Phoenix
FEDERATION

Safeguarding Policy

Chair of Governors: _____

Executive Headteacher: Mr. Dean M. Gordon

Date: 16.10.2025

Date to be reviewed: October 2026

UNITED KINGDOM unicef | Rights Respecting Schools

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This policy should be read alongside the following other policies:

List here those policies with which this should be consistent, adjust list to fit needs of your setting. E.g.

- Physical intervention and the use of reasonable force
- Personal and intimate care
- Complaints procedure
- Anti-bullying policy

- Appropriate physical contact policy
- Whistle blowing policy.
- SEN policy
- Behaviour policy
- Attendance including Children Missing in Education
- Safer Recruitment policy
- Managing allegations policy
- Searching and Screening Policy
- Grievance and disciplinary
- Attendance Policy
- Relationships, Sex and Health Education Policy
- Lewisham's Early Help Strategy https://lewisham.gov.uk/myservices/children-and-young-people-service/earlyhelp/information-for-professionals

Safeguarding and Child Protection Structure at Phoenix Federation

Executive Headteacher	Mr Dean Gordon
Designated Safeguarding Lead	Mr Dean Gordon
Deputy Safeguarding Lead(s)	Kay-Ann Williamson, Sean MacNamara, Opha Robertson, Vanessa Bright and Stephen Orton
Designated Governor for Child Protection	Ade Onagoruwa
Review Cycle	Annual
Governing Body Ratification	Date: As cover page
Date shared with staff	**Date: 1 September**
Review Date	**Date: As cover page**
Legal Framework	Children Act 1989 (as amended 2004 Section 52) Children Act 2004 Children Schools and Families Act 2010 Education Act 2002 s175/s157 The Teachers Standards' 2012 The Counter Terrorism and Security Act 2015 (section 26 The Prevent Duty) Equality Act 2010
Statutory Guidance	Keeping Children Safe in Education (September **2025**) Working Together to Safeguard Children (December 2023)

	Children who run away or go missing from home/care (Jan 2014)
Department of Education and Local Advice and Guidance	What to do if you're worried a child is being abused (March 2015) Information Sharing – Advice for practitioners Providing safeguarding services to children, young people, parents and carers (July 2018)
Related Policies	E.g. Behaviour Staff Code of Conduct Whistleblowing

We are a Rights Respecting School

We are working with UNICEF to create a safe and inspiring place to learn, where children are respected, their talents are nurtured, and they are able to thrive. We are currently working towards our silver Right Respecting School Award by embedding the rights of the child into daily school life. Our aim is to give children the best chance to live, health lives and to be responsible active citizens.

This policy pays attention to the following rights

• Article 12: Children have the right to be listened to and taken seriously

• Article 29: Children have the right to be protected from being hurt or badly treated.

• Article 31: Children have the right to relax and play.

• Article 37: Children have the right not to be punished in a cruel and hurtful way.

At Phoenix Federation we have a primary responsibility for the care, welfare and safety of all pupils in our charge. We are committed to providing help and support to meet the needs of children as soon as problems emerge, protecting children from maltreatment, whether that is within or outside the home, including online, preventing impairment of children's mental and physical health or development and ensuring that children grow up in circumstances consistent with the provision of safe and effective care (Working Together to Safeguard Children (2023).

Phoenix Federation staff are advised to maintain an attitude of 'it could happen here' as far as safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the interest of the child.

We encourage a culture in which all staff believe safeguarding to be of the highest importance and understand that their vigilance is critical. We want all staff to feel confident to discuss their concerns with designated staff/Governors and have clear lines of protocol in place for how to do this.

At Phoenix Federation we explicitly teach pupils about safeguarding themselves in and outside of school, including online, through a broad and balanced curriculum. We establish and maintain a culture in which children feel secure, are encouraged to talk and are listened to.

At Phoenix Federation we recognise that 'Adultification bias' is a form of racial prejudice where children of minority groups, typically Black children, are treated by adults as being more mature than they actually are. Actions committed by these children that would be deemed normal for child development are more likely to be treated as opportunities for discipline and children are more likely to be seen as having malicious intentions. A clear example of this bias in action is when a Black child is assumed to be older than their actual age. These perceptions could in turn perpetuate the maturity of Black children and the assumptions of adults can lead to these students experiencing harm and can lead to Black children are not receiving the safeguarding responses they need.

This can inadvertently send a clear message in terms of worth and value to children as to who is and is not perceived as worthy of support. This can then impact on how Black children view themselves and what they then identify and understand to be harmful. Ultimately, this type of behaviour normalises harm and feeds into the narrative that Black people can withstand any form of abuse.'

Phoenix Federation has signed the Lewisham's pledge to tackle race inequalities in school. We pledge to take actions that will address access and opportunity for all pupils, by highlighting inequalities and increasing awareness.

We commit to:

- Targeting ambitious outcomes for Black Caribbean heritage and Black and Minority Ethnic pupils
- Reducing exclusions of Black Caribbean heritage pupils of all ages
- Leaders and governors taking a whole school approach to tackling race inequality

- Transparent reporting and sharing of borough-wide data trends
- Working together in new ways and sharing good practice to tackle race inequality in our school cultures and curriculum
- Actively developing high quality relationships with Black Caribbean heritage and Black and Minority Ethnic pupils and their parents
- Improving Black representation in school leadership and governing bodies.

This Safeguarding Policy applies to **all** staff, governors and volunteers working in school.

1.0 Rationale:

This policy has been developed in accordance with the principles established by the Children Act, 1989, the Education Act, 2002 and the statutory guidance: Keeping Children Safe in Education, (KSCIE) **2025**.

At Phoenix Federation we believe that the needs of the child are paramount. All children deserve the opportunity to achieve their full potential; they have the right to be protected from harm and exploitation whatever their race, religion, first language or ethnicity, gender or sexuality, age, health or disability, political or immigration status.

All staff accept their fundamental responsibility to keep pupil's safe, promoting children's social, physical, emotional and moral development. All staff are trained to identify signs of abuse and exploitation and work to identify, assess, and support those children who are suffering harm. Staff will help to equip children with the skills needed to keep them safe.

There are three main elements to the child protection and safeguarding policy:

PREVENTION through the teaching and pastoral support offered to pupils and the creation and maintenance of a whole school protective ethos.

PROTECTION by following agreed procedures for identifying, monitoring and reporting cases, or suspected cases, of abuse; protecting children from unsuitable people.

SUPPORT to victims and culprit of abuse and to staff in identifying signs and symptoms of abuse.

Aims:

- To provide a caring environment in which children and young people feel safe, secure, valued and respected.
- To instil confidence so that pupils can trust adults and know how to approach staff if they are in difficulty.
- To raise awareness among all staff, both teaching and non-teaching, of the need to safeguard children through identification and prompt reporting of all possible cases of abuse.

- To ensure that rigorous systems of identification, reporting and monitoring are in place to protect all children from harm.
- To establish clear and effective channels of communication between staff, and to develop effective working relationships with all other agencies involved in safeguarding children including Children Social Care services, the police and health services.
- To ensure that all adults have appropriate checks and relevant safeguarding training completed before working with children.

2.0 Roles and Responsibilities:

All adults working with children have a responsibility to protect children.
At **Phoenix Federation,** there are, however key people within school who have specific responsibilities.

Designated Safeguarding Leads (DSL)	**Deputy Designated Safeguarding Leads**	**Designated Governor for Safeguarding**
To attend safeguarding Level 3 refresher training every two years. (Minimum requirement). Deliver annual staff safeguarding training according to the needs of the team and/or in response to current practices. Liaise with class teachers, learning mentors and other relevant staff to provide support for the child in school. Liaise with agencies that support the child such as social care, Child and Adolescent Mental Health Services (CAMHS), Education Welfare Service and Educational Psychology service. Support or lead 'team around the family' (TAF) meetings and attend case conference reviews/ core group meetings. Ensure the child protection policy is reviewed, updated and enforced every year.	To attend safeguarding Level 3 refresher training every two years. During initial meeting with new pupils – make parents aware of safeguarding policy. Monitor children on CP register and all 'live' concerns. Receive current information for children on CP register weekly. Lead/ attend TAF meetings as necessary. To maintain good relations with the school community to ensure effective support and access to support.	Ensure all members of the governing body have attended Safeguarding and Child protection (including online safety) training as part of their induction. Report to the governing body the number of cases (without names or details) of child protection issues in the school. Ensure safeguarding policy is reviewed annually. To oversee procedures relating to allegations made against the Head Teacher.

To meet weekly/biweekly with the Deputy/Assistant Heads to discuss ongoing CP concerns. To meet half-termly with designated governor to discuss safeguarding. Ensure that relevant paperwork is copied and filed before being transferred to a pupil's new school within 5 days. Promote educational outcomes by sharing about welfare, safeguarding and child protection issues information regarding vulnerable children with teachers and leadership staff. **The DSL will be responsible when a school places a pupil with an alternative provision (AP) provider. As the school retains accountability for the pupil's safeguarding, the Designated Safeguarding Lead will meet with the alternative provision provider at least half-termly to ensure that the provider meets the pupil's needs.** **The DSL will take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place).**		

The Headteacher will:

- Ensure that all policies and procedures adopted by the Governing Body are fully implemented, and followed by the staff.
- Work towards establishing and maintaining a culture in school where all staff and volunteers feel able to raise concerns about poor or unsafe practice in regard to children. These concerns will be treated sensitively and proactively in line with the school's Whistle-blowing policy.
- Ensure that all relevant training for all staff and governors is up-to-date and reviewed annually.
- Ensure that all staff have received 'Section 1' and 'Annex A' of Keeping Children Safe in Education and have signed to acknowledge they have read and understood its contents.
- Heads will take on the following responsibilities. A designated Governor (Chair of Governors) is also identified.

The Designated Safeguarding Lead (DSL) will:

- Have received the appropriate official training, which will be undertaken every two years, and obtain access to resources and attend any relevant or refresher training courses.
- Ensure each member of staff has access to and understands the school's Safeguarding Policy and procedures, including new and part time staff. The DSL should ensure the school's policies are known and used appropriately.
- Ensure the Safeguarding policy is available publicly and parents are aware of the fact that referrals about suspected abuse, neglect and exploitation may be made and the role and responsibility the school has in this.
- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as Early Help Assessments.
- Be able to keep detailed, accurate and secure records of all concerns and referrals.
- Have a working knowledge of how local authorities conduct a Child Protection Case Conference and a Child Protection Review Conference and be able to attend and contribute to these effectively when required to do so.
- Be alert to the specific needs of children in need, those with special educational needs/disability and young carers.
- Encourage a culture of listening to children among all staff.
- Act as a source of support, advice and expertise to staff on matters of safety and safeguarding and, when deciding whether to make a referral, liaise with the appropriate agencies.
- Refer all cases of suspected or alleged abuse or harm by a member of the school staff**,** colleague or volunteer known to work with children to the local authority children's social care and the LA Designated Officer (LADO)
- Ensure the school's safeguarding policy is reviewed annually, and the procedures and implementation are updated and reviewed regularly, working with the governing body regarding this.
- Where children leave the school or college (including in year transfers) the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure

transit, and confirmation of receipt should be obtained. The DSL should ensure a copy of the file is kept for their own records.

- Ensure that safeguarding issues are regularly discussed at Governors, SLT and staff meetings.
- Ensure all members of the governing body have attend Safeguarding and Child protection (including online safety) training as part of their induction.
- Promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school and college leadership staff.

The Governing Body at Phoenix Federation, will ensure that:

- The school has a Safeguarding policy in place and that procedures are in accordance with statutory and Local Authority (LA) guidance.
- The Safeguarding policy is made available to parents.
- Safer recruitment procedures are used at all times, and all appropriate checks are carried out on staff and volunteers who work with children.
- The Designated Safeguarding Lead (DSL) with responsibility for safeguarding is a member of the senior leadership team.
- All staff and governors have undertaken the appropriate safeguarding training.
- A nominated governor will have responsibility for liaising with the DSL, the LA and partner agencies.
- Oversee procedures for dealing with allegations of abuse against staff and volunteers that comply with guidance from the LA and locally agreed inter-agency procedures.
- Policies and procedures are reviewed annually.
- All members of the governing body will have a current Enhanced DBS check and a s128 check as per DfE guidance.
- The Chair of Governors oversees appropriately anonymised LADO referral information as well as managing investigations into allegations made against the Headteacher

3.0 CHILD PROTECTION:

At **Phoenix Federation,** we fully recognise our responsibilities for child protection and strive to achieve an environment where children feel secure, supported and valued within and beyond the school gate.

We recognise that some children are the victims of neglect and/or physical, sexual or emotional abuse. Staff at school, by virtue of their day-to-day contact with and knowledge of the children in their care, are well placed to identify such abuse and to offer support to children in need.

All child protection concerns and referrals will be handled sensitively, professionally and in ways which support the needs of the child.

What is Child Protection?

Child Protection is one very important aspect of safeguarding. It refers to the activity which is undertaken to protect specific children who are suffering, or at risk of suffering, significant harm. Safeguarding, in addition to child protection, encompasses issues such as pupil health and safety, bullying/cyber-bullying, appropriate medical provision. These areas have specific policies and guidance which should be read in conjunction with this document.

What is significant harm?

The Children's Act 1989 introduced the concept of significant harm as the threshold that justifies compulsory intervention by statutory agencies in family life in the best interests of children. There are no absolute criteria on which to rely when judging what constitutes significant harm. Sometimes it might be a single traumatic event but more often it is a compilation of significant events which damage the child's physical and psychological development. Decisions about significant harm are complex and require discussion with the statutory agencies.

Responsibilities

The responsibility for child safeguarding falls on everybody who is employed at **Phoenix Federation.** All adults who work at **Phoenix Federation** are expected to support the Child Protection and Safeguarding Policy, with overall responsibility falling on the Headteacher. All staff, including volunteers have a statutory obligation to report to the DSL if there is suspicion of abuse, neglect and exploitation of a child or if a child discloses abuse or allegations of abuse.

3.1 Recognising abuse

To ensure that our children are protected from harm, we need to understand what types of behaviour constitute abuse, neglect and exploitation.

Abuse, neglect, and exploitation are all forms of maltreatment that can severely impact a child's well-being. Abuse involves actively causing harm, such as hitting a child, while neglect refers to failing to protect a child from harm, such as leaving a small child home alone or placing dangerous objects like knives or matches within reach of an unattended toddler. Exploitation, another serious form of maltreatment, involves taking advantage of a child for personal gain, which can include forcing them into labour, engaging them in illegal activities, or subjecting them to sexual abuse. Each of these forms of maltreatment can have devastating effects on a child's physical, emotional, and psychological health.

Physical abuse

Physical abuse 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 (this used to be called Munchausen's Syndrome by Proxy, but is now more usually referred to as fabricated or induced illness).

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child, such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate or valued only for meeting the needs of another person. It may feature age – or developmentally-inappropriate expectations being imposed on children. These may include interactions that are beyond the 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, 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

Sexual abuse involves forcing or enticing a child person to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative and non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

Neglect

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

(Definitions taken from Working Together to Safeguard Children)

Exploitation

Child exploitation encompasses various forms of abuse and maltreatment, including sexual exploitation, forced labour, trafficking, and the use of children in illicit activities such as drug trafficking (County Lines). It also involves the manipulation or coercion of children into performing activities that are harmful to their physical, mental, or emotional development.

Bullying

While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause considerable anxiety and distress. At its most serious level, bullying is thought to result in up to 12 child suicides each year.

All incidences of bullying should be reported and will be managed through our anti-bullying procedures. All pupils and parents receive a copy of the anti-bullying procedures on joining the school and the subject of bullying is addressed at regular intervals in the personal, social and health education (PSHE) curriculum. In the event that there is a possibility the bullying may be linked to abuse/, the Headteacher and the DSL will consider implementing child protection procedures.

3.2 Indicators of abuse and what you might see

Physical signs define some types of abuse, for example, bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For these reasons it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the designated person.

It is the responsibility of all staff members, volunteers and contractors to *report* their concerns. It is *not their responsibility to investigate* or decide whether a child has been harmed or abused.

A child who is being harmed, abused, neglected and exploited may:

- have bruises, bleeding, burns, fractures or other injuries
- show signs of pain or discomfort
- keep arms and legs covered, even in warm weather
- be concerned about changing for PE or swimming
- look unkempt and uncared for
- change their eating habits
- have difficulty in making or sustaining friendships
- appear fearful
- be reckless with regard to their own or other's safety
- self-harm
- frequently miss school or arrive late
- show signs of not wanting to go home
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn
- challenge authority
- become disinterested in their school work
- be constantly tired or preoccupied
- be wary of physical contact
- be involved in, or particularly knowledgeable about drugs or alcohol
- display sexual knowledge or behaviour beyond that normally expected for their age.
- Unexplained fear, anxiety, depression, or aggression.
- Unexplained increase in social media activity, especially at odd hours
- Presence of an older boyfriend/girlfriend or adult friend.
- Evidence of expensive gifts, money, or possessions without clear explanation.
- Regularly missing school or unexplained changes in school performance.

- Extreme secrecy or privacy, especially regarding online activities
- Low self-esteem or self-worth.
- Self-harm or suicidal tendencies

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSL to decide how to proceed. It is very important that all staff, volunteers and/or contractors report *all* concerns even if there is no 'absolute proof' that the child is at risk. (See Appendix 1 for the 'Reporting a Concern' form on **CPOMS.**

3.3 Taking action

For staff to be able to identify and respond appropriately to possible abuse and/or neglect, they must at all times follow the four stages below:

1. Be alert
2. Question behaviours
3. Ask for help
4. Refer

It may not always be appropriate to go through all four stages sequentially, if a child is in immediate danger or is at risk of harm, the DSL must refer to police or social care without delay, so it is important staff share any concerns in a timely manner to ensure children are safe.

Staff members working with children are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned.

When worried about the welfare of a child, staff members should always act in the interests of the child and report any concerns as per **Phoenix Federation** procedures as set out below.

Staff concerns about a child / young person's wellbeing, is likely to be based on:

a) Something the child/young person/parent has told them
b) Something they have noticed about the child's behaviour, health, or appearance
c) Something another professional said or did

Even if staff believe their concern is minor, it is always their responsibility to share concerns no matter how small. The DSL may have more information that, together with what staff have shared, represents a more serious worry about a child. It is never up to a staff member to make their decision alone on how to respond to concerns.

3.4 If you suspect a child is at risk of harm

There will be occasions when staff suspect that a child may be at serious risk, but they have no 'real' evidence. The child's behaviour may have changed, their artwork could be bizarre or other physical but inconclusive signs may have been noticed. In these circumstances, staff will always try to give the child the opportunity to talk. The

signs noticed may be due to a variety of factors and it is wholly appropriate to ask the child if they are alright or if they can help in any way.

Use CPOMS to record these early concerns. If the child does begin to reveal that they are being harmed staff should follow the advice in the section 'If a child discloses to you'.

If, following the conversation, they remain concerned, they should discuss your concerns with the DSL.

3.5 If a child discloses information to you

It takes a lot of courage for a child to disclose that they are being neglected and or abused. They may feel ashamed, particularly if the abuse is sexual, their abuser may have threatened what will happen if they tell, they may have lost all trust in adults, or they may believe, or have been told, that the abuse is their own fault.

If a child talks to any member of staff about any risks to their safety or wellbeing it is very important that staff let them know that **they must** pass the information on. Under no circumstances should staff keep any secrets for children. Staff/volunteers/contractors should:-

1. Decide whether they need to find out more by asking the child / young person, or their parent to clarify any concerns, being careful to use open questions: beginning with words like: 'how', 'why', 'where', 'when', 'who'?
2. Let the child/young person/parent know what they plan to do next
3. Not promise to keep what s/he tells them secret.... for example, 'I am worried about your bruise and I need to tell Mrs Jaffer so that she can help us think about how to keep you safe'
4. Inform the DSL immediately. If the DSL is not available, inform the Deputy DSLs. If neither are available, speak to the Principal or Vice Principals. If there is no other member of staff available, staff must make the referral themselves
5. Make a written record as soon as possible after the event, noting:

   a. Name of child
   b. Date, time and place
   c. Who else was present?
   d. What was said / What happened / What was noticed ... speech, behaviour, mood, drawings, games or appearance
   e. If child or parent spoke, record their words rather than the staff member's interpretation
   f. Analysis of what you observed and why it is a cause for concern

During a conversation with the child staff should:

- Allow them to speak freely.
- Remain calm and do not over react – the child may stop talking if they feel they are upsetting you.

- Give reassuring nods or words of comfort – 'I'm so sorry this has happened', 'I want to help', 'This isn't your fault', 'You are doing the right thing in talking to me'.
- Not be afraid of silences – remember how hard this must be for the child.
- Under no circumstances ask investigative questions – such as how many times this has happened, whether it happens to siblings too, or what does the child's mother thinks about all this.
- At an appropriate time tell the child that in order to help them you must pass the information on.
- Not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused.
- Avoid admonishing the child for not disclosing earlier. Saying 'I do wish you had told me about this when it started' or 'I can't believe what I'm hearing' as a child may interpret it that they have done something wrong.
- Tell the child what will happen next, either going straight to the designated person or advising that someone will come to see them before the end of the day.
- Report verbally to the designated person.
- Write up your conversation as soon as possible on CPOMS.
- Seek support if they feel distressed.

3.6 Notifying parents

The school will normally seek to discuss any concerns about a child with their parents. This must be handled sensitively, and the DSL will make contact with the parent in the event of a concern, suspicion or disclosure.

However, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, then advice will first be sought from Children's Social Care.

3.7 Referral to Children's Social Care

The DSL will make a referral to Children's Social Care if it is believed that a child is suffering or is at risk of suffering significant harm. The child (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child. (See 3.10 for details on how this referral can be made).

3.8 Confidentiality and sharing information

All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the child and staff involved but also to ensure that being released into the public domain does not compromise evidence.

Staff should only discuss concerns with the DSL/Headteacher, Deputy DSL or Chair of Governors (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

Child protection information will be stored and handled in line with General Data Protection Regulation (GDPR), 2018 principles. Information is:

- processed for limited purposes
- adequate, relevant and not excessive
- accurate
- kept no longer than necessary
- processed in accordance with the data subject's rights
- secure.

Record of concern forms and other written information will be stored in a locked facility and any electronic information will be password protected and only made available to relevant individuals.

Every effort should be made to prevent unauthorised access and sensitive information should not be stored on laptop computers, which, by the nature of their portability, could be lost or stolen. If it is necessary to store child protection information on portable media, such as a CD or flash drive, these items should also be kept in locked storage. Child protection information will be stored separately from the child's school file and the school file will be 'tagged' to indicate that separate information is held.

Child protection records are normally exempt from the disclosure provisions of GDPR, which means that children and parents do not have an automatic right to see them. If any member of staff receives a request from a child or parent to see child protection records, they should refer the request to the head teacher.

GDPR principles do not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child. When information is shared, the reason for doing so as well as the reasons why consent may not have been sought, will be clearly documented within the child protection records.

'*Fears about sharing information cannot be allowed to stand in the way of the need to safeguard and promote the welfare of children and young people at risk of abuse or neglect'. Information Sharing – DfE guidance 2018*

When a child leaves the school (including in year transfers) their Child Protection files will be copied with the copies archived and stored securely for 7 years and the original securely packaged and transferred by hand or secure delivery to the new school. The designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. The DSL should ensure a copy of the file is kept for their own records.

The school's policy on confidentiality and information-sharing is available to parents and children on request.

3.9 Early Help and Family Thrive

Phoenix Federation follows Lewisham's multi-agency threshold guidance document which informs agencies in Lewisham on how to assess and identify a child's level of need and how to access the right level support.

The threshold guidance is divided into four levels:

- Tier 1 - No Additional Needs
- Tier 2 - Early Help/ Early Support
- Tier 3 - Children with Complex Multiple Needs
- Tier 4 - Children in Acute Need

The thresholds for intervention in Lewisham are based upon the London Continuum of Need. The London Continuum of Need provides descriptors for four levels of need. When there are children with additional needs, who may be vulnerable and showing early signs of abuse and/or neglect; their needs are not clear, this is the threshold for a multi-agency early help assessment to begin – Tier 2/Level 2, Early Help/Early Support which is provided by a Family Thrive practitioner.

Family Thrive is part of the wider Early Help offer within Lewisham, which includes a universal offer for all children, young people and families in Lewisham through children's centres, youth hubs and community and voluntary organisations.

Family Thrive is a consent based Targeted Early Help Service. Family Thrive provides intensive family support by working closely with partners to support the most vulnerable children, young people and families with complex needs who require additional and intensive support with a focus on delivering better outcomes. Family Thrive is delivered through a Hub model, organised by four areas with operational delivery managed by two Hub Managers.

If a family is allocated to work with a Family Practitioner, they will receive focused targeted support to improve outcomes, address challenges, reduce risks to children and enable families to sustain change. The Family practitioner will undertake an Early Help Assessment and contribute to outcome-focused plans in line with Signs of Safety and in a way that promotes holistic and family led planning. The Family Practitioner will be the lead professional and work alongside partner agencies as part of the multi-disciplinary Team Around the Family ensuring that each service is contributing to achieving the best outcomes for children, young people and families.

They will:

- Complete an Early Help Assessment with children, young people and families
- Chair a Team Around the Family meeting and develop an outcomes-focused family plan
- Provide targeted parenting support and undertake direct work with children and young people.

Parents/carers will always be contacted to discuss our concerns prior to making a referral for Early Help. However, if consent is not given and we maintain that there remain unmet needs of the child and there are safeguarding concerns of any nature, a TAF may still be held without the parent/carer consent.

During the TAF, an Early Help Assessment (EHA) will be made and this will enable us to make clear decisions about any help/support that may be needed and the next steps that should be taken. As part of the TAF process, the EHA will be revisited in six-weekly cycles as a very minimum, although if the needs change, this may happen sooner. At each meeting, a decision will be made as to the current needs for the child/family and how these are best met, including making decisions whether more intervention is needed or whether the current support can be stepped down.

3.10 Team around the School (TAS)

TAS is a local network consisting of schools and other family support services that meet on a regular basis (each term) to have a shared conversation about children and young people that we may be worried about and that early help and intervention may stop concerns escalating. Individuals from a range of different agencies working together to pool resources come together, to provide support to families that is outcome driven, focused on solutions and helps the family to become more resilient to prevent a child or young person requiring complex/acute support in the future.

Schools facilitate the TAS, identifying the children and young people and complete the TAS Referral form to facilitate discussion. Parents do not attend these meetings, however, need to consent to their information being shared. The TAS will ensure their views and wishes are expressed and considered in any discussion. During the TAS meeting, the school and partner agencies will explore how best to support the child, young person and family to achieve clear outcomes, sustainable change, and prevent them requiring complex and acute support in the future.

The focus is early intervention for children, young people and their families who have an unmet need but who don't require specialist services; ensuring that early help support is getting to families as early as possible.

3.11 Lewisham Family First Contact Point (FFCP) Referral Process

Referrals to Children's Social Care are only made for children with needs at Level 3 or 4 of the Continuum of Need. This is determined where children are identified as requiring specialist services in order to achieve or maintain a satisfactory level of health or development or to prevent significant impairment of their mental and/or physical health and development and/or who are disabled. They may require longer term intervention from specialist services. In some cases these children's needs may be secondary to the adults needs. This is the threshold for an assessment led by children's social care under Section 17, Children Act 1989 although the assessments and services required may come from a range of provision outside of children's social care.

Staff with concerns should follow the reporting procedures outlined in this policy.

However, they may also share information directly with children's social care, police or the NSPCC if:

- the situation is an emergency and the DSL/Deputy DSL/ Headteacher or the Chair of Governors (for allegations against the Headteacher) are all unavailable
- they are convinced that a direct report is the only way to ensure the child's safety.

As advised in KCSIE **2025** the DSL (including any deputies) should liaise with the three safeguarding partners in line with Working Together to Safeguard Children and NSPCC – When to call the Police

Making a FFCP request

If, as a professional, staff have safeguarding concerns or are requesting additional targeted early help, they can use the online **FFCP** request form after reading the below information.

Please note that residents and other members of the public can still make referrals in person or over the phone.

All requests that come through the **FFCP** will be triaged by the multi-agency team and staff may be contacted by a professional representing the school to discuss the request.

Before staff make a request

- The following information will help to determine if it is necessary to make a **FFCP** request, and which part of the MASH request form to use:
- Lewisham's Threshold Guidance will help to assess the level of support needed or risks present. **Professionals should refer to this guidance before making a FFCP referral. This, along with some brief guidance, can be found on the FFCP webpage and the LSCP website, links below.**
- If staff believe a child and their family need some additional support this should be **discussed with the family first** and agree who is best placed to provide that support. An Early Help Assessment can help to get a full picture of the family's situation and plan how to meet that need.
- If it is believed a child or family has needs at the targeted level, which are not being met by services currently involved with the family, the form can be completed to **request help and support** from the **FFCP.**
- If professional working with a child requires supporting information from Children's Social Care (e.g. CAFCASS, probation, housing conducting statutory safeguarding checks, assessments), the form can also be completed to **request supporting information.**
- If there is any worry that a child is at risk of significant harm through abuse or neglect, staff should call the **FFCP** immediately on 020 8314 6660 to discuss their concerns and then use the form to **request child protection** from the **FFCP**.

FFCP/ Early Help Consultation Service

To help professionals make the most informed decisions the **FFCP** and Early Help Team will provide a professionals' advice line. This will be available for consultation from 9am – 5pm.

Where the child may need help and protection they will be given advice and guidance about making a referral, including how to involve parents. Professionals

will also receive guidance on the need for parental consent/ recorded clarification needed as to why consent was overridden.

During consultation professionals, should:

- Be clear about their concern and what is needed from the consultation
- Clearly identify what their organisation has already done about the concern and the impact of this
- Seek clarification where there are any uncertainties about what is involved
- In the case of the outcome of consultation being to make a referral, discuss the appropriateness of not seeking, or overriding parental consent.

The Consultation service aims to:

- Offer quick access via the telephone to Children's Safeguarding and Social Care advice
- Provide advice on Children's Safeguarding and Social Care threshold decision making i.e. S17 or S47 of the CA 1989
- Improve information sharing about universal and target services providing early help
- Allow professionals the opportunity to talk through situations (hypothetically if necessary) of concern to help determine an appropriate response, without the need for formal referral. This advice will be recorded to provide an audit trail.

How the Consultation Service works?

- Consultation will be offered by **FFCP** Social worker/ Early help team and their professional partners for all professionals seeking advice about children who they are concerned about
- To undertake a consultation professionals should telephone the **FFCP/** Early Help team on 0208 314 6660. Professionals have the option to speak with their own service colleagues co-located in the **FFCP**; who in turn will always be able to seek advice and guidance from social workers
- When concerns are raised about a child (ren) the **FFCP**/ Early Help hub will record the consultation as a contact on the EHM database checking the child's details to ensure appropriate identification. An analysis of need, harm and risk issues will be carried out to provide early action, diversion or intervention to the child and his/ her family. Consent on these cases will always be recorded and considered
- Where professionals simply seek advice and or guidance on hypothetical cases they feel stuck with, the **FFCP** or Early help staff members who provides the consultation will send an email as a follow up action and with the advice recorded. It is expected that the contacting professional follow the record keeping and information guidelines for their own agency, to record they have held a consultation. With hypothetical queries the **FFCP**/ Early Help team will not contact the family but do expect professionals to discuss any concerns they have with the individuals who have parental responsibility for the child

- Professionals and their agencies are not obliged to follow the advice offered, however staff within the **FFCP**/ Early Help team will escalate concerns in line with the London Safeguarding Children Procedures where they feel safeguarding activity is required and advice is not followed
- If following consultation more information becomes known or the situation changes, a professional can seek further clarity by calling the consultation line at any time.
- Alternatively, if they feel that the response they have received does not meet the needs of the child/family or leaves a child at risk of harm, they can still make a referral in the usual way or escalate their concerns through their organisation's safeguarding process.

Using the Local Children Safeguarding Partnership (LSCP) Thresholds for Intervention guidance

The Lewisham Safeguarding Children Partnership (LSCP) has developed a document for professionals to determine the levels of need when making a judgement and assessment of the child and their family. This document provides advice and guidance regarding the level of support and intervention children and their families may require.

Before making a referral to the **FFCP** professionals should consider if the needs identified can be met within their own agency, or by other professionals already involved with the family. This is usually relevant for children who have universal or additional needs, this is often referred to as Level 1 or 2 support as demonstrated in the Thresholds Guidance.

Professionals should seek to discuss any concerns they have with the parents/carers who have parental responsibility, are caring for the child by way of private fostering arrangements (or under a statutory regulation) and inform them that they are making a referral to the **FFCP** when new safeguarding concerns arise or no change is affected within existing plans. This should only be done where such discussions will not place a child at increased risk of significant harm or cause any significant delay.

The Thresholds for Intervention Guidance can be accessed here:

Identifying a child in need of help/ support or protection

A referral to the **FFCP** should be made when a child or family needs support identified require Level 3 or 4 support in the Thresholds Guidance. Additional information including the link to the online request from can be found on the Lewisham **FFCP** Webpage:

www.lewisham.gov.uk/MASH

Contact:

Family First Contact Point (FFCP) Tel: 020 8314 6660

Email: mashagency@lewisham.gov.uk

Opening hours: Monday–Friday 9am–5pm.

If you have concerns about the welfare of a child outside these hours, please contact the emergency duty team on 020 8314 6000 and ask to speak to the out-of-hours duty social worker

3.12 Female genital mutilation (FGM)

At **Phoenix Federation** we believe that all our pupils should be kept safe from harm. FGM affects girls particularly from north African countries, including Egypt, Sudan, Somalia and Sierra Leone.

It is illegal in the United Kingdom to allow girls to undergo female genital mutilation either in this country or abroad. People guilty of allowing FGM to take place are punished by fines and up to fourteen years in prison.

At **Phoenix Federation** School we have a duty to report concerns we have about girls at risk of FGM to the police and social services.

FGM occurs mainly in Africa and to a lesser extent, in the Middle East and Asia. Although it is believed by many to be a religious issue, it is a cultural practice. There are no health benefits.

Communities particularly affected by FGM in the UK include girls from:
Somalia, Kenya, Ethiopia, Sierra Leone, Sudan, Egypt, Nigeria, Eritrea, Yemen, Indonesia and Afghanistan.

In the UK, FGM tends to occur in areas with larger populations of communities who practice FGM, such as first-generation immigrants, refugees and asylum seekers. These areas include: London, Cardiff, Manchester, Sheffield, Northampton, Birmingham, Oxford, Crawley, Reading, Slough and Milton Keynes. In England and Wales, 23,000 girls under 15 could be at risk of FGM.

Key Points:

- Not a religious practice
- Occurs mostly to girls aged from 5 – 8 years old; but up to around 15
- Criminal offence in UK since 1985
- Offence since 2003 to take girls abroad
- Criminal penalties include up to 14 years in prison

Reasons for this cultural practice include:

- Cultural identity – An initiation into womanhood
- Gender Identity – Moving from girl to woman – enhancing femininity
- Sexual control – reduce the woman's desire for sex
- Hygiene/cleanliness – unmutilated women are regarded as unclean

Risk Factors include:

- low level of integration into UK society
- mother or sister who has undergone FGM
- girls who are withdrawn from PSHE
- a visiting female elder from the country of origin

- being taken on a long holiday to the family's country of origin
- talk about a 'special' event or procedure to 'become a woman'

High Risk Time

This procedure often takes place in the summer, as the recovery period after FGM can be 6 to 9 weeks. Schools should be alert to the possibility of FGM as a reason why a girl in a high risk group is absent from school or where the family request an 'authorised absence' for just before or just after the summer school holidays. Although, it is difficult to identify girls before FGM takes place, where girls from these high risk groups return from a long period of absence with symptoms of FGM, advice should be sought from the police or social services.

Post-FGM Symptoms include:

- difficulty walking, sitting or standing.
- spend longer than normal in the bathroom or toilet.
- unusual behaviour after a lengthy absence
- reluctance to undergo normal medical examinations.
- asking for help but may not be explicit about the problem due to embarrassment or fear.

Longer Term problems include:

- difficulties urinating or incontinence.
- frequent or chronic vaginal, pelvic or urinary infections
- menstrual problems
- kidney damage and possible failure
- cysts and abscesses
- pain when having sex.
- infertility
- complications during pregnancy and childbirth
- emotional and mental health problems

The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. In schools, this will usually come from a disclosure.

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

At Phoenix Federation**,** if we have concerns about FGM, we will discuss these with parents/carers where appropriate, and the young person concerned, before taking any further action. In cases where it is deemed likely that discussing preliminary concerns with the family may put a child(ren) at risk of any kind, we may not discuss this with parents/carers before reporting to the relevant authorities.

3.13 Forced Marriage/Honour Based Abuse

It is now a criminal offence for any person to cause a child to enter into marriage before their 18th Birthday, whether or not they used violence, threats or any other form of coercion or deception**.** A child who is being forced into marriage is at risk of

significant harm through physical, sexual and emotional abuse. Significant harm is defined as a situation where a child is suffering, or is likely to suffer, a degree of physical, sexual and / or emotional harm (through abuse or neglect), which is so harmful that there needs to be compulsory intervention by child protection agencies into the life of the child and their family.

The reasons given by parents who force their children to marry include protecting their children, building stronger families, strengthening family links, protecting family honour (e.g., promiscuity or homosexuality), retaining or acquiring wealth, appeasement etc.

Suspicions that a child may be forced into marriage may arise in a number of ways, including:

- A family history of older siblings leaving education early and marrying early.
- Depressive behaviour including self-harming and attempted suicide.
- Unreasonable restrictions such as being kept at home by their parents ('house arrest') or being unable to complete their education.
- A child being in conflict with their parents.
- A child going missing / running away.
- A child always being accompanied including to school and doctors' appointments.
- A child talking about an upcoming family holiday that they are worried about, fears that they will be taken out of education and kept abroad; or
- A child directly disclosing that they are worried s/he will be forced to marry.

Information about a forced marriage may come from one of the child's peer groups, a relative or member of the child's local community, from another professional or when other family issues are addressed, such as domestic violence between parents.

Situations where a child fears being forced into marriage have similarities with both domestic violence and honour-based abuse. Forced marriage may involve the child being taken out of the country (trafficked) for the ceremony, is likely to involve non-consensual and/or underage sex, and refusal to go through with a forced marriage has sometimes been linked to so-called 'honour killing'.

Professionals should respond in a similar way to forced marriage as with domestic violence and honour-based abuse (i.e. in facilitating disclosure, developing individual safety plans, ensuring the child's safety by according them confidentiality in relation to the rest of the family, completing individual risk assessments etc).

3.14 Domestic Violence (DV)

Any incident or pattern of incidents of controlling, coercive or 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. This can encompass but is not limited to the following types of abuse:

- psychological
- physical
- sexual

- financial
- emotional

In extreme cases this could include murder.

Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.

3.14.1 Children and young people witnessing domestic abuse

Witnessing domestic abuse is child abuse. Living in a home where domestic abuse happens can have a serious impact on a child or young person's mental and physical wellbeing, as well as their behaviour. Children can experience domestic abuse or violence in lots of different ways. They might:

- see the abuse.
- hear the abuse from another room.
- see a parent's injuries or distress afterwards.
- be hurt by being nearby or trying to stop the abuse.

3.14.2 Teenagers experiencing domestic abuse

Domestic abuse can happen in any relationship, and it affects young people too.

They may not realise that what's happening is abuse. Even if they do, they might not tell anyone about it because they're scared of what will happen, or ashamed about what people will think.

It's often difficult to tell if domestic abuse is happening, because it usually takes place in the family home and abusers can act very differently when other people are around.

Children who witness domestic abuse may:

- become aggressive.
- display anti-social behaviour.
- suffer from depression or anxiety.
- not do as well at school - due to difficulties at home or disruption of moving to and from refuges.

Where potential cases of Domestic Violence are identified, the school will conduct an assessment using the Domestic Abuse Stalking and Harrassment (DASH) Risk Indicator Checklist. If a case causes enough concern following this assessment, the Designated Safeguarding Lead (DSL), will make the necessary referral(s) on to other appropriate agencies.

3.14.3 Operation Encompass

At Phoenix Federation we are working in partnership with the Metropolitan Police and Lewisham 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 a number of ways. Children are at increased risk of physical injury during an incident, either by accident or because they attempt to intervene. Even when not directly injured, children are greatly distressed by witnessing the physical and emotional suffering of a parent.

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

In order to achieve this, the Lewisham 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 could be silent or overt 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 Lewisham MASH Encompass Protocol Data Sharing Agreement. We will record this information and store this information in accordance with the record keeping procedures outlined in this policy.

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

3.15 Child sexual exploitation (CSE)

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

This involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves

varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

A common feature of CSE is that the child or young person does not recognise the coercive nature of the relationship and does not see themselves as a victim of exploitation. This means that they are unlikely to report the abuse so police and partners must be alert to the signs of CSE and actively look for victims. CSE can also occur through the use of technology without the child's immediate recognition; for example, being persuaded to post images on the internet/ mobile phones without immediate payment or gain.

Staff should be aware of the key indicators of children being sexually exploited which can include:

- going missing for periods of time or regularly coming home late.
- regularly missing school or education or not taking part in education.
- appearing with unexplained gifts or new possessions.
- associating with other young people involved in exploitation.
- having older boyfriends or girlfriends.
- suffering from sexually transmitted infections.
- mood swings or changes in emotional wellbeing.
- drug and alcohol misuse; and
- displaying inappropriate sexualised behaviour.

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

There are three main types of child sexual exploitation:

Inappropriate relationships:

Usually involves just one abuser who has inappropriate power – physical, emotional or financial – or control over a young person. The young person may believe they have a genuine friendship or loving relationship with their abuser.

Boyfriend/Girlfriend:

Abuser grooms victim by striking up a normal relationship with them, giving them gifts and meeting in cafés or shopping centres. A seemingly consensual sexual relationship develops but later turns abusive. Victims may be required to attend parties and sleep with multiple men/women and threatened with violence if they try to seek help.

If colleagues have concerns about any students at risk of CSE, they should ensure that their concerns are passed promptly on to the DSL so that a referral is made to the Concerns Hub. Any school can complete the referral form by sending a request to PLMailbox-ConcernHub@met.police.uk

3.16 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
- 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 through the use of 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.

If colleagues have concerns regarding any students at risk of CCE, they should ensure that their concerns are passed promptly on to the DSL.

3.17 County Lines

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

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move (and store) drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations.

Staff should be aware of some of the key indicators of children who are involved in county lines, including:

- Going missing for periods of time or regularly coming home late.
- Regularly missing school or education or not taking part in education.
- Appearing with unexplained gifts or new possessions.
- Associating with other young people involved in county lines.
- Having older friends
- Mood swings or changes in emotional wellbeing; and
- Drug and/or alcohol misuse

If colleagues have concerns about any students at risk of county lines, they should ensure that their concerns are passed promptly to the DSL so that a referral is made to the Concerns Hub. Any school can complete the referral form by sending a request to PLMailbox-ConcernHub@met.police.uk

3.18 Organised exploitation and trafficking

Trafficking involves the recruitment, transportation and exploitation of women and children for the purposes of prostitution and domestic servitude across international borders and within countries.

Victims are trafficked through criminal networks – often between towns and cities – and forced or coerced into sex with multiple men. They may also be used to recruit new victims. This serious organised activity can involve the buying and selling of young people.

Also, modern slavery encompasses human trafficking, as defined in the UN Palermo Protocol and the Council of Europe Convention and as made illegal in UK legislation under the Sexual Offences Act 2003 and the Asylum and Immigration (Treatment of Claimants) Act 2004. It also includes cases of slavery and servitude as made illegal in the Coroners and Justice Act 2009, which criminalises holding a person in slavery or servitude or requiring a person to perform forced or compulsory labour. When referring to modern slavery, it encompasses all of the forms of human trafficking, slavery and servitude that have been defined in national and international laws and agreements.

Signs that a child has been trafficked may not be obvious, but you might notice unusual behaviour or events. These include a child who:

- spends a lot of time doing household chores.
- rarely leaves their house, has no freedom of movement and no time for playing.
- is orphaned or living apart from their family, often in unregulated private foster care.
- lives in substandard accommodation.
- isn't sure which country, city or town they're in?
- is unable or reluctant to give details of accommodation or personal details.
- might not be registered with a school or a GP practice.
- has no documents or has falsified documents.
- has no access to their parents or guardians.
- is seen in inappropriate places such as brothels or factories.
- possesses unaccounted for money or goods.
- is permanently deprived of a large part of their earnings, required to earn a minimum amount of money every day or pay off an exorbitant debt.
- has injuries from workplace accidents.
- gives a prepared story which is very similar to stories given by other children.

Our procedures for responding to concerns about students at risk of or victims of modern slavery are informed by the statutory DfE guidance ‘Care of unaccompanied migrant child and child victims of modern slavery, published in November 2017. All concerns about students who may be being trafficked should be passed straight to the DSL on our standard concerns form.

3.19 Child on child abuse including ‘sexting’ and children displaying Harmful Sexual Behaviours

Child on child abuse can take many forms including physical (including hitting, kicking, shaking, biting, hair pulling etc.), sexual (e.g., inappropriate touching) and emotional abuse (including bullying & cyberbullying). Department for Education (DfE).

September **2025:** Keeping children safe in education; statutory guidance for schools and colleges, makes it clear that abuse is abuse and should never be tolerated or passed off as 'banter' or part of 'growing up. The Equality Act 2010 replaced previous anti-discrimination laws with a single Act.

A key provision was a new public sector Equality Duty, which came into force on 5 April 2011. This requires the school/college to:

- Eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the act.
- Advance equality of opportunity between people who share a protected characteristic (age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation) and people who do not share it.
- Foster good relations between people who share a protected characteristic and people who do not share it.

Child on child abuse often involves an imbalance of power between the perpetrator and the victim. This could involve perpetrators having control over the relationship which makes it difficult for those they abuse to defend themselves. This imbalance of power can manifest itself in several ways. It may be physical, psychological (knowing what upsets someone), or social (e.g., isolating or excluding someone). It could also include issues such as revenge porn or what are often gender issues (e.g., girls being touched or boys being involved in initiation activities).

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

We recognise that some students will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school's Behaviour and Anti-Bullying Policies were necessary. However, there will be occasions when a child's behaviour warrants a response under child protection rather than anti-bullying procedures. In particular, research suggests that up to 30 per cent of child sexual abuse is committed by someone under the age of 18.

Child Protection issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is likely that to be considered a safeguarding allegation against a pupil, some of the following features will be found.

The allegation:

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

The management of children and young people with sexually harmful behaviour is complex and the school will work with other relevant agencies to maintain the safety of the whole school community. Young people who display such behaviour may be victims of abuse themselves and the child protection procedures will be followed for both victim and perpetrator. KCSIE **2025** defines a form of child-on-child abuse described as "upskirting", which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm".

At Phoenix Federation, we are committed to supporting victims of child-on-child abuse by adhering to the DfE guidance in KCSIE 2025.

In addition, Phoenix Federation uses the Brook Traffic Light Tool to help staff identify, understand and respond appropriately to sexual behaviours in children and young people. The tool supports staff to recognise and identify sexualised behaviours and differentiate between those which are part of healthy sexual development and those which are problematic or harmful. It helps us to understand what a behaviour may be communicating and why the child or young person may be exhibiting the behaviour enabling us to respond appropriately to sexualised behaviours, considering possible motivations, communications and severity.

Sexting

In cases of 'sexting' we follow guidance given to schools and colleges by the UK Council for Child Internet Safety (UKCCIS) published in August 2016: 'Sexting in schools and colleges, responding to incidents, and safeguarding young people'. https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/562876/Guidance_for_School_Governors_-_Question_list.pdf

3.19 Preventing Radicalisation

'Channel' and 'Prevent'

Terrorism is defined in KCSIE **2025** as "an action that endangers or causes violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause".

As part of the Counter Terrorism and Security Act 2015, schools have a duty to 'prevent people being drawn into terrorism'. This has become known as the 'Prevent Duty'. Channel, a key element of the Home Office's "Prevent" strategy, is a multi-agency approach to protect people at risk from radicalisation. As a school we will work with the local authority, local law enforcement, and religious and community leaders, to identify children vulnerable to radicalisation, and to stamp out extremism if it arises. This includes identifying pupils:

- Displaying feelings of grievance and injustice
- Feeling under threat
- Searching for identity, meaning and belonging

- Who have a desire for status amongst their peers
- Shows empathy for extremist causes.
- Glorifying violence, especially other faiths or cultures
- Who have a desire for excitement and adventure?
- Displaying a need to dominate and control others.
- Who have a susceptibility to indoctrination?
- Displaying a radical desire for political or moral change
- Who are susceptible to opportunistic involvement?
- Who have family or friends involved in extremism?
- Susceptible to being influenced or controlled by a group.
- With relevant mental health issues
- Secretive behaviour
- Advocating messages similar to illegal organisations or other extremist groups

We will always take allegations and concerns of radicalisation and/or terrorism seriously. We will help pupils channel their desire for excitement and adventure into suitable and healthy activities. Radicalisation and extremism can be wider than religious beliefs and linked affiliations and can include radicalisation around far right groups and also by criminal groups connected with gang activity.

We will work with local religious and cultural organisations to instil a strong sense of identity in our pupils, as well as a clear place and purpose within the school. We use the curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet.

We will establish appropriate filters to protect children from terrorist and extremist material online.

Our school is stronger thanks to our open, multi-cultural and multi-faith community. We will always aim to integrate and engage every child within the school community, and in the wider community.

We will celebrate a range of different religious and cultural festivals across the year, giving every child the opportunity to take part.

We will monitor and assess incidents which suggest pupils are engaging, or are at risk of engaging in, extremist activity and/or radicalisation.

Where staff are concerned that children and young people are developing extremist views or show signs of becoming radicalised in any way, they should discuss this with the DSL.

4.0 Safer Working Practice

4.1 Safer Recruitment

Phoenix Federation recognises that sometimes people who want to cause harm to children actively seek employment that provides them access to young people.

The school will protect our pupils from having to come into contact with people with the propensity to cause harm by thorough and rigorous scrutiny of all applications. We will:

- Verify applicant's identity.
- Check applicants' qualifications/experience/ employment/history
- Obtain professional and character references.
- Check applicant's health and physical capacity to undertake the job.
- Hold a face-to-face interview for all candidates with at least one member of the **Phoenix Federation** panel who has attended safer recruitment training.
- Ensure all adults in regulated activity with the children have had an Enhanced DBS check and barred list check.
- Make staff aware of their contractual, legal, administrative and pastoral responsibilities. A key document to support staff's understanding in this area is 'Keeping Children Safe in Education' **(2025)** which will be made available to all staff.

In recruiting and appointing staff, the Headteacher and the School's Governing body have key responsibilities to create a culture of safe recruitment and, as part of that, adopt recruitment procedures that help deter, reject or identify people who might abuse children.

4.2 Employees: Advertising / Shortlisting / Interviews

We ensure that the advertisement makes clear the school's commitment to safeguarding and promoting the welfare of children.

All job descriptions make reference to the responsibility for safeguarding and promoting the welfare of children.

All person specifications include specific reference to suitability to work with children.

We ask for written information about previous employment history and check that information is not contradictory or incomplete. If a candidate for a teaching post is not currently employed as a teacher, we will check with the school, college or local authority at which they were most recently employed, to confirm details of their employment and their reasons for leaving.

We will always seek at least two references to obtain objective and factual information to support our appointment decisions. These will be scrutinised, and any concerns need to be resolved satisfactorily, before the appointment can be confirmed.

We endeavour to seek references on all short-listed candidates, including internal ones, before interview, so that any issues of concern they raise can be explored further with the referee, and taken up with the candidate at interview.

We will always request references directly from the referee and employers and will not rely on open references, for example in the form of 'to whom it may concern' testimonials.

On receipt, references will be checked by the Head Teacher to ensure that all specific questions have been answered satisfactorily. The referee should be contacted to provide further clarification as appropriate: for example, if the answers are vague. They should also be compared for consistency with the information provided by the candidate on their application form. Any discrepancies will be taken up with the candidate.

Any information about past disciplinary action or allegations will be considered carefully when assessing the applicant's suitability for the post; including information obtained from records held on the Database of Qualified Teachers (DQT). The DQT is maintained by the Teaching Regulation Agency (TRA) which is an executive agency of the Department for Education (DfE).

We verify that the successful applicant has all the academic or vocational qualifications claimed.

We check his or her previous employment history and experience.

We conduct a face-to-face interview that explores the candidate's suitability to work with children as well as his or her suitability for the post.

We verify the successful applicant's identity, when they arrive for an interview.

4.3 Offer of appointment.

An offer of appointment to a successful candidate, including one who has lived or worked abroad, will be conditional upon satisfactory completion of our pre-employment checks.

Before new staff are appointed, we will:

- Verify a candidate's identity from current photographic ID and proof of address.
- Obtain a certificate for an enhanced DBS check with a barred list information where the person will be engaging in regulated activity.
- Obtain a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available.
- Check that a candidate to be employed as a teacher is not subject to a prohibition order issued by the Secretary of State, using the NCTL Teacher Service Portal (formerly known as the Employer Access Online service).
- Verify the candidate's mental and physical fitness to carry out their work responsibilities. This is done through the council's occupational health services.
- Verify professional qualifications, as appropriate.

4.4 Additional checks on individuals who have lived or worked outside the UK:

Individuals who have lived or worked outside the UK must undergo the same checks as all other staff. In addition, we will make any further checks we think appropriate so that any relevant events that occurred outside the UK can be considered.

We will verify the person's right to work in the UK. If there is uncertainty about whether an individual needs permission to work in the UK, we will follow the council's guidance and the advice on the GOV.UK website.

All schools have a statutory duty under the new Home Office guidance issued on 6 April 2017, which states that:

"All Tier 2 (General) visa applicants who want to work in specified health, education or social care sectors must provide a criminal record certificate and so for all new appointments, schools must consider additional checks, including obtaining a Certificate of Good Conduct, where staff have ever lived or worked abroad".

The requirement is applicable to **all** *Tier 2 (General) staff from any country (excluding the United Kingdom and Northern Ireland), where an individual has lived or worked for more than 12 months+ either in total or continuously as well as within the previous 10 years.

In Lewisham local authority, all new employees who declare that they have every lived or worked outside the UK for more than 12 months+ either in total or continuously since the age of 18 years, will be risk assessed before making a decision as to whether further checks are appropriate in accordance with statutory guidance in Keeping Children Safe in Education **2025.**

It is not a legal requirement for existing staff who have ever lived or worked abroad for 12 months+ in total or continuously since the age of 18 years, but the governing body and senior leadership at **Phoenix Federation** have made the decision that we will not risk assess existing staff to make a decision whether or not we will pursue overseas criminal records checks for existing members of staff, volunteers or governors.

4.5 Additional online checks for shortlisted candidates

As part of the shortlisting process, we may consider carrying out an online search for shortlisted candidates. This may help identify any incidents or issues that have happened, which are publicly available online which may be explored with the applicant at interview.

4.6 Single Central Record (SCR)

We keep a SCR for the school. Generally, the information to be recorded is whether or not the following checks have been carried out or certificates obtained, and the date on which the checks were completed and by whom:

- an identity checks.
- a barred list checks.
- an enhanced DBS checks.
- a prohibition from teaching check.
- further checks on people living or working outside the UK.
- a check of professional qualifications; and

- a check to establish the person's right to work in the United Kingdom.

The SCR will cover the following people:

- all staff (including supply staff) who work at the school.
- all others who work in regular contact with children in the school including volunteers.
- Governors

In order to comply with the requirements of the Data Protection Act, we will not retain a copy of the individual's Disclosure and Barring Service (DBS) Certificate. However, copies of other documents used to verify the successful candidate's identity, right to work and required qualifications will be kept on their personnel file.

4.7 Visiting Professionals/Agency Workers/Third Party Staff

We only use supply agencies that are able to provide full written vetting information about their staff prior to them starting work at the school.

The vetting information must contain the following:

- ID Checked
- Teaching Agency Check
- Qualification Evidence
- Medical Check
- Barred List Check and Date
- Valid DBS Date
- Enhanced DBS number
- Further Disclosure Information, if necessary
- Right to work in the UK Check
- Overseas Checks/Risk Assessment
- References Check
- Confirmation of Level 1 safeguarding training within the last 12 months

We ask supply agencies to email the vetting information to the School Business Manager as well as to the school receptionist.

The school's receptionist checks this evidence on arrival, checking that the person presenting themselves for work is the same person on whom the checks have been made.

Any discrepancies will be reported to the Business Manager immediately and the agency staff will not be able to start their work until satisfactory checks have been concluded.

Safer recruitment records of regular agency workers are included in the school's SCR.

We provide an induction for supply staff, which includes safeguarding and a briefing on any vulnerable children they will be working with.

4.8 Trainee/Student Teachers

Initial Teacher Training Students, e.g., Schools Direct Students, who are salaried by the school, have to undergo the same safer recruitment checks as regular staff, before they can start working for the school.

Safer Recruitment records for Initial Teacher Training Students, e.g., Schools Direct Students, who are salaried by the school, are included in the school's Single Central Record.

Where trainee teachers are fee-funded, it is the responsibility of the Training Provider to carry out the necessary checks.

4.9 Regulated Activity

A person will be considered to be in 'regulated activity' if as a result of their work they:

- will be responsible, on a regular basis, in any setting for the care or supervision of children; or
- will regularly work in a school or college at times when children are on school or college premises (where the person's work requires interaction with children, whether or not the work is paid (unless they are a supervised volunteer), or whether the person is directly employed or employed by a contractor).

Any member of staff, volunteer or governor that will be working in regulated activity will have a barred list check carried out.

All visiting professionals e.g., PE coaches, Music teachers, Health Professionals and LA advisors have to provide the school with their valid enhanced DBS details.

All kitchen staff have to provide the school with their valid enhanced DBS details. It is the responsibility of the Catering Contractor to carry out the necessary checks.

All kitchen staff's safer recruitment records are included in the school's SCR.

All cleaning staff have to provide the school with their valid enhanced DBS details. It is the responsibility of the Cleaning Contractor to carry out the necessary checks.

All cleaning staff's safer recruitment records are included in the school's SCR.

All Breakfast Club and After School Club Personnel have to provide the school with their valid enhanced DBS details. It is the responsibility of the Extended School providers to carry out the necessary checks.

All Extended School personnel's safer recruitment records are included in the school's SCR.

It is the responsibility of the Business Manager to make sure all enhanced DBS checks are current and recorded.

4.10 Volunteers E.g., Parents/Carers

As per the guidance in Keeping Children Safe in Education **2025**, all volunteers will be risk assessed to determine whether they require a DBS and whether or not this will need to include a barred list check should their role require them to be in regulated activity. Under no circumstances should a volunteer in respect of whom no checks have been obtained be left unsupervised or allowed to work in regulated activity.

We will obtain an enhanced DBS certificate with barred list check for all volunteers in regulated activity who will regularly teach or look after children on an unsupervised basis or provide personal care on a one-off basis.

According to the DfE guidelines there is no requirement to request an enhanced DBS check for new or existing volunteers not in regulated activity.

However, the school may still choose to request one as they judge necessary but may not request a check of the barred list.

If a volunteer is not engaging in regulated activity and is therefore supervised at all times, e.g., a parent accompanying their children on a school trip, the school will undertake a risk assessment and use their professional judgement and experience, when deciding whether to seek an enhanced DBS check. A barred list check is legally not allowed under these circumstances.

4.11 School Governors

The school will apply for an enhanced DBS check for all members of the governing body. In addition to this, a risk assessment will be completed to ascertain if any members of the governing body are taking part in regulated activity with children. If it is determined that any person is taking part in regulated activity, a barred list check will be requested. They must do this by 1 September 2016 where a governor was elected before 1 April 2016 and within 21 days of appointment or election if a governor is elected or appointed after 1 April 2016.

All new governors will be asked to declare their overseas history and where necessary, complete a risk assessment. Existing governors will also/will not be required to complete an overseas criminal history risk assessment in line with our agreed school procedures.

All governors must also undergo a s128 check to confirm any directions which may have been made against them by the Secretary of State. This check will be carried

out using the NCTL Teacher Service Portal (formerly known as the Employer Access Online service).

All governors and trustees should receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.

All governors and proprietors should be aware of their obligations under the Human Rights Act 1998 21, the Equality Act 2010, (including the Public Sector Equality Duty23), and their local multi-agency safeguarding arrangements.

4.12 Contractors

The Receptionist and /or a member of the Premises Team will always check the identity of contractors upon their arrival in the school.

Contractors and contractors' employees for whom an appropriate DBS check has not been undertaken will be supervised by a member of the Premises Team, if they will have contact with children.

If a self-employed contractor is working at the school and will have unsupervised contact with children, the school will obtain an DBS check and/or barred list check as appropriate, as self-employed people are not able to make an application directly to the DBS on their own account.

4.13 General Visitors to the School

We will not request DBS checks and barred list checks, or ask to see DBS certificates, for general visitors, e.g., children's relatives attending events in the school, etc.

Visitors will need to sign in with the admin team and have a visible id badge during their stay in the school. This does not apply to parents, who should be with a member of staff at all times. Parents are not allowed to wonder into the school by themselves, especially during the school day. All staff must report to the office when they make an appointment with a parent to visit the school so that they can be informed when the parent arrives.

5.0 Staff Conduct

5.1 Training

Staff will be supported to recognise the signs and symptoms of neglect, physical, emotional, sexual abuse and exploitation. New/temporary staff will receive training as part of their induction process. Every member of staff will receive a copy of this Safeguarding and Child Protection Policy as well as the Staff Code of Conduct,

Keeping Children Safe in Education **(2025)** – Part One and Annex A and will need to sign to confirm that they have read and understood the documents.

All staff will receive child protection training at least annually with a particular focus on recognising signs of abuse, managing a disclosure as well as recapping monitoring and reporting procedures of abuse and suspected abuse. In addition, staff will receive regular training updates about safeguarding related issues.

The safeguarding training of third-party staff/contractors will be verified and if necessary, further training may be given as part of the induction process. Third party colleagues will also sign the Staff Code of Conduct. Should a child or a member of staff be concerned about another member of staff's conduct in relation to child protection then procedures are in place. All school staff should take care not to place themselves in a vulnerable position with a child. They should strictly adhere to the Department for Education and Skills (DfES) guidelines on teachers' behaviour and the school's policies.

5.2 Safer Working Practice

We make use of the Safer Recruitment Consortium document 'Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings.' May 2019 as the basis for our Code of Conduct. All staff are expected to follow the Phoenix Federation Staff Code of Conduct and the expectations set out in the staff handbook (see Code of Conduct and Staff Handbook).

Staff should take care not to place themselves in a vulnerable position with a child. It is always advisable for adults working with individual children to do so in view of other adults. If staff anticipate being in a situation that could be open to misinterpretation, they should alert a senior manager in advance and inform the child's parent or carer. Staff should escort children of the same sex to the toilet but are not expected to be involved with toileting, unless the child has an additional need that has been brought to their attention by the parent/guardian and a strategy agreed in writing. We recognise that physical touch between adults and children in relation to the activity being provided is acceptable in public places.

5.3 Managing Allegations Against Staff

We understand that a parent/pupil/another staff member may make an allegation against a member of staff (including volunteers and supply staff). If such an allegation is made:

The member of staff receiving the allegation will immediately inform the Headteacher or the most senior DSL who must be part of the senior Leadership team if the Headteacher is not present.

The Headteacher or the senior teacher on all such occasions will discuss the content of the allegation with the Local Authority Designated Officer (LADO) for Child Protection. If the allegation made to a member of staff concerns the Headteacher,

the person receiving the allegation will immediately inform the Chair of Governors who will consult as above, without notifying the Headteacher first.

The school will follow the Lewisham Local Authority procedures in the LADO protocol, updated in May 2018, for managing allegations against staff, and statutory guidance 'Keeping Children safe in Education.' **(2025)**

Individuals who are the subject of allegations should be informed of these as soon as possible, as should the parents and carers of any children involved. However, every effort must be taken to maintain confidentiality, in order to comply with the reporting restrictions in the Education Act 2011.

Suspension of the member of staff against whom an allegation has been made needs careful consideration, and we will consult the LADO for Child Protection, or the School's Personnel Officer.

The name of any member of staff considered not suitable to work with children will be given to the Department for Education Misconduct Team, with the advice and support of Education Personnel and in accordance with the Barring Regulations.

Any child making such an allegation will be treated sensitively and made to feel safe and listened to. If there are any immediate concerns of safety action must be taken to remove the child from harm. Parents or carers of a child or children involved should be told about the allegation as soon as possible if they do not already know of it.

Police need to be contacted at the earliest opportunity when a victim of a crime makes an allegation of serious sexual assault. Any delay will be likely to have a serious impact upon safeguarding/the reassurance of the victim and the securing all available evidence. Criminal procedures and considerations must be placed above internal disciplinary/suspension protocols in such instances.

5.4 Organisations or Individuals using school premises.

Allegations relating to an incident when an individual or organisation was using school premises for the purposes of running activities for children, schools should follow their safeguarding policies and procedures, including informing the LADO.

5.5 Whistleblowing

We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so. All staff should be aware of their duty to raise concerns about the attitude or actions of colleagues in relation to children. If necessary, they should speak to the Designated Child Protection Governor (Chair of Governors) or the LA Designated Child Protection Officer (LADO) via the DSL, if they are not the same person – see Whistleblowing Policy.

The NSPCC runs a whistleblowing helpline on behalf of the Home Office, the number is 0808 800 5000.

6.0 General Safeguarding

6.1 Health and Safety

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

6.2 Attendance

Our policy on attendance is set out in a separate document and is reviewed annually by the governing body. Phoenix Federation recognises that poor attendance can be an indicator that a child is experiencing abuse. The attendance officer Samantha Lane and senior leadership team monitor attendance weekly, and report concerns to the Attendance & Welfare Officer at regular meetings.

Phoenix Federation has enrolled in a programme called 'Study Bugs' to monitor children's attendance. The recorded data will be accessible to the Local Authority, in line with the new requirement from the DfE in Working together to improve school attendance - GOV.UK (www.gov.uk) (August 2024). The objective is to share this information with the local authority in a bid to support the improvement of school attendance and the provision of the most appropriate support.

6.3 Information Sharing of Child Protection Files

Where children leave a Phoenix Federation school (including in year transfers) the designated safeguarding lead will ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This will be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt will be obtained. In addition to this, the Designated Safeguarding Lead may also consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

6.4 E-Safety and Digital Safeguarding

(See separate policy – E-Safety and Use of Mobile Phones Policy)

We ensure pupils at Phoenix Federation are protected while using digital technologies at the school. The school is committed to including digital technologies, in particular, internet use, in our curriculum. In so doing we recognise the inherent risks posed by this useful learning tool. If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), will consider referring into the

Cyber Choices programme. Full compliance with the school Digital Safeguarding policy will mitigate these risks and help to ensure pupils are safe online.

6.5 Filtering and Monitoring Systems

As part of our statutory responsibility to safeguard and promote the welfare of all pupils, Phoenix Federation is committed to providing a safe online environment that supports effective teaching and learning while protecting children from online risks.

In line with DfE guidance, the governing body ensures that robust filtering and monitoring systems are in place to limit children's exposure to harmful and inappropriate content through the school's IT systems. These systems are reviewed regularly to ensure their effectiveness, and updates are made in response to new risks, changing technology, or emerging guidance.

The leadership team and relevant staff are expected to:

- **Be aware of the filtering and monitoring systems in place.**
- **Understand how these systems function and how to manage them effectively.**
- **Know how to escalate any concerns arising from online activity.**

When reviewing filtering and monitoring arrangements, the school takes into account:

- **The number and age range of pupils.**
- **The specific needs of vulnerable pupils who may be at greater risk of harm.**
- **The frequency and ways in which pupils access the school's IT systems.**

The school follows the Department for Education's Filtering and Monitoring Standards, which recommend that schools:

- **Clearly identify and assign roles and responsibilities for managing filtering and monitoring.**
- **Review the systems and provisions at least annually.**
- **Block harmful and inappropriate content without unnecessarily restricting access to learning resources.**
- **Implement effective monitoring strategies that are appropriate to the school's safeguarding needs.**

We use the DfE's 'Plan Technology for Your School' self-assessment tool to evaluate our current provision and receive tailored recommendations for improvement.

The governing body regularly reviews these standards and works in collaboration with IT staff and service providers to ensure continued compliance and protection for all users of the school's digital infrastructure.

6.5 Anti-Bullying Policy

Our policies on anti-bullying and cyber-bullying are set out in separate documents and are reviewed annually by the governing body. We expect staff to acknowledge that to allow or condone bullying, constitutes a lack of duty of care, which may lead to consideration under child protection procedures.

Both policies are written in line with advice and statutory guidelines set out in the DfE guidance *Preventing Bullying*, in July 2017 and *Approaches to Preventing and Tackling Bullying*, June 2018.

6.6 Physical Intervention Policy

Our policy on physical intervention by staff is set out in a separate document (as well as also being referred to in the Behaviour Management, Anti bullying, and Safe Touch Policies) and is reviewed annually by the governing body. We acknowledge that staff must only ever use physical intervention as a last resort, and that always it must be the minimum force necessary to prevent injury to themselves, another person or property. Individual Risk Assessments are completed for pupils who have a higher likelihood of needing physical intervention and/or restraint and staff who work closely with these students are provided with additional Positive Handling training.

6.7 School Visits

We have clear protocols in place to ensure the safety of children whilst on school trips (see visits and trips policy). These include:

- Visit procedures to be documented by staff and agreed with the Educational Visits Coordinator (all members of SLT will complete EVC training with Wide Horizons or other regulated provider of EVC training).
- A briefing for parents going on the trips including detailed information about complying with safeguarding responsibilities and what to do if a child discloses to them.
- Defined roles and responsibilities for school staff.
- Risk assessments
- DBS/barred list checks for parents/carers where appropriate

6.8 Looked After Children (LAC)

Our Headteacher and our Designated Teacher **(DT)** are responsible for Looked After Children and ensure that appropriate staff have the information, they need in relation to a child's looked after legal status and contact arrangements with birth parents or those with parental responsibility. The Headteacher and the Inclusion Leader also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her.

The **DT** for Looked After Children has details of the child's social worker and the name of the virtual school head in the authority that looks after the child.

The Chair is the designated Governor for Looked After Children **(CLA)** [adapt accordingly if you have an alternative representative from your governing body].

A separate policy sets out our systems and procedures in relation to CLA, which has been written with reference to the two statutory DfE guidance documents, 'Designated Teacher for looked after and previously looked after children' and 'Promoting the education of looked after and previously looked after children' released in February 2018.

6.9 Children Missing/Absent from Education

- Children absent from education are on the school roll but are regularly not attending.
- Children missing education aren't on any school roll or being educated elsewhere.
- These are vital warning signs of safeguarding risks to a child.

All children, regardless of their circumstances, are entitled to a full-time education, which is suitable to their age, ability, aptitude, and any special educational needs they may have. Local authorities have a duty to establish, as far as it is possible to do so, the identity of children of compulsory school age who are missing education in their area. A child going missing from education is a potential indicator of abuse or neglect. School and college staff should follow the school's or college's procedures for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in the future.

Phoenix Federation places a great emphasis on regular and punctual attendance and we promptly follow up any unexplained absence. It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, FGM and forced marriage. Phoenix Federation has both an admission register, and attendance register as required by law. All pupils are placed on both registers. **Phoenix Federation** informs and seeks guidance from the Local Authority before any child is deleted from the admission register. No child is deleted unless there are appropriate checks conducted to ensure that the child is not at risk from being missing from education. A child may be deleted from the admission register for the following reasons.

- The child has been taken out of school by their parents and is being educated outside the school system e.g., home education.
- The child ceased to attend the school and no longer lives within reasonable distance from the school at which they are registered.

- The child has been certified by the education medical officer as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither he/she nor his/her parent has indicated the intention to continue to attend the school after ceasing to be of compulsory school age.
- Are in custody for a period of more than four months due to a final court order and the Headteacher does not reasonably believe that they will be returning to the school at the end of that period; or,
- Have been permanently excluded. The Local Authority must be notified when the school is to delete a pupil form its register under the above circumstances. This should be done as soon as the grounds for deletion are met, but no later than deleting the pupil's name from the register. It is essential that schools comply with this duty so that Local Authorities can, as part of their duty to identify 8 regulation 4 of the Education (Pupil Registration) (England) Regulations 2006 9 Regulation 12(3) of the Education (Pupil registration) (England) Regulations 2006 14 children of compulsory school age who are missing education , follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse or neglect.

Phoenix Federation informs the Local Authority of any pupil who fails to attend school regularly or has been absent without the school's permission for a continuous period of 10 school days.

6.10 Children with Special Educational Needs and Disabilities

For a variety of reasons, children with additional needs face an increased risk of abuse and neglect, therefore adults are expected to take extra care to interpret correctly apparent signs of abuse or neglect. Indications of abuse will be reported as for other pupils.

Children and young people with special educational needs and disabilities can face additional safeguarding challenges because:

- There may be assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration.
- Children with SEN and disabilities can be disproportionally impacted by things like bullying without outwardly showing any signs; and
- Difficulties may arise in overcoming communication barriers.

At Phoenix Federation we identify pupils who might need more support to be kept safe or to keep themselves safe by:

[explain what is done in your school setting]

6.11 Fabricated Induced Illness

Fabricated or induced illness (FII) is a rare form of child abuse. It occurs when a parent or carer, usually the child's biological mother, exaggerates or deliberately causes symptoms of illness in the child.
FII is also known as 'Munchausen's syndrome by proxy' (not to be confused with Munchausen's syndrome, where a person pretends to be ill or causes illness or injury to themselves).

FII covers a wide range of symptoms and behaviours involving parents seeking healthcare for a child. This ranges from extreme neglect (failing to seek medical care) to induced illness.

Behaviours in FII include a parent or other carer who:

- persuades healthcare professionals that their child is ill when they're perfectly healthy.
- exaggerates or lies about their child's symptoms.
- manipulates test results to suggest the presence of illness – for example, by putting glucose in urine samples to suggest the child has diabetes.
- deliberately induces symptoms of illness – for example, by poisoning her child with unnecessary medication or other substances.

If you suspect that a parent/carer may be fabricating or inducing illness in their child, you should not confront them directly. It's unlikely to make the person admit to wrongdoing, and it may give them the opportunity to dispose of any evidence of abuse. You must immediately report any concerns to the DSL using the concerns form.

Please see further guidance on the DfE website via the link below:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/277314/Safeguarding_Children_in_whom_illness_is_fabricated_or_induced.pdf

6.12 Private Fostering

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. (Please refer to the Private Fostering Policy for more details).

A close family relative is defined as a ‘grandparent, brother, sister, uncle or aunt’ and includes half-siblings and stepparents; it does not include great-aunts or uncles, great grandparents, or cousins.

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

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

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

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

A referral should be made to Children's Social Care in writing using Lewisham's referral form. The referral should have as much information as possible, including full details of all children concerned and their parents/carers/those with PR and any information about how these children came to be in their current situation. In some cases, you may not have been provided with all the details, so it is important that you discuss the referral with the carers to obtain them. However, if the information is not forthcoming, the referral should not be delayed. Referrals should be made online at: www.lewisham.gov.uk/MASH.

Once notified about a private fostering arrangement, the local authority is required to assess the home to ensure that is suitable. If it is happy with the arrangements, then it is required to arrange a visit once every six weeks for the first year and then at three-monthly intervals whilst the placement continues. Children's Social Care will be appointing a dedicated worker to work with private fostered children. Details will be provided as soon as possible. This worker will be available to offer advice and assistance if required.

6.13 Separated Parents

The definition of a parent for school purposes is much wider than for any other situation. The Education Act 1996 defines a parent as:

- All natural parents, including those that are not married.
- Any person who has parental responsibility but is not a natural parent e.g., a legally appointed guardian or the Local Authority named in a Care Order.
- Any person who has care of a child i.e., a person with whom the child resides and who looks after the child irrespective of the relationship.

Who has “Parental Responsibility”? (The Children Act 1989)

Having parental responsibility means assuming all the rights, duties, powers, responsibilities, and authority that a parent of a child has by law. People other than a child's natural parents can acquire parental responsibility through:

- Being granted a Residence Order
- Being appointed a Guardian
- Being named in an Emergency Protection Order (although parental responsibility in a such a case is limited to taking reasonable steps to safeguard or promote the child's welfare)
- Adopting a child.

If the parents of a child were not married to each other when the child was born, the mother automatically has parental responsibility; however, the father only has parental responsibility from 1st December 2003 and by jointly registering the birth of the child with the mother. He can, however, subsequently acquire parental responsibility by various legal means. Phoenix Federation must act in accordance with the law with respect to parental responsibility, and the school’s duties and processes are clearly outlined in our “Separated Parents Policy”.

6.14 Photography and Images

To protect children, we will:

- Seek parental consent for photographs to be taken or published (for example on our website or in newspapers and/or publications)
- Only use the school’s equipment
- Only take photos and videos of children to celebrate achievement.
- Use only the child’s first name with an image.
- Ensure that the children are appropriately dressed.
- Encourage children to tell us if they are worried about any photographs that are taken of them.

Parents that are taking photographs at school assemblies and other productions or school trips are instructed that these are to be for personal use only and are not to be shared on social media.

6.15 Commissioned Extended School Provision and Lettings

Section 11 of the Children Act 2004 places duties on a range of organisations and individuals to ensure their functions, and any other services that they contract out to others, are discharged having regard to the need to safeguard and promote the welfare of children. **(Chapter 2 - Working Together 2023)**

In relation to extended school provision and lettings, these include: -

- A clear line of accountability for the commissioning and /or provision of services designed to safeguard and promote the welfare of children.
- A designated professional lead for safeguarding
- Safe recruitment practices for individuals whom the organisation will permit to work regularly with children.
- Clear policies, in line with those from the LSCP for dealing with allegations against people who work with children.
- Allegations relating to an incident when an individual or organisation was using school premises for the purposes of running activities for children, schools should follow their safeguarding policies and procedures, including informing the LADO.

'Employers are responsible for ensuring that their staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children and creating an environment where staff feel able to raise concerns and feel supported in their safeguarding role.' Working Together 2018. Where any extended service is directly commissioned by Lewisham Council, they will be responsible for the safeguard.

Where extended school provision is offered directly under the supervision or management of school staff, for example an after-school sports club led by a member of school staff, the school's safeguarding arrangements will apply.

Where services or activities are provided separately by another body, the Governing Body should seek assurance that the body concerned has **appropriate policies and procedures in place** regarding safeguarding children and child protection and there are arrangements to liaise with the school on these matters where appropriate.

Schools and colleges should have arrangements in place with extended school providers and contractors to make sure that anyone who will be coming onto school site and working with children has been subject to the appropriate level of DBS check and safer recruitment processes.

6.16 Drop-off and Collection Procedures

The school procedures covering the collection of pupils at the end of school are to ensure children are safe and in the care of the parent or an authorised adult by 3.30pm. The school must have the full contact details of parents/carers and other adults [such as grandparents] authorised by the parent/carer to collect their child. It is the parent/carer's responsibility to ensure contact details are up to date and that they have sufficient authorised adults for a range of emergencies. Please refer to the school's "Drop-off and Collection Procedures" policy for details on the protocols in place for the collection of children.

The responsibility is on parents/carers to complete these arrangements every day, including the responsibility to make their own arrangements with their named authorised adult to collect their child/children if they are going to be late for any reason.

In the event of an emergency the school expects the parent/carer to make appropriate arrangements, so the child/children are collected by 3.30pm by an authorised adult. It should be a rare occasion when there is a need to call the school to inform them that a child/children will be collected late.

6.16 Mental Health/Self-Harm

Mental health problems affect about 1 in 10 children and young people. They include depression, anxiety and conduct disorder, including self-harm, and are often a direct response to what is happening in their lives.

At Phoenix Federation, as a minimum, all staff will receive regular training about recognising and responding to mental health issues as part of their regular child protection training to enable them to be aware that mental health problems can in some cases be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation keep students safe.

We will host relevant information on our virtual learning environment for staff who wish to learn more about mental health. The MindEd learning portal provides free online training suitable for staff wishing to know more about a specific issue.

Recent research also indicates that up to one in ten young people in the UK engage in self-harming behaviours, and that this figure is higher amongst specific populations, including young people with special educational needs. School staff can play an important role in preventing self-harm and in supporting students, peers and parents of students currently engaging in self-harm.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood.

School staff may become aware of warning signs which indicate a student is experiencing difficulties that may lead to thoughts of self-harm or suicide. These warning signs should **always** be taken seriously and staff observing any of these warning signs should seek further advice from the DSL.

For further details of our school's procedures around supporting children who are self-harming or experiencing any other mental health issues refer to our [POLICY NAME] policy.

6.18 Faith Based Abuse

Faith abuse is abuse of a child, linked to faith or belief. It is not about challenging people's beliefs, but where these beliefs lead to abuse, this should never be tolerated. This includes: belief in concepts of witchcraft and spirit possession, demons or the devil acting through children or leading them astray (traditionally seen in some Christian beliefs), the evil eye or djinns (traditionally known in some Islamic

faith contexts) and dakini (in the Hindu context); ritual or multi murders where the killing of children is believed to bring supernatural benefits or the use of their body parts is believed to produce potent magical remedies; and use of belief in magic or witchcraft to create fear in children to make them more compliant when they are being trafficked for domestic slavery or sexual exploitation. This is not an exhaustive list and there will be other examples where children have been harmed when adults think that their actions have brought bad fortune, such as telephoning a wrong number which is believed by some to allow malevolent spirits to enter the home.

In Phoenix Federation, we have provided all staff, as part of our safeguarding training, information about potential signs and indicators of faith-based abuse.

In working to identify such child abuse it is important to remember every child is different. Some children may display a combination of indicators of abuse whilst others will attempt to conceal them. In addition to the factors above, there are a range of common features across identified cases. These indicators of abuse, which may also be common features in other kinds of abuse, include:

- a child's body showing signs or marks, such as bruises or burns, from physical abuse
- a child becoming noticeably confused, withdrawn, disorientated or isolated and appearing alone amongst other children.
- a child's personal care deteriorating, for example through a loss of weight, being hungry, turning up to school without food or lunch money, or being unkempt with dirty clothes and even faeces smeared on to them.
- it may be directly evident that the child's parent or carer does not show concern for or have a close bond with the child.
- a child's attendance at school becoming irregular or the child being taken out of school altogether without another school place having been organised, or a deterioration in a child's performance at school.
- a child reporting that they are or have been accused of being 'evil', and/or that they are having the 'devil beaten out of them'.

All staff should be alert to the indicators above and should be able to identify children at risk of this type of abuse and intervene to prevent it.

Following the potential identification, confirmation, or disclosure of faith abuse by a child/young person/family member to an adult in school, the following actions will be considered:

- Standard child safeguarding procedures apply and must always be followed in all cases where abuse or neglect is suspected including those that may be related to belief systems.
- A **FFCP** referral may be necessary to safeguard the child/young person (see below for contact details)

- An Early Help Assessment may be appropriate for some children and young people to meet need.

6.19 Exclusions

Decisions to exclude a child are not taken lightly and the final decision will always be made by the Headteacher. In line with the recent DfE statutory guidance, 'Exclusion from maintained schools, academies and pupil referral units in England', September 2017, wwhen the school is considering excluding, either fixed term or permanently, a vulnerable pupil and / or a pupil/student who is the subject of a child protection plan or where there is an existing child protection file, we will call a multi-agency risk-assessment meeting prior to making the decision to exclude. In the event of a one-off serious incident resulting in an immediate decision to exclude, the risk assessment *must* be completed prior to convening a meeting of the Governing Body.

6.20 Searching Screening and Confiscation

The DfE advisory guidance, Searching, screening and confiscation guidance for Headteachers, school staff and governing bodies' sets out the power schools have when searched pupils, both with or without consent, and their right to confiscate items found during the searches.

The United Nations Convention on the Rights of the Child (UNCRC) embodies the idea that every child should be recognised, respected and protected as a rights holder and as a unique and valuable human being. It applies to all persons under the age of 18. At [school name] we will ensure that we give due diligence to Article 3 and 16 as outlined below when we conduct any such searches.

Article 3 (best interests of the child)

The best interests of the child must be a top priority in all decisions and actions that affect children.

Article 16 (right to privacy)

Every child has the right to privacy. The law should protect the child's private, family and home life, including protecting children from unlawful attacks that harm their reputation.

We will attempt to contact the parent/carer immediately to advise them of the situation and if practical and safe to do so, may wait until the parent/carer can be present. If this is not possible or the search needs to be undertaken more speedily, the Head teacher may authorize a member of security staff to conduct a search, when there is credible and reliable evidence to suggest that a child or young person is in possession of a prohibited item by the school, or an item which may be intended to cause serious harm to an individual including themselves.

Contact will be made to the parent/carer immediately if this is the case. A search will only involve the removal of outer clothing and searching pockets. If a more intimate search is required, this can only be carried out by the police under specific

instructions of the Borough Command Unit (BCU) Inspector and the search will only go ahead when the parent/carer or appropriate member of school staff, in loco parentis is present. Colleagues must ensure that they have confirmed instructions from the BCU Inspector to permit such a search being carried out.

At [school name] we will at all times consider our duty to advocate for the child and pay due diligence to promoting anti-racist practice and be aware of the potential of adultification in these cases. We will also make the appropriate referrals to MASH following any such requirement.

At Phoenix Federation there are times that we routinely screen students for safeguarding reasons while on other occasions it may be necessary to conduct searches more randomly. Any such searches/screening will always be done in accordance with advisory guidance and full details of our school's approach are detailed in our [POLICY NAME] policy.

6.21 Serious Youth Violence and Knife Crime

In line with the recommendations that came out of the recent DfE report, Safeguarding children and young people in education from knife crime, March 2019 which summarises their findings and recommendations from a research project in London on knife crime in education we will carry out routine screening and searches as above.

In Lewisham a weekly Concerns Hub is held to discuss children at risk of being victims to this crime and we will follow the referral process to direct the relevant children accordingly by emailing PLMailbox-ConcernHub@met.police.uk.

6.22 Contextual Safeguarding

Phoenix Federation is aware that the young people in our school may face additional extra-familial risks outside of the school context. Working Together to Safeguard Children, 2018 states that, "These extra-familial threats might arise at school and other educational establishments, from within peer groups, or more widely from within the wider community and/or online. These threats can take a variety of different forms and children can be vulnerable to multiple threats, including:

- exploitation by criminal gangs and organised crime groups such as county lines.
- trafficking.
- online abuse.
- teenage relationship abuse.
- sexual exploitation and
- the influences of extremism leading to radicalisation,".

As part our whole-school approach to these contextual safeguarding risks, we have developed a curriculum, policy and practice that promotes a culture that focuses on educating about risks and potential threats as well as responding to these. In

addition to this, Phoenix Federation will regularly use student-led intelligence to identify potential risks in and outside of our community and mitigate against them through regular safety mapping exercises.

Where safety mapping exercises identify people, places, and environments where extra-familial harm could take place, we will focus on interventions that address these wider environmental factors by partnering with other professionals, external agencies, and community establishments to create more safe spaces for our young people.

We will train colleagues to understand how to identify these potential contextual safeguarding risks/threats and refer any new concerns in the normal way.

Schools have been identified as sites in which young people can experience and/or be safeguarded from abuse and violence. From experiences of sexual harassment and sexual violence through to physical assaults, relationship-based abuse, bullying and grooming into exploitative networks, young people have told practitioners, researchers, and journalists about risks they have faced in educational settings.

As such it is critical that when young people experience abuse and violence, and this is in some way associated to their school environment or school relationships – that the school itself features within the process of assessment and intervention. If we want to address the factors that cause abuse, or provide an opportunity for abuse to occur, then these factors need to be identified explored and addressed – and school assessments is one way to achieve this.

School assessments uncover risks and strengths within school contexts, that are associated to young people's experiences of abuse.

A school assessment draws on aspects of the environment to build a picture of how the school can be safer for young people. A range of methods will be used to gather this information including:

- Speaking to young people
- Student and parent surveys
- Speaking with staff
- Reviewing behaviour logs
- Observing the school environment

At Phoenix Federation we take contextual safeguarding very seriously. If colleagues have concerns or become aware of circumstances within school where young people are currently experiencing or are at risk of harm, please report to the DSL using the concerns form. A decision will then be made by the Senior Leadership Team about the potential need to carry out a school assessment.

6.23 Alternative Provision

When our school places a pupil in an alternative provision, we maintain responsibility for the safeguarding of that pupil. We will ensure that the placement meets the pupil's needs and that their safety and well-being are prioritised.

Given that pupils placed in Alternative Provision (AP) often have complex needs and may be at increased risk of harm, Phoenix Federation recognises the importance of robust safeguarding oversight in these settings. The school will obtain written confirmation from all alternative providers that appropriate safeguarding checks have been completed for all individuals working with pupils equivalent to those that schools would undertake for their own staff.

This includes a commitment from the provider to inform the school of any changes that could pose a risk to pupils, such as new staff appointments, so the school can be assured appropriate vetting has occurred. The school will also maintain accurate records of each child's placement, including the address of the AP or subcontracted provision being accessed.

To ensure ongoing safety and suitability, placements will be reviewed at least half-termly, with checks on attendance, safeguarding practices, and the child's overall wellbeing. Where safeguarding concerns arise, the placement will be immediately reviewed and terminated, if necessary, unless or until those concerns are satisfactorily resolved.

6.24 Children and the Court System

Children may sometimes be required to provide evidence in criminal courts, whether as victims of crimes or as witnesses. At Phoenix Federation we recognise the significant impact this can have on a child's emotional and psychological well-being, our school is committed to supporting children throughout this challenging process.

To assist children in understanding the court system, there are two specific guides available:

For children aged 5-11 years. This guide explains the court process in simple terms, including the special measures available to support young children.

For children aged 12-17 years. This guide offers a more detailed explanation of the court process, appropriate for older children.

Both guides include diagrams illustrating the courtroom structure and explain the use of video links to help children understand what to expect.

When children are required to give evidence, our school will:

1. Provide Emotional Support: Offer counseling services and emotional support through our school's support staff.

2. Educational Support: Ensure that children understand the court process by discussing the age-appropriate guides in a safe and supportive environment.

3. Coordination with Families: Work closely with families to understand the child's needs and coordinate support strategies.

Adopted

Signed by

_____	**Headteacher**	**Date:** _____
_____	**Chair of Governors**	**Date:** _____

Next review date: _____

Appendix 1:

Reporting a Concern Form

For completion by staff or volunteers when they become aware of child welfare concerns in accordance with government guidance and the child protection policy. The Designated Safeguarding Lead will monitor concerns and report where appropriate to Children's Social Care if a child is deemed at risk of significant harm. This information will be disclosed only to those staff who need to know for the purposes of child protection. Concerns should usually be shared with parent/child, unless to do so may place a child/ren at increased risk of harm (if in doubt about this, the DSL should consult with Children's Social Care). Please write legibly and do not use acronyms. Exact words must be used even if they may offend.

Section 1

Date of alleged incident		**Date/time of disclosure**		**Date/time of referral to DSL**	
Name of child/ren			**Class/Year**		
Name of person making this record			**Role in setting**		
Signed as a true record			**Date DD/MM/YY**		

Section 2

Nature of Concern Attach additional sheet(s) if necessary. (Include observations as well as professional opinions)					
	Body Map Used	Yes		No	
Any other relevant information (previous concern, other professionals					

involved/SEN details etc.).								
Status with social care (please tick & name where known)	None		Known to social care		Allocated Social Worker		Child Protection Plan	
Name of Social Worker if current								

PTO

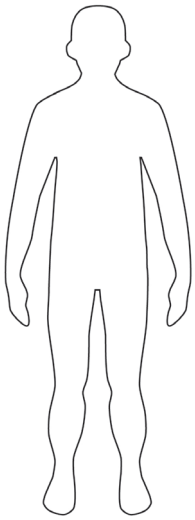
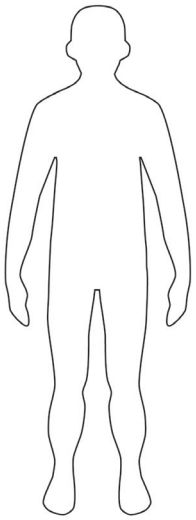
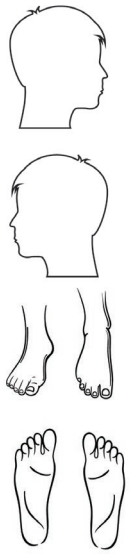
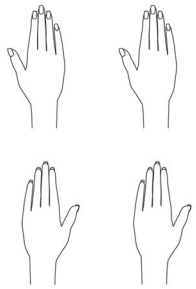
Section 2 *(For completion by Designated Safeguarding Lead or another appropriate Senior Teacher)*

Name of Designated Safeguarding Lead reviewing the concern		Initial Action Taken		Date: Time:
Further action taken (Please also record whether concerns were shared with: • Parents/carers • MASH And reason(s) why:				Date: Time:
Final Outcome				Date:
Feedback given to member of staff sharing with DSL?	**Please tick**	Staff member satisfied with actions?	**Please tick**	Date:

Body Map			
Date Concern Noted		Date/Time of Report	
Name of Child/ren		Class	
Name of person making this record (please print)		Role in setting	
Signed as a true record		Date DD/MM/YY	

N.B. Under no circumstances should a member of staff ask a child to remove clothing to see a suspected injury. If a child has described where an injury is, or it is clearly visible without needing to remove outer clothing, please indicate below.

FRONT BACK LEFT RIGHT

Appendix 2

Safeguarding Overview Sheet

(To be included in the child's CP file when concerns are logged for the first time)

Name of child _____ DOB: _____

Other known names

_____

Address

_____

_____

Nature of concern:

Other family members:
(Include full name, relationship e.g., mother, stepfather etc. For under 18s include age, if known)

Are any other child protection files held at the setting relating to this child or another child closely connected to him/her? YES/NO

If yes, which files are relevant?

_____

Name and contact number of Social Worker

_____

Name and contact number of any other agency workers involved.

_____

Name of lead person responsible for reviewing this record

_____

Appendix 3 what to do if you're worried a child is being abused or neglected.

(Modify to show procedures in your school/setting)

Member of staff has concerns about a child's welfare.

- Be alert to signs of abuse and question unusual behaviours.

Where a young person discloses abuse or neglect

- Listen; take their allegation seriously; reassure that you will take action to keep them safe.
- Inform them what you are going to do next.
- Do not promise confidentiality.
- Do not question further or approach/inform the alleged abuser.

Discuss concerns with the Designated Safeguarding Lead

The Safeguarding Lead will consider further actions required, including consultation with Children's Social Care (number below). Concerns and discussion, decisions and reasons for decision should be recorded in writing by agency/organization

In exceptional circumstances or in the absence of a safeguarding lead, the individual may contact Social Care directly.

Still have concerns? Refer to Social Care

Follow the guidance from the Lewisham MASH:
http://www.safeguardinglewisham.org.uk/lscb/lscb/professionals/early-help

During office hours Monday – Friday

Multi-Agency Safeguarding Hub (MASH)
020 8314 6660 or email them on mashagency@lewisham.gov.uk.

If a child is in immediate danger, call 999.

Children's Social Care

1. Acknowledge receipt of referral
2. Decide on next course of action (within one working day)
3. Feedback decision to referrer

No longer has safeguarding concerns.

Additional/unmet needs

Consult with family and relevant agencies and organize a Team around the Family meeting to discuss how family/child can be further supported.

Monitor and revisit on a 6-weekly basis.

This flowchart is intended for use as a brief guide. Please refer to the DfE Guidance 'What to do if you're worried a child is being abused, which includes definitions and possible indicators of abuse.