



South Bank Academies

Safeguarding Policy (Child Protection policy)

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

Culture

We are committed to creating a culture of safeguarding. We promote an open and transparent culture in which all concerns about all adults working in or on behalf of the academies (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. It is an expectation of all staff that all concerns about adults (including allegations that do not meet the harms threshold) are shared responsibly and with the right person, recorded and dealt with appropriately. This will assist all involved to identify concerning, problematic or inappropriate behaviour early, minimise the risk of abuse and ensure that adults working in or on behalf of the academies are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution. (KCSIE section 406-407, page 95).

Staff may have 'nagging doubts' about low-level safeguarding issues. It is important that all staff are aware that low-level issues are not insignificant. Low-level concerns include adult behaviours which are not in line with the staff code of conduct in or outside of work and which do not meet the threshold for reporting to the LADO. These might include for example being over-friendly, having 'favourites', using age-inappropriate language or taking photographs of children. It is critical that such issues are shared responsibly, with the right person, investigated and recorded appropriately. (KCSIE sections 407-411, page 95).

This policy draws upon duties conferred by the Children Acts 1989 and 2004, The Children and Families Act 2014, S175 of the 2002 Education Act, The Education (Independent Academy Standards) Regulations 2014 (for independent schools), The Non-Maintained Special Schools (England) Regulations 2015 (for non-maintained special schools) and the guidance contained in "[Working Together to Safeguard Children](#)", the DfE's statutory guidance "[Keeping children safe in education](#)", Ofsted Guidance and procedures produced by the London Safeguarding Children Partnership for each.

We also have regard to the advice contained in DfE's "[What to do if you're worried a child is being abused](#)" and "[Information Sharing – Advice for practitioners.](#)" The policy is applicable to all on, and off-site activities undertaken by pupils whilst they are the responsibility of the Academy.

We will ensure that all staff read at least Part one of DfE guidance "[Keeping children safe in education](#)" and that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part one.

POLICY AIMS

The purpose of this policy is to:

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

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

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

COVID-19

At South Bank Academies we operate in line with government guidance in relation to Covid-19. This has included conducting planning and risk assessments to ensure practical arrangements are as safe as possible for students. Additionally, during periods of remote education, student safeguarding is managed differently, with pastoral and safeguarding staff in regular contact with children and families. New systems have been implemented to minimize online safety concerns. On return to face-to-face education, South Bank Academies have a range of measures in place to support students reporting concerns and to feel safe.

The South Bank Academies safeguarding Covid-19 addendum is informed by Southwark local authority guidance as well as DfE and other national guidance.

[Model COVID-19 Safeguarding Policy Addendum](#)

[Guidance for full opening: academies](#)

[Actions for early years and childcare providers during the coronavirus \(COVID-19\) outbreak /](#)

We are aware that pupils may be experiencing a variety of emotions in response to the pandemic,

such as anxiety, stress, or low mood. This may particularly be the case for vulnerable children, including those with a social worker and young carers. All staff members and volunteers are vigilant about the possible impacts of the pandemic on pupils' mental wellbeing and act immediately on any safeguarding concerns, including new concerns where children are returning, and share their concerns with designated and deputy designated safeguarding leads. We have put in place appropriate support systems for pupils and parents/carers, including working with and/or referral to relevant outside agencies. We note the Government's [COVID-19: guidance on supporting children and young people's mental health and wellbeing](#). We are aware of the continued importance for our staff to work with and support children's social workers, the local authority virtual academy head for looked-after and previously looked-after children and any other relevant safeguarding and welfare partners during this period.

We will continue to ensure that arrangements are in place to keep children not physically attending the academy safe, especially online. Where we identify a child to be on the edge of social care support, or who would normally receive pastoral-type support in academy, we will ensure that a robust communication plan is in place for that child or young person. Details of this plan will be recorded appropriately as will a record of contact. The communication plans can include remote contact, phone contact, door-step visits. Other individualised contact methods will be considered and recorded. All our staff who interact with children, including online, will continue to look out for signs a child may be at risk. Any such concerns will be dealt with as per this policy and where appropriate, referrals will continue to be made to relevant agencies. In relation to any child receiving remote education, we note the DfE's [guidance on safeguarding and remote education during coronavirus \(COVID-19\)](#) in terms of keeping children as well as staff members safe online.

RESPONSIBILITIES AND IMMEDIATE ACTION

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

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

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

THE ROLE OF GOVERNANCE

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

The SBA Board will ensure that the academies contribute to inter-agency working in line with statutory guidance "[Working Together to Safeguard Children](#)" and that the academies' safeguarding arrangements consider the procedures and practice of the local authority as part of the inter-agency safeguarding procedures set up by the local authority.

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

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

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

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

Types of child abuse and neglect

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

children.

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

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only as far 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 an elevated level of violence, whether the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy because of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing, and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. Safeguarding incidents and/or behaviours can be associated with factors outside the academy or college and/or can occur between children outside of these environments. All staff, but especially the DSL and DDSs will be considering whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence. This is known as [Contextual Safeguarding](#), which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

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

Mental Health

We are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Our staff members, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that our staff members are aware of how these children's experiences can impact on their mental health, behaviour, and education. If staff have a mental health concern about a child that is also a safeguarding concern, this will be shared with the DSL with a view to referring to appropriate agencies following the referral procedures. We also note the DfE's advice and guidance on [Mental Health and Behaviour in Schools](#).

Child Criminal Exploitation (CCE)

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator and/or through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur using technology. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people. Some of the indicators of CCE are children who appear with unexplained gifts or new possessions; children who associate with other young people involved in exploitation; children who suffer from changes in emotional well-being; children who misuse drugs and alcohol; children who go missing for periods of time or regularly come home late; and children who regularly miss academy or education or do not take part in education. Any possible CCE case will be shared with the DSL with a view to referring to appropriate agencies following the referral procedures.

Child Sexual Exploitation (CSE)

CSE is a type of sexual abuse in which children are sexually exploited for money, power or status. Children or young people may be tricked into believing they are in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed online. Some indicators of children being sexually exploited are: going missing for periods of time or regularly coming home late; regularly missing academy or education or not taking part in education; appearing with unexplained gifts or new possessions; associating with other young people involved in exploitation; having older boyfriends or girlfriends; suffering from sexually transmitted infections; mood swings or changes in emotional wellbeing; drug and alcohol misuse and displaying inappropriate sexualised behaviour. A child under the age of 13 is not legally capable of consenting to sex (it is statutory rape) or any other type of sexual touching. Sexual activity with a child under 16 is also an offence. It is an offence for a person to have a sexual relationship with a 16- or 17-year-old if that person holds a position of trust or authority in relation to the young person. Non consensual sex is rape whatever the age of the victim. If the victim is incapacitated through drink or drugs, or the victim or his or her family has been subject to violence or the threat of it, they cannot be considered to have given true consent and therefore offences may have been committed. Child sexual exploitation is therefore potentially a child protection issue for all children under the age of 18.

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

'Sexting'

Creating and sharing sexual photos and videos of under-18s is illegal. Sharing youth produced sexual imagery, which is commonly known as 'sexting' covers the incidents were

- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.

When such an incident involving youth produced sexual imagery comes to a member of staff's attention, this will be shared with the designated safeguarding lead with a view to referring to appropriate agencies following the referral procedures. Further information and advice on youth produced sexual imagery is available in the non-statutory guidance produced by the UK Council for Child Internet Safety (UKCCIS) ['Sexting in schools and colleges.'](#)

Serious violence

All staff will be made aware of indicators, which may signal that children are at risk from, or are involved with serious crime. These may include increased absence from academy, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or meaningful change in wellbeing, or signs of assault or unexplained injuries.

Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs. We are also aware that fear and a need for self-protection is a key motivation for children to carry a weapon – it affords a child a feeling of power. Neighbourhoods with elevated levels of deprivation and social exclusion have the highest rates of gun and knife crime. Children are more likely to carry knives and other weapons than guns. All staff will be aware of the associated risks and will share any concerns about or knowledge of such children immediately with the DSL. Further advice on these is available in the Home Office documents [Preventing youth violence and gang involvement](#) and [Criminal exploitation of children and vulnerable adults: county lines](#).

Child criminal exploitation: county lines

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market, and seaside towns. Key to identifying potential involvement in county lines are missing episodes when the victim may have been trafficked for the purpose of transporting drugs. 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 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.

Peer on peer abuse

Children can abuse their peers. This can take different forms, such as bullying (including cyberbullying), physical abuse (such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; violence, particularly pre-planned, forcing other children to use drugs or alcohol, initiation/hazing type violence and rituals), emotional abuse (blackmail or extortion, threats and intimidation), sexual violence, such as rape, assault by penetration and sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, sexting, sexual abuse (indecent exposure, indecent touching or serious sexual assaults, forcing other children to watch pornography or take part in sexting) and sexual exploitation (encouraging other children to engage in inappropriate sexual behaviour, having an older boyfriend/girlfriend, associating with unknown adults or other sexually exploited children, staying out overnight, photographing or videoing other children performing indecent acts) and up skirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm. Up skirting is now a criminal offence. Although it is more likely that girls will be victims and boys' perpetrators, all peer-on-peer abuse is unacceptable and will be taken seriously. We do not tolerate these or pass them off as "banter," "just having a laugh" or "part of growing up."

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

Sexual violence and sexual harassment between children

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It can occur online and offline (both physically and verbally). It is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. Children who are victims of sexual violence and sexual harassment will find the experience stressful and distressing. This will affect their educational attainment. Staff will share any concerns about or knowledge of such incidents immediately with the DSL with a view to ensuring that support systems are in place for victims (and alleged perpetrators). We take these incidents seriously and ensure that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. Where necessary, we will work with relevant external agencies to address the issue, which may include a referral to MASH and reporting to the Police. Further information is available in

'Part 5: Child on child sexual violence and sexual harassment' of DfE (Department for Education) guidance "[Keeping children safe in education](#)".

Domestic abuse

Domestic violence and abuse are any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence, or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to psychological, physical, sexual, financial, and emotional. 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. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. If members of staff have a concern about or knowledge of any domestic abuse incidents, they will share it immediately with the DSL with a view to referring to appropriate agencies.

Operation Encompass

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

The purpose of Operation Encompass is to safeguard and support children and young people who have been involved in or witness to a domestic abuse incident. Domestic abuse impacts on children in several ways. Children are at increased risk of physical injury during an incident, either by accident or because they attempt to intervene. Even when not directly injured, children are distressed by witnessing the physical and emotional suffering of a parent.

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

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

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

Violence Against Women and Girls (VAWG)

VAWG is defined as any act of gender-based violence that results in, or is likely to result in physical, sexual, or psychological harm or suffering to women including threats of such acts, coercion, or arbitrary deprivation of liberty, whether occurring in public or private life. VAWG is the umbrella term

which brings together multiple forms of serious violence such as crimes committed in the name of “honour;” domestic abuse; female genital mutilation (FGM); forced marriage; sexual violence, abuse, exploitation, and rape; stalking; harassment; trafficking for sexual exploitation; prostitution. If members of staff have a concern about or knowledge of any VAWG incidents, they will share it immediately with the DSL with a view to referring to appropriate agencies.

So-called ‘honour-based’ abuse (HBA) (including Female Genital Mutilation and Forced Marriage)

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

Female Genital Mutilation (FGM)

FGM is a procedure where the female genital organs are injured or changed and there is no medical reason for this. It is frequently a very traumatic and violent act for the victim and can cause harm in many ways. The practice can cause severe pain and there may be immediate and/or long-term health consequences, including mental health problems, difficulties in childbirth, causing danger to the child and mother; and/or death.

FGM is a deeply embedded social norm, practised by families for a variety of complex reasons. It is often thought to be essential for a girl to become a proper woman, and to be marriageable. The practice is not required by any religion. FGM is an unacceptable practice for which there is no justification. It is child abuse and a form of violence against women and girls. FGM is prevalent in 30 countries and is a deeply rooted practice, widely carried out among specific ethnic populations in Africa and parts of the Middle East and Asia. While FGM is concentrated in countries around the Atlantic coast to the Horn of Africa, in areas of the Middle East like Iraq and Yemen, it has also been documented in communities in Colombia, Iran, Israel, Oman, The United Arab Emirates, The Occupied Palestinian Territories, India, Indonesia, Malaysia, Pakistan and Saudi Arabia. It has also been identified in parts of Europe, North America, and Australia.

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

We note a new duty that was introduced on 31 October 2015 that requires teachers, which includes qualified teachers or persons who are employed or engaged to carry out teaching work in academies and other institutions to report ‘known’ cases of FGM in girls aged under 18 to the police. The duty applies to any teacher who is employed or engaged to carry out ‘teaching work,’ whether they have qualified teacher status, in maintained schools, academies, free schools, independent schools, non-maintained special schools, sixth form colleges, 16-19 academies, relevant youth accommodation or children’s homes in England. The duty does not apply in relation to suspected cases – it is limited to ‘known’ cases’ (i.e., those which are visually identified or disclosed to a professional by the victim). It

will be rare for teachers to see visual evidence, and they should not be examining pupils or students. The duty does not apply in cases where the woman is over 18 at the time of the disclosure/discovery of FGM (even if she was under 18 when the FGM was carried out). Further information on this duty can be found in the document "[Mandatory Reporting of Female Genital Mutilation – procedural information](#)." A useful summary of the FGM mandatory reporting duty is available in [FGM Fact Sheet](#). Staff in our academies will personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they will still discuss any such case with the designated safeguarding lead (or deputy) with a view to involving children's social care as appropriate.

Forced marriage

Forcing a person into a marriage is a crime in England and Wales. 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 perpetrators use perceived cultural practices to coerce a person into marriage. We note The Forced Marriage Unit's [statutory guidance](#) and especially Chapter 7 on page 32 of the [Multi-agency guidelines](#), which is specifically aimed at teachers, lecturers, and other members of staff within academies, colleges, and universities. Any possible forced marriage case will be shared with the DSL with a view to referring to appropriate agencies following the referral procedures.

Preventing Radicalisation

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

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

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

The examples above are not exhaustive and vulnerability may manifest itself in other ways. There is no single route to terrorism nor is there a simple profile of those who become involved. For this reason, any attempt to derive a 'profile' can be misleading. It must not be assumed that these characteristics and experiences will necessarily lead to individuals becoming terrorists, or that these indicators are the only source of information required to make an appropriate assessment about vulnerability.

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

We will refer children at risk of harm because of involvement or potential involvement in extremist activity to local authority's Multi Agency Safeguarding Hub. The MASH will share the referral details of new referrals with the Prevent lead police officer and LA Prevent coordinator at the point the referral is received. The referral will then be processed through the MASH multi agency information sharing system and parallel to this the Prevent police officer will be carrying out initial screening checks. The Prevent police officer will make a referral to the Channel Practitioner if there are sufficient concerns.

Private Fostering

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

The law requires that the council should be notified if anyone is looking after someone else's child for 28 days or more. The purpose of the council's involvement is to support the child and private foster family (and wherever possible the biological parent/s) with any issues arising. These may be practical issues such as benefits, housing, immigration, or emotional issues such as keeping contact with biological family, maintaining cultural identity.

If we become aware of a child in a private fostering arrangement within our boroughs, we will notify the council's Multi Agency Safeguarding Hub.

REFERRALS

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

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

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

The local authority sets out the various levels of need and detailed guidance about how concerns within these various levels should be responded to by council's agencies.

Safeguarding referrals should be made to local authority's Multi Agency Safeguarding Hub via the relevant referral processes. Prior to any written form being sent as a referral to social care, it is advised that there should be a verbal consultation with the MASH social worker or manager. The parent/carer will normally be contacted to obtain their consent before a referral is made. However, if the concern involves, for example alleged or suspected child sexual abuse, Honour Based Abuse, fabricated or induced illness or the Designated Safeguarding Lead has reason to believe that informing the parent at this stage might compromise the safety of the child or a staff member, nothing should be said to the parent/carer ahead of the referral, but a rationale for the decision to progress without consent should be provided with the referral.

When we make a referral, the local authority should decide, within one working day of a referral being made, about the type of response that is required and should let us, as the referrer know the outcome. We will follow up if this information is not forthcoming.

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

The Early Help team for the local authority will be used to request additional early help for a family when the needs of a child are beyond the level of support that can be provided by universal services, which will give four options:

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

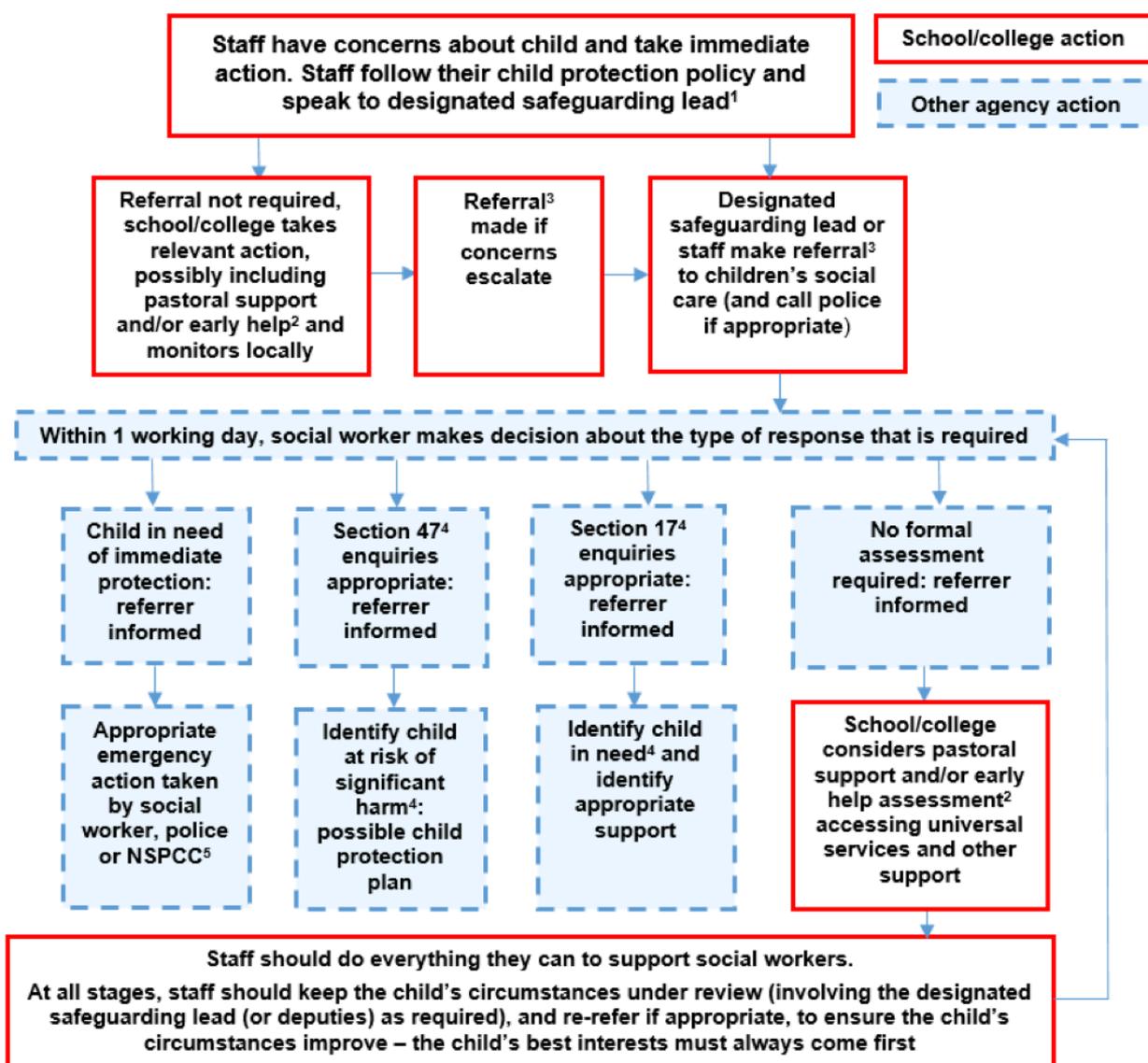
In circumstances where a child has an unexplained or suspicious injury that requires urgent medical attention, the CP referral process should not delay the administration of first aid or emergency medical assistance. **If a pupil is thought to be at immediate risk because of parental violence, intoxication,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

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

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

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

Actions where there are concerns about a child



VULNERABLE PUPILS

Vigilance will be exercised in respect of pupils who are subject to Child Protection Plan and any

incidents or concerns involving these children will be reported immediately to the allocated Social Worker (and confirmed in writing; copied to the LA's Academy's Safeguarding Coordinator). If the pupil in question is a Looked-After child, this will also be brought to the notice of the Designated Person with responsibility for children in public care. The Academy's Designated Teacher for Looked-after and Previously Looked-after Children will work with the local authority's virtual school head, who manages pupil premium plus for looked after children, to discuss how funding can be best used to support the progress of looked after children in the academy and meet the needs identified in the child's personal education plan. The designated teacher will also work with the virtual academy head to promote the educational achievement of previously looked after children. We note the DfE's statutory guidance [Designated teacher for looked-after and previously looked-after children](#).

Local authorities should share with our academy/setting the fact a child has a social worker, and the DSL will hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This will be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and academies and colleges to safeguard and promote the welfare of children. Where children need a social worker, this will inform decisions about safeguarding (for example, responding to unauthorised absence or 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).

We acknowledge that children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. We are aware that additional barriers can exist when recognising abuse and neglect in this group of children. This can include assumptions that indicators of abuse such as behaviour, mood and injury relate to the child's disability without further exploration; children with SEN and disabilities can be disproportionately impacted by things like bullying- without outwardly showing any signs; and communication barriers and difficulties in overcoming these barriers. If a pupil discloses that they have witnessed domestic abuse or it is suspected that they may be living in a household which is affected by family violence, this will be referred to the Designated Safeguarding Lead as a safeguarding issue.

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

TRAINING

All staff members will receive appropriate safeguarding and child protection training (including online safety) which is regularly updated. In addition, all staff members will receive safeguarding and child protection updates (for example, via email, e-bulletins, and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. All newly recruited staff (teaching and non-teaching), trustees and governors will be apprised of this policy and will be required to attend relevant LA or the local authority's Safeguarding Children Partnership (SSCP) training. In addition, all fresh staff and temporary staff will be required to attend an induction session with the Designated Safeguarding Lead or their deputy on their first day in the academy.

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

Staff training will be tailored in response to issues in the academies, the local and wider community, in order that staff have the knowledge they need to be able to respond effectively to evolving safeguarding concerns. Leaders will reflect and consider if aspects of the culture in the academies has contributed to certain behaviours occurring, and respond including through training as appropriate.

RECRUITMENT

Both academies are committed to the principles of safer recruitment and, as part of that, adopts recruitment procedures that help deter, reject and/or identify people who might abuse children. Safe recruitment processes are followed, and all staff recruited to the academy will be subject to appropriate identity, qualification, and health checks. References will be verified and appropriate criminal record checks [Disclosure and Barring Service (DBS) checks], barred list checks and prohibition checks will be undertaken. The level of DBS check required, and whether a prohibition check is required, will depend on the role and duties of an applicant to work in the academy, as outlined in Part three of the DfE guidance "[Keeping children safe in education](#)." We will also have regard to DfE's statutory guidance for academies about the employment of staff disqualified from childcare "[Disqualification under the Childcare Act 2006](#)", which also contains information about 'disqualification by association'.

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

The academies will only use employment agencies which can demonstrate that they positively vet their supply staff and will report the misconduct of temporary or agency staff to the agency concerned and to the LA. Staff joining the academy on a permanent or temporary basis will be given a copy of this policy. Additionally, the Staff Handbook confirms CP procedures within both academies.

VOLUNTEERS

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

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

Volunteers who on an unsupervised basis teach or look after children regularly or provide personal care on a one-off basis in our academy are deemed to be in regulated activity. We will obtain an

enhanced DBS certificate (which will include barred list information) for all volunteers who are new to working in regulated activity. Existing volunteers in regulated activity do not have to be re-checked if they have already had a DBS check (which includes barred list information). However, we may conduct a repeat DBS check (which will include barred list information) on any such volunteer should we have any concerns.

The law has removed supervised volunteers from regulated activity. There is no legal requirement to obtain DBS certificate for volunteers who are not in regulated activity and who are supervised regularly and on ongoing day to day basis by a person who is in regulated activity, but an enhanced DBS check without a barred list check may be requested following a risk assessment. Further information on checks on volunteers can be found in Part three of the DfE guidance "[Keeping children safe in education](#)."

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

Voluntary sector groups that operate within this academy or provide off-site services for our pupils or use academy facilities will be expected to adhere to this policy or operate a policy which is compliant with the procedures adopted by the Safeguarding Children Partnership (SCP). Premise's lettings and loans are subject to acceptance of this requirement.

STAFF CODE OF CONDUCT

All staff (paid and voluntary) are expected to adhere to a code of conduct in respect of their contact with pupils and their families. The Teachers' Standards 2012 state that all teachers, including Principals, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties. Children will be treated with respect and dignity and no punishment, detention, restraint, sanctions, or rewards are allowed outside of those detailed in both academies Behaviour and Exclusion policies. Whilst it would be unrealistic and undesirable to preclude all physical contact between adults and children, staff are expected to exercise caution and avoid placing themselves in a position where their actions might be open to criticism or misinterpretation. Where incidents occur, which might otherwise be misconstrued, or in the exceptional circumstances where it becomes necessary to physically restrain a pupil for their own protection or others' safety, this will be appropriately recorded and reported to the Principal and parents. Any physical restraint used will comply with DfE guidance "[Use of reasonable force in schools](#)."

Except in cases of emergency, first aid will only be administered by qualified First Aiders. If it is necessary for the child to remove clothing for first aid treatment, there will, wherever possible, be another adult present. If a child needs help with toileting, nappy changing or washing after soiling themselves, another adult should be present or within earshot. All first aid treatment and non-routine changing, or personal care will be recorded and shared with parents/carers at the earliest opportunity. Children requiring regular medication or therapies for long-term medical conditions will be made the subject of a Medical Plan that has been agreed with the parents and health authority.

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

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

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

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

CONTRACTORS

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

Individuals and organisations that are contracted by the academy to work with or provide services to pupils will be expected to adhere to this policy and their compliance will be monitored. Any such contractors will be subject to the appropriate level of DBS check, if any such check is required (for example because the contractor is carrying out teaching or providing some type of care for or supervision of children regularly). Contractors for whom an appropriate DBS check has not been undertaken will be supervised if they will have contact with children. Under no circumstances we will allow a contractor in respect of whom no checks have been obtained to work unsupervised or engage in regulated activity. We will determine the appropriate level of supervision depending on the circumstances. We will always check the identity of contractors and their staff on arrival at both academies.

COMPLAINTS/ALLEGATIONS MADE AGAINST STAFF

Both academies take seriously all complaints made against members of staff. Procedures are in place for pupils, parents, and staff to share any concern that they may have about the actions of any

member staff, including supply teachers and volunteers.

There are now two levels of allegation as outlined in KCSIE (2021):

1. Allegations that may meet the harms threshold.
2. Allegation/concerns that do not meet the harms threshold

All such complaints will be brought immediately to the attention of the Principal or one of the Designated Safeguarding Leads if the Principal is not available and nothing should be said to the colleague involved. The case manager of any allegation (usually the Principal) has a duty to ensure the wellbeing of students as well as a duty of care towards staff. In cases where the Principal is the subject of the allegation or concern, they will be reported to the Executive Principal, in order that they may activate the appropriate procedures.

These procedures are used in respect of all cases in which it is alleged that anyone working in the academy or college 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; or
- 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.

The Local Authority Designated Officer (LADO) should be informed of all allegations that come to an academy's attention and appear to meet the criteria. Contact can also be made with LA's School Safeguarding Coordinator who will liaise with the LADO. The procedures for dealing with allegations need to be applied with common sense and judgement. Many cases may well either not meet the criteria set out above or may do so without warranting consideration of either a police investigation or enquiries by local authority children's social care services. In these cases, local arrangements will be followed to resolve cases without delay. Managers will follow KCSIE guidance: "Where appropriate an assessment of transferable risk to children with whom the person works should be undertaken. If in doubt seek advice from the local authority designated officer (LADO)." (section 340 of KCSIE, p.82)

Some rare allegations will be so serious they will require immediate intervention by children's social care services and/or police. In such cases, referral to the LADO will lead to a Strategy Meeting or Discussion being held in accordance with the DfE guidance and London SCB procedures. This process will agree upon the appropriate course of action and the timescale for investigations.

Suspension should not be an automatic response when an allegation is reported. All options to avoid suspension should be considered prior to taking that step. The case manager must consider carefully whether the circumstances warrant suspension from contact with children at the school or college, or until the allegation is resolved. It should be considered only in cases where there is cause to suspect a child or other children at the school or college is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. If in doubt, the case manager should seek views from their personnel adviser and the LADO, as well as the police and children's social care where they have been involved. Further detail and alternative courses of action are outlined in KCSIE (p86).

The academies have a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child and who has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left. The DBS will consider whether to bar the person. Referrals will be made as soon as possible after the resignation or removal of the individual.

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

Governors

If an allegation is made against a governor, local policy will be followed. Where an allegation is substantiated, they should follow the procedures to consider removing them from office." (*section 360 of KCSIE, p.85*)

RECORDS

Brief and accurate written notes will be kept of all incidents and child protection or child in need concerns relating to individual pupils. These notes are significant especially if the incident or the concern does not lead to a referral to other agencies. This information may be shared directly with other agencies as appropriate. All contact with parents and external agencies will be logged and these will be kept as CP records. The academies will consider the views and wishes of the child who is the subject of the concern, but staff will be alert to the dangers of colluding with dangerous "secrets." Child protection records are not open to pupils or parents. All CP records are kept securely by the Designated Safeguarding Lead and separately from educational records. They may only be accessed by the Designated Safeguarding Lead, their Deputies, and the senior managers of both academies. The content of Child Protection Conference or Review reports prepared by the academy will follow the headings recommended by Children's Services and will, wherever possible, be shared with the parents/carers in advance of the meeting.

Child Protection records will be sent to receiving academies separately from the main pupil file and under a confidential cover when pupils leave both academies, ensuring secure transit and a confirmation of receipt will be obtained.

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

When we receive child protection records from other academies, we will ensure key staff such as the DSL and SENCO (SEN coordinators) are aware as required.

If a pupil is withdrawn from either academy having not reached the normal date of transfer; due to a family move or any other reason, all efforts will be made to identify any new address and the academy to which they are being admitted and to ensure that their educational records are sent without delay to the child's new academy. If the parent/carer fails to provide this information, an urgent referral will be made to the Family Early Help Service either through the Academy's Single Point of Contact (SPOC) or the Family EHS Duty Manager in order that they might make further enquiries. If this academy

receives educational records concerning a child who is not registered with us, the records will be returned promptly to the sending academy with a note, advising them to refer to their LA's Children's Services Department. **A child's name will only be removed from an Academy's Admissions Register in accordance with the *Pupil Registration Regulations* or with the authorisation of a Team Manager in the Family Early Help Service.**

We will inform the Local Authority when we are about to add or delete a pupil's name from the academy admission register for any reason in line with council's *Children Missing Education (CME) Protocols*.

When a pupil ceases to be registered at this academy and becomes a registered pupil at another academy in England or Wales, we will send a Common Transfer File (CTF) to the new academy via DfE's secure internet system called school2school.

We will upload CTFs of pupils who have left but their destination or next school is unknown, or the child has moved abroad or transferred to a non-maintained school to a searchable area of the school2school website commonly referred to as the 'Lost Pupil Database'. If a pupil arrives in our academy and the previous school/academy is unknown, we will search the database for any record of the child. The academy will require documentary proof as to the identity of pupils presented for admission. If there is any doubt as to the identity of a pupil, advice will be sought from the local authority and other statutory agencies, as appropriate. We will maintain accurate and up to date records of those with Parental Responsibility and emergency contacts. We will hold more than one emergency contact number for each pupil or student to contact a responsible adult when a child missing education is also identified as a welfare and/or safeguarding concern. Pupils will only be released to the care of those with Parental Responsibility or someone acting with their written consent.

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

SAFETY IN THE ACADEMIES

No internal doors to classrooms will be locked whilst pupils are present in these areas. Entry to both academies' premises will be controlled by doors that are secured physically or by constant staff supervision or video surveillance. Authorised visitors to the academies will be logged into and out of the premises and will be asked to wear their identity badges or be issued with academy visitor badges. Unidentified visitors will be challenged by staff or reported to the Principal or office. Carelessness in closing any controlled entrance will be challenged.

The presence of intruders and suspicious strangers seen loitering near the academy or approaching pupils, will be reported to the Police by calling 101 or 999, depending on the circumstances and the urgency of the case so that if police stop these individuals, they can be spoken to about what they were doing and dealt with accordingly. Brief information about the incident will be sent to LA's

School's Safeguarding Coordinator with a view to alerting other local schools/academies in liaison with the police and through appropriate systems.

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

CURRICULUM

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

- to recognise and manage risks in different situations and then decide how to behave responsibly.
- to judge what kinds of physical contact are acceptable and unacceptable.
- to recognise when pressure from others (including people they know) threatens their personal safety and well-being; including knowing when and where to get help.
- to use assertiveness techniques to resist unhelpful pressure.
- emotional literacy.

All computer equipment and internet access within the Academy will be subject to appropriate “parental controls” and Internet safety rules in line with our Online Safety Policy. We will be careful that “over blocking” does not lead to unreasonable restrictions as to what children can be taught regarding online teaching and safeguarding.

HEALTHY SCHOOLS LONDON

All the Academies will work with partners to promote a whole, healthy academy approach and achieving the “Healthy Schools London” status – including a focus on the curriculum with the aim of:

- Developing an academy ethos, culture, spiritual, moral, social, and cultural (SMSC) development provision and environment which encourages a healthy lifestyle for all pupils, including the vulnerable.
- Using the full capacity and flexibility of the curriculum to help pupils to be safe and healthy.
- Ensuring that food and drink available across the academy day reinforce the healthy lifestyle message.
- Delivering the new mandatory Relationships & Sex Education (RSE) and Health Education (HE) and/or where delivered, through Personal, Social, Health and Economic (PSHE) & Wellbeing Education.
- Providing high quality Physical Education (PE) and sport to promote physical activity.
- Promoting an understanding of the full range of issues and behaviours which impact upon

lifelong health and wellbeing, including emotional wellbeing and mental health.

- Working in partnerships with parents/carers, local communities, external agencies, and volunteers to support health and wellbeing of all pupils including the most vulnerable and disadvantaged.

WORKING IN PARTNERSHIP WITH PARENTS

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

- We will use clear statements in our brochures and correspondence.
- We will liaise with agencies in the statutory, voluntary and community sectors and locality teams that are active in supporting families.
- We will be alert to the needs of parents/carers who do not have English as their first language and will utilise the translation services, as necessary.
- We will distribute the LA's leaflet for parents, "*Protecting Children in Education Settings.*"
- We will make available a copy of this policy to any parent who requests it. The policy will also be available through the academy's web site.
- We will keep parents informed as and when appropriate.

MONITORING AND EVALUATION

The SBA executive, central team and link trustee and link governors will monitor the safeguarding arrangements in the academies to ensure that these arrangements are having a positive impact on the safety and welfare of children. This will be evaluated based on evidence of:

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

COMPLAINTS

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

Appendix A

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

South Bank UTC (University Technical College), 56 Brixton Hill, Brixton, London SW2 1QS

Principal: Austin Sheppard

DSL: Rob Harding

DDSLs: Delma Russell, Coretta Brown, Caron Bernard, Mikael Cohen, Laura Parsons, and Kim Field

Safeguarding Governor: Beau Fadahunsi

Local Authority contacts: Lambeth Council Safeguarding Partnership

<https://www.lambethsaferchildren.org.uk/>

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

LADO@lambeth.gov.uk

Other local authority external agencies:

[Lambeth safeguarding external agencies](#)

Internal reporting procedures for safeguarding concerns by staff:

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

Internal and external reporting procedures for safeguarding concerns by students:

Students can send Microsoft Teams chat messages to any member of staff about any safeguarding concerns. The staff member will then report this as above. Students, parents, and external agencies can also email safeguarding@southbank-utc.co.uk . This email is monitored during office hours by the Safeguarding team. Students can also speak to any member of staff if they have any worries or concerns, and the staff member will follow the academy's reporting procedures.

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

Principal: John Taylor

DSL: Jason Badu

DDSLs: Annette Moses

Safeguarding Governor: Chris Mallaband

Local Authority contacts: The Southwark Safeguarding Board

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

LADO: Eva Simcock 0207525 0689, eva.simcock@southwark.gov.uk

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

Other local authority external agencies:

The LA strategic Lead Officer for safeguarding in education services is the Director of Education Nina Dohel 020 7525 3252

The LA's Academy's Safeguarding Coordinator is Apo CAGIRICI 020 7525 2715

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

Internal reporting procedures for safeguarding concerns by staff:

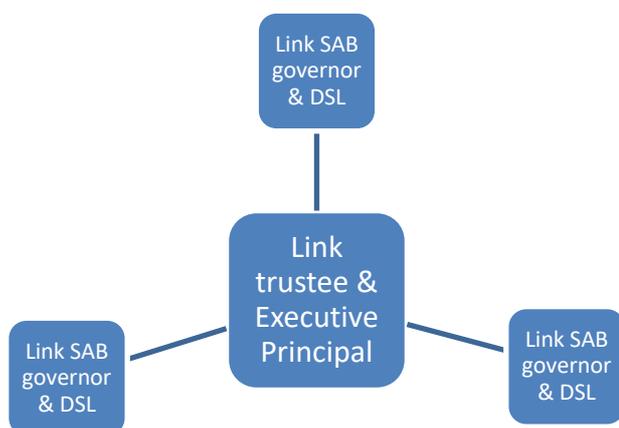
All staff will always report concerns via the academy's CPOMS system. If a child is at harm or in danger it is imperative the staff member speaks to a member of the Safeguarding immediately. Concerns and worries should not be reported after the child has left academy.

Appendix B

Governance and safeguarding within South Bank Academies

Structure

- Named link trustee on South Bank Academies Board
- Executive Principal (EP) is Trust's safeguarding lead
- Named link governor on each School Advisory Board
- Designated Safeguarding Lead at each school



*Theoretical future model

- Termly meeting between Designated Safeguarding Lead (DSL) and link SAB governor in advance of safeguarding discussion at 2nd SAB meeting each term
- Safeguarding on SAB agendas for 2nd SAB meeting each term
- Annual link safeguarding meeting
- Safeguarding on all SBA agendas for noting and annual report discussed at Summer SBA Board

Link Trustee

The Trust is required to appoint a senior board member, or a 'link trustee' to take leadership responsibility for the Trust's safeguarding arrangements (paragraph 60 of KCSIE).

Roles and responsibilities: Link trustee

You should:

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

You should make sure the Trust has an effective:

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

Link Governor

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

Roles and responsibilities: Link governor

You should:

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

- Attend the annual (more?) meeting of safeguarding governors to facilitate monitoring, discussion and sharing of best practice ideas and review of the annual safeguarding report in advance of submission to the Summer Board meeting

The link trustee and link governors should not:

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

Governance output requirements

- Termly monitoring visit checklist (appendix 1) for 2nd SAB meeting of the term
- Termly visit report for 2nd SAB meeting of the term
- Governance input at annual link safeguarding meeting added to annual safeguarding report
- Completion of annual audit using NSPCC audit tool to be reviewed at annual link safeguarding meeting

Operational output requirements

- Termly safeguarding report (DSL) for 2nd SAB meeting of the term
- Termly reports (above) to be collated and presented to each SBA Board meeting for noting (EP)
- In-depth focus (termly report plus expanded narrative) on safeguarding completed by DSLs for 2nd Summer SAB meeting
- Annual safeguarding report written by EP & DSLs, reviewed at link safeguarding meeting in advance of submission to Summer SBA Board meeting

Monitoring questions

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

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

Trustee/governors safeguarding visit report

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

Monitoring the Single Central Register

Link trustees and governors are responsible for the strategic task of monitoring that school leaders are keeping up with their statutory duties. They do this by asking the right questions about how complete the record is, how frequently it is reviewed and how it is stored.

Questions to ask your school leaders about the SCR

- How and where do we store the SCR?
- Is it secure?
- How frequently do you check the SCR?
- When is the last time you checked the SCR?
- Have you checked the information recorded on the SCR for errors?
- Are all new staff recorded?
- Are current volunteers (for whom a DBS check has been conducted) recorded? (This is not a requirement under KCSIE but OFSTED will want to see this, as explained in its safeguarding guidance – page 25 and 29)
- Are all relevant fields on the register completed for each listed person?

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

Appendix C: Safeguarding monitoring questions

Roles and responsibilities

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

Training

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

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

Policies and procedures

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

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

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

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

Safer recruitment

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

Teaching and learning

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

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

Information must be recorded for:

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

Schools must record:

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

In respect of these checks, the SCR must record:

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

For supply staff, schools must also record:

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

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

Policy approved by South Bank Academies trust board. Date: March 2021
Date of last review: September 2021
Date of next review: August 2022