



THE JUBILEE ACADEMY

Aspire and Achieve

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| Title: | Safeguarding Child including Child Protection and Training Policy |
| Date Approved: | September 2021 |
| Date Reviewed: | September 2021 |
| Status: | Statutory |
| Delegation: | Governing Body Resource Committee |
| Review Frequency: | Annually |
| Policy Locations: | Website/Staff Shared Drive/Hard Copy |
| Next Review Date: | September 2022 |

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Safeguarding Child including Child Protection and Training Policy

Statement of intent

In order to safeguard and promote the welfare of students the school will act in accordance with the STATUTORY legislation and guidance published by the Department of Education's statutory guidance:

Keeping Children Safe in Education 2021 and Working Together to Safeguard Children, (DfE July 2018), which requires all schools to follow the procedures protecting children from abuse which are established by the Harrow Safeguarding Partnerships.

Schools are also expected to ensure that they have appropriate procedures in place for responding to situations in which they believe that a child has been abused or are at risk of abuse - these procedures should also cover circumstances in which a member of staff is accused of, or suspected of, abuse. For the purposes of this guidance children includes everyone under the age of 18.

The Jubilee Academy ensure they facilitate a whole school approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. The Jubilee Academy will ensure all systems, processes and policies operate with the best interests of the child at their heart.

Where there is a safeguarding concern, governing bodies, proprietors and school leaders ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems are in place, and are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

This policy is built upon The Jubilee Academy's commitment to the development and maintenance of good behaviour and a positive and inclusive ethos for all members of the school community. It reflects the school's commitment to safeguarding in creating a culture of vigilance and to encourage and reflect diversity in all aspects of learning at The Jubilee Academy.

This policy applies to **all Governors, Senior Leadership Teams, staff, volunteers, adults, including volunteers or external agency workers working in or behalf of the school** and is consistent with the procedures of Harrow Safeguarding Partnerships. Our policy and procedures also apply to extended school and off-site activities.

- The policy will follow the five principles of the Student Plan:
- to support parents/carers and families
- to allow students to reach their full potential
- to enable students to enjoy their young personhood whilst preparing for adult life
- to provide services in response to students and family needs.
- to use preventative measures to help students avoid the possibility of failure

This policy will be brought to the attention of, and/or issued to, all members of staff and will be available for parents/carers as required and will be reviewed on an annual basis by the Governing Body.

M. Jarrett

Mike Jarrett
Head of School

H. Freed

Howard Freed
Chair of Governors

Section A: Introduction

Aims and objectives

This Policy is intended to help all understand that **everyone** has a statutory responsibility with respect to safeguarding in identifying concerns, sharing information and taking prompt action when ensuring students and families are to receive the right help at the right time.

In keeping with the key aims of 'Keeping Children Safe in Education, our role is: to keep students safe, and it links with other policies to form an integral part of the school's suite of safeguarding policies which promote the welfare, health and safety of students and staff.

The purpose of this policy is to inform staff, parents/carers, volunteers and governors about the school's responsibilities for safeguarding students and to enable everyone to have a clear understanding of how these responsibilities should be carried out.

We intend to:

- Establish and maintain an environment where students feel safe, secure, are encouraged to talk, and are listened to when they have a worry or concern;
- Establish and maintain an environment where school staff and volunteers feel safe, are encouraged to talk and are listened to when they have concerns about the safety and wellbeing of a young person;
- Ensure students know that there are adults in the school whom they can approach if they are worried;
- Ensure staff are properly trained in recognising and reporting safeguarding issues
 - e.g.
 - Online abuse, the student can communicate via Netsupport or CEOP link.
 - Physical, emotional, sexual neglect can be reported directly to the Designated Safeguarding lead or safeguarding team
 - Peer on peer abuse
 - Sexual violence and harassment
- Ensure that students who have been abused will be supported;
- Ensure there are clear procedures for dealing with abuse including peer on peer abuse
- Ensure all staff recognise that when a child has a social worker, it is an indicator that the child is more at risk than most pupils and that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health.
- The Department for Education's (DfE's) definition of 'vulnerable children' includes those who:
 - Have a social worker, including children:
 - With a child protection plan
 - Assessed as being in need
 - Looked after by the local authority
 - Have an education, health, and care (EHC) plan
- Take these needs into account when making plans to support pupils who have a social worker, (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and / or academic support, alongside action by statutory services)peer
- Include opportunities in the (RSHE) – Relationships, Sex and Health Education Curriculum for students to develop the skills that they need to recognise and stay safe from abuse;
The Department has produced a one-stop page for teachers on GOV.UK, which can be accessed here: Teaching about relationships sex and health. This includes teacher training modules on the RSHE topics and non-statutory implementation guidance.
- Contribute to the five outcomes which are key to students' wellbeing:

Legal Scope

This policy is in line with the following legislation:

- **The Children Act (1989)** (and **2004 amendment**), which provides a framework for the care and protection of children
- **The Education Act (2002) under section 175** requires school governing bodies, local education authorities and further education institutions to make arrangements to safeguard and promote the welfare of children
- **Non-Maintained Special Schools (England) Regulations (2015)**
- **The Teachers' Standards 2012 and The Teachers' Disciplinary (England) Regulations (2012)** state that teachers (which includes headteachers) should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.
- **The Education (Pupil Information) (England) Regulations (2005)**
- **The London Child Protection Procedures, (2018)**
- **Disqualification under the Childcare Act (2006) (as amended, 2018)**
- **Education (Independent School Standards) Regulations (2014, Part 3)**, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- **Keeping Children Safe in Education (DfE, September 2019)**, statutory guidance for schools and colleges to safeguard and promote welfare of children
- **Working Together to Safeguard Children (DfE, July 2018)**, a guide to interagency working to safeguard and promote welfare of children
- **Information Sharing for Practitioners (DfE, July 2018)**, providing safeguarding services to children, young people, parents, and carers
- **The children and Social Work Act (2017)**, provision about staff member for looked after and previously looked after pupils
- **Sexual violence and sexual harassment between children in schools and colleges (DfE, May 2018)**
- **Children Missing Education (DfE, Sept 2016)**, Statutory Guidance for Local Authorities
- Section 5B(11) of the **Female Genital Mutilation Act 2003**, as inserted by section 74 of the **Serious Crime Act 2015**, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- **The Rehabilitation of Offenders Act (1974)**, which outlines when people with criminal convictions can work with children
- **Safeguarding Vulnerable Groups Act (2006), Schedule 4** which defines what 'regulated activity' is in relation to children
- **Voyeurism (Offences) Act 2019: which criminalise the act of 'Up skirting'**

This policy also pays due regard to:

- **The Prevent Duty (DfE, July 2015)**, which explains schools' duty with respect to protecting people from the risk of radicalisation and extremism under the Counter-Terrorism and Security Act 2015.
- **Health and Safety advice for schools (DfE, Feb 2014)** advice on legal duties and powers
- **Governance Handbook (DfE, January 2017)**

- [A Competency Framework for Governance \(DfE, January 2017\)](#)
- [Mental health and behaviour in schools \(DfE, March 2016\)](#)
- [UKCCIS Guidance: Sexting in schools and colleges, responding to incidents, and safeguarding young people \(2017\).](#)
- [New curriculum for Relationships Education, ad Relationships and SEX Education, and Health Education](#)
- [New Ofsted Framework \(2019\)](#)
- [Teaching online safety in school \(2019\)](#)

Linked Policies

This policy forms part of a set of documents and policies which relate to the safeguarding responsibilities of the school and should be read in conjunction with:

- The school's Funding agreement and articles of association
- TJA HR Suite of Policies – inc. Safer Recruitment, Staff Code of Conduct, and whistleblowing Policies
- Harrow Safeguarding Children Board Inter-agency Child Protection and Safeguarding Children Procedures (Electronic)
- Admission
- Behaviour
- Attendance
- Disability Policy and Access plan
- Supporting children with medical conditions inc. administration of medicines
- Equal opportunities
- Physical Intervention
- Searching, Screening and Confiscation
- E-safety and ICT Acceptable Use
- Single central record
- Visitors' policy
- Teaching and Learning
- Careers Education, Information, Advice and Guidance & Work-Related Learning
- PSHRE, RSHE & SRE
- Preventing bullying inc. procedure to reporting racist, sexist, homophobic incidents
- Drug and substance
- Schools' visits and journeys
- Safe working practice agreement; and the
- Health and safety suite of policies

Key Roles at The Jubilee Academy:

- **POSITION: The Senior Designated Safeguarding Lead (DSL)** for child protection and safeguarding. Trained to Level 3 child protection training and training in interagency working and undertakes refresher training once a year.

Deputy Head of School: Personal Development and Welfare (Name: Marlon Boothe)

- **POSITION: Deputy Designated Safeguarding Lead (DDSL)***. Trained to Level 3 child protection training and training in interagency working and undertakes refresher training at 2-year intervals.

Deputy Head of School: Conduct and Discipline (Name: Darren Sutherland)

*Whilst the activities of the **DSL** can be delegated to the **Deputy Designated Safeguarding Lead (DDSL)** for child protection and safeguarding, the ultimate **lead responsibility** for child protection, as set out above, remains with the DSL, this **lead responsibility** is not be delegated

- **POSITION: Nominated School Governor for Safeguarding and Health and Safety.** Trained to Level 3 child protection training and training in interagency working and undertakes refresher training at 2-year intervals. **(Name: Becky Cozens)**
- **POSITION: Local Authority Designated Officer for Allegation against staff (LADO)**
Initial referrals via MASH/Golden Number **(Name: Rosalind Miller)**
Quality Assurance and Service Improvement, Harrow Peoples Services **(07871 987254)**

Golden Number (020 8901 2690)

Emergency Duty Team (operates out of hours): **020 8424 0999** between 5pm and 9am, Monday to Friday, 24 hours during weekends and all bank holidays.

Section B: Providing a Safe and Supportive Environment

Definition of Safeguarding and Child Protection

Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who comes into contact with children and their families and carers has a role to play in safeguarding children. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child centred. This means that they should consider, at all times, what is in the best interests of the child

No single professional can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who meets them has a role to play in identifying concerns, sharing information, and taking prompt action.

Safeguarding and promoting the welfare of children is defined as:

- Protecting children from maltreatment.
- Preventing impairment of mental health and physical health or development.
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- Taking action to enable all children to have the best outcomes

Children includes everyone under the age of 18

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

Child protection is one part of safeguarding and promoting welfare and refers to the procedures that are undertaken to protect specific children who are, are believed to, or are likely, to suffer significant harm.

Schools are also expected to ensure that they have appropriate procedures in place for responding to situations in which they believe that a young person has been abused or are at risk of abuse - these procedures should also cover circumstances in which a member of staff is accused of, or suspected of, abuse.

School staff and volunteers are particularly well placed to observe outward signs of abuse, changes in behaviour and failure to develop because they have daily contact with students.

We as a school will endeavour to ensure that we act quickly to ensure early help is given to students.

Safe Practice

- All school staff will undergo appropriate training in child protection and safeguarding lead by the Senior DSL. Further frequency and depth of training will depend upon their role. The aim of training is to develop their understanding of the signs and indicators of abuse and to ensure they understand what to do if they have concerns about a child. Staff working in a teaching and non-teaching role will receive training annually in line with designated good practice.
- All members of staff know how to respond to a pupil who makes an allegation or appears to be vulnerable or at risk.
- All new members of staff will be given a copy of the Employee Handbook, child protection procedures and informed of relevant systems as part of their induction into the school.
- Child Protection Awareness and updates will be carried out as part of our staff training day and Continuing Professional Development (CPD)
- In addition to vetting information, all temporary staff, regular volunteers. Agency or third-party organisations who have contact or work with our students are given a copy of this policy and Part one of 'Keeping Children Safe in Education' (2021)
- This policy is formulated by the Head of School and senior DSL for child protection and safeguarding, in consultation with staff and is monitored by other members of the Senior Leadership Team. The policy is subject to annual review by The Full Governing Body of The Jubilee Academy.

- Our procedures are regularly reviewed, updated, and reported on appropriately to the Governing Body.

Safeguarding Information for pupils

- The school is committed to ensuring that pupils are aware of behaviour towards them that is not acceptable, so they can **recognise when they are at risk, how they can keep themselves safe and how to get help when they need it.**
- All pupils know that we have senior members of staff with responsibility for child protection and know who they are.
- We inform pupils of whom they might talk to, both in and out of school, their right to be listened to and heard and what steps can be taken to protect them from harm.
- The following Information is made available to pupils e.g. Childline and NSPCC helplines, posters, NSPCC and Childline website addresses
- School's arrangements for consulting with and listening to pupils are the tutor system, school council, mentoring and counselling service.
- Students are taught about safeguarding, including online safety, through various teaching and learning opportunities in addition to specific RSHE and assembly sessions as part of a broad and balanced curriculum.
- Ensuring pupils are aware of these arrangements and the staff involved is a major part of the Induction programme for the New Admissions
- Students are issued with a Safeguarding booklet in the first part of the Autumn Term.

Partnerships with Parents

- All parents/carers are made aware of the responsibilities of staff members about Safeguarding and Child Protection procedures and can view this policy on the website.
- We provide information in relation to Safeguarding to parents in the Prospectus and Safeguarding Booklet, on the website and updates as necessary in the newsletter.
- We are committed to working with parents positively, openly, and honestly. We ensure that all parents are treated with respect, dignity, and courtesy. We respect parents' rights to privacy and confidentiality and will not share sensitive information unless we have permission, or it is necessary to do so to protect a child.
- The School will share with parents any concerns we may have about their child unless to do so may place a child at risk of harm.
- We encourage parents to discuss any concerns they may have with the relevant pastoral team members e.g. Tutor, Year Coordinator, Attendance and Pastoral Officer, DHT for Personal Welfare and Development
- As part of the admission and safeguarding process, all parents/carers will need to provide at least two emergency contact numbers.

The following comment is also inserted on the school website along with a full menu of relevant information relating to all aspects of safeguarding which is easily navigated:

"Nothing is more important to us than the safety and welfare of our students. We take rigorous steps to ensure that children stay safe and do not come to any harm. We work closely with parents/carers and a range of professional external agencies to secure this"

*If you have any concerns, no matter how small they may seem, about the safety or welfare of any child, please contact the school's Designated Lead for Child Protection, **Mr M Boothe**, or the Deputy Safeguarding Lead, **Mr D Sutherland**, both available at:*
[**safeguarding@thejubileeacademy.onmicrosoft.com**](mailto:safeguarding@thejubileeacademy.onmicrosoft.com).

Partnerships with Others

The school recognises that it is essential to establish positive and effective working relationships with other agencies e.g. Local Authority (LA), Children's Services, Police, Public Health, Childline in Partnership with schools, Children Centres and Early Help. These relationships are continually nurtured and developed via a range of activities and dialogue. Further information can be made available upon request from the Deputy Headteacher for Personal Development and Welfare, who is also the Designated Safeguarding Lead.

Local authorities should share the fact a child has a social worker, and the designated safeguarding lead should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools to safeguard and promote the welfare of children.

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

At The Jubilee Academy, we recognise that when a child has a social worker, it is an indicator that the child is more at risk than most pupils. This may mean that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour, and poor mental health. We take these needs into account when making plans to support pupils who have a social worker.

Section C: Safer recruitment, Selection and Pre employment vetting

Safer recruitment, selection and preemployment vetting

We ensure that all appropriate measures are applied in relation to **everyone** who works in the school who is likely to be perceived by the children as a safe and trustworthy adult including Trustees, Governing body members, teachers, trainee teachers, support staff, volunteers, external agency workers, and contractors or employee of the contractors.

The School Business Managers and Head of School have completed Safer Recruitment training One of the above will be involved in all staff and volunteer appointments and arrangements (including, where appropriate, contracted/commissioned services). **More information on Safer Recruitment can be found in the TJA Academies HR suite of Policies**

Safer recruitment practice includes conducting **mandatory pre-employment checks** that scrutinises applicants, verifying references, checking previous employment history, checking educational and professional qualifications, and checking if they have lived and worked abroad and ensuring the candidate has the health and physical capacity to do the job. It also includes undertaking interviews and, where appropriate, Barred List Check, Disclosure and Barring Service checks and Overseas Police Checks.

The School takes account of the Keeping Children Safe in Education guidance and the statutory guidance for regulated most recent activity, which is replicated in **Keeping Children Safe in Education 2021 Annex F**. Checks are recorded on the school's Single Central record detailing the range of checks carried out on staff, supply staff, others who work in regular contact with children, including volunteers and all members of the academy trust. The register will confirm whether a check was carried out and the date of such a check. The school undertakes the following checks in line with Keeping Children Safe in Education **2021**:

- Identity checks to verify a candidate's identity **by checking their name on their birth certificate**,
- **A Separate barred list checks WILL BE carried out in the following circumstances:**
 - for newly appointed staff who are engaging in regulated activity, pending the receipt of an Enhanced Certificate with Barred List information from the Disclosure and Barring Service (DBS) (and where all other relevant checks have been carried out); or,
 - where an individual has worked in a post in a school or college that brought them into regular contact with children or young persons which ended not more than three months prior to that person's appointment to the organisation (and where all other relevant checks have been carried out).

The School will take account of guidance as listed in the Flowchart of Disclosure and Barring Service criminal record checks and barred list checks found on **page 60 KCSIE 2021**; and definition of a regulated activity as detailed in **Annex F** respectively of **KCSIE 2021** and **Disqualification under the Childcare Act (2006)**

- Obtain a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available.
- **Check there are no prohibition, directions, sanctions and restrictions to prevent a person from carrying out teaching work by using the TRA'S Employer Service**
- Verify the candidate's mental and physical fitness to carry out their work responsibilities.
- Verify Professional qualifications
- **Section 128 (Prohibition from Management) regulatory check for Academy Governors and Staff in Management Position**
- Enhanced DBS check for any Governor
- Verify the person's right to work in the UK
- **Verify if the person has lived outside the UK by conducting the same checks as all other staff in schools and any further checks though to be appropriate so that any relevant events that occurred outside the UK can be considered**

These checks **could** include, where available:

- **criminal records checks for overseas applicants - Home Office guidance can be found on GOV.UK; and for teaching positions**

- obtaining a letter (via the applicant) from the professional regulating authority in the country (or countries) in which the applicant has worked confirming that they have not imposed any sanctions or restrictions, and or that they are aware of any reason why they may be unsuitable to teach⁸⁷. Applicants can find contact details of regulatory bodies in the EU/EEA and Switzerland on the Regulated Professions database. Applicants can also contact the UK Centre for Professional Qualifications who will signpost them to the appropriate EEA regulatory body.
- written vetting information from all agency or third-party organisations that confirms that appropriate safeguarding checks have been carried out on individuals/supply staff working at the school, i.e. those checks that the school would otherwise perform in respect of its own staff
- Supervised volunteers are not in regulated activity, however an enhanced DBS check without a barred list check will be undertaken for these staff in appropriate circumstances.

Roles and Responsibilities

a) The Governing Body

The Governing Body has overall responsibility for ensuring that there are sufficient measures in place to safeguard the students in The Jubilee Academy.

The Governing Body must ensure:

- That Part 1 of (KCSIE 2021) is made available to all staff working directly with children.
- The condensed Part 1 found in annex A, KCSIE 2021 is made available to those staff not working directly with children, including governing body members and proprietors.
- The effective implementation of this Child Protection Policy and safeguarding procedures in accordance with current government guidance on Keeping Children Safe in Education and local agreed inter agency safeguarding procedures set up by the Harrow Safeguarding Children Board.
- Safeguarding policies and procedures are reviewed annually, and information provided to the local authority about them and about how the above duties have been discharged.
- The school operates safe recruitment procedures and makes sure that all appropriated checks are carried out on staff and volunteers to ensure suitability to work with children.
- The Chair of Governors will be responsible in the event of an allegation of abuse being made against the Head of School. He can be contacted via the school.
- Has a named governor for safeguarding and child protection that is trained as required and who will oversee the school's policy and practice and champion safeguarding issues.
- Appointment of Lead Designated Persons for Safeguarding and Child Protection who are senior members of the school leadership team.
- Liaise closely with the Designated Safeguarding Lead and receive regular reports to monitor procedures and practices to ensure compliance.
- To appoint a designated teacher to ensure that staff have the skills and knowledge necessary respond to respond to the needs and promote the educational achievement of vulnerable children including those with disabilities and who are looked after by the local authority;
- Ensure the school contributes to multi-agency working in line with the current statutory guidance Working together to safeguard children.
- Appropriate arrangements in place that set out the process and principles of information sharing to reflect Working together to safeguard children, GDPR and Data Protection Bill.
- Relevant 'safeguarding' training (including online safety), for all school staff/volunteers is delivered at induction and
- Ensure all staff undergo regular updated safeguarding training including online safety and the requirement to ensure children are taught about safeguarding, including online safety that safeguarding training for staff, including online safety training, is integrated, aligned and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning.
- Whilst considering the above training requirements, governing bodies and proprietors should have regard to the Teachers' Standards which set out the expectation that all teachers manage behaviour effectively to ensure a good and safe educational environment and requires teachers to have a clear understanding of the needs of all pupils.
- Whilst considering the above training requirements, governing bodies and proprietors should be aware that the cohort of students in an Alternative Provision often have complex needs and should be aware of the additional risk of harm that their students may be vulnerable to

- Ensure that the curriculum supports children in recognising and responding to risks including online safety.
- Appropriate and careful management of allegations procedures are in place.
- Appropriate safeguarding responses and procedures in place for: Sexual violence and sexual harassment between children, children who go missing from education, FGM, antibullying, and preventing radicalisation.
- Deficiencies or weaknesses in safeguarding arrangements are remedied without delay.

b) The Head of School

The Head of School will ensure that:

- The policies and procedures adopted by the Governing Body are fully implemented and followed by all staff.
- There are sufficient resources and time allocated to enable the designated person and other staff to discharge their responsibilities effectively.
- All staff and volunteers feel able to raise concerns about poor or unsafe practice regarding students and such concerns are addressed sensitively and effectively in a timely manner in accordance with agreed whistleblowing policies; and
- He/she manages allegations made against staff and volunteers. Should an allegation be made against the Head of School, it is the responsibility of the Chair of Governors to manage this as part of their role of the School's Governing Body

c) The Senior Designated Safeguarding Lead (DSL):

- Has lead responsibility for safeguarding and child protection (including online safety) which is explicit in the role holders' job description.
- Is given the time, funding, training, resources, and support to provide advice and expertise within the educational establishment.
- Is a member of the Senior Leadership Team and has successfully completed the level 3 safeguarding training to provide them with the knowledge and skills required to carry out the role?
- Completes refresher training annually to keep his or her knowledge and skills up to date with regular updates on developments in between, e.g. via ebulletins, meetings for DSLs and reading time.
- The Deputy DSL is trained to same standard as the DSL.
- During term time the DSL or Deputy will be available (during school hours) for staff to discuss any safeguarding concerns. Appropriate cover arrangements are in place for out of hours/ out to term activities.
- Ensures that that this policy is updated and reviewed annually and work with the governing body regarding this.
- Ensure that all staff who work in the school undertake safeguarding training to equip them to carry out their responsibilities for safeguarding students effectively and that this is kept up to date by refresher training at yearly intervals.
- Record the names of staff and the training they have received, to what level and the date of that training.
- Ensure that new staff receive safeguarding training as part of their induction process and before commencement of their work with students at the school.
- Ensure that temporary staff and volunteers are made aware of the school's arrangements for safeguarding students.
- Act as a focal point for staff concerns and liaise with the Local Authority and other agencies in accordance with Working Together to safeguard Children (2019).
- Manage referrals from school staff or any others from outside the school.
- Work with external agencies and professionals on matter of safety and safeguarding.
- Liaise with the Head of School to inform him/her of any issues and ongoing investigations under section 47 of the Children Act 1989 and police investigations.
- Develop effective working relationships with other agencies and services.
- Discuss with new parents/carers the role of the DSL and the role of safeguarding in the school. Make parents/carers aware of the safeguarding procedures used and how to access the young person protection.

- When sharing information, use appropriate **Information Sharing for Practitioners (DfE, July 2018)**, and in accordance with the school's Data Protection Policy that reflects Working together to safeguard children, GDPR and Data Protection Bill.
- Refer all cases of suspected abuse to Harrow children's' Social Care via the Multi-agency Safeguarding Hub (MASH).
- Be aware of pupils who have a social worker.
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues with teachers and school and college leadership staff.
- Refer cases to the Channel programme where there is a radicalisation concern as required.
- Liaise and work with Safeguarding and Specialist Services over suspected cases of young person abuse.
- Refer cases where a crime may have been committed to the Police as required.
- Ensure that accurate safeguarding records relating to individual students are kept separate from the academic file in a secure place, marked 'Strictly Confidential' and are passed securely on transfer (both to The Jubilee Academy and on exit back to their 'home school');
- Submit reports and ensure the school's attendance at young person protection conferences and contribute to decision making and delivery of actions planned to safeguard the young person
- Ensure that the school effectively monitors students about whom there are concerns, including notifying Safeguarding and Specialist Services when there is an unexplained absence of more than two days for a young person who is the subject of a young person protection plan;
- Provide guidance to parents/carers, students, and staff about obtaining suitable support.
- Where a student transfers to The Jubilee Academy and has been/or is the subject of a young person protection plan, the Senior DSL will liaise closely with the Lead Designated Persons for Safeguarding and Child Protection in the 'home school' to ensure that social care and the young person's social can make the appropriate transfer arrangements of records (which will be kept in a secure manner and separate from the young person's academic file).
- Ensure that child protection information is transferred to the pupil's new school

d) The School Business Manager:

- responsible for maintaining the safety and security of the site and ensuring safe access for students with disabilities
- responsible for maintaining safe systems of internet access, blocking any undesirable (e.g. pornographic, racist, violent) sites.
- responsible for maintaining correct information on students.

e) The Attendance and Pastoral Officer:

- work alongside key school staff to promote excellent attendance, substantially reduce levels of absence and work with students and families to promote high levels of attendance, behaviour, and achievement. Pastoral care, support and guidance will be given to students.
- The Attendance Officer, Designated Person or other appropriately designated staff are responsible for notifying Children's Services if a child on a Child Protection Plan is absent for more than two days

f) All school staff and Volunteer:

- fully comply with the school's policies and procedures
- should be conversant with the Staff Conduct Policy and the Acceptable Use of ICT policy
- attend appropriate training
- inform the designated persons of any concerns
- in the case of risk of immediate serious harm to a child, make a referral to children's social care immediately if a senior member of staff or the Safeguarding Team are not available
- always act in the best interests of the child, even when this is against the expressed wishes of the child
- 'relationships and associations' that staff have in school and outside (including online), may have an implication for the safeguarding of children in the school. Where this is the case, the member of staff must speak to the school.
- support social workers to take decisions about individual children

Section D : Staff Induction and Training

All staff members receive safeguarding training by the Senior **DSL** for child protection and safeguarding, to be made aware of systems for supporting safeguarding as part of the staff induction process and before working with students.

The aim of this training is to develop their understanding of the sign and indicators of abuse, to ensure they understand what to do if they have concerns about a child and how to respond to a student who makes an allegation

All staff members receive refresher safeguarding training at the beginning of every academic year delivered by the Senior **DSL** for child protection and safeguarding, to equip them to carry out their responsibilities for child protection effectively.

The Senior **DSL** holds a Central File of all training dates and details.

All staff are required to read the following documents and sign the Safer Working Agreement that confirms that they have read and understood their duties and responsibilities in relation to:

- Part one of 'Keeping Children Safe in Education' (2021) and staff that work directly with children should also read Annex A
- Safeguarding including Child Protection Policy
- Behaviour Policy
- Staff Code of Conduct Policy
- The safeguarding response to children who go missing in education and the role of the designated safeguarding lead.
- The role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies). (see KCSIE (2021))

All staff continue to receive ongoing safeguarding updates and guidance through staff meetings and daily staff briefings.

Mandatory and further ongoing safeguarding training will be part of our INSET and Continuing Professional Development (CPD) – e.g.

- Prevent and Channel Programme
- Female Genital Mutilation - FGM
- Child Sexual Exploitation – CSE
- Child Criminal Exploitation – CCE
- Child on Child Sexual Violence and Sexual Harassment
- Children Who go Missing in Education

All staff are aware of the early help process and understand their role in it. This includes identifying emerging problems, liaising with the designated safeguarding lead, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment.

All staff are aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989 that may follow a referral, along with the role they might be expected to play in such assessments.

Section E: Identifying Children & Young People Who May Be Suffering Significant Harm

Teachers and other adults in school are well placed to observe any physical, emotional, or behavioural signs which indicate that a child may be suffering significant harm. The relationships between staff, pupils, parents, and the public which foster respect, confidence and trust can lead to disclosures of abuse, and/or school staff being alerted to concerns.

Definitions

As in the Children Acts 1989 and 2004, a child is anyone who has not yet reached his/her 18th birthday.

Harm means ill-treatment or impairment of health and development, including, for example, impairment suffered from seeing or hearing the ill-treatment of another.

Development means physical, intellectual, emotional, social, or behavioural development; Health includes physical and mental health; Ill-treatment includes sexual abuse and other forms of ill-treatment which are not physical.

Signs and Symptoms of Abuse and Neglect

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children.

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

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

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

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy because 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 caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Signs and Symptoms of Abuse

Possible signs of physical abuse

1. Unexplained injuries or burns, particularly if they are recurrent
2. Refusal to discuss injuries
3. Improbable explanation for injuries
4. Untreated injuries or lingering illness not attended to
5. Disclosure of punishment which appears to be excessive
6. Shrinking from physical contact
7. Fear of returning home or of parents being contacted
8. Fear of undressing
9. Fear of medical help
10. Aggression / bullying
11. Running away from home
12. Significant changes in behaviour with no apparent explanation
13. Deterioration in work
14. Unexplained pattern of absences which may serve to hide bruises or other physical injuries

Possible signs of sexual abuse

1. Bruises, scratches, burns or bite marks on body
2. Scratches, abrasions, or persistent infections in the anal or genital regions
3. Pregnancy – particularly in the case of young adolescents who are evasive concerning the identification of the father
4. Sexual awareness inappropriate to the child's age shown in drawings, vocabulary, games etc
5. Frequent public masturbation
6. Attempts to teach other children about sexual behaviour
7. Refusing to stay with certain people or go to certain places
8. Aggressiveness, anger, anxiety, tearfulness
9. Withdrawal from friend

Possible signs of emotional abuse

1. Continual self-deprecation
2. Fear of new situations
3. Inappropriate emotional responses to painful situations
4. Self-harm or mutilation
5. Drug / solvent abuse
6. 'Neurotic' behaviour – obsessive rocking, thumb sucking etc.
7. Social isolation – does not join in and has few friends
8. Desperate attention seeking behaviour
9. Eating problems, including over-eating and lack of appetite
10. Depression, withdrawal

Possible signs of neglect

1. Constant hunger
2. Poor personal hygiene
3. Inappropriate clothing
4. Frequent lateness or non-attendance at school
5. Untreated medical problems
6. Low self-esteem
7. Poor social relationships
8. Compulsive stealing or scrounging
9. Constant tiredness
10. Weight loss

Related School Practice and Policies

‘.....safeguarding covers more than the contribution made to child protection in relation to individual children. It also encompasses issues such as pupil health and safety and bullying.....and a range of other issues, for example, arrangements for meeting the medical needs of children.... providing first aid, school security, drugs, and substance misuse, etc. There may also be other safeguarding issues that are specific to the local area or population’.

Types of abuse and neglect include physical abuse, emotional abuse, sexual abuse, and neglect. Some specific forms of abuse or safeguarding concern are outlined in **Appendix A** contains important additional information about specific forms of abuse and safeguarding issues.

Types of Abuse and Neglect can be found in ‘Keeping Children Safe in Education (2021)’ (Part 1)

Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside the school or college. All staff should be considering the context within which such incidents and/or behaviours occur

Section F: Ensuring Children are safe at school and at Home

It is not the responsibility of the school staff to investigate welfare concerns or determine the truth of any disclosure or allegation. This may only be investigated by the Police, NSPCC, or Social Care. All staff, however, have a duty to recognise concerns and maintain an open mind.

a. Reporting a concern

Staff will immediately report:

- any suspicion that a child is injured, marked, or bruised in a way which is not readily attributable to the normal knocks or scrapes received in play.
- any explanation given which appears inconsistent or suspicious.
- any behaviours which give rise to suspicions that a child may have suffered harm (e.g., worrying drawings or play)
- any concerns that a child may be suffering from inadequate care, ill treatment, or emotional maltreatment.
- any concerns that a child is presenting signs or symptoms of abuse or neglect.
- any significant changes in a child's presentation, including non-attendance.
- any hint or disclosure of abuse from any person
- any concerns regarding person(s) who may pose a risk to children (e.g., living in a household with children present).

When adults in the school have a concern about a child or young person they should:

- recorded in writing using CPOMS emailing Safeguarding@TheJubileeAcademy.onmicrosoft.com
- as well as having a follow up conversation with the designated safeguarding lead.

Accordingly, all concerns regarding the welfare of pupils will be recorded and discussed with the Lead Designated Safeguarding Lead with responsibility for child protection (or another senior member of staff in the absence of the designated person) prior to any discussion with parents.

b. Responding to Disclosure

Disclosures or information may be received from pupils, parents, or other members of the public. The School recognises that those who disclose such information may do so with difficulty, having chosen carefully to whom they will speak. Accordingly, all staff will handle disclosures with sensitivity. Should pupils have communication difficulties the school will ensure they are enabled to express themselves to a member of staff with appropriate skills wherever possible.

c. Confidentiality

Safeguarding students raises issues of confidentiality that must be clearly understood by all staff/volunteers in the school and information will be shared on a need-to-know basis

If a young person confides in a member of staff/volunteer and requests that the information is kept secret, it is important that the member of staff/volunteer tell the young person in a manner appropriate to the young person's age/stage of development that they cannot promise complete confidentiality – instead they must

Explain that they may need to pass information to other relevant professionals to help keep the young person or other students safe.

d. Information Sharing and managing child protection file

Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. Schools and colleges have clear powers to share, hold and use information for these purposes.

The Jubilee Academy recognises the importance of information sharing between practitioners and local agencies. The school has arrangements in place that set out clearly the processes and principles for sharing information within the school and with children's social care, the safeguarding partners, other organisations, agencies, and practitioners as required.

The Jubilee Academy is proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to the local authority children's social care.

To keep children safe and provide appropriate care for them the school requires accurate and up to date information regarding:

- Names and contact details of persons with whom the child normally lives.
- Names and contact details of all persons with parental responsibility (if different from above).
- Two Emergency contact details
- Details of any persons authorised to collect the child from school (if different from above).
- Any relevant court orders in place including those which affect any person's access to the child (e.g. Residence Order, Contact Order, Care Order, Injunctions etc.).
- If the child is or has been the subject of a Child Protection Plan.
- Name and contact detail of G.P.
- Any other factors which may impact on the safety and welfare of the child.

The school will collate, store, and agree access to this information. The Privacy Policy and Notice is on the school website, and this informs stakeholders how and what data is shared. Parents are then able to opt out of this system. The School Business Manager has control over access to information.

The designated safeguarding lead will be responsible for ensuring that child protection files are kept up to date.

Information will be kept confidential and stored securely. All concerns and referrals will be stored in a separate child protection file for each child and a digital footprint stored on CPOMs.

Records will include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome

The designated safeguarding lead will ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice as set in KCSIE 2021

Where children leave the school or college (including in year transfers) the designated safeguarding lead will ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained.

Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required

e. GDPR and Data Protection

The GDPR and Data Protection Act 2018 do not prevent, or limit, the sharing of information for the purposes of keeping children and young people safe. Keeping Children Safe in Education (2021), paragraph 85

This includes:

Understanding that ‘safeguarding of children and individuals at risk’ is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk. Keeping Children Safe in Education (2021), paragraph 84

The General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing but provide a framework to ensure that personal information about living individuals is shared appropriately.

Where possible, we share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 we may share information without consent if, in our judgement, there is a lawful basis to do so, such as where safety may be at risk.

f. Timings of Referrals

Schools have no legal right to stop the young person from going home at the end of the school day, so it is vital that referrals are made as early as possible, especially if it is believed that the young person would not be safe in going home.

It is particularly important that any concerns about the safeguarding and protection of a child or young person is raised as soon as possible to ensure that matters can be dealt with prior to any school holiday breaks

If a young person discloses that he or she has been abused in some way, the member of staff/volunteer should:

- Listen to what is being said without displaying shock or disbelief.
- Take what the child says seriously.
- Keep an open mind.
- Allow the young person to talk freely.
- Reassure the young person, but not make promises which it might not be possible to keep.
- Not promise confidentiality – it might be necessary to refer to Student Services: Safeguarding and Specialist Services.
- Reassure him or her that what has happened is not his or her fault.
- Stress that it was the right thing to tell.
- Listen, only asking questions when necessary to clarify.
- Not criticise the alleged perpetrator.
- Explain what must be done next and who must be told.
- All verbal conversations should be promptly recorded in writing
- Make a written record (see Record Keeping).
- Pass the information to the Designated Senior Person without delay.

g. Record Keeping

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing using CPOMS or emailing Safeguarding@TheJubileeAcademy.onmicrosoft.com

Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

Records should include:

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

If in doubt about recording requirements, staff should discuss with the designated safeguarding lead.

h. Support, Advice and Guidance for Staff

The KCSIE (2021) have produced a flowchart which in **Appendix B** summarises the actions where there are concerns about a child and how this is to be managed by schools and other agencies

Staff will be supported by the senior DSL and additional advice and support can be found in **Appendix E**

The senior DSL will be supported by SLT, nominated Governor for safeguarding. Advice and support are always available from the Designated Officer for the Local authority – **Rosalind Miller**

Children's Services Multi Agency Safeguarding Hub (MASH) – See Contacts List **Appendix F**
Guidance and contact details for national and voluntary advisory bodies are also provided on The Harrow LCSB Website

i. Action by the Senior Designated Safeguarding Lead (or Deputy DSL)

Following any information raising concern, the senior designated persons will consider:

- any urgent medical needs of the child
- the context of the concern within which incidents and/or behaviours occur, and the wider environmental factors present in a child's life
- discussing the matter with other agencies involved with the family
- consulting with appropriate persons e.g. Children's Services
- the child's wishes

All staff will have access to the Golden Number – if in the unlikely scenario none of the 2 Designated Safeguarding Staff or the Head of School are not available, staff are able to access the number on the Contacts page of this policy.

Then decide:

- wherever possible, to talk to parents, unless to do so may place a child at risk of significant harm, impede any police investigation and/or place the member of staff or others at risk.
- whether to make a child protection referral to social care because a child is suffering or is likely to suffer significant harm and if this needs to be undertaken immediately. Any serious concerns will be reported immediately to Children's Services and a written referral (CAF) made within 24 hours of the disclosure.

OR

- not to make a referral at this stage
- if further monitoring is necessary
- if it would be appropriate/beneficial to undertake an assessment (e.g. CAF) and/or make a referral for other services

All information and actions taken, including the reasons for any decisions made, will be fully documented. All referrals to Children's Services will be accompanied by a standard referral form (CAF).

j. Early Help

Safeguarding is everyone's responsibility, and that management should ensure that all staff are prepared to identify children who may benefit from 'early help'. Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged.

If Early Help is appropriate, the senior DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead professional. Any such cases should be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services, if the child's situation does not appear to be improving.

Early Support in Harrow delivers services and activities for parents, carers, pregnant women, and young people aged 0-19 (or 25 with Special Educational Needs/disability). Children with Special educational needs and disabilities can face additional safeguarding challenges.

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

- is disabled and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- is frequently missing/goes missing from care or from home
- is at risk of modern slavery, trafficking, or exploitation
- is at risk of being radicalised or exploited
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing drugs or alcohol themselves
- has returned home to their family from care
- is a privately fostered child

k. Communication with parents/carers

The Jubilee Academy will:

- Undertake appropriate discussion with parents/carers prior to involvement of another agency unless to do so would place the young person at further risk of harm or undermine the collation of evidence.
- Ensure that parents/carers have an understanding of the responsibilities placed on the school and staff for safeguarding students.

l. Recording and Monitoring

Accurate records will be made as soon as practicable and will clearly distinguish between observation, fact, opinion, and hypothesis. All records will be signed and dated, any information given will be recorded and a note made of the location and description of any injuries seen.

All Child Protection documents will be retained in a 'Child Protection' file, separate from the child's main file. This will be locked away and only accessible to the Headteacher and senior designated persons. These records will be copied and transferred to any school or setting the child moves to, clearly marked 'Child Protection, Confidential, for attention of Designated Person Child Protection.' separately to the student's main school file, by hand or by recorded delivery. A record of this transfer will be kept, and an acknowledgment of receipt sent by receiving school. Original copies will be retained until the child's 25th birthday

m. Whistleblowing: Concerns with safeguarding practices in the school

All staff and volunteers are made aware of their Whistle-blowing responsibilities and will promptly report any raise concerns about poor or unsafe practice and potential failures in the school or college's safeguarding regime and know that such concerns will be taken seriously by the senior leadership team.

The school has appropriate whistleblowing procedures as outlined in the Whistleblowing Policy which is part of the suite of **TJA HR Suite of Policies**, to support staff for such concerns to be raised that is available on the staff shared drive and school website

This policy aims to:

- provide avenues for employees to raise concerns internally as a matter of course and receive feedback on any action taken.
- provide for matters to be dealt with quickly and appropriately; and ensure that concerns are taken seriously.
- reassure employees that they will be protected from reprisals or victimisation for whistleblowing where they have a genuine concern.
- allow employees to take the matter further if they are dissatisfied with the Governing Body's response.

A whistleblowing disclosure must be about something that affects the public such as:

- a criminal offence has been committed, is being committed or is likely to be committed
- a legal obligation has been breached
- there has been a miscarriage of justice
- the health or safety of any individual has been endangered
- the environment has been damaged
- information about any of the above has been concealed.

Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

General guidance can be found at: [Advice on whistleblowing](#).

The [NSPCC whistleblowing helpline](#) is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school or college. Staff can call **0800 800 5000** – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk

n. Supporting the Child and Partnership with Parents

- School recognises that the child's welfare is paramount, however good child protection practice and outcome relies on a positive, open, and honest working partnership with parents.
- Whilst we may, on occasion, need to make referrals without consultation with parents, we will make every effort to maintain a positive working relationship with them whilst fulfilling our duties to protect any child.
- We will provide a secure, caring, supportive and protective relationship for the child.

- Children will be given a proper explanation (appropriate to age and understanding) of what action is being taken on their behalf and why.
- We will endeavour always to preserve the privacy, dignity and right to confidentiality of the child and parents. The Senior Designated Safeguarding Lead will determine which members of staff “need to know” personal information and what they “need to know” for the purpose of supporting and protecting the child.

o. Use of school premises for non-school activities

- The school does not rent or hire out the school facilities or premises to organisations, individuals or community groups.

Section F: Allegations against students - procedures for dealing with peer-on-peer abuse including sexual violence and sexual harassment

The Jubilee academy recognises that children can also be vulnerable to physical, sexual, and emotional bullying and abuse by their peers or they may be the perpetrator of such behaviour.

We will always address such abuse seriously, involving partner agencies where required. We will remain alert to the possibility that a child or young person who has harmed another may well also be a victim.

All staff should be aware that children can abuse other children (often referred to as peer on peer abuse) and it can take many forms. It can happen both inside and outside of school and online. It is important that all staff recognise the indicators and signs of peer on peer abuse and know how to identify it and respond to reports.

All staff should understand, that even if there are no reports in their schools or colleges it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have **any** concerns regarding peer on peer abuse they should speak to their designated safeguarding lead.

It is essential that **all** staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Peer on peer harm or harmful sexual behaviour is most likely to include, but not limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- 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; and
- 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).

All staff should be clear as to the school's or college's policy and procedures with regards to peer-on-peer abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

Abuse is abuse and should never be tolerated or passed off as "banter" or "part of growing up". Different gender issues can be prevalent when dealing with peer on peer harm. This could for example include girls being sexually touched/assaulted or boys being subject to initiation-type violence.

At The Jubilee Academy we believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and other students.

We recognise that some students will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school's Behaviour Policy.

Occasionally, allegations may be made against students by others in the school, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse, and sexual exploitation. It is likely that to be considered a safeguarding allegation against a pupil, some of the following features will be found

The allegation:

- is made against an older pupil and refers to their behaviour towards a younger pupil or a more vulnerable pupil
- is of a serious nature, possibly including a criminal offence
- raises risk factors for other pupils in the school
- indicates that other pupils may have been affected by this student
- indicates that young people outside the school may be affected by this student

Staff should not dismiss some abusive sexual behaviour as 'normal' between young people and should not develop high thresholds before acting.

All concerns and or allegations should be reported via CPOMs and send an email to the designated safeguarding lead, who will investigate and record in line with the school behavioural policy. The school has a zero tolerance to abuse including peer on peer abuse.

At The Jubilee Academy we will support the victims of Peer-on-peer harm through different channels such as mentoring, counselling as well as providing advice to parents and acers and if necessary third-party intervention.

At The Jubilee Academy victims will be taken seriously, kept safe and never be made to feel like they are creating a problem for reporting abuse, sexual violence or sexual harassment

At The Jubilee Academy will deal with such incidents following the DfE guidance: Sexual Violence and Sexual Harassment 'Sexual Violence and Sexual Harassment between children in schools and colleges' (DfE 2018) and UKCCIS (now known as the UKCIS) Guidance on the 'Sharing nudes and semi-nudes: advice for education settings working with children and young people' (Jan 2021)

Sexual violence, harmful sexual behaviour, and sexual harassment between children in schools

The Jubilee academy recognises, acknowledges and understands the scale of harassment and abuse.

Advice and guidance on Sexual violence, harmful sexual behaviour and sexual harassment can be found via:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/999239/SVSH_2021.pdf

All staff will be required to read Part 5 of KCSIE 2021: Child on child sexual violence and sexual harassment paragraphs 428 – 434

Context

Sexual violence, harmful sexual behaviour and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence, harmful sexual behaviour and sexual harassment will likely find the experience stressful and distressing. This will, likely, adversely affect their educational attainment. Sexual violence, harmful sexual behaviour and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support.

Staff should be aware that:

- the Jubilee academy takes a zero-tolerance approach towards sexual violence and sexual harassment
- sexual violence and sexual harassment is not acceptable, is not an inevitable part of growing up
- never to make the victim feel they are the problem for making a report or made to feel ashamed for making a report
- children might not tell staff about their abuse and it may be that staff overhear a conversation or the child's behaviour changes
- not to tolerate or dismiss sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and
- of the challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts, and genitalia, flicking bras, and lifting skirts.
- Not to dismiss or tolerate such behaviours risks and normalising them
- some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.
- Sexual assault can result in a range of health needs including physical, mental and sexual health problems and unwanted pregnancy.

What is Sexual violence, harmful sexual behaviour and sexual harassment?

Sexual violence

It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003¹⁰⁵ as described below:

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: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his 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: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes 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. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

What is consent? 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 s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

Further information about consent can be found here: [Rape Crisis England & Wales -Sexual consent](#)

- a child under the age of 13 can never consent to any sexual activity;
- the age of consent is 16; 138
- sexual intercourse without consent is rape.

What is harmful sexual behaviour?

Harmful sexual behaviour (HSB) is developmentally inappropriate sexual behaviour which is displayed by children and young people and which may be harmful or abusive (derived from Hackett, 2014). It may also be referred to as sexually harmful behaviour or sexualised behaviour. HSB encompasses a range of behaviour, which can be displayed towards younger children, peers, older children or adults. It is harmful to the children and young people who display it, as well as the people it is directed towards.

HSB includes;

- Sexist or homophobic name calling and bullying
- Sexual comments in person and on social media directed at students (such as 'slag', 'sket', 'hoe', 'bitch' and 'slut')
- Rumours about other students' sexual activity • Rating students (predominantly directed at girls in relation to attractiveness, but also "how much of a sket she is"; and rating male students around masculinity/aggressive behaviour)
- Controlling behaviour in relationships, including pressure from partners to share social media passwords and to take down images they didn't like
- Pressure to send sexual photos by another student – predominantly aimed at girls
- Sexual imagery shared on social media without consent
- Inappropriate or unwanted touching or groping – predominantly touching of bums in school
- Pressure to perform sexual acts, particularly fellatio and masturbation
- Sexual bullying, harassment and pressure
- Self-harm (as a result of sexual pictures being shared with other students)

Sexual harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment 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.

Whilst not intended to be an exhaustive list, sexual harassment 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) and displaying pictures, photos or drawings of a sexual nature; and
- 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 sharing of nudes and semi-nudes images and/or videos.¹⁴⁰ As set out in [UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) (which provides detailed advice for schools and colleges) taking and sharing nude photographs of U18s is a criminal offence;
- sharing of unwanted explicit content;
- upskirting (is a criminal offence¹⁴¹);
- sexualised online bullying;
- unwanted sexual comments and messages, including, on social media;
- sexual exploitation; coercion and threats.

Upskirting

'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 now a criminal offence

Raising awareness of sexual violence and sexual harassment

The Jubilee Academy has an effective programme of personal, social, health and economic education (PSHE) and sex and relationships education (SRE) to help our students to understand safeguarding issues, how to raise a concern they may have about themselves, or a friend or peer; and learn to recognise and develop healthy and respectful relationships, avoiding stereotypes and promoting equality, in order to minimise Peer on peer harm.

They are taught that sexual violence and sexual harassment is always wrong

The response to a report of sexual violence or sexual harassment

At The Jubilee Academy we will support the victims of Peer on peer abuse by investigating thoroughly and involving other agencies whenever necessary e.g. Children's Services, CAMHS, police. The procedures to deal with sexual violence and sexual harassment are laid out in **Appendix C**

If staff have a concern, they should discuss any such case with the DSL and involve social care or specialist services as appropriate.

Reviewing Online Safety report of sexual violence or sexual harassment

The Designated safeguarding lead and safeguarding team will regularly review all records and actions associated to all sexual violence or sexual harassment reports to consider potential patterns and trends of problematic or inappropriate behaviour and bail consideration, 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 may be appropriate.

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

Ongoing response safeguarding and supporting the victim

The school will ensure support is tailored on a case-by-case basis

The school will signpost to sources of support which could include:

- Early help and children's social care as set out in Part one of this guidance.
- Children and Young People's Independent Sexual Violence Advisors (ChISVAs) provide emotional and practical support for victims of sexual violence. They are based within the specialist sexual violence sector and will help the victim understand what their options are and how the criminal justice process works if they have reported or are considering reporting to the police. ChISVAs will work in partnership with schools and colleges to ensure the best possible outcomes for the victim.
- Police and social care agencies can signpost to ChISVA services (where available) or referrals can be made directly to the ChISVA service by the young person or school or college. Contact details for ChISVAs can be found at [Rape Crisis](#) and

The Survivors Trust.

- Child and adolescent mental health services ([CAMHS](#)) is used as a term for all services that work with children who have difficulties with their emotional or behavioural wellbeing. Services vary depending on local authority. Most CAHMS have their own website, which will have information about access, referrals and contact numbers.
- The specialist sexual violence sector can provide therapeutic support for children who have experienced sexual violence. Contact [Rape Crisis](#) (England & Wales) or [The Survivors Trust](#) for details of local specialist organisations. The [Male Survivors Partnership](#) can provide details of services which specialise in supporting men and boys.
- NHS - [Help after rape and sexual assault - NHS \(www.nhs.uk\)](#) provides a range of advice, help and support including advice about the risk of pregnancy, sexually transmitted infections (STI), reporting to the police and forensics.
- Rape and sexual assault referral centres services can be found at: [Find Rape and sexual assault referral centres](#). [Sexual assault referral centres \(SARCs\)](#) offer medical, practical and emotional support. They have specially trained doctors, nurses and support workers. If children, young people, or their families are unsure which service to access, they should contact their GP or call the NHS on 111.
- [Childline](#) provides free and confidential advice for children and young people.
- [Internet Watch Foundation](#) works internationally to remove child sexual abuse online images and videos and offers a place for the public to report them anonymously.
- [Childline / IWF: Remove a nude image shared online](#) *Report Remove* is a free tool that allows children to report nude or sexual images and videos of themselves that they think might have been shared online, to see if they can be removed from the internet

Section G: Allegations made against/Concerns raised in relation to teachers, including supply teachers, other staff , volunteers and contractors

Concerns about a staff member, supply teacher, volunteer or contractor

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the headteacher as soon as possible. If the concerns/allegations are about the headteacher, speak to the chair of governors.

The head of school will then follow the procedures set out here if appropriate.

Section 1: allegations that may meet the harms threshold

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation. This will be the Head of School , or the chair of governors where the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgement.

Suspension of the accused until the case is resolved

Suspension of the accused will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the Jubilee Academy

If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate

- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. [Add further information here about the support available to individuals in your context, such as who they can turn to for advice – trade union representatives, or a colleague, for example – and any school/local authority/trust arrangements for welfare counselling or medical advice]
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Additional considerations for supply teachers and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week

- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Specific actions

Action following a criminal investigation or prosecution:

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated, unfounded, false or malicious reports

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Confidentiality and information sharing

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the LADO, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared

- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, the school will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

Learning lessons

After any cases where the allegations are *substantiated*, the case manager will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: concerns that do not meet the harm threshold

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

Examples of such behaviour could include, but are not limited to:

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Using inappropriate sexualised, intimidating or offensive language

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per section 7.7 of this policy
- Empowering staff to self-refer

- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

Responding to low-level concerns

If the concern is raised via a third party, the headteacher will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's staff code of conduct.

Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves' employment at the school

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

Section H: Online Safety

It is essential that children are safeguarded from potentially harmful and inappropriate online material. The use of technology has become a significant component of many safeguarding issues including CSE, radicalisation and sexual predation. Young people can be both victims and perpetrators of online abuse. Online safety is reflected in all relevant policies and is considered when planning the curriculum, any teacher training, the role and responsibilities of the DSL and any parental engagement.

The school has an effective approach to online safety to protect and educate the whole school community in their use of technology and establishes mechanisms to identify, intervene in and escalate any incident where appropriate. A commitment to online safety is an integral part of the safer recruitment and selection process of staff and volunteers.

The four main areas of risk in the use of technology are:

- content: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- contact: being subjected to harmful online interaction with other users; 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 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 your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

Raising awareness of online safety

To meet our aims and address the risks above we will:

- Educate pupils about online safety as part of our curriculum. For example:
 - The safe use of social media, the internet and technology
 - Keeping personal information private
 - How to recognise unacceptable behaviour online
 - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety

The **DSL and SBM (ICT)** are the appointed staff members Staff E-learning /who receive appropriate on-going training, support and supervision and works closely with the Designated Person for Child Protection

All staff including governors, volunteers, supply teachers and agency staff are made aware of the school's E-learning /Safety Policy and arrangements.

E-Safety and ICT Acceptable Use Policy in. of Remote and Mobile Technology and Acceptable User Agreements (AUAs) and Online Safety Policy

The School has AUAs for: Students, Staff, Parents, External Agencies, and an E-Safety and ICT Acceptable Use Policy in. of Remote and Mobile Technology.

Mobile Phones and mobile Technology

Details of how the School manages mobile technology in The Jubilee Academy are set out in the School's E-Safety and ICT Acceptable Use Policy in. of Remote and Mobile Technology.

Students are not allowed the use of mobile or smart technology when on the school site. All devices are collected t the beginning of the day and locked away securing until the end of the day.

Access to the wireless school network is tightly password protected and access is monitored by the ICT technician.

Filters and monitoring, information security and access management

The School has a filter and monitoring systems in place to ensure that children are safe from inappropriate sexual, terrorist and extremist material when accessing the internet from the School's IT system

This filter is regularly checked in accordance with the School's E-Safety and ICT Acceptable Use Policy in. of Remote and Mobile Technology.

All internet traffic passes through the filter, this is a software installed on a piece of hardware. This filters all traffic by web address and/or IP address based on the user. The filter differentiates between students and staff and restricts access to websites that are deemed inappropriate and potentially harmful. The School's Internet is monitored for all users whether using a School device or a personal device connected to the school network The software also allows reports to be generated on the activity of users accessing websites blocked by category or blocked individually.

The School has a monitoring system as set out in the E-Safety and ICT Acceptable Use Policy in. of Remote and Mobile Technology that is an essential tool to safeguard the school's systems and shield them from security threats (cybercrimes)– whether external or internal – keeping the school's IT systems secure and running efficiently.

The school's monitoring software allows multiple ways of restricting content via keywords. It can prevent and log any attempts to access a website/file/program with restricted keywords providing a very powerful way to protect students from harmful content. The software also allows reports to be generated on the activity of users typing key words defined within the software. School has robust security to protect users (and their data).

Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;
- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and

- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime

All concerns about a child in this area are to be reported to the designated safeguarding lead who will consider referring the child into the **Cyber Choices** programme.

Remote Learning and School Closure

At The Jubilee Academy our primary aim is the safety and wellbeing of our staff and students. In addition to this we recognise the need for continuity, routine, and predictability for parents / carers and young people.

In circumstances where teaching and learning is provided to students off-site (due to school closure, for instance), teachers and non-teaching staff will communicate with pupils in accordance with the [Remote Learning Policy](#) through the relevant approved channels; school email accounts, the TJA online platform through MS teams and zoom.

Staff, pupils and parents will be reminded that the usual arrangements for safeguarding are not affected by school closure and that this policy on safeguarding applies despite pupils learning remotely.

Reviewing Online Safety

Technology, and risks and harms related to it evolve and change rapidly. The School's Online safety Group holds termly online safety meetings, and regularly reviews our approach to online safety, supported by an annual risk assessment that considers and reflects the risks our children face.

Section I: Monitoring and Evaluation

- All students at risk and with Child Protection Plans or Child in Need Plans are monitored regularly and discussed between the Senior Designated Safeguarding Lead and Safeguarding Team at fortnightly meetings
- All students at risk and with Child Protection Plans or Child in Need Plans are monitored by the Senior Designated Safeguarding Lead, with relevant staff members, and appropriate outside professional agencies on a regular basis as appropriate
- The Senior Designated Safeguarding Lead meets the team regularly to monitor individual cases.
- The Senior Designated Safeguarding Lead meets the Head of School regularly to monitor individual cases.
- The Senior Designated Safeguarding Lead provides the designated Governors with regular briefings.
- The designated Governor for overall Safeguarding will make regular 'blind' checks of a sample of staff to ensure correct practices are accurately understood.
- All staff regularly receive updated Safeguarding and Child Protection information and training.
- All adults working on a temporary or casual basis are required to read and sign updated staff conduct policy before working with students.
- Staff leading residential trips are given a briefing on CP procedure as disclosures are more likely in these types of situations.
- Regular questionnaires regarding safeguarding issues and the perception of safety are issued to students, parents and staff, the results analysed, and data used to inform future planning and practice.
- Governors will conduct visits and internal checks on the school's systems relating to safeguarding.
- The Senior Leadership Team and the relevant Safeguarding Governor, with the Head of School, will conduct an annual audit of Safeguarding as per the Local Safeguarding Children Board guidance

Appendix A Related School Practice and Policies

This part contains important additional information about specific forms of abuse and safeguarding issues.

Bullying

The Jubilee Academy's policy on the prevention and management of bullying is set out in a separate document and is reviewed annually by the governing body. This policy includes reference to all prejudice related bullying. We acknowledge that to allow or condone bullying may lead to consideration under child protection procedures.

Physical Intervention

The Jubilee Academy has a separate Physical Intervention Policy which complies with DfE's guidance on use of reasonable force. This policy states that staff may only use reasonable force, meaning no more force than is needed to prevent pupils from hurting themselves or others, from damaging property, or from causing disorder. It is always unlawful to use force as a punishment.

The Jubilee Academy has a searching, Screening and Confiscating Policy which complies with DfE's guidance on Searching Screening and Confiscating. The Head of School and other authorised trained staff can use such forces as is reasonable in the circumstances to conduct a search for the following prohibited items: knives and weapons, alcohol, illegal drugs, stolen items, cigarettes and tobacco, fireworks, pornographic images, mobile phones or any article that has been or is likely to be used to commit an offence, cause personal injury or damage property.

If the use of force is necessary, reasonable adjustments for disabled children and children with special educational needs will be made.

Any use of force or restraint should be recorded and signed by a witness. The parent/carers will be informed of the incident.

Serious Violence

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

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, 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.

All serious violent crimes will be investigated using the school's behaviour policy, but we will work closely with our safer schools' officer and social workers where necessary. Further information can be found in annex B.

Children Missing from Education

A child going missing from education is a potential indicator of abuse or neglect, and such children are at risk of being victims of harm, exploitation, or radicalisation.

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

Children missing from education are at greater risk of:

- Physical harm
- Sexual exploitation
- Becoming involved in crime
- Demonstrating anti-social behaviour
- Abusing drugs and alcohol
- Being illegally employed

In response to the guidance Keeping children Safe In Education (2021) the school will follow procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future.

The school will always follow up with parents/carers when pupils are not at school. This means we need to have a least two up to date contacts numbers for parents/carers. Parents will be expected to ensure that the school has at least two emergency contacts for their child. Parents should remember to update the school as soon as possible if the numbers change.

In response to the guidance in Keeping Children Safe in Education (2021) the school has:

- Staff who understand what to do when children do not attend regularly
- Appropriate policies, procedures and responses for pupils who go missing from education (especially on repeat occasions).
- Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.
- Procedures to inform the local authority when we plan to take pupils off-roll when they:

- leave school to be home educated
- move away from the school's location
- remain medically unfit beyond compulsory school age
- are in custody for four months or more (and will not return to school afterwards); or
- are permanently excluded

This includes informing the local authority if a child leaves the school without a new school being named and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

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

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is in immediate danger or at risk of harm.

If staff have a concern, they should discuss any such case with the DSL and who will involve social care or specialist services as appropriate.

Children with family members in prison

Approximately 200,000 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. NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

If staff have a concern, they should discuss any such case with the DSL and who will involve social care or specialist services as appropriate

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

The school knows that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.

Child sexual exploitation CSE

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 nonpenetrative 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.

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.

Like all forms of child sex abuse, child sexual exploitation:

- 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.
- can still be abuse even if the sexual activity appears consensual.
- can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity.
- can take place in person or via technology, or a combination of both.
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.
- may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).
- 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; and
- is typified by some form of power imbalance in favour of those perpetrating the abuse. 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.

Children rarely self-report child sexual exploitation so it is important that practitioners are aware of potential indicators of risk, including:

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

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

Child sexual exploitation is never the victim's fault, even if there is some form of exchange: all children and young people under the age of 18 have a right to be safe and should be protected from harm

Sexual exploitation can have links to other types of crime.

- Child trafficking.
- Domestic abuse.
- Sexual violence in intimate relationships.
- Grooming (including online grooming).
- Abusive images of children and their distribution.
- Drugs-related offences.
- Gang-related activity.
- Immigration-related offences.
- Domestic servitude.

The following vulnerabilities are examples of the types of things children can experience that might make them more susceptible to child sexual exploitation

- Having a prior experience of neglect, physical and/or sexual abuse; •
- Lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example); •
- Recent bereavement or loss.
- Social isolation or social difficulties.
- Absence of a safe environment to explore sexuality.
- Economic vulnerability.
- Homelessness or insecure accommodation status.
- Connections with other children and young people who are being sexually exploited.
- Family members or other connections involved in adult sex work.
- Having a physical or learning disability.
- Being in care (particularly those in residential care and those with interrupted care histories); and
- Sexual identity.

Not all children and young people with these vulnerabilities will experience child sexual exploitation. Child sexual exploitation can also occur without any of these vulnerabilities being present

Further information about CSMENTALE including definitions and indicators is included in Annex B of KCSIE (2021)

These include: If staff have a concern, they should discuss any such case with the DSL and who will involve social care or specialist services as appropriate.

Child Criminal Exploitation (CCE):

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime 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.

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur using technology.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions.
- children who associate with other young people involved in exploitation.
- children who suffer from changes in emotional well-being.
- children who misuse drugs and alcohol.
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

Further information about CCE including definitions and indicators is included in Annex B of KCSIE (2021)

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children’s homes and care homes.

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing and are subsequently found in areas away from their home;
- have been the victim or perpetrator of serious violence (e.g. knife crime);
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a ‘traphouse or cuckooing’ or hotel room where there is drug activity;
- owe a ‘debt bond’ to their exploiters;
- have their bank accounts used to facilitate drug dealing.

Further information on the signs of a child’s involvement in county lines is available in guidance published by the [Home Office](#).

If staff have a concern, they should discuss any such case with the DSL and who will involve social care or specialist services as appropriate.

Modern Slavery and the National Referral Mechanism

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK (www.gov.uk)

Domestic abuse

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse.

The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be “personally connected” (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of peer on peer abuse is sometimes referred to as ‘teenage relationship abuse’. Depending on the age of the young people, this may not be recognised in law under the statutory definition of ‘domestic abuse’ (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support. The Act’s provisions, including the new definition, will be commenced over the coming months.

If staff have a concern, they should discuss any such case with the DSL and who will involve social care or specialist services as appropriate.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. 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.

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 should also be recognised 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.

If staff have a concern, they should discuss any such case with the DSL and involve social care or specialist services as appropriate.

Faith

Certain kinds of child abuse linked to faith or belief. These include belief in witchcraft, spirit possession, demons or the devil and use of fear of the supernatural to make children comply with being trafficked for domestic slavery or sexual exploitation.

If staff have a concern, they should discuss any such case with the DSL and involve social care or specialist services as appropriate.

Fabricated or induced illness

A rare form of child abuse, which may include parents or carers fabricating signs and symptoms of illness, falsifying medical records, letters, or documents, or inducing illness.

Signs:

- Frequent and unexplained absences from school, particularly from PE lessons
- Regular absences for doctor's or hospital appointments
- Repeated claims by parent(s) that a child is frequently unwell and that he/she requires medical attention for symptoms which, when described, are vague in nature, difficult to diagnose and which teachers/ early years staff have not themselves noticed (for example, headaches, tummy aches, dizzy spells)
- Frequent contact with opticians and/or dentists or referrals for second opinions

If staff have a concern, they should discuss any such case with the DSL and involve social care or specialist services as appropriate.

Self-Harm

Self-harm is any behaviour where the intent is to deliberately cause harm to one's own body for example:

- Cutting, scratching, scraping, or picking skin
- Swallowing inedible objects
- Taking an overdose of prescription or non-prescription drugs
- Swallowing hazardous materials or substances
- Burning or scalding
- Hair-pulling
- Banging or hitting the head or other parts of the body
- Scouring or scrubbing the body excessively

If staff have a concern, they should discuss any such case with the DSL and involve social care or specialist services as appropriate.

Female Genital Mutilation (FGM)

Also known as 'female circumcision'. Any FGM procedure on a woman or girl is unlawful under the Female Genital Mutilation Act 2003. It is also an offence under the Act for UK nationals or permanent residents to carry out FGM abroad, or to aid, abet, counsel or procure the carrying out of FGM abroad, even in countries where the practice is legal.

Section 5B of the 2003 Act introduces a mandatory reporting duty which requires regulated health and social care professionals and teachers in England and Wales to report **'known' cases of FGM in under 18s** which they identify in the course of their professional work to the police. In schools, this will usually come from a disclosure (unlike in the medical profession where an observation may have been made).

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out; and discuss any such cases with the Designated Safeguarding Lead who will inform children's social care. The duty does not apply in relation to at risk or suspected cases.

School staff are made aware of the risks of a girl having suffered FGM or be a risk of this. Victims of FGM are more likely to come from a community that is known to practise this activity. Staff should note that girls at risk of FGM may not be aware of the practice or that it may be conducted on them, therefore sensitivity should be shown when approaching the subject.

Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK.

FGM typically takes place between birth and around 15 years old; however, it is believed that most cases happen between the ages of 5 and 8.

Potential signs that a pupil may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
 - Having a mother, older sibling or cousin who has undergone FGM
 - Having limited level of integration within UK society
 - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
- Being unexpectedly absent from school
- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues

Potential Symptoms of FGM include

- Having difficulty walking, sitting, or standing, or looking uncomfortable
- Finding it hard to sit still for long periods of time (where this was not a problem previously)
- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Having frequent urinary, menstrual or stomach problems
- Avoiding physical exercise or missing PE
- Being repeatedly absent from school, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

The above indicators and risk factors are not intended to be exhaustive.

As a school we will monitor requests for leave before the Easter Break and Summer Holidays and on the return to school to support any individual student that may be at risk and also help raise awareness amongst parents, pupils and teachers. We will also draw on the knowledge of our local community

Sexting – Sharing Nudes and Semi Nudes

The term 'sexting' also known as youth produced sexual imagery) UKCCIS Guidance: Sexting in schools and colleges, responding to incidents, and safeguarding young people (2017), which has been replaced by Guidance on the 'Sharing nudes and semi-nudes: advice for education settings working with children and young people' (Jan 2021); is derived from texting and refers to the sending of sexually provocative material (including photos, videos and sexually explicit text) from modern communication such as mobile phones, tablets, email, social networking sites and instant messaging services. Legal Implications for Students

Sexting – Sharing Nudes and Semi Nudes may breach laws that prohibit the creation, distribution or possession of child pornography regardless of whether all parties involved consent to the images being taken and shared, or whether the images are sent to other minors, even minors of the same age.

Sexting – Sharing Nudes and Semi Nudes can constitute a criminal offence and sexual harassment. It can also be considered a form of sexual exploitation and cyberbullying. This is especially the case where images are shared past the intended audience or when accompanied by nasty comments

All staff members are required to notify the Lead Designated Persons for Safeguarding and Child Protection immediately upon becoming aware that sexting by a student is likely to have occurred. The allegation will first be investigated by the Lead Designated Persons for Safeguarding and Child Protection and the parents of all students involved will be contacted.

Staff members are not permitted to forward, copy or print any sexting images, however, if the nature of the sexting is deemed by the designated Person to be of a serious nature, the Police will be contacted, and the sexting will be reported to Children's Services.

If staff have a concern, they should discuss any such case with the DSL and involve social care or specialist services as appropriate.

Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered 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 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 to coerce a person into marriage. There can also be links to Honour Based Abuse

Signs include:

- Absence and persistent absence
- Request for extended leave of absence and failure to return from visits to country of origin
- Fear about forthcoming school holidays

- Surveillance by siblings or cousins at school
- Decline in behaviour, engagement, performance, or punctuality
- Not being allowed to attend extra-curricular activities
- Prevented from going on to further/higher education

Our school recognises that it has an important role in safeguarding children from forced marriage by educating pupils about the law and their rights and in identifying signs of risk. This is a safeguarding and child protection issue. The school will ensure:

- All staff need to be aware of any signs that would indicate a pupil is concerned that they may be taken away.
- There are close checks on requests for holidays abroad or requests for leave of absence
- There is close monitoring of attendance and reasons for absence.
- All concerns regarding the possibility of Forced Marriage will be referred to the Duty and Assessment Team or the Forced Marriage Unit 0207 0080151 or out of hours 0207 0081500

If staff have a concern, they should discuss any such case with the DSL and involve social care or specialist services as appropriate.

‘Honour Based’ Abuse

So-called ‘honour-based’ abuse (HBA) encompasses 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. All forms of so called HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

Where staff are concerned that a child might be at risk of HBA, they must contact the Designated Safeguarding Lead as a matter of urgency.

Child Trafficking

The Jubilee Academy will remain alert for children trafficked into the country who may be registered at our school for a term or longer, before being moved to another part of the UK or abroad. We will bear in mind that not all children who go missing from education have been victims of trafficking. For example, there may be instances of children from communities that move around -Gypsy, Roma, traveller, or migrant families – who collectively go missing from school. For further government guidance refer to Safeguarding Children who may have been trafficked practice guidance.

Gangs and youth violence

Gangs are defined as a relatively durable, predominantly street-based group of young people who:

- See themselves (and are seen by others) as a discernible group
- Engage in criminal activity and violence
- Lay claim over territory
- Have some form of identifiable structural feature
- Conflict with other, similar gangs

Schools are increasingly recognised as places where early warning signs can be spotted that younger children may be at risk of getting involved in gangs or youth violence. Crucial preventive work can be done at this stage to prevent negative behaviour from escalating and becoming entrenched

We recognise that even low levels of youth violence can have a disproportionate impact on a pupil or the wider school/community environment. We will therefore, support children in developing safeguarding skills to prevent involvement in risky behaviours, and where serious concerns arise, we will work collaboratively with our partner agencies to help prevent escalation of harm

If staff have a concern, they should discuss any such case with the DSL and involve social care or specialist services as appropriate.

Radicalisation and Preventing Violent Extremism

In line with Government and local guidelines, the school is committed to protect the freedom of speech. However, we understand that we must challenge any extremist (and non-violent) ideas that are part of a terrorist ideology. We are committed to intervene to prevent students from being drawn into radicalisation and terrorism.

We have worked and will continue to work in partnership with a wide range of local and national agencies, including those responsible for PVE, to monitor, report and record any activity deemed inappropriate.

Preventing

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' or colleges' safeguarding approach.

[Extremism](#) is the vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces which received Royal Assent on 12 February 2015, places a duty on specified authorities, including local authorities and childcare, education and other children's services providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism ("the Prevent duty").

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Terrorism¹³² 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.

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).

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, 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 and act proportionately which may include the designated safeguarding lead (or deputy) making a referral to the Channel programme.

The relevant provisions of the Act will come into force on 12 Indicators that an individual is engaged in an extremist group, ideology, or cause, 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 like 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 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, artwork 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

The designated safeguarding lead (and any deputies) are aware of local procedures for making a Prevent referral.

The Prevent duty

All schools and colleges are subject to a duty under section 26 of the Counter- Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have “due regard¹⁰³ to the need to prevent people from being drawn into terrorism”.¹⁰⁴ This duty is known as the Prevent duty.

The Prevent duty should be seen as part of schools’ and colleges’ wider safeguarding obligations. Designated safeguarding leads and other senior leaders in schools should familiarise themselves with the revised [Prevent duty guidance: for England and Wales](#), especially paragraphs 57-76, which are specifically concerned with schools (and also covers childcare). Designated safeguarding leads and other senior leaders in colleges should familiarise themselves with the [Prevent duty guidance: for further education institutions in England and Wales](#). The guidance is set out in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies.

If staff have a concern, they should discuss any such case with the designated safeguarding lead and who will involve social care as appropriate.

[Educate Against Hate](#), a website launched by the Her Majesty’s Government has been developed to support and equip school and college leaders, teachers, and parents with information, tools and resources (including on the promotion of fundamental British values) to help recognise and address extremism and radicalisation in young people. The platform provides information on and access to training resources for teachers, staff and school and college leaders, some of which are free such as Prevent e-learning, via the Prevent Training catalogue.

The School is 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.

Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual’s engagement with the programme is entirely voluntary at all stages.

The designated safeguarding lead (and any deputies) are aware of local procedures for making a Prevent referral.

The designated safeguarding lead should consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the ‘Channel’ programme, and have that support in place for when the child arrives.

Teenage relationship abuse

Teenage relationship abuse consists of the same patterns of coercive and controlling behaviour as domestic abuse. These patterns might include sexual abuse, physical abuse, financial abuse, emotional abuse, or psychological abuse.

Signs include:

- Physical signs injury/illness
- Truancy
- Falling grades
- Isolation from family and friends
- Frequent texts and calls from boyfriend/girlfriend
- Depression
- Self-harm

Looked after children

The most common reason for children becoming looked after is because of abuse and/or neglect. We ensure that staff have the skills, knowledge and understanding necessary to keep looked after children safe.

In particular, we ensure that appropriate staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. They also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The designated safeguarding lead has details of the child's social worker and the name of the virtual school head in the authority that looks after the child.

Under the Children and Social Work Act 2017, a 'registered pupil' is any child who has ever been looked after by the local authority but has now ceased to be looked after as a result of child arrangements order, or a special guardianship or an adoption order – schools must have a designate member of staff for promoting the educational achievement of such 'registered pupils'. Designated member of staff for 'registered pupils' - Looked after child, looked after child in past, Special guardianship or adoption order is Mr Boothe, Deputy Headteacher

If staff have a concern, they should discuss any such case with the DSL and involve social care or specialist services as appropriate.

LA notification when private fostering is discovered

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.

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

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

Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.

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

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

If staff have a concern, they should discuss any such case with the DSL and involve social care or specialist services as appropriate.

Contextual Safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside the school or college. All staff, but especially the designated safeguarding lead (and deputies) should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

Children's social care assessments should consider where children are being harmed in contexts outside the home, so it is important that schools and colleges provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm.

Children's social care assessments should consider such factors, so it is important that schools and colleges provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

Mental Health

The Jubilee Academy will prevent mental health problems by promoting resilience as part of an integrated, whole school approach to social and emotional wellbeing, which is tailored to the needs of their students.

The Designated safeguarding Lead is the senior mental health lead and provide strategic direction for mental health awareness and support.

All staff at The Jubilee Academy are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

School staff are not expected or trained to diagnose mental health conditions or issues but may notice behaviours that may be of concern.

Where staff have a mental health concern about a child that may also be a safeguarding concern, they should raise the issue by informing the designated safeguarding lead or a deputy.

Students: The Jubilee Academy seeks to promote positive mental health in our students and to identify and address those with less severe problems at an early stage and build their resilience. We are also committed to identifying and supporting students with more severe needs and to help make appropriate referrals to specialist agencies such as Child and Adolescent Mental Health Services (CAMHS) where necessary.

The daily morning staff briefing is a forum used to highlight all students with behaviour, attendance, or emotional issues as well as reminders on key aspects from the safeguarding policy.

Students receive a yearly Safeguarding Booklet which contains a range of simplified information relating to such issues as safety, abuse, depression, and sexuality with appropriate links to both internal and external agencies who can help. These areas are followed up in RSHE, assembly and tutor sessions.

The Year Coordinator, who is a member for the Senior Leadership Team is the first port of call for any student's concerns in addition to their form tutor.

There is a Pastoral team comprising:

- 2 designated safeguarding officers trained to Level 3
- Deputy Headteacher, Personal Development and Welfare
- Attendance and Pastoral Officer
- Pastoral Administrator
- Learning Mentor
- Learning Champions

Staff can make referrals to Mr Boothe, The Deputy Head of Personal Development and Welfare or The Deputy Head of Discipline and Conduct of any concerning behaviour, both of whom are also the designed safeguarding leads. If it is deemed necessary referrals will then be made as required.

In order to target all students including those who may not self-refer or be reluctant to talk, the school has a universal system to ensure potential signs of safeguarding concern including mental health and self-harm, and other forms of abuse are reported to a dedicated email address for Safeguarding: safeguarding@thejubileeacademy.onmicrosoft.com.

This ensures that when any member of staff such as a classroom teacher spots a potential concern, e.g. low mood, change in behaviours they report directly to one of the 2 Level 3 trained members of the safeguarding team.

This is usually the first reporting point – staff are aware that should a member of the SG team not acknowledge / respond to the email within an hour, they must find a member of the team and report / discuss the concern in person. Instances of potential self-harm for individual students would be reported, and have been reported, and staff are confident and willing to do this

Most concerns turn out to be minor, however, the following would be put in place if a student's mental health were of a concern (also Refer Section C):

- Student is spoken to before the end of the school day and if necessary, confidential support offered
- If considered appropriate, parent / carer is spoken to that day and invited in to discuss and go over options for support – which could be allocation of a Learning Mentor and / or advised to go to GP and discuss a referral to CAMHS. Harrow Horizons (a commissioned service supported by Barnardos that offers mental health and therapeutic support prior to accessing CAMHS), can also be accessed in school.
- Should the concern be significant, and a student is deemed to be at risk to themselves, school contact parents / carers immediately and meet with them that day.
- Should the concern be even greater, and a student is deemed to be at significant risk to themselves, school contact parents / carers immediately and advise parent / carer to take the student to A&E to access immediate psychiatric consultation. If this is not possible, the school will take the student to A&E themselves.
- If there is a lack of protective factors for that student e.g. (family issues) – the school would refer to MASH as a priority safeguarding concern.

Once counselling is in place for a student, this is regularly monitored by the Deputy Head of Personal Development and Welfare and the Safeguarding Team, and next steps discussed with parents / carers, student, CAMHS and other agencies as appropriate.

Parental Mental Health: The Jubilee Academy recognises that some parents with mental health issues may experience difficulties at times with their parenting responsibilities. We are committed to supporting such families and will endeavour to identify those who would benefit from early help from local services and work with them to avoid any adverse impact on their children.

The school can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the mental health and behaviour in schools' guidance, colleges may also wish to follow this guidance as best practice. Public Health England has produced a range of resources to support secondary school teachers to promote England's positive health, wellbeing and resilience among children.

Health and Safety

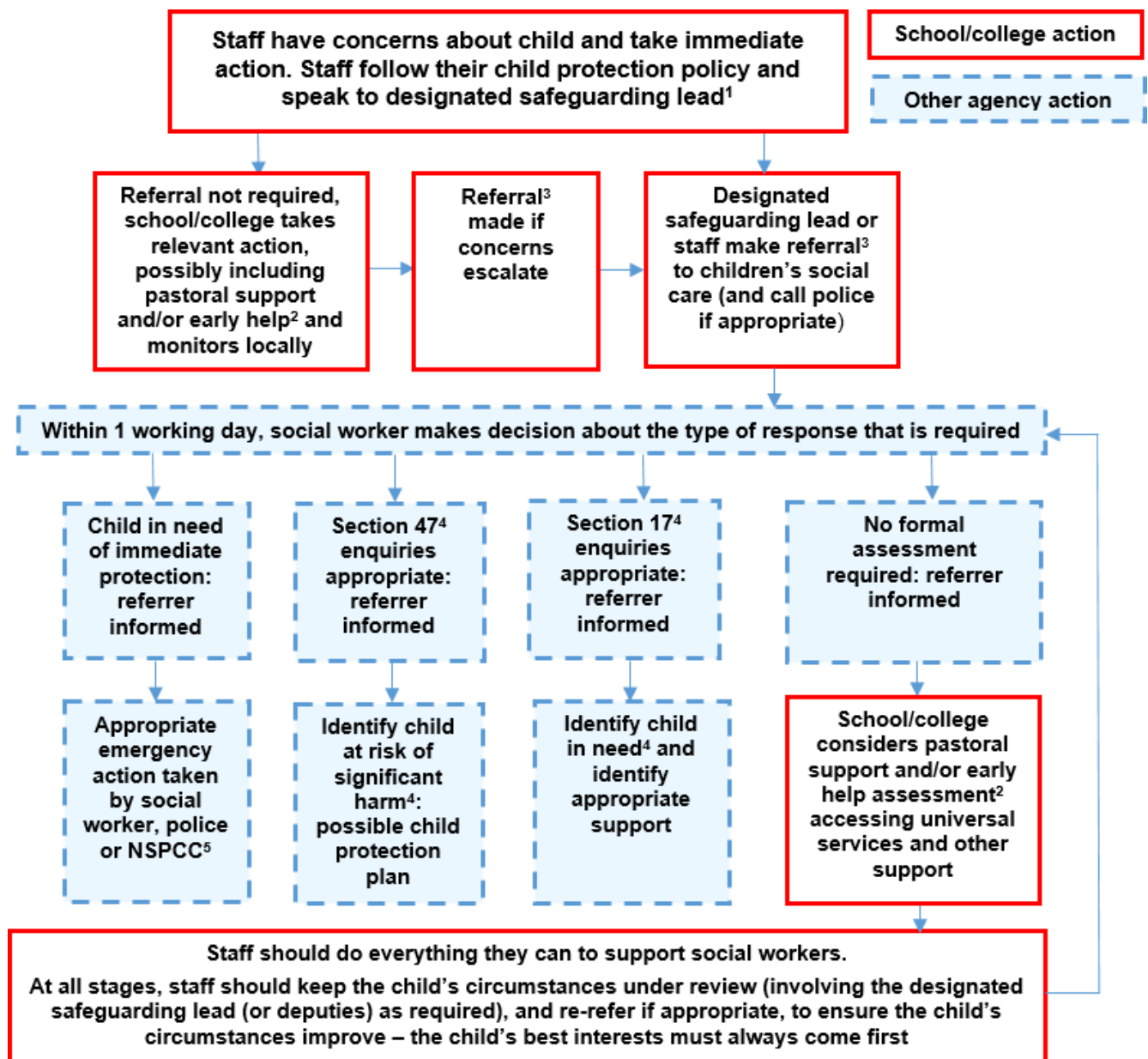
For more information see full and detailed policy

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

The Jubilee Academy ensures the safety of its environment for pupils through:

- Controlling access to the site
- a single entry/ exit access point, for visitors supervised by reception staff that is separate to staff and student entry/ exit access point
- Conducting an accessibility report and acting on its recommendations.
- Ensuring that we comply with Health and Safety requirements for all on-site activities.
- Requiring risk assessments before allowing any trips, visits, or work experience placements.
- Work Experience that includes safeguarding information for employers and a requirement that they accept their Child Protection responsibilities
- Vigilant monitoring to guard against intruders, anti-social behaviour and drug and alcohol misuse on site.
- Curriculum activities and social areas compliant with Health and Safety Requirements.
- Named passes issued to visitors with prior appointments, after their identity has been checked.
- Visitors being met at reception and escorted into the school.
- CCTV monitoring of the site, internal and external.
- A record of staff and visitors signing in/out.
- Supervision of students at break and lunchtimes.

Appendix B Action where there are concerns about a child



¹ In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of this guidance.

² Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

³ Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).

⁴ Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working Together to Safeguard Children](#).

⁵ This could include applying for an Emergency Protection Order (EPO).

Appendix C Procedure for dealing with incidents of Sexual Violence and Sexual Harassment (Peer on peer harm)

Procedure for dealing with incidents of Sexual Violence and Sexual Harassment

The Jubilee Academy will deal with such incidents following the DfE guidance: Sexual Violence and Sexual Harassment 'Sexual Violence and Sexual Harassment between children in schools and colleges' (DfE 2018).

For each incident, school will consider the severity of the incident and therefore whether it will be managed internally, with Early Help sought or referred to Social Care and the Police. Other considerations are listed on the flow chart below.

In all incidents, the victim will be supported and reassured, in consultation with parents / carers. The safeguarding of the victim and other students is paramount. Witnesses will also be supported (as per Table 2).

School will also support the alleged perpetrator.

The Jubilee Academy will consider the conduct of the alleged perpetrator as part of our behaviour policy on the 'balance of probabilities' and apply appropriate and proportional consequences. Depending on the nature of the incident, a Risk Assessment will be completed with the emphasis on the victim continuing with normal routines. If necessary, victims and alleged perpetrators can be kept apart in classrooms and other shared spaces, and consideration will be given about travel to and from school.

Response to report of alleged sexual violence or harassment (Peer on peer harm)

PART FOUR: RESPONSE TO REPORTS

Summary of responses

Definitions

Sexual Violence
Rape
Assault by penetration
Sexual assault

Sexual Harassment
Unwanted conduct of a sexual nature, including sexual remarks, sexual taunts, physical behaviour or online sexual harassment

Record-keeping
Remember, to record all concerns, discussions, decisions and reasons for decisions.

REPORT RECEIVED
(from the victim or third-party)
[Onsite, offsite or online]

Victim reassured

- taken seriously and kept safe
- confidentiality not promised
- listen to victim, non-judgementally
- record the disclosure (facts as reported)
- two staff present (one being the DSL, or reported to DSL as soon as possible)
- victim sensitively informed about referral to other agencies
- if victim does not give consent to share, staff may still lawfully share in order to protect child from harm and to promote the welfare of children (see 'Sexual Violence and Sexual Harassment' paragraph 43)
- parents of victim informed

Anonymity

Note that in cases of sexual violence there is legal protection of the victim's identity. Remember that this also includes sharing on social media and discussion amongst pupils in the school.

Considerations

- (Sexual Violence, Sexual Harassment and Harmful Sexual Behaviours)
Immediately: Consider how to support the victim and the alleged perpetrator
- wishes of the victim
 - nature of the alleged incident
 - ages of the children
 - development stage of the child
 - any power imbalance
 - one-off, or part of a pattern of behaviour
 - any ongoing risks
 - other related issues and wider context

MANAGE INTERNALLY

One-off incidents which the school believes that the child(ren) are not in need of early help or statutory intervention, which would be appropriate to deal with internally under the school's behaviour policy or anti-bullying policy.

EARLY HELP

Non-violent Harmful Sexual Behaviours
(see Harmful Sexual Behaviours Framework (NSPCC) and the Brook Traffic Light Tool)

REFER TO SOCIAL CARE

All incidents where a child has been harmed, is at risk of harm or is in immediate danger.

Social Care staff will decide next steps. Be ready to escalate if necessary.

REFER TO POLICE

All incidents of rape, assault by penetration or sexual assault.

Discuss next steps with police, for example, disclosing information to other staff, informing alleged perpetrator and their parents.

RISK ASSESSMENT

Case-by-case basis

RISK ASSESSMENT

Immediately

Do not wait for outcome of referral before protecting victim.
Emphasis on victim being able to continue normal routines.

Alleged perpetrator removed from any classes with victim (also consider shared spaces and journey to/from school)
[Not a judgement of guilt]

SAFEGUARD AND SUPPORT VICTIM AND (ALLEGED) PERPETRATOR

(see separate page)

SAFEGUARD AND SUPPORT VICTIM AND (ALLEGED) PERPETRATOR

(see separate page)

DISCIPLINARY MEASURES TAKEN

(see school's Behaviour Policy/Anti-bullying Policy)

DISCIPLINARY MEASURES TAKEN

(may be undertaken based on balance of probabilities, unless prejudicial or unreasonable)

CRIMINAL PROCESS ENDS

- ▶ **Conviction or Caution:** follow behaviour policy, consider Permanent Exclusion. If pupil remains in school, make clear expectations; keep victim and perpetrator apart. Consider victim's wishes.
- ▶ **Not Guilty:** Support victim and alleged perpetrator
- ▶ **No Further Action:** Support victim and alleged perpetrator

Ensure actions do not jeopardise the investigation
School to work closely with police and/or other agencies

Safeguarding and supporting victims and alleged perpetrators

| Victim | Alleged Perpetrator | Other children |
|--|--|--|
| <ul style="list-style-type: none"> • needs and wishes of victim are paramount • not made to feel they are the problem • consider proportionality of response • aim for victim to carry out normal routine • recognise that they may struggle in class and may need time out (if they wish) • be aware that they may not disclose the whole picture immediately • prepare for support over a long period and consider who is involved (internal and external) • if victim moves school, the Designated Safeguarding Lead (DSL) informs the new school of the need for continued support | <ul style="list-style-type: none"> • possible tension between discipline and support (these are not mutually exclusive) • consider age/ developmental stage/any SEND • proportionate response • consider unmet needs (for example, harmful sexual behaviours (HBV) in younger children may be a sign or abuse or trauma) • if (alleged) perpetrator moves school, the Designated Safeguarding Lead (DSL) informs the new school of the issues and transfers the child protection file | <ul style="list-style-type: none"> • witnesses may need support (especially in cases of sexual violence) • avoid allowing pupils to 'take sides' • minimise potential for bullying or victimisation in school and on school transport • be aware of any social media use and inappropriate or even illegal posts (especially in cases of criminal investigation where anonymity is legally guaranteed) • develop safeguarding culture • constantly review reporting procedures and responses • consider potential for systematic and environmental weaknesses |

Appendix D Additional advice and support

| Abuse or Safeguarding issue | Link to Guidance/Advice | Source |
|--|---|--|
| Abuse | What to do if you are worried a child is being abused | DfE advice |
| | Domestic abuse: Various Information/Guidance | Home Office |
| | Faith based abuse: National Action Plan | DfE advice |
| | Relationship abuse: disrespect nobody | Home Office website |
| | Tackling Child Sexual Abuse Strategy | Home Office policy paper |
| | Together we can stop child sexual abuse | HM Government campaign |
| Bullying | Preventing bullying including cyberbullying | DfE advice |
| Children missing from education, home, or care | Children missing education | DfE statutory guidance |
| | Child missing from home or care | DfE statutory guidance |
| | Children and adults missing strategy | Home Office strategy |
| Children with family members in prison | National Information Centre on Children of Offenders | Barnardo's in partnership with Her Majesty's Prison and Probation Service (HMPPS) advice |
| Child Exploitation | Modern slavery: how to identify and support victims | HO statutory guidance |
| | Care of unaccompanied and trafficked children | DfE statutory guidance |
| | Trafficking: safeguarding children | DfE and HO guidance |
| Drugs | Drug and Alcohol education — teacher guidance & evidence review | PSHE Association website |
| | Drug strategy 2017 | Home Office strategy |
| | Information and advice on drugs | Talk to Frank website |

| Abuse or Safeguarding issue | Link to Guidance/Advice | Source |
|---|--|--|
| “Honour Based Violence” (so, called) | Female genital mutilation: information and resources | Home Office |
| | Female genital mutilation: multi agency statutory guidance | DfE, DH, and HO statutory guidance |
| | fmv@fcdo.gov.uk | Forced Marriage Unit (FMU) statutory guidance |
| | FGM resource pack | HM Government guidance |
| Health and Well-being | Fabricated or induced illness: safeguarding children | DfE, Department for Health and Home Office |
| | Rise Above: Free PSHE resources on health, wellbeing and resilience | Public Health England resources |
| | Medical conditions: supporting pupils at school | DfE statutory guidance |
| | Mental health and behaviour | DfE advice |
| Homelessness | Homelessness: How local authorities should exercise their functions | Ministry of Housing, Communities & Local Government guidance |
| Private fostering | Private fostering: local authorities | DfE - statutory guidance |
| Radicalisation | Prevent duty guidance | Home Office guidance |
| | Prevent duty advice for schools | DfE advice |
| | Educate Against Hate Website | DfE and Home Office |
| Violence | Gangs and youth violence: for schools and colleges | Home Office advice |
| | Youth Endowment Fund | Home Office |
| | Ending violence against women and girls 2016-2020 strategy | Home Office strategy |
| | Violence against women and girls: national statement of expectations for victims | Home Office guidance |
| | Sexual violence and sexual harassment between children in schools and colleges | DfE advice |
| | Serious violence strategy | Home Office Strategy |

Appendix E Key Contacts

| Role | Name | Telephone | Email |
|---|---------------|-------------|--|
| Designated Safeguarding Lead (DSL) | Mr Boothe | 02030961221 | Safeguarding@TheJubileeAcademy.onmicrosoft.com |
| Deputy Designated Safeguarding Leads (DDSL) | Mr Sutherland | 02030961221 | |
| Designated Lead Governor for Safeguarding & Health and Safety | Ms Cozens | 02030961221 | |
| Lead for Looked After Children | Mr Boothe | 02030961221 | |
| Lead for Online Safety - (DSL) | Mr Boothe | 02030961221 | |
| Head of School | Dr Jarrett | 02030961221 | info@thejubileeacademy.org.uk |
| Chair of Governors | Mr Howard | 02030961221 | info@thejubileeacademy.org.uk |

Key Local contacts for safeguarding children

| | |
|--|--|
| Harrow Children's Social Care & Multi agency Safeguarding Hub (MASH) | 'Golden Number': 020 8901 2690 Emergency Duty Team: weekends, bank holidays and between 5pm – 9am during the week: 0208 424 0999 |
| Police | 101 or for immediate emergency: 999 |
| FGM- Mandatory reporting | Police on 101 Stephanie Minter Social Worker, FGM Lead |
| Local Authority Designated Officer for Allegation against staff (LADO) | Initial referrals via MASH/Golden Number (Name: Rosalind Miller) Quality Assurance and Service Improvement, Harrow Peoples Services (07871 987254) |
| Children and Young People with Disabilities 0-25 years | 020 8966 6481 |
| Children Missing from Education | pragna.bhatt@harrow.gov.uk |
| Local multi-agency procedures, guidance, and training: Harrow Safeguarding Children Board (HSCB) | www.harrowlscb.co.uk |
| NSPCC | 0800 800 5000 |
| Childline | 0800 1111 |
| Government's Whistleblowing Service via NSPCC Report Line | 0800 028 0285 |
| | |

