school to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM.

Indications that FGM may have already taken place may include:
- difficulty walking, sitting or standing and may even look uncomfortable
- spending longer than normal in the bathroom or toilet due to difficulties urinating
- spending long periods of time away from a classroom during the day with bladder or menstrual problems
- frequent urinary, menstrual or stomach problems
- prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return
- reluctance to undergo normal medical examinations
- confiding in a professional without being explicit about the problem due to embarrassment or fear
- talking about pain or discomfort between her legs

9.8 Radicalisation and Extremism:

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies outside school
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour and peer relationships

(but there are also very powerful narratives, programmes and networks that young people can come across online, so involvement with particular groups may not be apparent.)
- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality
- graffiti, art work or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views
- advocating violence towards others

10.0 Online Safety: The detail of online harm and abuse is in the Empower Learning Academy Trust online safety policy (including filtering and monitoring).
The online world develops and changes at great speed. New opportunities, challenges and risks are appearing all the time. The DSL supported by the DSL team and specific staff who have expertise in Online Safety will stay up to date with the latest devices, platforms, apps, trends and related threats.

The academy and the local governance committee keep children safe online when they are in school and when they are learning online at home. This includes ensuring children know how to recognise risk and ask for help. The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- **Content** - being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny/misandry, self-harm, suicide, anti-Semitism, radicalisation and extremism, misinformation, disinformation (including fake news) and conspiracy theories.
- **Contact** - being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **Conduct** - personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual making or sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- **Commerce** - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (https://apwg.org/).

DfE 'Teaching Online Safety in school' outlines how the curriculum will support children to learn about risk and responsibility.

Online safety concerns will be taken to the DSL in the same way as any other form of harm, or risk of harm.

The academy will help pupils stay safe online by helping them to recognise, through the curriculum and through support offered to them, that:

- Some online content tries to make people believe something false is true and/or mislead (misinformation and disinformation)
- Companies use techniques to persuade people to buy something
- Some games and social media companies use techniques to try to keep users online longer (persuasive/sticky design)
- There are grooming risks online, such as grooming into criminal activities.

The academy will help pupils recognise acceptable and unacceptable behaviours by:

- looking at why people behave differently online, for example how anonymity (you do not know me) and invisibility (you cannot see me) affect what people do,
- looking at how online emotions can be intensified resulting in mob mentality,
- teaching techniques (relevant on and offline) to defuse or calm arguments, for example a disagreement with friends, and disengage from unwanted contact or content online; and
- considering unacceptable online behaviours often passed off as so-called social norms or just banter. For example, negative language that can be used, and in some cases is often expected, as part of online gaming and the acceptance of misogynistic/misandrist, homophobic and racist language that should never be tolerated online or offline.

The academy will help pupils identify and manage risk by:

- discussing the ways in which someone may put themselves at risk online,
- discussing risks posed by another person's online behaviour,
- discussing when risk taking can be positive and negative
- discussing "online reputation" and the positive and negative aspects of an online digital footprint. This could include longer-term considerations, i.e how past online behaviours could impact on their future, when applying for a place at university or a job for example
- discussing the risks vs the benefits of sharing information online and how to make a judgement about when and how to share and who to share with; and
- asking questions such as what might happen if I post something online? Who will see it? Who might they send it to?

11.0 Child on child abuse (including harassment and violence):

Children can abuse other children. This may include physically, sexually or emotionally hurting others. All staff should recognise that children are capable of abusing their peers. This abuse may take place in school, out of school or online. There is a 'zero tolerance' approach to all forms of peer-on-peer abuse, it is never acceptable; staff have an important role in preventing it.

There is a clear recognition that even when there are no reported cases of peer on peer abuse, such abuse is likely to be taking place, and not reported. The trust's academies have a clear attitude of 'it could happen here', and when working in partnership with local schools this is revised to 'it does happen here'. The trust recognises that failing to understand the scale of harassment and abuse, or downplaying some behaviours would lead to an unsafe environment, and a culture that could normalise abuse, meaning that children would accept it as normal, and not report.

Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. This includes challenging physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

Each academy has a system in place, well promoted, accessible and understood for children to confidently report abuse, knowing their concerns will be treated seriously.

All staff should be aware of safeguarding issues from peer abuse including:

- bullying (including cyber bullying, prejudice based bullying and discriminatory bullying)
- abuse in intimate relationships (sometimes known as 'teenage relationship abuse')
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- 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
- consensual and non-consensual sharing of nudes and semi-nudes images and/or videos (also known as sexting or youth produced sexual imagery)
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

The trust recognises the different forms of child on child abuse, and is clear that abuse is abuse and should never be tolerated or passed off as "banter" or "part of growing up". Failure to do so can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it.

This abuse can:

- Be motivated by perceived differences e.g. on grounds of race, religion, gender, sexual orientation, disability or other differences
- Result in significant, long lasting and traumatic isolation, intimidation or violence to the victim; vulnerable adults are at particular risk of harm

Children or young people who harm others may have additional or complex needs e.g.:

- Significant disruption in their own lives
- Exposure to domestic abuse or witnessing or suffering abuse
- Educational under-achievement
- Involved in crime

Stopping harm and ensuring immediate safety is the first priority of any education setting. Academy staff, alongside their Designated Safeguarding Lead and/or Deputy, will make their own judgements about each specific case and should use this policy guidance to help.

It is important to be aware that the alleged perpetrator is likely to have considerable unmet needs as well as posing a significant risk of harm to other children. Evidence suggests that such children may have suffered considerable disruption in their lives, may have witnessed or been subjected to physical or sexual abuse, may have problems in their educational development and may have committed other offences. They may therefore be suffering, or be at risk of suffering, significant harm and be in need of protection. Any long-term plan to reduce the risk posed by the alleged perpetrator must address their needs.

Staff should also be aware of the added vulnerability of children and young people who have been the victims of violent crime (for example mugging), including the risk that they may respond to this by abusing younger or weaker children.

Types of child-on-child abuse (including harassment and violence) include:

11.1 Bullying (including cyberbullying, prejudice-based and discriminatory bullying)

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

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

Repetition: Bullying behaviours happen more than once or have the potential to happen more than once. Bullying includes actions such as making threats, spreading rumours, attacking someone physically or verbally or for a particular reason e.g., size, hair colour, gender, sexual orientation, and excluding someone from a group on purpose.

Online Bullying is the use of technology (social networking, messaging, text messages, e-mail, chat rooms etc.) to harass threaten or intimidate someone for the same reasons as stated above. Online bullying can take many forms

- Abusive or threatening texts, emails or messages
- Posting abusive comments on social media sites
- Sharing humiliating videos or photos of someone else
- Stealing someone's online identity
- Spreading rumours online
- Trolling – sending someone menacing or upsetting messages through social networks, chatrooms or games
- Developing hate sites about another person
- Prank calls or messages
- Group bullying or exclusion online
- Anonymous messaging
- Encouraging a young person to self-harm
- Pressuring children to send sexual messages or engaging in sexual conversations

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

11.2 **Discriminatory behaviour, including racism, faith-targeted abuse, and other prejudice-based incidents**

All staff should recognise that children may experience prejudice-based harm, including racism, faith-based prejudice, and other forms of discrimination. Such experiences may affect a child's welfare, wellbeing, mental health, and willingness to seek help. Staff should be alert to the signs and impact of prejudice-based harm and ensure that concerns are considered within safeguarding practice where appropriate.

11.3 Abuse in intimate personal relationships between children (sometimes known as teenage relationship abuse')

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

11.4 **Physical abuse and assault**

Physical abuse includes hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse). Staff should

also be alert to the potential for a child to commit serious physical assault and harm, or to threaten harm with a weapon.

11.5 **Sexual violence such as rape, assault by penetration and sexual assault**

This may include an online element which facilitates, threatens and/or encourages sexual violence.

Sexual offences under the Sexual Offences Act 2003

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: they intentionally touch another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (Sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent, or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)

Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: they intentionally cause another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents.

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if they agree by choice to that penetration and has the freedom and capacity to make that choice.

A child under the age of 13 can never consent to any sexual activity.

The age of consent is 16.

Sexual intercourse without consent is rape.

11.6 **Sexual harassment**

This is 'Unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school. It is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. It may be standalone or part of a broader pattern of abuse and can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
- sexual "jokes" or taunting
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes. Schools and colleges should be considering when any of this crosses a line into sexual violence – it is important to talk to and consider the experience of the victim.
- displaying pictures, photos or drawings of a sexual nature
- upskirting (see 8.8)
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
    - consensual and non-consensual making or sharing of nude and semi-nude images and/or videos.
    - sharing of unwanted explicit content
    - sexualised online bullying
    - unwanted sexual comments and messages, including, on social media
    - sexual exploitation; coercion and threats

- coercing others into sharing images of themselves or performing acts they're not comfortable with online.

Sexual harassment creates a culture that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

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. We use the term "**harmful sexual behaviour**" (HSB). HSB can occur online and/or face-to-face and can also occur simultaneously between the two.

The 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.

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.

11.7 **Initiation/hazing type violence and rituals**

This could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Hazing is a form of initiation ceremony which is used to induct newcomers into an organisation such as a private school, sports team etc. There are a number of different forms, from relatively mild rituals to severe and sometimes violent ceremonies. The ceremony welcomes newcomers by subjecting them to a series of trials which promote a bond between them. After the hazing is over, the newcomers also have something in common with older members of the organisation, because they all experienced it as part of a rite of passage. Many rituals involve humiliation, embarrassment, abuse, and harassment.

12.0 Recognising and responding to child-on-child abuse

12.1 Expected staff action

Staff should consider the seriousness of the case and make a quick decision whether to inform the DSL immediately before taking any further in-school actions.

Not recognising, acknowledging or understanding the scale of harassment and abuse and/or downplaying some behaviours related to abuse as it can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

It is important to deal with a situation of child-on-child abuse immediately and sensitively. It is necessary to gather the information as soon as possible to get the true facts. It is equally important to deal with it sensitively and think about the language used and the impact of that language on both the children and the parents when they become involved. Avoid language that may create a 'blame' culture and leave a child labelled.

Staff will talk to the children in a calm and consistent manner. Staff will not be prejudiced, judgmental, dismissive or irresponsible in dealing with such sensitive matters.

12.2 **Summary of key actions**

- Always take complaints seriously
- Gain a statement of facts from the pupil(s)
- Assess needs of victim and alleged perpetrator

The DSL will:

- consider referral to Police or Social Care
- Contribute to multi-agency assessments
- Convene a risk management meeting

- Record all incidents and all action taken

12.3 **Incident assessment**

An assessment of an incident between children should be completed and consider:

- Chronological and developmental ages of everyone involved
- Difference in their power or authority in relation to age, race, gender, physical, emotional or intellectual vulnerability. Is the alleged perpetrator significantly older, more mature, more confident or has well known social standing?
- All alleged physical and verbal aspects of the behaviour and incident
- Whether the behaviour involved inappropriate sexual knowledge or motivation
- What was the degree of physical aggression, intimidation, threatening behaviour or bribery
- The effect on the victim
- Any attempts to ensure the behaviour and incident is kept a secret
- The child or young person's motivation or reason for the behaviour, if they admit that it occurred
- Whether this was a one-off incident, or longer in duration

12.4 **Responding to sexual harassment and sexual violence**

This must always be referred immediately to the DSL.

The DSL will follow Part Five of Keeping Children Safe in Education 2026: Child-on-child sexual harassment and sexual violence, with consideration of:

13.0	Managing internally
14.0	Early Help
15.0	MASH referral
16.0	Reporting to the police. A MASH referral would always be made when there is a report to police.

Our school knows what local processes are in place and what support can be accessed when sexual violence or sexual harassment has occurred. Staff know that they can take any concerns to the DSL. The DSL knows what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment and is confident in accessing this support.

12.4.1 Recording sexualised behaviour

- Be clear, explicit and non-avoidant, and avoid vague statements or euphemisms
- Record as soon as possible, as you can quickly forget or confuse detail
- Follow the prompts on your safeguarding and child protection recording form
- Use proper names for body parts but record exactly any language or vocabulary used by the child. Use the child's exact words in quotation marks.
- Note where and when the incident happened and whether anyone else was around.

12.4.2 Gather the Facts

Speak to all the young people involved separately, gain a statement of facts from them and use consistent language and open questions for each account. Ask the young people to tell you what happened. Use open questions, 'where, when, who'. (What happened? Who observed the incident? What was seen? What was heard? Did anyone intervene?). Do not interrogate or ask leading questions.

12.4.3 Consider the Intent

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

12.4.4 Decide on your next course of action

If you believe any young person to be at risk of significant harm you must report to the DSL immediately; they will follow the school's Safeguarding and Child Protection Policy.

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

12.4.5 Informing parents/carers

The best way to inform parents/carers is face to face. Although this may be time consuming, the nature of the incident and the type of harm/abuse a young person may be suffering can cause fear and anxiety to parents/carers whether their child is the child who was harmed or who harmed another.

Is the pupil 13+ and does not want to share with parents? Use the 'Gillick' test and the 'Fraser' guidelines.

https://www.nspcc.org.uk/preventing-abuse/child-protection-system/legal-definition-child-rights-law/gillick-competency-fraser-guidelines/

In all circumstances where the risk of harm to the child is evident then the school should encourage the young person to share the information with their parent/carer (they may be scared to tell parents/carers that they are being harmed in any way).

12.5 Considering confidentiality and anonymity

12.5.1 Confidentiality

Staff taking a report should never promise confidentiality as it is very likely that it will be in the best interest of the victim to seek advice and guidance from others in order to provide support and engage appropriate agencies to support the children involved and/or be involved in any investigation.

The victim may ask the school not to tell anyone about the sexual violence or sexual harassment. If the victim does not give consent to share information, the DSL may still lawfully share it, if there is another legal basis under the UK GDPR that applies. The DSL will consider:

- parents or carers should normally be informed (unless this would put the victim at greater risk)
- if a child is at risk of harm, is in immediate danger, or has been harmed, a referral will be made to children's social care
- rape, assault by penetration and sexual assaults are crimes and where a report of a crime is made, this will be referred to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of referring to the police remains. The police will take a welfare, rather than a criminal justice approach, in these cases.

Ultimately, the DSL will balance the victim's wishes against their duty to protect the victim and other children.

If the DSL makes a referral to children's social care and/or a report to the police against the victim's wishes, this will be handled extremely carefully, the reasons will be explained to the victim and appropriate specialist support will be sought and offered.

12.5.2 Anonymity

Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, the school will be aware of anonymity, witness support, and will offer appropriate support. The school will do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment. The school will also consider the potential impact of social media in facilitating the spreading of rumours and exposing pupils' identities.

12.6 Points to consider

12.6.1 What is the age of the children involved?

How old are the young people involved in the incident and is there any age difference between those involved? In relation to sexual exploration, children under the age of 5, in particular 1-4

year olds who are learning toileting skills may show a particular interest in exploration at around this stage. This, however should not be overlooked.

12.6.2 Where did the incident or incidents take place?

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

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

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

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

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

12.6.5 Repetition

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

12.7 Next Steps

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

The academy will follow Part Five of Keeping Children Safe in Education 2026: Child-on-child sexual HSB, sexual harassment and sexual violence.

12.7.1 For the young person who has been harmed

Victims will be reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

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

Other interventions that could be considered may target a whole class or year group for example a speaker on online bullying, relationship abuse etc. It may be that through the continued curriculum of Relationship and Sex Education (from 2020), PSHE and SMSC that certain issues can be discussed and debated more frequently.

If the young person feels particularly vulnerable it may be that a risk assessment can be put in place for them whilst in school so that they have someone named that they can talk to, support strategies for managing future issues and identified services to offer additional support. Any support offered to the child, or safety arrangements made for the child, should also be shared with them in writing (by email, or school communication system).

It is important the victim feels in as much control of the process as is reasonably possible. Wherever possible the victim, if they wish, should be able to continue in their normal routine.

Overall, the priority should be to make the victim's daily experience as normal as possible, so that the school is a safe space for them

12.7.2 For the young person who has displayed harmful behaviour

It is important to find out why the young person has behaved in such a way. It may be that the young person is experiencing their own difficulties and may even have been harmed themselves in a similar way. In such cases support such as one to one mentoring or counselling may also be necessary.

Particular support from identified services may be necessary through an early help referral and the young person may require additional support from family members. Any support offered to the child, or safety arrangements made for the child, should also be shared with them in writing (by email, or school communication system).

Once the support required to meet the individual needs of the young person has been met, it is important that the young person receives a consequence for their behaviour (following the school behaviour policy). Disciplinary action can be taken whilst other investigations by the police and/or children's social care are ongoing. The designated safeguarding lead (or a deputy) should take a leading role. The academy should consider if, by taking any action, it would prejudice an investigation and/or any subsequent prosecution. (KCSIE 2026 para 544 and following).

In the cases of sexually harmful behaviour it may be a requirement for the young person to engage in one to one work with a particular service or agency (if a crime has been committed this may be through the police or youth offending service).

If there is any form of criminal investigation ongoing it is important that the DSL works closely with the police (and other agencies as required) to ensure the actions of the school do not jeopardise the police investigation.

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

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

12.7.3 After care

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

12.7.4 Review

The academy will monitor and review potential patterns of concerning, problematic or inappropriate behaviour. Where a pattern is identified, the academy will decide on a course of action. Consideration will be given as to whether there are wider cultural issues within the academy that enabled the inappropriate behaviour to occur. Where appropriate, extra teaching time and/or staff training will be delivered to minimise the risk of it happening again.

12.8 Unsubstantiated, unfounded, false or malicious reports

All concerns, discussions and decisions made, and the reasons for those decisions, are recorded in writing. Records must be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified, and addressed.

If a report is determined to be unsubstantiated, unfounded, false or malicious, the designated safeguarding lead will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care maybe appropriate.

If a report is shown to be deliberately invented or malicious, the academy will consider whether any disciplinary action is appropriate against the individual who made it (following the academy's behaviour policy).

12.9 Preventative Strategies

Peer on peer abuse can and will occur on any site even with the most robust policies and support processes. It is important to develop appropriate strategies to proactively prevent peer on peer abuse.

ELAT academies have an open environment where young people feel safe to share information about anything that is upsetting or worrying them. There is a strong and positive PSHE/SMSC curriculum that tackles such issues as prejudiced behaviour and gives children an open forum to talk things through rather than seek one on one opportunities to be harmful to one another. The academies make sure that 'support and report' signposting is available to young people.

Staff will not dismiss issues as 'banter' or 'growing up' or compare them to their own experiences of childhood. Staff will consider each issue and each individual in their own right before taking action.

Young people are part of changing their circumstances and, through school council and pupil voice for example, we encourage young people to support changes and develop 'rules of acceptable behaviour'. We involve pupils in the positive ethos in school; one where all young people understand the boundaries of behaviour before it becomes abusive.

13.0 Handling an incident of consensual and non-consensual making or sharing of nudes and semi nudes:

UK Council for Internet Safety (UKCIS) "Sharing nudes and semi-nudes" (2020) will always be used to triage concerns.

It is important that academy actions do not blame, shame or criminalise the child.

There should always be an initial review meeting, led by the DSL. This should consider the initial evidence and aim to establish:

- Whether there is an immediate risk to a young person or young people
  When assessing the risks the following should be considered:

  Why was the imagery shared?
  Was the young person coerced or put under pressure to produce the imagery?
  Who has shared the imagery?
  Where has the imagery been shared?
  Are there any adults involved in the sharing of imagery?
  Does the child involved have additional vulnerabilities?
  Does the young person understand consent?
  Has the young person taken part in this kind of activity before?

- If a referral should be made to the police and/or children's social care.
  Do not refer automatically, unless there are additional concerns about the pressure applied on the child to take/share the image, or unless there are sexual aspects involved which are not in line with the child's age/stage.
  A MASH referral would always be made when there is a report to police.
- Imagery should not be viewed, DSL only - only view if it is essential to keep the child safe.
- What further information is required to decide on the best response
- Whether the imagery has been shared widely and via what services and/or platforms. This may be unknown.
- Whether immediate action should be taken to delete or remove images from devices or online services.
- Any relevant facts about the young person involved which would influence risk assessment

- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved - in most cases parents/carers should be involved

An immediate referral to police and/or children's social care should be made if at this initial stage. (A MASH referral would always be made when there is a report to police).:

1. The incident involves an adult
2. There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
3. What you know about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
4. The imagery involves sexual acts and any pupil in the imagery is under 13
5. You have reason to believe a pupil is at immediate risk of harm owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming).

If none of the above apply then the academy may decide not to involve police or children's social care (the academy can choose to escalate the incident at any time if further information/concerns come to light).

The decision to respond to the incident without involving the police or children's social care would be made in cases when the DSL is confident that they have enough information to assess the risks to pupils involved and the risks can be managed within the academy's pastoral support and disciplinary framework and if appropriate local network of support.

Image taking and sharing includes **Upskirting:** where someone takes a picture under a person's clothing (not necessarily a skirt) without permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

14.0 The role of the Designated Safeguarding Lead and team members is to:

14.1 Obtain information from staff, supply staff, volunteers, children or parents and carers who have child protection concerns and to record this information.

14.2 DSL and team members will be supported by nurture and pastoral staff, such as ELSA, Thrive, counsellor etc.

14.3 Assess the information quickly and carefully and ask for further information as appropriate.

14.4 They should also consult with Havering services in the first instance (e.g. MASH including Early Help, LADO)

14.5 The Designated Safeguarding Lead should make a referral to the MASH (social care / police) or the police without delay if it is agreed during the consultation or if there is an immediate risk to the child.
A MASH referral would always be made when there is a report to police.

14.6 The referral should be made to the MASH team in which the child lives, e.g. if a child lives in another borough, the referral needs to be made to the MASH team in that borough / authority.

14.7 A telephone referral should be made and confirmed in writing using MARF online on the same working day if requested. The MASH team should acknowledge the referral within one working day and should be contacted if no acknowledgement has been received within 3 working days.

14.8 Following referral, the MASH team should consider the next course of action, record their decision in writing and notify the Designated Safeguarding Lead that they have made a decision.

14.9 Liaise with the senior mental health lead, and where available, the mental health support team, where safeguarding concerns are linked to mental health.

14.10 Concerns will not be discussed with anyone other than those nominated above.

14.11 It is the right of any individual to make direct referrals to the child protection agencies. If for any reason you believe that the Designated Safeguarding Lead has not responded appropriately to your concerns, it is then your responsibility to contact the MASH and the LADO immediately.

14.12 Responsibilities

The Designated Safeguarding Lead and team in each academy are responsible for:

14.12.1 Adhering to the Havering LSP (Local Safeguarding Partnership), London Borough of Havering and Empower Learning Academy Trust procedures with regard to referring a child if there are concerns about possible abuse.

14.12.2 Keeping full written chronological records of in-school concerns about a child even if there is no need to make an immediate referral.

14.12.3 Ensuring that all such records are kept confidentially and securely and are separate from pupil records.

14.12.4 Ensuring that an indication of further record-keeping is marked on the pupil records.

14.12.5 Checking the attendance of children subject to a Child Protection Plan on a daily basis.

14.12.6 Ensuring that any child currently who is subject to a Child Protection Plan who is absent without explanation is referred to MASH (Social Care).

14.12.7 Taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact these issues might be having on children's attendance, engagement and achievement at school.

14.12.8 Ensuring that where any child currently who is subject to a Child Protection Plan leaves, their information is transferred securely to the new school immediately (within 5 days of the child starting the new school) and that the child's social worker is informed. A digital copy of the child's information will be securely retained / archived by the Academy.

14.12.9 The academy's Local Governance Committee should ensure the DSL has the appropriate status and authority to carry out the duties of the post. The role carries a significant level of responsibility and the postholder should be given the additional time, funding, training, resources, and support needed to carry out the role effectively.

14.12.10 Continuity of cover is ensured, and robustly communicated, in the event of the DSL being unavailable due to illness, leave or other circumstances so that safeguarding concerns continue to be received, monitored and acted upon without delay.

15.0 Supporting children

15.1 All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or feel threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child.

15.2 We recognise that a child who is abused or witnesses violence and/or abuse may find it difficult to develop and maintain a sense of self-worth. We recognise that a child in these circumstances may feel helpless and humiliated. We recognise that a child may feel self-blame.

15.3 We recognise that the academy may provide the only stable, secure and predictable element in the lives of children who have been abused or who are at risk of harm.

15.4 We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.

15.5 Empower Learning Academy Trust will support all children through:

- The curriculum
- The school ethos
- Encouraging self-esteem and self-assertiveness whilst not condoning aggression or bullying.
- Promoting a caring, safe and positive environment within the academy, giving children a sense of being valued.
- Ensuring children know there are adults in the academy whom they can approach if they are worried.

- Liaising and working together with all other support services and those agencies involved in the safeguarding of children.
- Notifying MASH (Social Care) as soon as there is a significant concern.
- Providing continuing support to a child about whom there have been concerns who leaves the academy by ensuring that appropriate information is forwarded under confidential cover to the child's new school.

16 Supporting staff

We recognise that staff working in Empower Learning Academy Trust who have become involved with a child who has suffered harm, or appears to be likely to suffer harm may find the situation stressful and upsetting.

We will support such staff by providing an opportunity to discuss the situation with the Designated Safeguarding Lead and to seek further support as appropriate.

17 Safer Recruitment and allegations

17.1 Empower Learning Academy Trust ensures we practise Safe Recruitment by undertaking 3 yearly enhanced DBS checks of staff and volunteers who work with children. Recruitment adverts will highlight the priority that the trust places on this and the trust's commitment to safeguarding. References and medical checks will be made on all new staff, and all staff will have references on file.

The trust will follow the guidance set out in

- Keeping Children Safe in Education 2026
- Local Safeguarding Partnership procedures
- Procedures 8th edition.

Allegations against staff including supply teachers, trainee teachers, volunteers and contractors

17.2 At Empower Learning Academy Trust we recognise the possibility that adults working in the trust may harm children. Any concerns about the conduct of adults in a trust academy should be taken to the Headteacher without delay or where that is not possible, to the Local Authority Designated Officer (LADO); any concerns about the Headteacher should go to the CEO, Chair of the Local Governance Committee (LGC) and the LADO.

17.2.1 We understand that a child or third party may make an allegation against a member of staff.

17.2.2 We understand that an allegation is wider than just those where it is considered that there is reasonable cause to believe that a child has suffered or is at risk of suffering significant harm. Some allegations may indicate that a staff member is unsuitable to work with children.

17.2.3 We will be guided by Working Together 2026 which defines an allegation as when an adult has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates that they are unsuitable to work with children.

17.2.4 If such an allegation is made, the member of staff receiving the allegation, or having the concern, will immediately inform the Headteacher; this must be done on the same working day.

17.2.5 The Headteacher on all such occasions will discuss immediately, on the same working day, the content of the allegation with LADO, before taking any further action.

17.2.6 If the allegation made to a member of staff concerns the Headteacher, the member of staff will immediately inform the Chair of the LGC who will consult with the LADO; this must be done on the same working day. If the Chair of the LGC is not available, the member of staff must make direct contact with the LADO.

17.2.7 The academy will not internally investigate until instructed by the LADO.

The academy will follow the London procedures for managing allegations against staff (paid, agency or voluntary), a copy of which will be readily available in the academy. These are also contained in the London Child Protection Procedures 7th edition.

17.3 **Whistleblowing**

All staff must be aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues.

Further information is available in the trust's Whistleblowing and Managing Allegations Policy.

18.0 Safeguarding and the school culture

Our governing body facilitate a whole school approach to safeguarding which means that everyone is involved in ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.

18.1 Restrictive interventions

Our policy on restrictive interventions by staff acknowledges that staff must only ever use restrictive intervention as a last resort, and that at all times it must be the minimal necessary to prevent injury to another person. Any incident of restrictive interventions will be communicated directly to parents on the same day. Our school recognises that this does not mean adopting a 'no contact' policy and that appropriate physical contact, positive handling, may be required to fully support and protect pupils.

The school will, where appropriate, create individual plans to minimise the likelihood of challenging behaviour, and when it occurs there will be less use of physical restraint and other restrictive methods

We understand that physical intervention of a nature which causes injury or distress to a child may be considered under child protection or disciplinary procedures. Staff need to be aware that if a child sustains an injury as a result of physical intervention, Safeguarding and Child Protection and Whistleblowing processes must be followed, including referral to the LADO.

18.2 Bullying

Our policy on bullying, and online bullying, is set out in a separate policy and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures.

18.3 Incidents motivated by perceived differences

Bullying and abuse can be motivated by perceived differences e.g., on the grounds of race, religion, gender, sexual orientation, disability or other difference. We acknowledge that repeated incidents or a single serious incident may lead to consideration under child protection procedures.

We promote an inclusive, anti-discriminatory culture where racism, and other forms of discriminatory behaviour are recognised, challenged and addressed as part of our safeguarding responsibilities.

18.4 Reasonable force

Our policy on reasonable force by staff is set out in a separate policy and acknowledges that staff must only ever use reasonable force as a last resort, and that at all times it must be the minimal force necessary to prevent injury to another person.

The academy will, where appropriate, create individual plans to minimise the likelihood of challenging behaviour, and when it occurs there will be less use of physical restraint and other restrictive methods

We understand that physical intervention of a nature which causes injury or distress to a child may be considered under child protection or disciplinary procedures. Staff need to be aware that if a child sustains an injury as a result of physical intervention Safeguarding and Child Protection processes must be followed.

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Our policy on bullying, and online bullying, is set out in a separate policy and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures.

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18.7 Health & Safety

Covid-19 Risk Assessment is in place, available to all staff and updated when needed.

Our Health & Safety policy, set out in a separate document, reflects the consideration the trust gives to the protection of our children both within the school environment and when away from school when undertaking school trips and visits.

18.8 Prevention

We recognise that our academies play a significant part in the prevention of harm to our children by providing children with good lines of communication with trusted adults, supportive friends and an ethos of protection.

Each academy community will therefore:

- Establish and maintain an ethos where children feel secure and are encouraged to talk and are always listened to.
- Ensure that all children know there is an adult in the academy whom they can approach if they are worried or in difficulty.

18.9 Other relevant trust policies and guidance

- Whistleblowing and Managing Allegations Policy
- Reasonable Force Policy
- Behaviour Policy, including online behaviour
- Anti-Bullying Policy, including online bullying
- Racial Incidents Policy, including online incidents
- Health & Safety Policy
- Online Safety Policy (including filtering and monitoring)
- First Day Calling Policy
- Equalities Policy

18.10 Support and training

We are committed to the provision of safeguarding training for all school staff supply staff, paid and voluntary, including agency staff, and we recognise that staff must be regularly updated. Safeguarding and Child Protection is always part of our start of year professional development and induction every September.

In addition to the annual basic safeguarding training, the Designated Safeguarding Lead and Team undertake training in inter-agency working at least bi-annually to keep their knowledge and skill up to date throughout the year.

All other staff undertake appropriate training to equip them to carry out their responsibilities for child protection effectively, which is kept up to date by annual refresher training – this training cycles round a range of key topics. This will be additionally supported every year with training and updates provided by the Designated Safeguarding Lead through staff meetings, training days, written updates and briefings.

All Staff will be required to sign annually that they have read Part One of 'Keeping Children Safe in Education' (2026).

19 Managing Family Help and Child Protection Cases

19.1 Children potentially at greater risk of harm (Family Help including targeted early help/Child in Need and Child Protection)

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

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

19.2 **Management of children subject to Child Protection investigation or subject to a Child Protection Plan**

The Designated Safeguarding Lead and team will contribute to the child protection investigation and attend or contribute to the Strategy meetings.

The Designated Safeguarding Lead or deputy will attend the Initial Child Protection Conference to share any relevant information and provide a written report for the conference.

If the child is placed on the Child Protection Plan, the Designated Safeguarding Lead or deputy is responsible for ensuring that the academy participates appropriately in the Child Protection Plan and attends all Core Group Meetings and Child Protection Conferences.

Information will be shared with staff on a "need to know" basis but key personnel working with child should have sufficient information to support them in their work with that child.

If a child with a Child Protection Plan has an unexplained absence from school, the Designated Safeguarding Lead will inform the Social Worker.

20.0 Record keeping

20.1 DfE guidance says that that all concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely, accessible only by appropriate senior staff members. It is good practice to keep concerns and referrals in a separate child protection file for each child. Current/live cases are exempt from examination by parents or children unless subject to a court order. Subject Access Requests may be made for records of historic, closed issues.

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

20.2 Havering Local Safeguarding Children's Partnership promotes high quality record keeping in respect of all concerns about children's welfare. The records should be completed in a timely manner and include all relevant information such as dates, times, others involved, witnesses etc. All records should be signed and dated. The child's confidential record should include a front sheet chronology of concerns to support the understanding of the impact of past concerns, patterns and escalation of concerns.

20.3 If a child transfers to another school or other educational establishment, the Designated Safeguarding Lead must forward securely, within 5 days of the child starting the new school the child protection file to a named person at the receiving school/establishment under a separate cover from the academic records. The file should be marked 'confidential, to be opened by addressee only.'

20.4 The DSL should retain a digital copy of the child protection file, which should be stored in a secure area accessible only by appropriate senior staff members. Child Protection records about a student who has ceased to become of compulsory school age should be archived and catalogued. Pupil records must be kept until a child reaches 25 years of age or 75 years of age in the case of child sexual abuse; if the child has SEND or is in care, child protection records must be kept for 35 years after the child leaves the school or in perpetuity.

20.5 When making a referral, the referrer should keep a written record of:

- Discussions with child
- Discussions with parent/s
- Discussions with staff
- Information provided to the MASH
- Advice given and decisions taken (clearly times, dated and signed)

20.6 The referrer should confirm verbal and telephone referrals in writing within 48 hours, using the inter-agency referral form.

20.7 Empower Learning Academy Trust will ensure that we keep up-to-date personal data records of all the children by regularly reminding parents to inform us of any change in family circumstances and requesting an annual update.

21.0 Confidentiality and information sharing

21.1 We recognise that all matters relating to child protection are confidential.

21.2 The Headteacher or Designated Safeguarding Lead will disclose personal information about a student to other members of staff on a need to know basis only.

21.3 However, all staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.

21.4 When considering sharing information the DSL and staff will:

21.4.1 Remember that GDPR is not a barrier to sharing information, it provides the framework

21.4.2 Be open and honest with the person from the outset about how information may be shared

21.4.3 Seek advice; do not fail to share information because you are unsure what to do

21.4.4 Share with consent where appropriate and respect the wishes of those who refuse consent unless you believe that there is a risk of harm to child if the information is not shared

21.4.5 Consider safety and well-being of the child and base information sharing decisions on this

21.4.6 Ensure all information shared is Necessary, Proportionate, Relevant, Accurate, Timely ad Secure. Ensure any third party or hearsay information is identified and that you have consent to share it

21.4.7 Keep a record of your decision and reasons for it. Record what you have shared, with whom and the purpose.

21.4.8 When a child transfers to another school, the DSL should consider if it would be appropriate to share any additional information in advance of them leaving particularly where the information would support an assessment of risk to others in the school as well as the individual pupil to help them put in place the right support to safeguard this child and to help the child thrive in the school or college.

22.0 Supervisory arrangements for the management of children in Alternative Provision and in out of school hours' activities.

22.1 We will aim to protect children from abuse and team members from false allegations by adopting the following guidelines:

22.2 All alternative provision, clubs and child minders must have appropriate Ofsted registration or London Borough of Havering AP Quality Assurance.

22.3 All alternative provision and clubs independent of the trust must have their own child protection policy and procedure in line with the trust's

22.4 All alternative provision and clubs will keep a register of all children attending the activities and give a copy to the host academy.
Alternative provision registers will be taken promptly and uploaded such that they are visible to the academy on the same day/in the same session. All absences without explanation will be notified to the academy immediately.

22.5 All alternative provision and clubs will keep a register of all team members (both paid staff members, supply staff and volunteers) and ensure they meet the requirements of the DBS.

22.6 Registers will include arrival and departure times.

22.7 All alternative provision and clubs will keep a record of all sessions including monitoring and evaluation records.

22.8 The team members will record any unusual events on an accident/incident form.
All safeguarding concerns will be communicated immediately to the academy DSL.

22.9 Written consent from a parent or guardian will be obtained for every child attending the alternative provision / activities.

22.10 Team members should not be alone with a child, although we recognise that there may be times when this may be necessary or helpful; in such circumstances another adult should be told.

22.11 Team members may escort children of the same sex to the toilet but are not expected to be involved with toileting, unless the child has a special need that has been brought to our attention by the parent/guardian and a care plan is in place for the child naming them as part of the care plan.

22.12 All team members should treat all children with dignity and respect in both attitude, language and actions.

22.13 All team members should treat all children with dignity and respect in both attitude, language and actions.

The cohort of pupils in Alternative Provision often have complex needs, it is important that governing bodies and proprietors of these settings are aware of the additional risk of harm that their pupils may be vulnerable to and that they adhere to the following measures:

22.14 Schools should obtain written information from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at their establishment (i.e. those checks that schools would otherwise perform on their own staff). This includes written confirmation from the Alternative Provision that they will inform the school of any arrangements that may put the child at risk (e.g. staff changes), so that the school are ensured that appropriate safeguarding checks have been carried out on new staff working in AP settings.

22.15 Schools should always know where a child is based during school hours. This includes having records of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend. They should regularly review the Alternative Provision placements they make. Reviews should be frequent enough (at least half termly) to provide assurance that the child is regularly attending and the placement continues to be safe and meets the child's needs. Where safeguarding concerns arise, the placement should be immediately reviewed, and terminated, if necessary, unless or until those concerns have been satisfactorily addressed.

23.0 Key contacts

Havering and local area

23.1 MASH Team

01708 433222 (day)
01708 433999 (night)
tmash@havering.gov.uk (enquiries)

Referral to Children/Young Person Services (havering.gov.uk)

23.2 LADO

Lisa Kennedy
lado@havering.gov.uk
01708 431653

23.3 HES Safeguarding team

Carol Rockey carol.rockey@havering.gov.uk 01708 431651
Michelle Wain michelle.wain@havering.gov.uk 01708 431650

23.4 Online Safety (including filtering and monitoring)

Amanda Jackson - amanda.jackson@havering.gov.uk
Andy Place - andy.place@havering.gov.uk

23.5 Havering CAD team

Social Care: CAD Duty - CADDuty@havering.gov.uk
Education: SEN - Sen@havering.gov.uk

23.6 Havering Virtual School

vsht@havering.gov.uk

23.7 LBH Prevent and Hate Crime Coordinator

Emily Knight
01708 433082
emily.knight@havering.gov.uk & prevent@havering.gov.uk

23.8 SO15 Counter Terrorism Command

SO15Mailbox-.LocalOpsNorthEastTeam2@met.pnn.police.uk

23.9 LBH Child Exploitation & Missing Education

Danielle Hemming
danielle.hemming@havering.gov.uk

CME Children Missing Education
cme@havering.gov.uk 01708 431777

23.10 LBH & East London Gangs & Serious Youth Violence

Integrated Gangs Unit
GangsUnit@met.police.uk

0203 276 0523

23.11 Operation Encompass

Lee Major and Dianne Cazan
East Area BCU - Safeguarding
MASH Team, Mercury House
0203 276 2800
Bekir.Bekir@met.police.uk
https://www.operationencompass.org/

23.12 LBH Alternative Provision & Elective Home Education

AP@havering.gov.uk

Inclusions@havering.gov.uk

EHE@havering.gov.uk

23.13 Barnado's Tiger Services

Aalto Peltoniemi – to request HSB consultations and book training

Aalto.pelttoniemi@barnados.org.uk

Beyond Havering

23.14 NSPCC whistleblowing helpline

0800 028 0285 and help@nspcc.org.uk
Whistleblowing advice: https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/whistleblowing-advice-line/

General helpline: www.nspcc.org.uk/Helpline

23.15 UK Safer Internet Centre

POSH Professionals Online Safety Helpline for schools
0344 381 4772
https://www.saferinternet.org.uk/professionals-online-safety-helpline

24.0 Where to go for further information:

Havering and local area

24.1 Havering Local Safeguarding Partnership
https://safeguardinghavering.org.uk/childrenpartnership/

24.2 Havering: MARF

Referral to Children/Young Person Services (havering.gov.uk)

24.3 Havering: CSE toolkit – Contact Danielle Hemming, LBH Child Exploitation & Missing Lead, for details:
danielle.hemming@havering.gov.uk

24.4 London Child Protection Procedures
http://www.londoncp.co.uk/

24.5 London Safeguarding Children Procedures: Missing protocol
https://www.londonsafeguardingchildrenprocedures.co.uk/ch_miss_care_home_sch.html

National guidance

24.6 Central depository of Government guidance:

www.gov.uk/topic/schools-colleges-childrens-services/safeguarding-children

Covering:

- Preventing neglect, abuse and exploitation
- Keeping children safe in education and other settings
- Online safety
- Safeguarding disabled children
- Runaway and homeless children
- Cross border child protection

24.7 Meeting digital and technology standards in schools and colleges (includes filtering & monitoring and cyber security standards)
https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges

24.8 Plan technology for your school - a service to help schools plan to use digital technology to keep children safe online, prevent cyber incidents and upgrade and maintain technology in cost-effective ways. Schools can complete self-assessments to get recommendations to help meet the digital and technology standards.

24.9 DfE: Behaviour and discipline in schools
https://www.gov.uk/government/publications/behaviour-and-discipline-in-schools

24.10 DfE: Cyberbullying: Advice for head teachers and school staff
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/374850/Cyberbullying_Advice_for_Headteachers_and_School_Staff_121114.pdf

24.11 DfE: Mental health and behaviour in schools
https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2

24.12 DfE: Preventing Bullying (includes cyber bullying advice)
https://www.gov.uk/government/publications/preventing-and-tackling-bullying

24.13 DfE: Relationship Education and Relationship and Sex Education
https://www.gov.uk/government/publications/relationships-education-relationships-and-sex-education-rse-and-health-education

24.14 DfE: Safeguarding and remote education
https://www.gov.uk/guidance/safeguarding-and-remote-education-during-coronavirus-covid-19

24.15 DfE: Safeguarding practitioners: information sharing advice
https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice

24.16 DfE: Searching, screening and confiscation at school
https://www.gov.uk/government/publications/searching-screening-and-confiscation

24.17 DfE: Statutory guidance School exclusion
https://www.gov.uk/government/publications/school-exclusion

24.18 Home Office: Criminal exploitation of children and vulnerable adults: county lines
https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines

24.19 Home Office: Preventing youth violence and gang involvement
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/418131/Preventing_youth_violence_and_gang_involvement_v3_March2015.pdf

Ofsted: Handbooks and Frameworks https://www.gov.uk/government/collections/ofsted-handbooks-and-frameworks

24.20 Ofsted: Positive environments where children can flourish
https://www.gov.uk/government/publications/positive-environments-where-children-can-flourish

24.21 Ofsted: Safeguarding concerns, a guide for inspectors
https://www.gov.uk/government/publications/ofsted-safeguarding-policy/safeguarding-concerns-guidance-for-inspectors

24.22 Prevent duty guidance: England and Wales (2023)
https://www.gov.uk/government/publications/prevent-duty-guidance

24.23 The Prevent duty: safeguarding learners vulnerable to radicalisation
The Prevent duty: safeguarding learners vulnerable to radicalisation - GOV.UK (www.gov.uk)

24.24 Working together to improve school attendance - statutory guidance
Working together to improve school attendance - GOV.UK

24.25 Alternative Provision - statutory guidance
Alternative Provision - GOV.UK

24.26 Education for children with health needs who cannot attend school
Education for children with health needs who cannot attend school - GOV.UK

Other key agencies

24.27 UKCIS: Education for a connected world 2020
https://www.gov.uk/government/publications/education-for-a-connected-world

24.28 UKCIS using external expertise guidance, September 2022
Using External Expertise to Enhance Online Safety Education (publishing.service.gov.uk)

24.29 UKCIS: Tackling race and faith targeted bullying face to face and online, May 2017
https://www.gov.uk/government/publications/tackling-race-and-faith-targeted-bullying-face-to-face-and-online-a-guide-for-schools

24.30 LGfL: online safety policies (including filtering and monitoring) and Acceptable Use Policies https://www.lgfl.net/online-safety/resource-centre?s=24

24.31 Childnet cyberbullying guidance https://www.childnet.com/resources/cyberbullying-guidance-for-schools/

24.32 NPCC: When to call the police https://www.npcc.police.uk/documents/Children%20and%20Young%20people/When%20to%20call%20police%20guidance%20for%20schools%20and%20colleges.pdf

24.33 NSPCC: Undertaking remote teaching and learning safely https://learning.nspcc.org.uk/news/2020/march/undertaking-remote-teaching-safely/

24.34 Sexualised Behaviour Guidance NSPCC: https://learning.nspcc.org.uk/media/2685/responding-to-children-who-display-sexualised-behaviour-guide.pdf

24.35 Brook (link to training to use traffic light tool): https://www.brook.org.uk/education/sexual-behaviours-traffic-light-tool/

Local Variations:

Hall Mead School

Procedures (Ref. page 8, item 6):

- There is a Designated Safeguarding Lead who has responsibility for Child Protection and who undertakes regular training for this role.
- There are two designated Safeguarding Deputies who will act in the Designated Safeguarding Lead's absence.

The Safeguarding and Child Protection team are:

- Nicola Afteni, Deputy Headteacher – Designated Safeguarding Lead. Operation Encompass Lead Teacher, Filtering and Monitoring Lead teacher
- Kirsty Fanning, Deputy Headteacher – Designated Safeguarding Lead.
- Gordon Bamber, Deputy Headteacher – Designated Safeguarding Lead.
- The Safeguarding Lead is a member of the Senior Leadership Team of Hall Mead School.
- Those named above have received appropriate training. The Designated Safeguarding Lead will undertake formal training at least every two years. The Safeguarding Team will keep themselves up to date throughout the year.
- All Academy staff will receive training at least every year.
- We have a designated Governor for Child Protection/Safeguarding. This person is Matthew Dronfield.

All parents, as part of the child induction process, will be made aware of the Safeguarding and Child Protection Policy which is on the ELAT: www.elatrust.co.uk and Hall Mead websites: www.hallmeadschool.co.uk

Contact information – Hall Mead School

Safeguarding Governor – Matthew Dronfield

Designated Lead and team:

Nicola Afteni, Deputy Headteacher – 01708 225684 Ext 252, nafteni@elatschools.co.uk

Kirsty Fanning, Deputy Headteacher – 01708 225684 Ext 2059, kfanning@elatschools.co.uk

Gordon Bamber, Deputy Headteacher – 01708 225684 Ext 2017, gbamber@elatschools.co.uk

Safeguarding recording system – My Concern

Bower Park Academy

Procedures (Ref. page 8, item 6)

There is a Designated Safeguarding Lead who has responsibility for Child Protection and who undertakes regular training for this role.

There are three designated Safeguarding deputies, two of whom are also Assistant Principals and will act in the Designated Safeguarding lead's absence.

The Safeguarding and child protection team are:

Stuart Gander – Designated Safeguarding Lead, Vice principal, Operation Encompass Lead, Prevent Lead and Looked After Child Lead

Danniella Charlton – Deputy Designated Safeguarding Lead, Assistant Principal

Tara English – Deputy Designated Safeguarding Lead, Assistant Principal

Jaeden Dixon – Deputy Designated Safeguarding Lead

Jenni Cook – Safeguarding Officer

The Safeguarding lead is a member of the Senior Leadership Team of Bower Park Academy.

Those named above have received appropriate training. The Designated Safeguarding Lead and their deputies will undertake formal training at least every two years. The Safeguarding Team will keep themselves up to date throughout the year.

All Academy staff will receive training at least every year.

We have a designated Governor for Child Protection/Safeguarding. This person is Bex Templeman, Chair of the LGC.

All parents/carers, as part of the child induction process, will be made aware of the Safeguarding and Child Protection Policy which is on the ELAT: www.elatrust.co.uk Bower Park Academy websites www.bowerpark.co.uk

Designated Lead and Team Contact Information:

Stuart Gander -	sgander@elatschools.co.uk
Danniella Charlton -	dcharlton@elatschools.co.uk
Tara English -	tenglish@elatschools.co.uk
Jaeden Dixon -	jdixon@elatschools.co.uk
Jenni Cook -	jcook1@elatschools.co.uk

Safeguarding recording system - CPOMS

Brittons Academy

Procedures (Ref. page 8, item 6)

There is a Designated Safeguarding Lead who has responsibility for Child Protection and who undertakes regular training for this role. There are four designated Safeguarding deputies who will act in the Designated Safeguarding Lead's absence.

- The Safeguarding Lead and child protection team are:
- Mrs Laurie Cossey-Atkins (Designated Safeguarding Lead) Operation Encompass Lead Teacher
  Mrs Keri Seeley (Safeguarding Officer)
- Mr Eugene Cole (Safeguarding Deputy)
- Ms Victoria Hallett (Safeguarding Deputy)
- Mrs Maria Palombo (Safeguarding Deputy)
- Mr Rhys Shercliff (Safeguarding Deputy)
- Mrs Claire Whiley (Safeguarding Deputy)
- Mrs Sarah Bradshaw (Support and Guidance Manager)
- Mrs Gill Gilbert (Support and Guidance Manager)
- Mrs Maria Martin (Support and Guidance Manager)
- Ms Gemma Slade (Support and Guidance Manager)
- Ms Heidi Wallace (Support and Guidance Manager)

· The Safeguarding lead is a member of the Senior Leadership Team of The Brittons Academy.

· Those named above have received appropriate training. The Designated Safeguarding Lead and their deputies will undertake formal training at least every two years. The Safeguarding Team will keep themselves up to date throughout the year.

· All Academy staff will receive training at least every year.

· We have a designated Governor for Child Protection/Safeguarding. This person is Ms Elizabeth Dixon.

· All parents, as part of the child induction process, will be made aware of the Safeguarding and Child Protection Policy which is on the ELAT: www.elatrust.co.uk and Brittons Academy websites: www.brittons.havering.sch.uk

Designated Lead and Team Contact Information:

Mrs Laurie Cossey-Atkins: lcossey@elatschools.co.uk

Mrs Keri Seeley: kseeley@elatschools.co.uk

Mr Eugene Cole: ecole@elatschools.co.uk

Ms Victoria Hallett: vhallett@elatschools.co.uk

Mrs Maria Palombo: mpalombo@elatschools.co.uk

Mr Rhys Shercliff: rshercliff@elatschools.co.uk

Mrs Claire Whiley: cwhiley@elatschools.co.uk

Mrs Sarah Bradshaw: sbradshaw@elatschools.co.uk

Mrs Gill Gilbert: ggilbert@elatschools.co.uk

Mrs Maria Martin: mmartin@elatschools.co.uk

Ms Gemma Slade: gslade@elatschools.co.uk
Ms Heidi Wallace: hwallace@elatschools.co.uk

Safeguarding recording system – CPOMS

Ardleigh Green Infant & Junior Schools

Procedures (Ref. page 8, item 6)

- There is a Designated Safeguarding Lead who has responsibility for Child Protection and who undertakes regular training for this role.
- The designated safeguarding lead and Operation Encompass Lead Teacher at **Ardleigh Green Infant School** is Mrs Verity Hoffman, Headteacher.
- The designated safeguarding lead and Operation Encompass Lead Teacher at **Ardleigh Green Junior School** is Mrs Janelle Johnson, Headteacher.
- There are two designated safeguarding deputies:
    - Mr Simon Harris, Assistant Headteacher
    - Mrs Paula Broadmore, Office Manager
- The Safeguarding lead is a member of the Senior Leadership Team of Ardleigh Green Infant and Junior School.
- Those named above have received appropriate training. The Designated Safeguarding Lead and their deputies will undertake formal training at least every two years. The Safeguarding Team will keep themselves up to date throughout the year.
- All Academy staff will receive training at least every year.
- We have a designated Governor for Child Protection/Safeguarding. This person is Mrs S. Consterdine.
- All parents, as part of the child induction process, will be made aware of the Safeguarding and Child Protection Policy which is on the ELAT: www.elatrust.co.uk and Ardleigh Green Infant School www.agi.havering.sch.uk and Ardleigh Green Junior School www.ardleighgreenjun.org.uk websites.

Designated Lead and Team Contact Information:

- Mrs Verity Hoffman– vhoffman@elatschools.uk
- Mrs Janelle Johnson – jjohnson@elatschools.co.uk
- Mr Simon Harris – sharris@elatschools.co.uk
- Mrs Paula Broadmore – pbroadmore@elatschools.co.uk

Telephone: 01708 449362 – Infant School
01708 443014 – Junior School

Safeguarding recording system – My Concern

Hacton Primary School

Procedures (Ref. page 8, item 6)

- There is a Designated Safeguarding Lead who has responsibility for Child Protection and who undertakes regular training for this role. The lead works alongside a team of safeguarding officers.
- The designated safeguarding lead and Operation Encompass Lead Teacher at Hacton Primary School is Mrs Emily Leslie, Headteacher.
- There are two designated safeguarding deputies:
    - Ms Vicky Hornsby, Deputy Headteacher
    - Mrs Sue Ware, Office Manager
- The Safeguarding lead is a member of the Senior Leadership Team of Hacton Primary School.
- Those named above have received appropriate training. The Designated Safeguarding Lead and their deputies will undertake formal training at least every two years. The Safeguarding Team will keep themselves up to date throughout the year.
- All Academy staff will receive training at least every year.
- We have a designated Governor for Child Protection/Safeguarding. This person is Ms J Didau.
- All parents, as part of the child induction process, will be made aware of the Safeguarding and Child Protection Policy which is on the ELAT: www.elatrust.co.uk and Hacton Primary School www.hacton.havering.sch.uk websites

Designated Lead and Team Contact Information:

- Ms Emily Leslie – eleslie@elatschools.co.uk
- Ms V Hornsby – vhornsby@elatschools.co.uk
- Mrs Sue Ware – sware1@elatschools.co.uk

Telephone: 01708 443991

Safeguarding recording system – My Concern