



THE JUBILEE ACADEMY

Aspire and Achieve

Title:	Safeguarding Child including Child Protection and Training Policy
Date Approved:	September 2025
Date Reviewed:	September 2025
Status:	Statutory
Delegation:	Governing Body Resource Committee
Review Frequency:	Annually
Policy Locations:	Website/Staff Shared Drive/Hard Copy
Next Review Date:	September 2026

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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 2025 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 Partnership and Integrated Care Systems.

At the Jubilee Academy we are committed to safeguarding children and young people and we expect everyone who works in our school to share this commitment.

Adults in our school will take all welfare concern seriously and encourage children and young people to talk to us about anything that worries them. we will always act in the best interest of the child.

Staff should share any concerns they have about a child with the Designated Safeguarding Lead. However, it should be remembered 'that sometimes children will not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. This should not prevent staff from having a professional curiosity and speak to the DSL.

Children/young people at The Jubilee Academy are taught about how they can keep themselves and others safe, including online. To be effective, we present this information in an age-appropriate way. We are sensitive to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs or disabilities.

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.

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, 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 and Integrated Care Systems. 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.

Head of School	Signature	Date 01/09/2025
Chair of Governors	Signature	Date 01/09/2025
Next Review date	September 2026	

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; and staff should maintain professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.
- 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.
 - Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.
 - Physical, emotional, sexual neglect can be reported directly to the Designated Safeguarding lead or safeguarding team.
 - Understanding that children can be at risk of harm inside and outside of the school, inside and outside of home and online and offline.
 - Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect.
- Ensure that students who have been abused will be supported;
- 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 students and that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health; and will ensure these needs are taken into account when making plans to support students who have a social worker.
- 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 Students 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)
 - 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;
 - 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
- **Human Rights Act 1998**
- **Equality Act 2010**
- **Public Sector Equality Duty**
- **Non-Maintained Special Schools (England) Regulations (2015)**
- **The Teachers’ Standards 2012 and The Teachers’ Disciplinary (England) Regulations (2012)** state that teachers (which includes Head of Schools) should safeguard children’s wellbeing and maintain public trust in the teaching profession as part of their professional duties.
- **The Education (Student Information) (England) Regulations (2005)**
- **The London Child Protection Procedures, (2018)**
- **Disqualification under the Childcare Act (2006) (as amended, 2018)**
- **The MOJ’s guidance on the Rehabilitation of Offenders Act 1974 and the Exceptions Order 1975**
- **Education (Independent School Standards) Regulations (2014, Part 3)**, which places a duty on academies and independent schools to safeguard and promote the welfare of Students at the school
- **Keeping Children Safe in Education (DfE, September 2025)**, 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 Students

- **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, March 2025)**
- **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, and Relationships and SEX Education, and Health Education**
- **New Ofsted Framework (2025)**
- **Teaching online safety in school (2023)**
- **Apprenticeships, Skills, Children and Learning Act 2009**

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
- Online Safety
- Single central record
- Visitors' policy
- Teaching and Learning

- Careers Education, Information, Advice and Guidance & Work-Related Learning
- PSHRE
- 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 Contacts

Safeguarding and Promoting the Welfare of Children at The Jubilee Academy

Role	Name
Designated Lead Person for Safeguarding (DSL)	Ms S Rockell
Deputy DSL	Ms A Forrester Mr D Artrey
Other SLT Safeguarding trained to Level 3	Mr M Boothe Mrs M Jermy
Designated Lead Governor for Safeguarding, Health and Safety, Pupil Premium & FSM	Ms R Cozens
Lead for Looked After Children	Ms S Rockell
Lead for Online Safety	Ms S Rockell
Mental Health Lead	Ms S Rockell
Head of School (for concerns/allegations about staff)	Mr M Boothe
Chair of Governors	Mrs S Pittaway

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: 020 8424 0999
Police	101 or for emergency: 999
FGM - Mandatory reporting	Police on 101
Local Authority Designated Officer for Allegations against staff (LADO)	Initial referrals via MASH/Golden Number above. (For on-going cases: 020 8736 6435)
Children and Young People with Disabilities 0-25 years	020 8966 6481
Local multi-agency procedures, guidance and Training: Harrow Strategic Safeguarding Partnership	www.harrowscb.co.uk/
NSPCC	0800 800 5000
Report Abuse in Education NSPCC Helpline	0800 136 663
Childline	0800 1111
Government's Whistle-blowing Service via NSPCC Report Line	0800 028 0285
Forced Marriage Unit	Tel: 020 7008 0151 From overseas: +44(0)20 7008 0151 (Mon-Fri 9am-5pm) Out of hours: 020 7008 1500 (ask for Global Response Centre) Email: fmu@fco.gov.uk

**Support and Advice about Extremism DfE
helpline (non-emergency advice for staff
and governors)**

Tel: 020 7340 7264

Email:

counterextremism@education.gsi.gov.uk

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. 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 within or outside the home, including online.
- Preventing impairment of mental health and physical health or development.
- Providing help and supporting to meet the needs of children as soon as problems emerge.
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- Preventing the impairment of children's mental and physical health or development.
- 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.

The management of safeguarding

At The Jubilee Academy, relevant topics will be included within Relationships and Sex Education for all students. In teaching these subjects we will have regard to the statutory guidance, which can be found [here](#) (revised for introduction September 2026).

Schools play a crucial role in preventative education. Preventative education is most effective in the context of a whole-school or college approach that prepares pupils and students for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. The school will have a clear set of values and standards, upheld and demonstrated throughout all aspects of school life. These will be underpinned by the school's behaviour policy and

pastoral support system, as well as by a planned programme of evidence based RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum. Such a programme should be fully inclusive and developed to be age and stage of development appropriate (especially when considering the needs of children with SEND and disabilities and other vulnerabilities). This programme will tackle, at an age-appropriate stage, issues such as:

- supporting children to develop the skills that form the building blocks of all positive relationships
- healthy and respectful relationships
- boundaries, consent and kindness in relationships
- stereotyping, prejudice and equality
- body confidence and self-esteem
- how to recognise and report concerns about an abusive relationship, including coercive and controlling behaviour
- the concepts of, and laws relating to – all forms of sexual harassment, and abuse, and how to access support
- what constitutes sexual harassment and sexual violence and why these are always unacceptable, emphasising that it is never the fault of the person experiencing it.

Safe Practice

- All school staff will undergo appropriate training in child protection and safeguarding. The 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 student 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' (2025)
- 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 Students

- The school is committed to ensuring that Students 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 Students know that we have senior members of staff with responsibility for child protection and know who they are.
- We inform Students 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 Students e.g. Childline and NSPCC helplines, posters, NSPCC and Childline website addresses.

- School's arrangements for consulting with and listening to Students 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 Students 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.
- Made aware of importance of children being safe online and that parents and carers are likely to find it helpful to understand what systems schools use to filter and monitor online use.
- Made aware about children's access to online sites when away from school during parent evenings, school website, newsletters and workshops
- 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, **Ms S Rockell**, or the Deputy Safeguarding Leads, **Ms A Forrester and Mr A Artrey**, all available at:*
[**safeguarding@thejubileeacademy.org.uk**](mailto:safeguarding@thejubileeacademy.org.uk)

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 Head of School 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 Students. 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 Students who have a social worker.

Where a school places a student with The Jubilee Academy, it continues to be responsible for the safeguarding of that student and should be satisfied that the placement meets the student's needs. The cohort of students in Alternative Provision often have complex needs, it is important that governing bodies and proprietors of these settings are aware of the additional risk of harm that their students may be vulnerable to. The department has issued two pieces of statutory guidance to which commissioners of Alternative Provision should have regard:

- [Alternative Provision](#) DFE statutory guidance, and
- <https://www.gov.uk/government/publications/education-for-children-with-health-needs-who-cannot-attend-school>– DFE statutory guidance.

Safer Recruitment, Selection and Pre-employment 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.

Safer Recruitment training is available to all relevant staff and governors who are involved in the recruitment process. **The Deputy Headteacher/DSL 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 Academy HR suite of Policies](#)

The school's safer recruitment practices which are part of the wider whole school safeguarding regimes, includes: scrutinising 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, Online searches, and Overseas Police Checks and other checks that may be necessary or appropriate.

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 Appendix 1 of this guidance. 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 2023:

- Identity checks to verify a candidate's identity.
- A DBS Enhanced Disclosure with barred list information is required for all staff engaged in a regulated activity (as defined in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006) and The MOJ's guidance on the Rehabilitation of Offenders Act 1974 and the Exceptions Order 1975, provides information about which convictions must be declared during job applications and related exceptions and further information

The school will take account of guidance as listed in the Flowchart of Disclosure and Barring Service criminal record checks and barred list checks; and definition of a regulated activity as detailed in Annex G & F respectively of **Keeping children safe in education (2025)** 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 orders to prevent a person from carrying out teaching work
- 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 are subject to additional checks as appropriate
- Written vetting information from all visitors who support the school in a professional capacity that confirms that appropriate safeguarding checks including DBS 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
- Enhanced DBS checks of all volunteers and supervised volunteers engaging in regulated activity
- 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.

The Information Commissioner has published guidance on employment records in its, **The Information Commissioner Employment Practices Code** which provides some practical advice on record retention.

Individuals who have lived or worked outside the UK

Individuals who have lived or worked outside the UK must undergo the same checks as all other staff in schools (set out in paragraphs 238). This includes obtaining (via the applicant) an enhanced DBS certificate (including children's barred list information, for those who will be engaging in regulated activity) even if the individual has never been to the UK.

In addition, schools must make any further checks they think appropriate so that any relevant events that occurred outside the UK can be considered. Following the UK's exit from the EU,

schools should apply the same approach for any individuals who have lived or worked outside the UK regardless of whether or not it was in an EEA country or the rest of the world.

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

Roles and Responsibilities

a) The Governing Body

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

The Governing Body must ensure:

- The effective implementation of transparent, clear and each to understand 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.
- Ensure the school facilitates as whole school approach to safeguarding and that safeguarding, child protection and online safety are at the forefront and underpin all relevant aspects of process and policy development.
- Ensure Safeguarding policies and procedures reflects the fact that additional barriers can exist when recognising abuse and neglect in this group of children. These can include: cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.
- 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 are in place, embedded and effective; and makes sure that all appropriated checks are carried out on staff and volunteers to ensure suitability to work with children.
- Be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements.
- 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.
- Members of the Governing Body of the school take part in mandatory safeguarding training to ensure that they can 'assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective.' This training is regularly updated.
- 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 Safer Recruitment training on safeguarding issues.
- Appointment of Lead Designated Persons for Safeguarding and Child Protection who are senior members of the school leadership team and it is not appropriate for a governor to be the DSL.
- 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 lead designated person given the additional time, funding, training, resources and support needed to carry out the role effectively.

- Ensure the school contributes to multi-agency working in line with the current statutory guidance Working together to safeguard children.
- Ensure that appropriate filtering and monitoring systems are in place, they should be careful that “over blocking” does not lead to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding.
- 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 and governors, is attended, as per this policy.
- Ensure that the curriculum supports children in an age-appropriate way to recognise and respond to risks including online safety and how to keep themselves and other safe.
- Ensure that the school is sensitive to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs or disabilities.
- Ensure there are procedures in place to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold, about staff members (including supply staff, volunteers, and contractors)
- Ensure the school has appropriate filters and monitoring systems in place and regularly review their effectiveness.
- Ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.
- 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.
- Take a proportionate risk-based approach to the level of information that is provided to temporary staff, volunteers and contractors.
- Deficiencies or weaknesses in safeguarding arrangements are remedied without delay.

Data Protection Act 2018 and the UK GDPR

It is important that governing bodies and proprietors are aware that among other obligations, the Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. See ICO guidance ‘For Organisations’ which includes information about your obligations and how to comply, including protecting personal information, and providing access to official information. In addition, see the DfE Data Protection guidance for schools, which will help school staff, governors and trustees understand how to comply with data protection law, develop their data policies and processes, know what staff and pupil data to keep and follow good practices for preventing personal data breaches.

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) and understanding the filtering and monitoring systems and processes in place) 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 **every two years** 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.
- Work with others to ensure that the school's filtering and monitoring systems are functional and effective
- 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 liaison 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 of any issues and ongoing investigations under section 47 of the Children Act 1989 and police investigations. **This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - PACE Code C 2019.**
- 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 Students 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 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 within 5 days for an in year-transfer or within the first five days of the start of a new term. (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 student's new school.
- d) The School Business Manager/Site supervisor:**
- 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 safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring
 - have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, deliberately missing education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk. Below are some safeguarding issues all staff should be aware of
 - inform the designated persons of any concerns.
 - in the case of risk of immediate serious harm to a child, make a referral to local authority 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 and offline), 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.

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' (2025) and staff that work directly with children should also read Annex A
- Safeguarding including Child Protection Policy
- Behaviour Policy
- Staff Code of Conduct Policy: (sometimes called a code of conduct) should amongst other things, include low- level concerns, allegations against staff and whistleblowing.
- The safeguarding response to children who are absent from school 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 (2025))

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 on Child Sexual Violence and Sexual Harassment
- Children Who are absent from school.

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and

other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.

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 local authority 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.

Student Information

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 head of school has control over access to information.

Section C: 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, Students, 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.

Abuse, neglect and exploitation - (Keeping Children Safe in Education (2025) Paragraphs 19 – 23)

All staff should be aware of the indicators of abuse, neglect and exploitation (see below), understanding that children can be at risk of harm inside and outside of the school/college, inside and outside of home, and

online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection. All school and college staff should be aware that abuse, neglect, exploitation, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation. All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content. **In all cases, if staff are unsure, they should always speak to the designated safeguarding lead or a deputy.**

Signs and Symptoms of Abuse and Neglect

(Keeping Children Safe in Education (2025) Paragraphs 24 – 28)

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

males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

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.

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

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 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

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

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 Student 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 (2025)'** (Part 1)

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

Section D: 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).
- any reports of abuse involving children with SEND will therefore require close liaison with the designated safeguarding lead (or deputy) and the SENCO.

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

- log all safeguarding concerns on CPOMS.
- if unable to log on CPOMS then email the safeguarding team on SafeguardingGroup@thejubileeacademy.onmicrosoft.com
- as well as having a follow up conversation with the designated safeguarding lead.

Accordingly, all concerns regarding the welfare of Students 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 Students, 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 Students 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 the child protection file

The designated safeguarding lead is responsible for ensuring that child protection files are kept up to date. 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 They should ensure the file is only accessed by those who need to see it and where the file or content within is shared, this happens in line with information sharing advice set out in **KCSIE 2025**. Where children leave the school or college (including in year transfers) the designated safeguarding lead should 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 special educational needs co-ordinators (SENCOs) or the named person with oversight for SEND in colleges, are aware as required. Lack of information about their circumstances can impact on the child's safety, welfare and educational outcomes. In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information

that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

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. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

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 legitimately 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 (2023), 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.

e. 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 Safeguarding Lead without delay.

f. Record Keeping

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. This will also help if/when responding to any complaints about the way a case has been handled by the school. 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. We will ensure careful management and handling of reports that include an online element.

Records should include:

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

When a young person has made a disclosure, the member of staff/volunteer should:

- log all safeguarding concerns on CPOMS.
- if unable to log on CPOMS then email the safeguarding team on **SafeguardingGroup@thejubileeacademy.onmicrosoft.com**
- as well as having a follow up conversation with the designated safeguarding lead.
- The recording must be a clear, precise, factual account of the observations.
- Not destroy the original notes in case they are needed by a court.
- Record the date, time, place and any noticeable non-verbal behaviour and the words used by the young person.
- Draw a diagram to indicate the position of any visible injuries and do not remove clothing from intimate areas.
- Record statements and observations rather than interpretations or assumptions.

g. Support, Advice and Guidance for Staff

The DfE (2019) 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 –

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

h. 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 (MASH) 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. MASH) 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 (MASH).

i. 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 or certain medical or physical health conditions can face additional safeguarding challenge both offline and online.

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

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory (Education, Health and Care plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care,
- has experienced multiple suspensions, is at risk of being permanently

- excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation, (FGM) or Forced Marriage
- is a privately fostered child.

j. 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.

k. 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 Head of School 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.

l. Allegations Involving school staff including governors, volunteers, supply teachers, contractors and agency staff.

At The Jubilee Academy we recognise the possibility that adults working in the school may harm children, including governors, volunteers, supply teachers, contractors and agency staff.

The guidance in KCSIE (Part Four) should be followed where it is alleged that anyone working in the school that provides education for children under 18 years of age, including supply teachers and volunteers has:

- behaved in a way that has harmed a child or may have harmed a child.
- possibly committed a criminal offence against or related to a child.
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children. (also includes behaviour outside the school).

This guidance applies to all members of staff including governors, volunteers, supply teachers, contractors and agency staff who are currently working in the school, regardless of whether the alleged abuse took place in the school, at a previous school or elsewhere. Any allegation against a teacher who is no longer teaching should be referred to the police.

Any concerns include low-level concerns, no matter how small, allegations against staff and whistleblowing about the conduct of other adults in the school should be taken to the Head of school without delay (or where that is not possible, to the Designated Safeguarding Lead); any concerns about the Head of School should go to the Chair of Governors who can be contacted by email: Miss R Cozens cozens@hatchend.harrow.sch.uk

Concerns may come from various sources, for example, a suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

The Head of school has to decide whether the concern is an allegation or low-level concern. The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold for referral to the Local Authority Designated Officer (LADO) (see below).

Examples of low-level concerns but are not limited to include:

- taking photographs of children on their mobile phone, contrary to school policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- humiliating students
- being over 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; or,
- using inappropriate sexualised, intimidating or offensive language.

Initial Action

- The person to whom an allegation is first reported or witnessed an event should take the matter seriously and MUST immediately inform the Head of School.
- S/he should not investigate or ask leading questions if seeking clarification; it is important not to make assumptions. Confidentiality should not be promised, and the person should be advised that the concern will be shared on a 'need to know' basis only.
- Actions to be taken include making an immediate written record of the allegation using the informant's words - including time, date and place where the alleged incident took place, brief details of what happened, what was said and who was present. This record should be signed, dated, and immediately passed on to the Head of School.
- The recipient of an allegation must not unilaterally determine its validity, and failure to report it in accordance with procedures is a potential disciplinary matter.
- The Head of School will take steps, where necessary, to secure the immediate safety of children and any urgent medical needs.
- The member of staff will not be approached at this stage unless it is necessary to address the immediate safety of children.
- The Head of School may need to clarify any information regarding the allegation; however no person will be interviewed at this stage.
- The Head of School will consult the Designated Officer for the Local Authority (see Contacts List) to determine if it is appropriate for the allegation to be dealt with by school or if there needs to be a referral to Children's Services and/or the police for investigation.

- Consideration will be given throughout to the support and information needs of Students, parents, and staff.
- The Head of School will inform the Chair of Governors of any allegation.
- In the absence of the Chair of Governors, the Vice Chair of Governors should be contacted. The Vice Chair of Governors at The Jubilee Academy is Ms Becky Cozens

Investigation

If a decision is taken that further action is required, the Head of School will consider with the Local Authority Designated Officer (LADO) what information should be put in writing to the individual concerned and who should conduct the investigation. The accused person should be told about the allegation as soon as possible; however, this may need to be after consultation with other agencies to establish what information can be disclosed.

The Head of School will need to decide whether the allegations warrant the accused person being suspended from contact with children or whether alternative arrangements can be put in place.

If a decision is taken that further action is required, the Head of School will consider with the Local Authority Designated Officer (LADO) what information should be put in writing to the individual concerned and who should conduct the investigation. The accused person should be told about the allegation as soon as possible; however, this may need to be after consultation with other agencies to establish what information can be disclosed.

The Head of School will need to decide whether the allegations warrant the accused person being suspended from contact with children or whether alternative arrangements can be put in place.

Confidentiality

The Education Act 2011 contains provisions to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated. The legislation imposes reporting restrictions making it clear that “publication” of material that may lead to the identification of the accused teacher is prohibited. This would include publication by a parent on a social networking site and the school should inform the parents of this restriction.

Reporting allegations

The school has a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences and who has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left.

If a person resigns or otherwise ceases to provide services prior to an investigation being completed, the Head of School should discuss with the Local Authority Designated Officer (LADO) whether the school should make a referral to the DBS.

Malicious or unsubstantiated allegations

If a child makes an allegation which is determined to be malicious or unsubstantiated, the school should discuss with the Designated Officer for the Local Authority whether a referral should be made to local authority children’s social care to determine whether the child is in need of services. In the case of a malicious allegation, the school can consider action under its behaviour policy.

The police can also be asked to consider action in cases of malicious allegations either from a child or an adult.

For full information regarding other aspects of whistleblowing relating to Safeguarding please refer to the Whistleblowing Policy which is part of the suite of TJA HR Suite of Policies available on the staff shared drive and school website

Advice to Staff

- We will ensure that where allegations against staff are made, they are properly and appropriately investigated following the procedures laid down by the Harrow Safeguarding Children Board.
- Recognise that on occasion troubled young people can make false or misplaced allegations against staff.
- Would always advise staff to avoid putting themselves in potentially vulnerable situations with students i.e. by not being alone with individuals in confined or secluded areas. However, where this is the case, they should maintain a physical barrier (desk) between themselves and the individual, and ensure any door remains open.
- Would advise staff not to develop inappropriate personal relationships with students or young people.
- Reiterate in this policy our approach to dealing with challenging behaviour e.g. 'We will maintain an appropriate distance (an arm's length) between ourselves and students, recognising and respecting their rights to personal space, as we expect them to respect ours'.
- Would always advise staff never to stand in the way of a student who is determined to leave a room, as this may result in unavoidable physical contact which may later be misinterpreted.

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'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. Staff can call **0808 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.

Section E: 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.

Appendices

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 Students 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, vapes, 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/carer will be informed of the incident.

Serious Violence

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include:

- 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.

The likelihood of involvement in serious violence may be increased by factors such as

- being male
- having been frequently absent or permanently excluded from school
- having experienced child maltreatment and having been involved in offending, such as theft or robbery.

All staff should be aware of the associated risks and understand the measures in place to manage these.

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.

Safeguarding issues

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

Below are some safeguarding issues all staff should be aware of.

Children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges.

Children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges. Governing bodies and proprietors should ensure their child protection policy reflects the fact that additional barriers can exist when recognising abuse and neglect in this group of children.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration.
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children.
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in managing or reporting these challenges.

The Jubilee Academy have considered extra pastoral support and attention for children with SEND, along with ensuring any appropriate support for communication is in place, see below:

- SEND Code of Practice 0 to 25 years
- Supporting students at School with Medical Conditions

And from specialist organisations such as:

- The Special Educational Needs and Disabilities Information and Support Services (SENDIASS). SENDIASS offer information, advice and support for parents and carers of children and young people with SEND. All local authorities have such a service: Find your local IAS service (councilfordisabledchildren.org.uk)
- Mencap - Represents people with learning disabilities, with specific advice and information for people who work with children and young people
- NSPCC - Safeguarding children with special educational needs and disabilities (SEND) and NSPCC - Safeguarding child protection/deaf and disabled children and young people

Children Who are Absent from Education

Knowing where children are during school hours is an extremely important aspect of Safeguarding. Missing school can be an indicator of abuse and neglect and may also raise concerns about other safeguarding issues, including the criminal exploitation of children.

The department's statutory guidance on school attendance **Working together to improve school attendance** which sets out how schools must work with local authority children's services where school absence indicates safeguarding concerns.

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 – particularly county lines. : **Children Missing Education.**

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 who are absent from Education are at greater risk of:

- Physical harm
- Child Sexual exploitation
- Child criminal 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 (2025)** 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.

In accordance with the School Attendance (Pupil Registration) (England) Regulations 2024, a school must make a return to the local authority when a pupil's name is deleted from the admission register.

We monitor attendance carefully and address poor or irregular attendance without delay. The school will always follow up with parents/carers when students 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 (2025)** the school has:

- Staff who understand what to do when children do not attend regularly.
- Appropriate policies, procedures and responses for Students 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 Students 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 student leaves the school, we will record the name of the student'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 sexual exploitation

The definition of child sexual exploitation is as follows:

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur using technology. (DfE Child Sexual Exploitation: Feb 2017)

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 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/suspicions 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 and offline 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

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):

The definition of Child Criminal Exploitation, which can be found on **KCSIE (2025) page 15**. CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence.

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

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.

County Lines

See **KCSIE (2025) page 151 and 152, which also includes relevant indicators of harm.**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”.

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can easily become trapped by this type of exploitation as county lines, gangs, drugs and alcohol misuse, deliberately missing education, radicalisation and consensual and non-consensual sharing of nudes; can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years.
- can affect any vulnerable adult over the age of 18 years.
- can still be exploitation even if the activity appears consensual.

- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence.
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children **5-11-year olds** and **12-17 year olds**. The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers

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.

Domestic abuse

The Domestic Abuse Act 2021 (Part1) defines domestic abuse as any following behaviours, either as a pattern of behaviour, or as single incident between two people over the age of 16, who are 'personally connected' to each other:

(The definition can be found here:

<https://www.legislation.gov.uk/ukpga/2021/17/part/1/enacted>

- (a) physical or sexual abuse.
- (b) violent or threatening behaviour.
- (c) controlling or coercive behaviour.
- (d) economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services); and
- (e) psychological, emotional or other abuse

People are 'personally connected' when they are or have been married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibility for the same child, or they are relatives.

The definition of Domestic Abuse applies to children if they see or hear, or experience the effects of, domestic abuse and is related to the person being abused or the perpetrator is also to be regarded as a victim of domestic abuse.

Extend the law to young people over the age of 16.

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

Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse.

In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

The National Domestic Abuse helpline can be called free of charge and in confidence, 24 hours a day on 0808 2000 247.

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.

The Serious Crime Act 2015 introduces a mandatory legal 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).

The duty does not apply in relation to at risk or suspected cases.

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 local authority children's social care. 'It is recommended that you make a report orally by calling 101, the single non-emergency number.'

'Where there is a risk to life or likelihood of serious immediate harm, professionals should report the case immediately to police, including dialling 999 if appropriate'.

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 student 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".
- A visiting elder from the country of origin.
- 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 Student confiding in a professional that FGM has taken place.
- A mother/family member disclosing that FGM has been carried out.
- A family/Student 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 periods of time away from the classroom than normal to go to 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 in order to support any individual student that may be at risk and also help raise awareness amongst parents, Students and teachers. We will also draw on the knowledge of our local community.

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

Sexting

The term 'sexting' also known as youth produced sexual imagery) UKCCIS Guidance: Sexting in schools, responding to incidents, and safeguarding young people (2017); 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 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 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

In February 2023, the age of consent for marriage in England was raised to 18. The Marriage and Civil Partnership (Minimum Age) Act 2022 means that 16 and 17 year olds will no longer be allowed to marry or enter a civil partnership, even if they have parental consent. Any concerns that students may be getting married should be referred to the DSL

It is now an offence, under the Marriage and Civil Partnership (Minimum Age) Act to cause a child under the age of 18 to enter a marriage in any circumstances, without the need to prove that a form of coercion was used. This includes non-legally binding 'traditional' ceremonies which would still be viewed as marriages by the parties and their families.

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 Students 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 student 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 student 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

Children may be susceptible to radicalisation into terrorism. 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 democracy, the rule of law, individual liberty and the mutual respect and tolerance of those with different faiths and beliefs.

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

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

Although there is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism, there are factors that may indicate concern.

It is possible to protect people from extremist ideology and intervene to prevent those at risk of radicalisation being drawn to terrorism. 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 a deputy) making a Prevent referral.

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' safeguarding approach.

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 Prevent Duty.

All schools 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 regard to the need to prevent people from being drawn into terrorism".¹⁰⁴ This duty is known as the Prevent duty.

The Prevent duty is part of the school's wider safeguarding obligations. Designated safeguarding leads and other senior leaders are familiar with the [Revised Prevent duty guidance: for England and Wales, especially](#) paragraphs 57-76 which are specifically concerned with schools (and also covers childcare). The guidance is set out in terms of four general themes: Risk assessment, working in partnership, staff training, and IT policies. The school will provide access to Prevent awareness training, which will support staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

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

The department has published advice for schools on the [Prevent duty](#). The advice is intended to complement the Prevent guidance and signposts other sources of advice and support

[Educate Against Hate](#), a website launched by the Her Majesty's Government has been developed to support and equip school 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 leaders, some of which are free such as Prevent e-learning, via the Prevent Training catalogue.

The School is committed to ensuring that our students 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 programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages. Guidance on Channel is available at: [Channel guidance](#), and a Channel awareness e-learning programme is available for staff at: [Channel General Awareness](#).

The senior **DSL** is aware of local procedures for making a Channel referral. As a Channel partner, the school may be asked to attend a Channel panel to discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required.

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

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 Student' 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 Students'. Designated member of staff for 'registered Students' - Looked after child, looked after child in past, Special guardianship or adoption order is Ms S Rockell, DSL.

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.

Child on child abuse

Children can abuse other children. This is generally referred to as child-on-child abuse and can take many forms, and that it can happen both inside and outside of school or online.

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. All staff should understand that even if there are no reports in their schools, it does not mean it is not happening. It may be the case that abuse is not being reported. As such it is important that when staff have any concerns regarding child-on-child abuse they should speak to their designated safeguarding lead (or a deputy)

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.

Child on child abuse 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 children (sometimes known as ‘teenage relationship abuse’)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment¹⁰ 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 nude and semi-nude 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).

It is essential that all staff understand the importance of challenging inappropriate behaviours between children, many of which are listed below, that are abusive in nature.

Abuse is abuse and we have a zero-tolerance approach to abuse. It is essential that all staff understand the importance of challenging inappropriate behaviours between children that are abusive in nature. Examples of which are listed below. 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. This could for example include girls being sexually touched/assaulted or boys being subject to initiation-type violence.

At The Jubilee Academy we recognise that it is more likely that girls will be victims and boys’ perpetrators, but that all child-on-child abuse is unacceptable and will be taken seriously.

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 student, some of the following features will be found.

The allegation:

- is made against an older Student and refers to their behaviour towards a younger Student or a more vulnerable student.
- is of a serious nature, possibly including a criminal offence
- raises risk factors for other Students in the school.
- indicates that other Students 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 to the designated safeguarding lead, who will investigate and record in line with the school behavioural policy. staff should understand that even if there are no reports in their school it does not mean it is not happening, it may be the case that it is just not being reported.

At The Jubilee Academy we will support the victims of child-on-child abuse or and any form of abuse 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 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: Sexting in schools and colleges, responding to incidents, and safeguarding young people (2017) and Sharing nudes and semi-nudes (December 2020)

Contextual Safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside the school. 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. Local authority children's social care assessments should consider such factors, so it is important that schools 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.

All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.

Preventing abuse

Effective safeguarding practice is demonstrated when schools are clear, in advance, about what local processes are in place and what support can be accessed when sexual violence or sexual harassment has occurred. It is important to prepare for this in advance and review this information on a regular basis to ensure it is up to date. As such:

- if required, the designated safeguarding lead (or a deputy) should discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues in order to prepare the school's policies (especially the child protection policy) and responses, and
- the designated safeguarding lead (and their deputies) should be confident as to what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment and be confident as to how to access this support when required.

Child-on-child sexual violence, harmful sexual behaviour and sexual harassment between children in schools

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. The school will respond to all signs, reports and concerns of child-on-child sexual violence and sexual harassment, including those that have happened outside of the school premises, and/or online.

Children who are victims of sexual violence, harmful sexual behaviour and sexual harassment whenever it happens may find the experience stressful and distressing. This will, likely, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school. 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 can occur also through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who have experienced sexual violence display a very wide range of responses to their experience, including in some cases clear signs of trauma, physical and emotional responses, or no overt signs at all. Schools should remain alert to the possible challenges of detecting those signs [sic] and show sensitivity to the needs of the child (e.g. about attendance in lessons) irrespective of how overt the child's distress is.

It is important that all victims are taken seriously and offered appropriate support. The Lucy Faithfull Foundation has developed a **HSB toolkit**, which amongst other things, provides support, advice and information on how to prevent it, links to organisations and helplines, resources about HSB by children, internet safety, sexual development and preventing child sexual abuse.

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The Lucy Faithfull Foundation in collaboration with the Home Office, has developed '**Shore Space**', an online resource which works to prevent harmful sexual behaviour. Shore Space offers a confidential chat service supporting young people who are concerned about their own or someone else's sexual thoughts and behaviour.

Children who are lesbian, gay, bisexual, or gender questioning

We expect to publish the revised guidance on gender questioning children soon. Once published, we will signpost to this guidance in KCSIE 2025.

A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are.

However, the Cass review identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism and/or attention deficit hyperactivity disorder.

It recommended that when families/carers are making decisions about support for gender questioning children, they should be encouraged to seek clinical help and advice. When parents are supporting pre-pubertal children, clinical services should ensure that they can be seen as early as possible by a clinical professional with relevant experience.

As such, when supporting a gender questioning child, schools should take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. The Jubilee Academy will refer to the **KCSIE 2025 guidance in relation to Gender Questioning Children**, when deciding how to proceed.

Risks can be compounded where children lack trusted adults with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff.

The fact that a child or a young person may be lesbian, gay, bisexual, or questioning their gender is not in itself an inherent risk factor for harm. However, children who are lesbian, gay, bisexual, or questioning their gender can be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, bisexual, or questioning their gender (whether or not) can be just as vulnerable as children who identify as lesbian, gay, bisexual, or questioning their gender.

Children with special educational needs and disabilities (SEND) are also three times more likely to be abused than their peers.

Risks can be compounded where children who are lesbian, gay, bisexual, or questioning their gender lack a trusted adult with whom they can be open. The school will therefore provide a safe space for students that are lesbian, gay, bisexual, or questioning their gender to speak out or share their concerns with members of staff. E.g. through the RSHE curriculum, mentoring, counselling, student voice, Netsupport DNA and external agencies

Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.
- staff should be aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys.
- zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”;
- recognising, acknowledging, and understanding the scale of harassment and abuse and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported.
- challenging physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

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

Sexual violence

It is important that school 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.

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.

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 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 and offline sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

It may include:

- non-consensual sharing of sexual images and videos.
- sexualised online and offline bullying.
- unwanted sexual comments and messages, including, on social media; and
- 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

The response to a report of sexual violence or sexual harassment

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

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 Child on child abuse.

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

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

Online Safety

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, including appropriate filtering and monitoring on school devices and school networks; 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.

It is essential that children are safeguarded from potentially harmful and inappropriate online material. An effective whole school approach to online safety empowers a school to protect and educate students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

The breadth of issues classified within online safety is considerable and ever evolving but can be categorised into four areas of risk:

content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.

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: 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/>.

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

All staff receive Online Safety training and made aware that that the '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. Staff must also understand that misuse of the internet may lead to disciplinary action (as detailed in section 5 of the HR Policies) and possible dismissal.

All staff receive Online Safety training and made aware that knowing what to look for is vital to the early identification of abuse and neglect. All staff should be aware of indicators of abuse

and neglect, including exploitation, so that they are able to identify cases of children who may be in need of help or protection. Abuse can take place wholly online, or technology may be used to facilitate offline abuse.

We ensure that we have effective mechanisms to identify, intervene in, and escalate any online safety incident where appropriate. Online safety is included in our curriculum at all levels and information is also provided to parents/carers. Where students are being asked to learn online at home, the school follows government advice to support schools to do so safely. Staff are made aware of the school approach to online safety, including:

- Creating a safer online environment – including training requirements
- appropriate filtering and monitoring on school devices and school networks.
- Giving everyone the skills, knowledge and understanding to help children and young people stay safe on-line (Teaching online safety in schools Jan. 2023);
- Inspiring safe and responsible use and behaviour.
- Acceptable use of school devices within and out of school
- What steps to take if you have concerns and where to go for further help.
- Harmful online challenges and online hoaxes

All staff must agree to the Acceptable use of ICT Policy in conjunction with our Code of Conduct in relation to personal online behaviour.

Further information and guidance can be found in the schools:

[Online Safety Policy and supporting appendices and supporting suite of policies.](#)

Filtering and Monitoring

Filtering refers to the technology preventing access to harmful or inappropriate content, whilst monitoring refers to the practical steps staff take to ensure harmful or inappropriate access is not made. Monitoring can include:

- Physical monitoring
- Live software monitoring
- Monitoring user logs
- Monitoring individual devices
- risk management plans for vulnerable children

We make sure that any school devices used away from the school site are also subject to filtering and monitoring procedures.

Each year (at least) our designated safeguarding lead, along with our IT team and a governor, review our filtering and monitoring procedures to ensure that they effectively prevent access to harmful or inappropriate content. They also ensure that the systems we have in place to report any difficulties with the system are understood by all staff and reports are effectively managed.

All our staff undertake training to understand the risks of poor filtering and monitoring and know how to share their concerns.

All our staff have taken part in annual cybersecurity training.

The Department has published **Generative AI: product safety expectations** to support schools to use generative artificial intelligence safely, and explains how filtering and monitoring requirements apply to the use of generative AI in education.

Mental Health

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.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour, and education.

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 who is also the Senior Mental Health Lead or the deputy designated safeguarding lead.

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 young people's mental health services (CYPMHS) 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 Middle Leadership Team is the first port of call for any student's concerns in addition to their form tutor.

There is a Safeguarding team comprising of one designated safeguarding lead and two deputy designated safeguarding members of staff along with one safeguarding officer, trained to Level 3, led by Mr Boothe, Headteacher, as well as the Attendance and Pastoral Officer, Pastoral Administrator, a Learning Mentor, Learning Champions and a counsellor.

Staff can make referrals to the DSL, S. Rockell, D. Artrey, The Deputy Head of Discipline and Conduct or A. Forrester, The SENCo and Assistant Headteacher of any concerning behaviour, both of whom are deputy safeguarding leads. If it is deemed necessary, referrals will then be made to the school counsellor, employed to work at TJA for part of the week.

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.org.uk

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 or CPOMS 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 – Counselling in school or Learning Mentor.
- If considered appropriate, parent / carer is spoken to that day and invited in to discuss and go over options for support – counselling in school, allocation of a Learning Mentor and / or advised to go to GP and discuss a referral to CYPMHS. Harrow Horizons (a commissioned service supported by Barnardos that offers mental health and therapeutic support prior to accessing CYPMHS), 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 to 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 and counsellor, CYPMHS 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.

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.

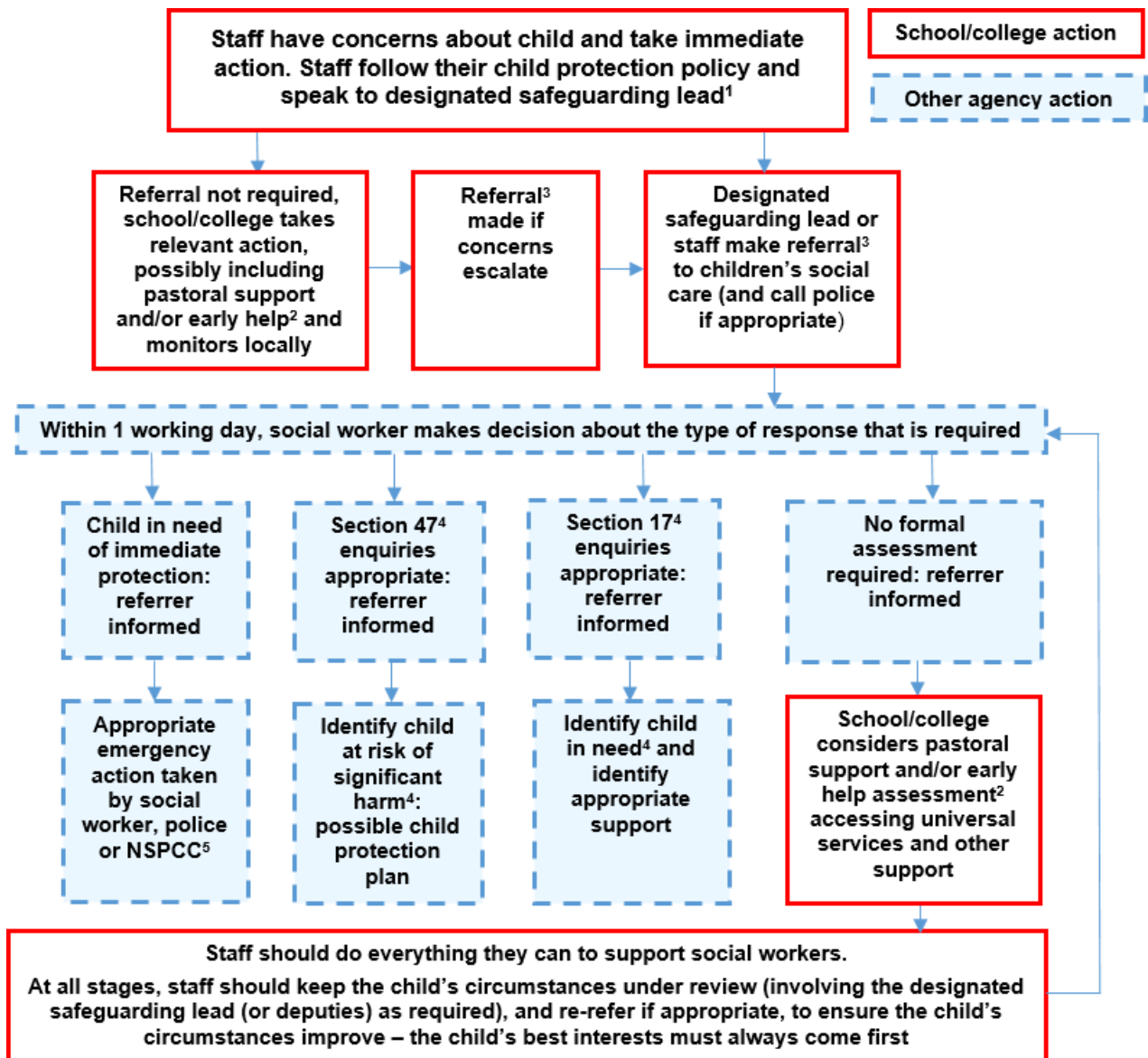
The Jubilee Academy ensures the safety of its environment for Students through:

- 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 D Procedure for dealing with incidents of Child-on-child Sexual Violence and Sexual Harassment

(child-on-child abuse or and any form of abuse)

The immediate response to a report

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 the purposes of this guidance, we, in places, use the term '**victim**'. It is a widely recognised and understood term. It is important that schools recognise that not everyone who has been subjected to abuse considers themselves a victim or would want to be described in this way. Ultimately, schools should be conscious of this when managing any incident and be prepared to use any term with which the individual child is most comfortable.

For the purpose of this advice, we, in places, use the term '**alleged perpetrator(s)**' and where appropriate '**perpetrator(s)**'. These are widely used and recognised terms and the most appropriate to aid effective drafting of guidance. However, schools should think very carefully about terminology, especially when speaking in front of children, not least because in some cases the abusive behaviour will have been harmful to the perpetrator as well. As above, the use of appropriate terminology will be for schools to determine, as appropriate, on a case-by-case basis.

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).

It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the school should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

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.

Confidentiality

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

The school should only engage staff and agencies who are required to support the children involved and/or be involved in any investigation.

The victim may ask the school not to tell anyone about the sexual violence or sexual harassment. There are no easy or definitive answers when a victim makes this request. If the victim does not give consent to share information, staff may still lawfully share it, if there is another legal basis under the UK GDPR that applies. For example, the public task basis may apply, where the overall purposes is to perform a public interest task or exercise official authority, and the task or authority has a clear basis in law. Advice should be sought from the designated safeguarding lead (or deputy), who should consider the following:

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

Ultimately, the designated safeguarding lead (or a deputy) will have to balance the victim's wishes against their duty to protect the victim and other children and decide if the school could manage internally and seek early help for both the victim and perpetrator(s).

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

Anonymity

Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, schools should be aware of anonymity, witness support, and the criminal process in general so they can offer support and act appropriately.

As a matter of effective safeguarding practice, schools should do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment. Amongst other things, this will mean carefully considering, based on the nature of

the report, which staff should know about the report and any support that will be put in place for the children involved.

Schools should also consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities. The unique challenges regarding social media are discussed at paragraph 469 along with potential support.

Risk assessment

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

- the victim, especially their protection and support
- whether there may have been other victims
- the alleged perpetrator(s)
- all the other children, (and, if appropriate, adult students and staff) at the school, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms, and
- The time and location of the incident, and any action required to make the location safer.

Risk assessments should be recorded (paper or electronic) and should be kept under review. At all times, the school should be actively considering the risks posed to all their Students and students and put adequate measures in place to protect them and keep them safe.

The designated safeguarding lead (or a deputy) should ensure they are engaging with local authority children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required.

The DSL should be part of discussions with statutory safeguarding partners to agree the levels for the different types of assessment and services to be commissioned and delivered, as part of the local arrangements.

The above school risk assessment is not intended to replace the detailed assessments of expert professionals. Any such professional assessments should be used to inform the school approach to supporting and protecting their students and students and updating their own risk assessment.

Action following a report of child-on-child sexual violence and/or sexual harassment.

What to consider

As set out above, sexual violence and sexual abuse can happen anywhere, and all staff working with children are advised to maintain an attitude of 'it could happen here'. Schools should be aware of and respond appropriately to all reports and concerns about sexual violence and/or sexual harassment both online and offline, including those that have happened outside of the school. The designated safeguarding lead (or deputy) is likely to have a complete safeguarding picture and be the most appropriate person to advise on the initial response by the school. Important considerations will include:

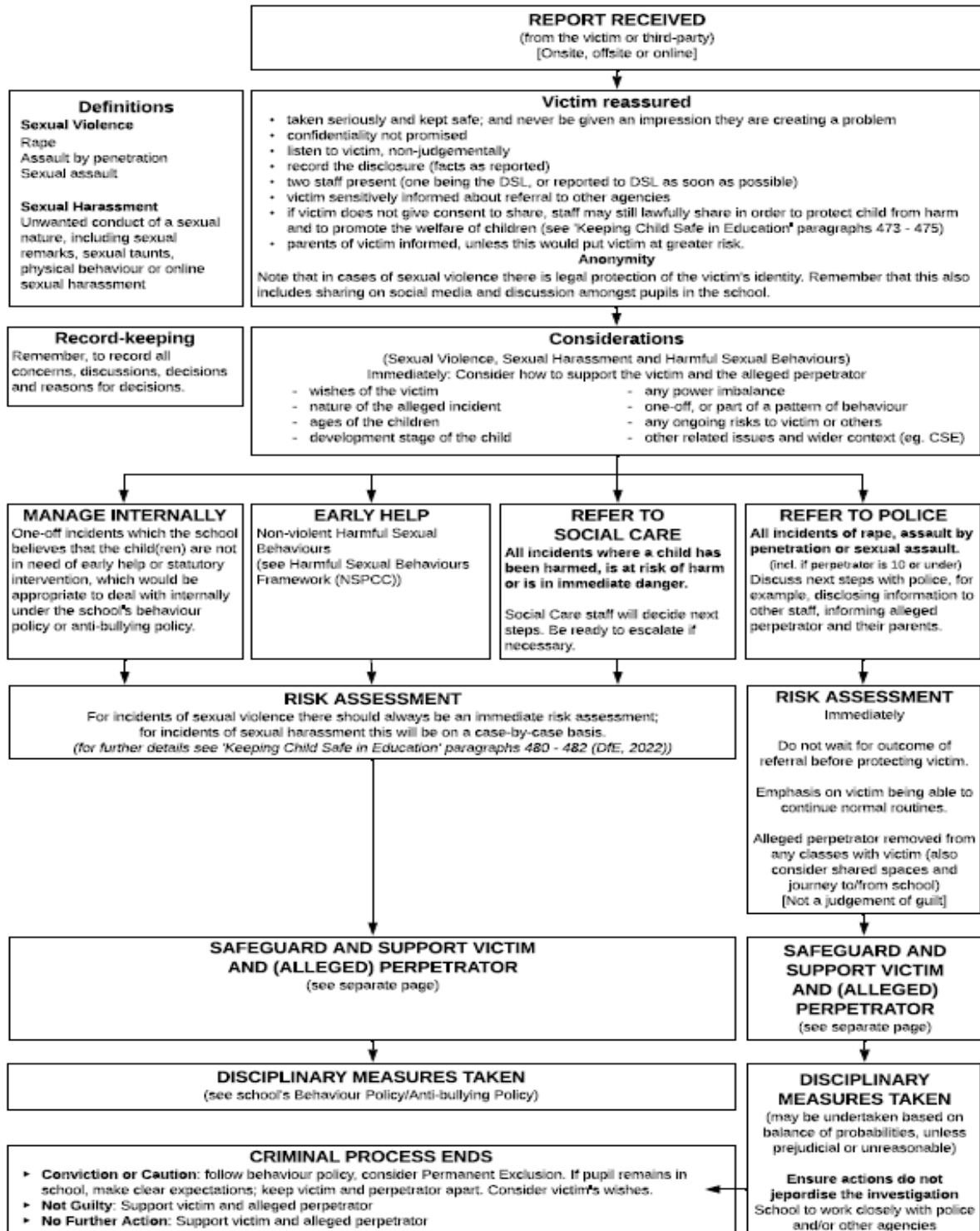
- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the school's duty and responsibilities to protect other children.
- the nature of the alleged incident(s), including whether a crime may have been committed and/or whether HSB has been displayed.
- the ages of the children involved.
- the developmental stages of the children involved.
- any power imbalance between the children. For example, is/are the alleged perpetrator(s) significantly older, more mature, confident and well-known social standing? Does the victim have a disability or learning difficulty?
- if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature)
- that sexual violence and sexual harassment can take place within intimate personal relationships between children.
- importance of understanding intra familial harms and any necessary support for siblings following incidents
- are there ongoing risks to the victim, other children, adult students or school staff, and
- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.
- Whilst protecting children and/or taking any disciplinary measures against the alleged perpetrator(s), the designated safeguarding lead (or a deputy) will work closely with the police (and other agencies as required), to ensure any actions the school take do not jeopardise the police investigation.

As always when concerned about the welfare of a child, all staff should act in the best interests of the child. In all cases, schools should follow general safeguarding principles as set out throughout this guidance. Immediate consideration should be given as to how best to support and protect the victim and the alleged perpetrator(s) (and any other children involved/impacted)

It will be important in all scenarios that decisions and actions are regularly reviewed and that relevant policies are updated to reflect lessons learnt. It is particularly important to look out for potential patterns of concerning, problematic or inappropriate behaviour which may point to environmental and or systemic problems that could and should be addressed by updating relevant policies, processes, or relevant parts of the curriculum

Where a pattern is identified, the school should decide on a course of action. Consideration should be given as to whether there are wider cultural issues within the school that enabled the inappropriate behaviour to occur and where appropriate extra teaching time and/or staff training could be delivered to minimise the risk of it happening again. Alongside this, patterns identified in schools may also be reflective of the wider issues within a local area and it would be good practice to share emerging trends with safeguarding partners.

***PART FIVE: CHILD-ON-CHILD SEXUAL VIOLENCE AND SEXUAL HARASSMENT**



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Source:
*Keeping Children Safe in Education September 2022 (DfE, 2022)

2022 SVSH Flowchart

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 E 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
Bullying	Preventing bullying including cyberbullying	DfE advice
Children and the courts	Advice for 12-17-year-old witnesses in criminal courts	MoJ advice
'Children who are absent from school	<p><i>Further information can be found in 'Working together to improve school attendance'</i></p> <p>Working together to improve school attendance</p>	DfE advice
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	County Lines: criminal exploitation of children and vulnerable adults	Home Office guidance
	Child sexual exploitation: guide for practitioners Preventing Child Sexual Exploitation The Children's Society	DfE & Children's Society
	Trafficking: safeguarding children	DfE and HO guidance
Drugs	Drugs: advice for schools	DfE and ACPO advice
	Drug strategy 2017	Home Office strategy
	Information and advice on drugs	Talk to Frank website

Abuse or Safeguarding issue	Link to Guidance/Advice	Source
	ADEPIS platform sharing information and resources for schools: covering drug (& alcohol) prevention	Website developed by Mentor UK
“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
	Forced marriage: information and practice guidelines	Foreign Commonwealth Office and Home Office
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 Students at school	DfE statutory guidance
	Mental health and behaviour	DfE advice
Homelessness	Homelessness: How local authorities should exercise their functions	HCLG
Online	Sexting: responding to incidents and safeguarding children CEOP Education	UK Council for Child Internet Safety
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
	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 F Key Local Contacts for Safeguarding Children

Harrow Local Authority 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 Mintern 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 Absent from Education	pragna.bhatt@harrow.gov.uk
Local multi-agency procedures, guidance, and training: Harrow Safeguarding Children Board (HSCB)	www.harrowiscb.co.uk
NSPCC	0800 800 5000 help@nspcc.org.uk
Childline	0800 1111
Government's Whistleblowing Service via NSPCC Report Line	0800 028 0285
Child Exploitation and Online Protection command: specialist sexual violence sector organisations	CEOP Rape Crisis or The Survivors Trust
The Anti-Bullying Alliance	Sexual and sexist bullying.
<p>Online:</p> <p>Schools should recognise that sexual violence and sexual harassment occurring online (either in isolation or in connection with face-to-face incidents) can introduce a number of complex factors. Amongst other things, this can include widespread abuse or harm across a number of social media platforms that leads to repeat victimisation. Online concerns can be especially complicated and support is available from:</p>	<p>The UK Safer Internet Centre provides an online safety helpline for professionals at 0344 381 4772 and helpline@saferinternet.org.uk.</p> <p>The helpline provides expert advice and support for school staff with regard to online safety issues</p> <p>Internet Watch Foundation: If the incident/report involves sexual images or videos that have been made and circulated online, the victim can be supported to get the images removed by the Internet Watch Foundation (IWF)</p> <p>Childline/IWF Report Remove is a free tool that allows children to report nude or sexual images and/or videos of themselves that they think might have</p>

been shared online

UKCIS Sharing nudes and semi-nudes advice: [Advice for education settings working with children and young people](#)

on responding to reports of children sharing non-consensual nude and semi-nude images and/or videos (also known as sexting and youth produced sexual imagery). Please see footnote 8 for further information

[Thinkuknow](#) from NCA-CEOP provides support for the children's workforce, parents and carers on staying safe online

LGFL ['Undressed'](#) provided schools advice about how to teach young children about being tricked into getting undressed online in a fun way without scaring them or explaining the motives of sex offenders.