



## SAFEGUARDING & CHILD PROTECTION POLICY

Updated August 2020 **AWAITING  
APPROVAL FROM THE  
GOVERNING BODY**

**This policy links to and should be read in conjunction with the following policies:**

- Learning and Behaviour Policy
- Health & Safety Policy
- Whistle Blowing Policy
- Anti-Bullying and Harassment Policy
- Equality and Diversity Policy
- Search and Confiscation Policy
- Special Educational Needs (SEN) Policy
- IT Security Policy
- Online Safety Policy
- Complaints, Compliments and Concerns Procedure
- Health and Wellbeing Policy
- Risk Assessment Policy
- Work Experience Policy
- Self Harm Policy
- Disciplinary Policy and Procedure
- Staff Induction Policy
- Guidance for Staff on Appropriate Conduct and Behaviour
- Disability and Accessibility Policy
- Supporting Learners with Medical Conditions Policy
- Inclusive Learning Policy

This policy is written in line with the Department for Education publication *Keeping Children Safe in Education*, updated in September 2020 and will be reviewed according to publication updates. The policy is also reviewed annually when the Principal will report to the Governing Body on its operation and effectiveness.

### KEY SAFEGUARDING CONTACTS AT BIG CREATIVE ACADEMY

**Child Protection Lead:**

Milly Azordegan (on leave until April 2021)

Contact number: 0208 498 3327, email: [milly.azordegan@bigcreative.education](mailto:milly.azordegan@bigcreative.education)

**Designated Safeguarding Lead (DSL):**

Milly Azordegan (on leave until April 2021)

Contact number: 0208 498 3327, email: [milly.azordegan@bigcreative.education](mailto:milly.azordegan@bigcreative.education)

**Alternative Safeguarding contact:**

Nick Iszakovits (acting CPL/DSL until April 2021)

Contact number: 0208 498 3318

Email: [nick.iszakovits@bigcreative.education](mailto:nick.iszakovits@bigcreative.education)

**Link Governor for Safeguarding:**

John Stone

Email: [john.stone@bigcreative.education](mailto:john.stone@bigcreative.education)

**KEY CONTACTS WITHIN THE LOCAL AUTHORITY**

The Safeguarding in Education Service is able to provide advice and consultancy in non-emergency situations

<https://www.walthamforest.gov.uk/Pages/Services/safeguarding-education.aspx?l1=100014&l2=200127>

The Waltham Forest Local Safeguarding Partners (Waltham Forest Safeguarding Children Board) can provide advice and training. The Local Safeguarding Partners within Waltham Forest consist of; Waltham Forest Council, NHS Waltham Forest, Newham and Tower Hamlets CCGs and Waltham Forest and Newham Police

Local Authority Designated Officer

LADO and Safeguarding in Education Manager is Caroline Aitken

([caroline.aitken@walthamforest.gov.uk](mailto:caroline.aitken@walthamforest.gov.uk) / 020 8496 3646)

**REFERRAL TO LOCAL AUTHORITY SOCIAL SERVICES**

If you feel that a child is at immediate risk of harm please call the Police on 999 who will be able to provide an immediate response. Alternatively, you can contact your local police on 101 at any time.

If you don't believe the risk requires immediate action, contact the Waltham Forest Multi Agency Safeguarding Hub team (previously the Referral and Advice Team) to discuss your concerns on:

Tel: 020 8496 2310 (Monday to Thursday, 9am-5.15pm and Friday, 9am-5pm)

Tel: 020 8496 3000 (Out of Hours).

You will get to speak to a social worker who is part of the Waltham Forest Multi Agency Safeguarding Hub (MASH) team. The social worker will need to gain as much information as possible about the child and the family.

If the young person does not reside in Waltham Forest contact their home borough social services.

**1. Introduction**

1.1 Big Creative Academy fully recognises its responsibility for the safeguarding and protection of learners and vulnerable adults, and its responsibility for promoting the welfare young people and vulnerable adults who are learners at the Academy. At all times, the Academy aims to create and maintain a safe environment for all learners, staff, volunteers and visitors.

1.2 An effective whole organisation safeguarding policy is one which provides clear direction to staff and others about expected behaviour when dealing with safeguarding issues. An effective policy also makes explicit Big Creative Academy's commitment to the development of good practice and sound procedures. This ensures that safeguarding

concerns, referrals and monitoring may be handled sensitively, professionally and in ways which support the needs of the learner.

- 1.3 Parents, carers or other interested parties can obtain a copy of this Safeguarding and Child Protection Policy on the website.
- 1.4 Big Creative Academy takes seriously its responsibility to protect and safeguard the welfare of children and young people in its care. "The welfare of the child is paramount" (Children Act 1989).
- 1.5 This policy applies to all governors, staff, agency staff, contractors, visitors and volunteers working for or within the Academy.

## **2. Safeguarding Principles**

- 2.1 Big Creative Academy is committed to the following safeguarding principles:
  - (a) all young people and vulnerable adults have the right to be safe from harm, abuse, exploitation and radicalisation.
  - (b) the welfare of the learner is paramount and this principle underpins all safeguarding work
  - (c) statements about abuse or neglect made by learners will be taken seriously
  - (d) the health and wellbeing of learners, which underpins a successful learning experience
- 2.2 There are three main elements to our safeguarding policy;
  - Prevention through the creation of a positive atmosphere and the teaching and pastoral support offered to learners.
  - Protection by following agreed procedures, ensuring staff are trained and supported to respond appropriately and sensitively to safeguarding concerns.
  - Support to learners and staff who may be affected by safeguarding concerns or issues arising.
- 2.3 Big Creative Academy recognises it is an agent of referral and not of investigation.
- 2.4 All staff must maintain an attitude of 'it could happen here' and everyone who comes into contact with learners has a responsibility to safeguard them.

## **3. Definitions**

- 3.1 For the purposes of this policy:
  - (a) a 'child' is someone who has not yet reached their 18th birthday (Children Act, 1989)
  - (b) a 'vulnerable adult' is any person over the age of 18, "who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation because of mental or other disability, age or illness."
  - (c) 'staff' means all employees, full-time or fractional and all agency, franchise, contract and volunteer staff working at or for the Academy;
  - (d) the term 'learner' is used in this policy to refer to anyone who is under the age of 18 or who meets the definition of a vulnerable adult.
  - (e) 'visitor' means any person who enters the building who is not a staff member
  - (f) 'volunteer' means any person who is unpaid employment in the Academy
  - (g) Safeguarding is defined as: protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

## **4. Legislative Context and Framework**

- 4.1 All action is taken in line with the following guidance:
- Local Safeguarding Children Board (LSCB) guidelines
  - London child protection procedures (March 2018)
  - Keeping Children Safe in Education (September 2020)
  - What to do if You're Worried a Child is Being Abused - Advice for Practitioners (2015)
  - Working Together to Safeguard Children (July 2018)
  - PREVENT Duty, as per the Counter Terrorism and Security Act (2015), see Appendix A
- 4.2 Section 175 of the Education Act 2002 places a duty upon this Academy to safeguard and promote the welfare of learners. Working Together to Safeguard Children and the London Child Protection Procedures provide a framework for enabling the Academy to fulfil its statutory duties effectively and efficiently in the best interests of learner and young people.
- 4.3 Section 11 of the Children Act (2004) requires all agencies working with or coming into contact with anyone under the age of 18 to have measures in place to safeguard and promote their welfare.
- 4.4 The Governing Body of Big Creative Academy holds responsibility for ensuring that the safety of the learners in this Academy is at all times of paramount importance and recognises the contribution the Academy makes in safeguarding and protecting learners. The Governing Body takes seriously its statutory responsibility to do so and recognises that all staff working with learners have a full and active part to play in protecting them from harm.
- 4.5 The Governing Body is responsible for ensuring that any deficiencies or weaknesses in the Academy are remedied immediately. Whilst the Governing Body holds overall responsibility for the child protection and safeguarding functions of the Academy the day-to-day operational responsibility rests with the Principal.
- 4.6 The Academy is committed to providing an environment where learners can learn, develop and achieve and where they are safeguarded and are enabled to tell or communicate if they are being harmed in some way. The Academy will seek advice from and work in partnership appropriately with Waltham Forest Children's Social Care and partner agencies in fulfilling its safeguarding and child protection responsibilities. The Academy is committed to ensuring that all staff are sensitive to the issues of characteristics protected by the Equality Act (2010) and that these issues should never be a barrier to sharing and reporting concerns about learners (please see the Academy's Equality and Diversity Policy).
- 4.7 All staff including teaching and non-teaching staff, temporary and agency staff, clerical and domestic staff, volunteers and staff working on site employed by other services and agencies and those working with learners on placements have a statutory responsibility to safeguard and promote the welfare of learners and must be fully conversant with and adhere to this policy. All staff are given a copy of this policy as part of their staff induction (please see the Staff Induction Policy).
- 4.8 For the purposes of this document, the term 'staff' will apply to those listed above. Because of their day to day contact with learners, staff in this Academy are well placed to observe possible signs of harm or abuse.
- 4.9 It is neither the role nor responsibility of those working with learners in the Academy to assess, diagnose or investigate whether a learner is at risk of or is suffering harm or abuse. It is the responsibility of all staff to be aware of the need to report any concerns

about a learner to the Designated Safeguarding Lead or the Child Protection Lead as a matter of priority.

## **5. Purpose and Aims of the Policy**

5.1 The purpose of this policy is to:

- (a) Raise the awareness of all staff of the need to safeguard learners and of their responsibilities in identifying concerns and reporting them immediately
- (b) Provide a framework to support staff in identifying concerns that a learner may be suffering or at risk of suffering harm or abuse thereby enabling them to report those concerns without delay
- (c) Promote and maintain an environment where learners feel secure and are listened to
- (d) Promote an environment where learners and staff treat each other with mutual respect and develop positive relationships, which are built on trust
- (e) Ensure that staff and students are aware of the PREVENT agenda via training sessions for staff and information sessions for students (see Appendix A)
- (f) Ensure that the Academy has sufficient staff for safeguarding and child protection to enable one of them to be available or contactable at all times during the Academy day
- (g) Ensure that the Governing Body has a nominated member who is responsible for safeguarding and protecting learner and vulnerable adults
- (h) Enable and support good levels of communication between staff to ensure that relevant information about learners is disseminated is shared with appropriate staff on a 'need to know' basis
- (i) Ensure that the Designated Safeguarding Lead and Child Protection Lead have undertaken suitable and appropriate training and that this training is updated every two years
- (j) Ensure that all staff receive safeguarding and child protection training every two years and refreshed annually.
- (k) Develop and promote effective working relationships with partner agencies, including Children's Social Care, the Police Child Abuse Investigation Team and the borough.
- (l) Provide a systematic means of monitoring learners who are thought be at risk of harm or who are subject to child protection plans
- (m) Provide structured procedures within the Academy, which will be followed by all staff when there are concerns about a learner who is potentially deemed at risk. These concerns should be recorded appropriately in a centralised source
- (n) Ensure that all adults working with learners in the Academy community have undergone appropriate safer recruitment vetting and checks as to their suitability to work with learners in line with the Academy recruitment process
- (o) Ensure that procedures are followed where an allegation is made against a member of staff or volunteer with the involvement of the Local Authority Designated Officer (see Appendix B for a flowchart of process for dealing with allegations against staff)
- (p) To support young people's and vulnerable adults' development in ways that will foster security, confidence and independence and to promote this through the curriculum, the tutorial programme, enrichment activities and the student forum.

## **6. Guidance**

6.1 This policy should be read in conjunction with the Department for Education Summary Booklet What to do if You're Worried a Child is Being Abused - Advice for Practitioners.

6.2 Our procedures are in line with the London Child Protection Procedures a copy of which is available on the London Safeguarding Children Board website: [www.londonscb.gov.uk](http://www.londonscb.gov.uk).

6.3 All Academy staff should be knowledgeable about what constitutes abuse (see Appendix C detailing indicators of abuse).

## 7. Procedures

- 7.1 All action is taken in line with the following guidance;
- Local Safeguarding Children Board (LSCB) guidelines
  - London Child Protection Procedures (2016)
  - Keeping Children Safe in Education (September 2020)
  - What to do if You're Worried a Child is Being Abused - Advice for Practitioners (2015)
  - Working Together to Safeguard Children (2018)
- 7.2 Big Creative Academy staff who work unsupervised will be kept informed about safeguarding responsibilities and procedures through induction, briefings and awareness training. There may be other adults in the Academy who rarely work unsupervised, more usually working alongside members of staff. However the DSL will ensure they are aware of the Academy's policy.
- 7.3 Any member of staff, including supply staff, volunteer or visitor to the Academy who receives a disclosure or allegation of abuse, or suspects that a learner may have suffered significant harm or be at risk of suffering significant harm, or who notices signs or indicators of abuse must make an immediate telephone report to the DSL or in their absence, the Principal. In the absence of either of the above, the matter should be brought to the attention of the most senior member of staff available.
- 7.4 Options for the DSL will then include:
- a) managing any support for the learner internally via the Academy's own pastoral support processes
  - b) an early help assessment
  - c) a referral for statutory services, for example as the child might be in need, is in need or suffering or likely to suffer harm
- 7.5 The young person concerned must be informed that this information is being passed on to the Academy DSL who will deal with information in line with this policy.
- 7.6 If there is a referral to statutory services by telephone, the referral to local authority social services must be confirmed in writing by the end of the working day.
- 7.7 The DSL should follow up with local authority social services within 24 hours of the referral to determine the outcome of the referral and any action to be taken.
- 7.8 Big Creative Academy is committed to sharing referral information with learner's parents/carers in accordance with the document Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (July 2018). The Academy is mindful that information sharing will not take place if to do so will place the learner at greater risk of harm or impede a criminal investigation. On these occasions advice will be taken from local authority Children's Social Care or the police.
- 7.9 The reporting member of staff must, as soon as possible, but at the latest by the end of the working day, make a written record of the disclosure of their concerns and send it via email to the DSL who will record it in the learner's record.
- 7.10 Where concerns do not relate to the immediate risk of significant harm the designated safeguarding coordinator will discuss the concerns with relevant colleagues and agree

a plan of action which will be recorded by the designated safeguarding coordinator in the learner's notes.

- 7.11 Where concerns about the safety or wellbeing of a young person exist it may be appropriate to approach relevant agencies (former schools, colleges etc.) to see if there is any relevant information available.
- 7.12 All staff, but especially the DSL should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

## **8. The Role of the Designated Safeguarding Lead (DSL)**

8.1 It is the role of the DSL to act as a source of support and guidance on all matters of child protection and safeguarding within the Academy. It is expected that the DSL will have a complete safeguarding picture for Big Creative Academy and is therefore the person to whom all concerns should be reported. In the absence of the DSL, staff should report any concerns to the Child Protection Lead who will act in accordance with this policy and the London Child Protection Procedures and report back to the DSL. The Principal retains overall responsibility for and oversight of safeguarding within the Academy.

8.2 The Designated Safeguarding Lead is responsible for:

- (a) Ensuring that all staff receive appropriate safeguarding, child protection and PREVENT training to ensure that they are up to date with current legislation, policy and practice and that all staff new to the Academy receive the Safeguarding and Child Protection Policy in their induction pack to enable them to adhere to the Academy policy. It is important that all staff, both teaching and non-teaching, receive training to enable them to respond sensitively and appropriately to what learners tell them.
- (b) Maintaining and updating safeguarding and child protection policies and procedures and ensuring that they disseminated and adhered to by all staff.
- (c) Ensuring that there is a system for monitoring and recording concerns about learners at an early stage which is implemented across the Academy and adhered to by all staff.
- (d) Managing child protection concerns and making referrals to Children's Social Care for the borough in which the child is resident when it is appropriate to do so and seeking advice and guidance on these matters when appropriate.
- (e) Attending and providing reports to child protection conferences and core group meetings and contributing to child protection plans. Termly reports and should also be made available to the Academy Governing Body.
- (f) Monitoring the attendance and progress of learners who are the subject of child protection plans and implementing the Academy's part of these plans.
- (g) Informing the learner's Social Care team of any proposed educational changes for a child who is subject to a protection plan and alerting them if a child who is subject to a protection plan is absent from the Academy without reasonable justification.
- (h) Ensuring that relevant information about learners is shared with staff on a 'need to know basis'
- (i) Maintaining accurate safeguarding and child protection records which are held securely and confidentially.
- (j) Ensuring that all staff are aware of the need to record concerns about learners and enabling them to do this as part of an Academy-wide process, such as in tutorial records and individual learning plans. These would include bullying, racial and radicalisation issues.

- (k) Ensuring that complete and accurate records are forwarded to receiving education providers, such as tutorial records and the individual learning plan and conversations and information sharing are started as soon as is reasonable.
- (l) Ensuring that learners, parents and carers have access to the Academy safeguarding policies and procedures.
- (m) Clarifying to lead tutors, the senior management team and student support services their role in monitoring students at risk in terms of welfare and tracking cases of concern.
- (n) Ensuring that there is a member of staff for safeguarding available on site for staff or students to discuss concerns.
- (o) Help 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.

8.3 For clarification, the DSL and the Child Protection Lead for Big Creative Academy is Milly Azordegan (Director of Learner Services). In her absence, the role of both DSL and Child Protection Lead falls to the Deputy Designated Safeguarding Lead, Nick Iszakovits (Deputy DSL and SENCo).

## **9. Responsibilities of the Principal**

9.1 The Principal is responsible for ensuring that the Safeguarding and Child Protection Policy adopted by the Governing Body and procedures and all linked policies are fully implemented and followed by all staff.

9.2 It is the Principal's responsibility to allocate sufficient resources and time to enable the responsibilities of the Designated Safeguarding Lead to be discharged fully and to ensure that relevant staff are able to attend strategy discussions, child protection conferences and other inter-agency meetings and to contribute fully to the assessment of learners.

9.3 The Principal is responsible for ensuring that all staff feel able to raise concerns about poor or unsafe practice regarding learners, and that concerns will be addressed sensitively and in a timely manner in accordance with the Academy Whistle Blowing Policy. We recognise that it is not the responsibility of learners to raise concerns. It is the responsibility of all staff to share concerns about the actions or attitudes of colleagues with the Principal who will deal with the concerns appropriately.

## **10. Safeguarding Training for Big Creative Academy Staff**

10.1 Big Creative Academy ensures that:

- (a) The DSL has undergone appropriate safeguarding and child protection training in accordance with Working Together to Safeguard Children 2018, the PREVENT duty and that further training is undergone every two years. The DSL will also attend appropriate training delivered by the Local Safeguarding Children Board to ensure that she/he is aware of current safeguarding issues and practice and that knowledge is refreshed annually.
- (b) All staff receive safeguarding, child protection and PREVENT training every year in addition to regular briefings and updates from the DSL.
- (c) All new staff and governors are given a copy of the Safeguarding and Child Protection Policy as part of the Big Creative Academy induction process
- (d) All new staff undertake safeguarding training to equip them to carry out their safeguarding responsibilities within the Academy.
- (e) A central record of staff training is held.

10.2 Initial training for staff will ensure that:

- (a) All staff are able to recognise possible signs and indicators of potential radicalisation in learners, particularly if the learners are vulnerable adults or have special educational needs or disabilities (see Appendix A).



- (b) All staff are able to recognise possible signs and indicators of abuse in learners, particularly if the learners are vulnerable adults or have special educational needs or disabilities (see Appendix C).
- (c) All staff know to whom they should report any concern about a learner's welfare and wellbeing and know that concerns will be taken seriously.
- (d) All staff understand the Academy Safeguarding and Child Protection Policy and procedures and are clear about their statutory duties.
- (e) All staff are aware of how to manage a disclosure from a learner in order to promote the best outcomes for that learner.
- (f) All staff are aware of the importance of keeping detailed and accurate written records of any concerns about a learner.
- (g) All staff are aware of the boundaries of confidentiality and disclosure and understand when the disclosure of confidential information would be a proportional response to the need to safeguard a learner.
- (h) All staff have a duty to report any child protection and vulnerable adult issues to the DSL.
- (i) All staff understand that they have a duty to safeguard and promote the welfare of learners through wellbeing and enrichment activities.

## **11. Safer Recruitment and Staff Appointments**

### **11.1 Safe recruitment and selection practice is vital in safeguarding and protecting learners.**

The Governing Body recognises and takes seriously its responsibility to adopt practice which minimises risk to the learners by ensuring that measures are in place to deter, reject or identify people who might abuse learners or who are unsuitable to work with them. The Governing Body is committed to evidencing this practice in relation to all staff working with learners in the Academy. All processes and details can be found in the Safer Recruitment Policy.

### **11.2 When interviewing candidates, the Academy will ensure that at least one member of the interviewing panel has undergone training in Safer Recruitment.**

### **11.3 The Academy makes sure that appropriate checks are carried out on new staff, volunteers and helpers and bears in mind the safety of learners when drawing up job descriptions and person specifications, advertising posts, calling for and scrutinising references and picking up on gaps in employment history through to the interview process and carrying out enhanced DBS with barred list and professional checks and verifications of qualifications and identity. Applicants will be scrutinised by:**

- (a) Verifying identity and academic or vocational qualifications
- (b) Obtaining two written professional references to be checked and verified
- (c) Checking previous employment history carrying out mandatory checks of List 99 (Children's Barred List) or through the Vetting and Barring Scheme and ISA registration
- (d) Undertaking enhanced DBS checks
- (e) Conducting interviews with applicants
- (f) Ensuring that Academy candidates have the health and physical capacity to undertake the job for which they are applying
- (g) Undertaking risk assessments where it is appropriate and necessary to do so for work experience, placements and work based learning
- (h) Collating and maintaining all information on the single central register

### **11.4 Big Creative Academy will also ensure that:**

- (a) Health and safety checks have been undertaken prior to establishing work experience placements.
- (b) Employers and providers are aware of and are carrying out their responsibilities in relation to safeguarding and the protection of children and vulnerable adults, and

ensuring that providers have appropriate policies and procedures in place, which are followed by all staff.

(c) Academy staff, volunteers, employers and work placement providers are aware of the action to be taken and by whom, should a safeguarding issue be raised before, during or after the placement.

(d) Academy staff are appropriately trained to carry out the health and safety work placement audit.

11.5 The Academy will ensure the DBS check for staff will not be older than 3 years and will encourage every member of staff to join the DBS update service. Whereby, changes to staff DBS record will be notified to the Academy immediately.

## **12. Safe use of Technology**

12.1 The Academy has an IT Security Policy. The Academy has appointed a member of staff with responsibility for monitoring the safe and appropriate use of technology and any concerns about inappropriate use will be flagged and followed up. The Academy also has an Online Safety Policy to ensure all learners are aware of how to use technology safely.

## **13. Extended Services and Activities**

13.1 The Governing Body of the Academy is responsible for controlling the use of the Academy premises both during and outside Academy hours, except where a trust deed allows a person other than the Governing Body to control the use of the premises, or a transfer of control agreement has been made. Where services are provided directly under the supervision and management of the Academy, the Academy safeguarding policies and procedures will apply. Where activities and services are provided separately, the Governing Body will seek assurances that the body concerned has appropriate safeguarding and child protection policies and procedures in place and that there are agreed arrangements to liaise with the Academy on these matters where appropriate.

13.2 Evidence of appropriate policies and procedures must be provided to the Governing Body. The Governing Body will only work with providers that can demonstrate that they have effective child protection policies and procedures in place, provide appropriate training and that the vetting arrangements for their staff are compatible with those of the borough educational managing body and government guidance. The Governing Body will enter into a formal letting contract with the provider once these conditions are met but reserve the right to withdraw permission for any letting.

13.3 There will be at any one time, a number of professionals delivering services to learners on behalf of the Academy in the community as well as on the Academy site. These professionals may be employed by partner agencies or other agencies. All staff providing services to learners whether in the Academy or in the community on behalf of the Academy must adhere to the Academy's Saefgarding and Child Protection Policy and have understood its content.

13.4 Risk assessments for external visitors coming to the Academy will be carried out in advance of the visit to ensure a safe environment for all learners (see paragraph 26).

13.5 Staff from partner agencies working with learners in the community will follow the referral procedures of their own agency and will inform the DSL that they have made a child or vulnerable adult protection referral as a matter of priority.

## 14. Supporting Learners and teaching learners how to stay safe

14.1 The Academy will promote the wellbeing of all its learners in terms of:

- (a) physical and mental health and emotional wellbeing
- (b) protection from harm and neglect
- (c) education, training and recreation
- (d) the contribution learners make to society
- (e) social and economic wellbeing

14.2 We recognise that a learner who is abused or neglected may find it difficult to develop and maintain a sense of self-worth. We recognise that a learner may feel helpless and humiliated and may blame themselves for what has or is happening to them. Our Academy may provide a vital source of stability in the life of learner who has been abused or is at risk of harm. We recognise that the behaviour of a learner in these circumstances may range from that which is perceived to be 'normal' to aggressive or withdrawn.

14.3 We aim to support the learners in our Academy by:

- (a) Encouraging a sense of self-worth and assertiveness whilst not condoning bullying and aggression. Bullying in itself may result in the threshold of significant harm being met and we take seriously our responsibility to challenge bullying behaviours in accordance with our Anti-Bullying & Harassment Policy; all allegations of bullying must be recorded.
- (b) Promoting a caring and safe environment within the Academy
- (c) Providing a safe forum for debate of issues relating to equal opportunities and PREVENT.
- (d) Providing opportunities through the curriculum for learners to learn strategies to protect themselves, ask for help and support and gain confidence in standing up for their rights and valuing and respecting others. e.g. through awareness raising activities and workshops including sexual health, anti-bullying, drug and alcohol support, LEAP anger management, gang prevention and health
- (e) Working in partnership with other services involved in safeguarding learners and notifying Children's Social Care or the Vulnerable Adults Team as soon as there are significant concerns about a learner.

14.4 Safeguarding is promoted through a learners' course (wellbeing, enrichment and curriculum) and learners are encouraged to recognise their own responsibilities to safeguard themselves and others. Guidance and support for learners is available through a range of student support services including wellbeing sessions, student counsellors and advisors, these aims are underpinned by the following Academy policies:

- Anti-Bullying and Harassment Policy, to include peer or peer abuse
- Complaints, Compliments and Concerns Procedure
- Health and Wellbeing Policy
- Health and Safety Policy
- Learning and Behaviour Policy
- No Smoking/Drugs Policy
- Online Safety Policy

14.5 In order to safeguard learners, all activities that take place outside of Academy premises must be prepared for and risk assessed in accordance with the policies and procedures. Failure by staff to adequately prepare for and risk assess any trips or visits may lead to disciplinary action under the disciplinary procedure (please refer to the Risk Assessment Policy).

14.6 Inductions

#### 14.6.1 Health and Safety Induction

During induction, students are taken through the Academy policies and procedures whilst studying on-site at our campus. Health and Safety induction ensures that students are aware of fire escapes, who the designated member of staff is for Health & Safety, who the designated first aiders are and where to find them, how to raise the fire alarm, who to report hazards to, fire assembly points and who to contact in case of emergency. Students complete and sign the Health and Safety questionnaire and provide back to Building Manager to sign off.

#### 14.6.2 IT Induction/ Online Safety

IT Induction and Online Safety Policy is intended to ensure that students will be responsible users and stay safe whilst using the internet and other communications technologies for educational, personal and recreational use. IT induction covers social networking, safe surfing, cyber bullying and mobile phone safety.

#### 14.6.3 Student Services and Safeguarding Induction

Director for students introduces the service and team to all students during enrolment including what support is available and what to do if a student does not feel safe or is worried about their safety or their peer's safety. Students are encouraged to drop into the Student Services Hub for help and support in regards to their emotional well-being, academic progression, sexual health and financial help. Designated Safeguarding Lead is introduced to all students during assembly and is based in the Student Services Hub to allow easy access for emotional support or disclosures.

#### 14.6.4 Prevent and anti-radicalisation training

London Borough of Waltham Forest PREVENT Officer attends induction assemblies to meet with students and brief them around anti-radicalisation and resilience.  
UPDATE: In 2020/21 school year, PREVENT training will take place online due to COVID-19.

14.7 Safer Schools officer: The Academy works closely with a Metropolitan Police Safer Schools' Officer who has a presence on campus and is available for students and staff to speak with in regards to any concerns. This partnership and presence of SSO increases levels of safety for staff and students on site and provides a direct bridge to Metropolitan Police services.

14.8 The Academy recognizes that learners with special educational needs may be more susceptible to abuse and staff members are aware that behavior, mood and injury may relate to possible abuse and not just their SEN or disability. All staff will take into account that changes in behavior and/ or demeanor may not necessarily be linked to their disability but to consider the potential for abuse as a reason for these changes. The Academy understands that there is a higher risk of peer group isolation, bullying and difficulties with communication for learners who have educational needs. The DSL, Inclusion Manager and Student Services department liaise and work together to minimize the potential of abuse and recognize any signs of abuse or change in behavior. Learners with special educational needs have a higher risk of being isolated by their peers and may be disproportionately affected by bullying. To provide the pastoral support for these learners, they will be encouraged to partner up with a staff mentor in which they can trust to ensure that regular communication is in place and to provide the learner with a designated adult that they can trust.

### 15. The role of schools in the early help process

15.1 "Early help means providing support as soon as a problem emerges, at any point in a child's life, from the foundation years through to the teenage years." Working Together

to Safeguard Children (DfE, 2018)

Schools provide universal services to children as part of their safeguarding approach. This includes the ways in which the school teaches pupils to stay safe, keep others safe and promote a safe culture through their policies and procedures.

Sometimes children and families require some support and intervention in addition to the above and schools can sometimes provide this from within their resources. This additional support could be put in place to improve a child's attendance or behaviour or increase engagement with families with the aim of making school life a more positive experience.

It requires multi-agency working so that children and families receive the right support at the right time, in order to prevent difficulties from escalating or needs from increasing. In a school setting, this might include nurture groups, breakfast or after school activities, social skills groups or family learning opportunities. Since schools already have regular contact and good relationships with children and families they can often be the most suitable place for some early help to take place.

15.2 All Academy staff should be particularly alert to the potential need for early help for a learner who

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

15.3 The early help process: the process for accessing early help will vary in different Local Authorities (LA). Each LA is required to have strategy for early help and procedures for referral and assessment. Many LAs have an early help hub on their website.

15.4 The DSL will take the lead on early help cases and is aware of:

- The LA strategy for early help
- The process for making early help referrals
- The early help assessment process
- How the LA expects schools to be part of the early help strategy

The DSL should attend any training on early help offered by the LA or the Local Safeguarding Children Board (LSCB).

15.5 As part of early help support and intervention, the DSL may be in the position of being asked to take on the role of lead professional/practitioner. This role includes:

- Being the single point of contact for a family
- Co-ordinating the delivery of agreed action

- Reducing overlap of services and inconsistencies

More guidance on the role of lead professional should be available in the LA strategy and the LA or LSCB may offer additional training about this.

The DSL should ensure that all staff are aware of early help in their LA and this could be done via a staff briefing or bulletin after the DSL has attended training.

## 16. Professional Confidentiality

- 16.1 Confidentiality is an issue which needs to be discussed and fully understood by all those working with children, particularly in the context of safeguarding.
- 16.2 The only purpose of confidentiality in this respect is to benefit the learner. **A member of staff must never guarantee confidentiality to a learner nor should they agree with a learner to keep a secret**, as where there is a safeguarding concern this must be reported to the designated safeguarding coordinator and may require further investigation by appropriate authorities.
- 16.3 Staff will be informed of relevant information in respect of individual cases regarding safeguarding on a “need to know basis”. Any information shared with a member of staff in this way must be held confidentially by them.
- 16.4 Where sharing will be in the best interests of the relevant learner information will be shared with other organisations.

## 17. Records and Monitoring

- 17.1 Well-kept records are essential to good safeguarding practice. Big Creative Academy is clear about the following:
- The need to accurately record any concern held about a learner within the company
  - The status of such records
  - When these records should be passed over to other agencies.
- 17.2 Any member of staff receiving a disclosure of abuse or noticing signs or indicators of abuse must email the details to the designated safeguarding coordinator. All records will be dated and will include the action taken. These notes are kept in a confidential electronic learner record.
- 17.3 If a learner transfers from Big Creative Academy, these files may be copied and forwarded to the learner’s new establishment marked confidential and for the attention of the designated safeguarding coordinator if this is deemed to be in the learner’s best interests.

## 18. Attendance at safeguarding conferences and core group

- 18.1 It is the responsibility of the DSL to ensure that the Academy is represented or a report is submitted to any safeguarding conference called for learners on programme at the Academy or previously known to them. Whoever attends should be fully briefed on any issues or concerns the Academy has and be prepared to make decisions on registration at the end of the conference.

- 18.2 When a learner is the subject of a safeguarding plan, it is the DSL's responsibility to ensure that the learner is monitored regarding their attendance, welfare and presentation.
- 18.3 If Big Creative Academy is part of the core group then the DSL should ensure that the Academy is represented at these meetings; that there is a record of attendance and issues discussed.
- 18.4 All concerns about the safeguarding plan and/or the learner's welfare should be discussed and recorded at the core group meeting unless the learner is at further risk of significant harm before the meeting date. In this case the safeguarding coordinator must inform the learner's key worker **immediately** and then record that they have done so and the actions agreed.

## 19. **Young Apprentices and Learners on Work Placements**

- 19.1 Where young apprentices or under 18s who are on work placement are working on their own with the placement provider the Academy (or appropriate sub-contractor) will conduct an enhanced DBS check and an ISA check (if appropriate) on that individual (please refer to the Work Experience Policy).
- 19.2 The Academy will provide guidance to placement providers as to appropriate action they should take if a learner discloses to them.
- 19.3 The Academy will provide guidance to young apprentices or learners who are on work placement as to action they should take if they have any concerns about their placement.

## 20. **Risk Assessment of Trips and Visits**

- 20.1 In order to safeguard learners, all activities that take place outside of the Academy designated training centres must be prepared for and risk assessed in accordance with the Risk Assessment Policy.
- 20.2 Failure by staff to adequately prepare for and risk assess any trips or visits may lead to disciplinary action under the Disciplinary Policy and Procedure.

## 21. **Professional Relationships with Learners**

- 21.1 Big Creative Academy recognises that positive professional relationships with learners will support and promote the best outcomes for them. The Academy gives guidance on the expectations of staff in this matter to which all staff are expected to adhere. Good professional boundaries safeguard learners and safeguard professionals from unfounded allegations.

## 22. **Personal Relationships**

- 22.1 It is the prime duty of the Academy to provide a safe and secure learning environment for students and staff and to protect the safety and welfare of young people in its care. The guidance below ensures that staff maintain professional standards while at work and do not commit acts of impropriety or abuse the trust of students for whom they are responsible. The personal relationships referred to are those that are of a romantic

and/or sexual nature. This includes the use of social media and digital means as set out in the Guidance for Staff on Appropriate Conduct and Behaviour.

- 22.2 A professional relationship exists where a member of staff is responsible for assessing, supervising, tutoring, teaching or providing pastoral support, administrative or technical support. Maintaining this professional relationship is vital to the educational development and achievement of its students.
- 22.3 Where staff engage in inappropriate personal relationships with students, this can have damaging effects, causing distress and lead to physical and mental ill health. Students may feel they have no choice but to comply with the employee's wishes or leave the course. At the same time, staff may make themselves vulnerable to claims of sexual harassment or abuse.
- 22.4 The Academy strongly disapproves of personal/sexual relationships between staff and students who are 19 or under or any student considered to be vulnerable, regardless of whether a professional relationship exists. Entering into such a relationship will be considered to be gross misconduct and will be investigated under the Academy Disciplinary Policy and Procedure.
- 22.5 The Academy strongly disapproves of personal relationships between staff and students above the age of 19 where a professional relationship exists. Such relationships must be reported to the relevant line manager, so that appropriate steps can be taken to ensure that s/he is no longer in a professional role in connection with that particular student. Failure to report the said relationship may lead to disciplinary action, depending on the individual circumstances of the case. Where no professional relationship exists between staff and student, a personal relationship should be reported to the line manager in order to protect everyone's interests.
- 22.6 All staff are reminded of the risks of a complaint being made against them and that they may face allegations of criminal misconduct. In some circumstances, staff may be referred to the Secretary of State and barred from teaching.
- 22.7 Staff may seek advice and guidance from the senior management team. Students may seek guidance from the Student Services manager or from one of the student advisers.
- 22.8 Abuse of trust may be reported to the DSL and this policy should be read in conjunction with the Whistle Blowing Policy and the Disciplinary Policy and Procedures. It reflects our responsibilities under the Children's Act 1989, the Sexual Offences Amendment Act 2000 and the DfES Circular 2002 on the Prevention of Unsuitable Persons from working with children and young adults. For the avoidance of doubt, student helpers and students on work placements are not considered members of staff.
- 22.9 Apprentices will be treated as members of staff for the purpose of this policy.

### **23. Safe Touch Policy and Code of Practice**

- 23.1 The Academy recognises that in certain Performing Arts disciplines, e.g. Dance, it is necessary for the tutor to physically touch a learner to improve their understanding of the exercise or movement.

### **24. Supporting Staff**

- 24.1 We recognise that child protection is a difficult and sometimes upsetting subject for those who work with learners. Working with a learner who has suffered harm or is at risk of



harm may be stressful and distressing. We are committed to supporting such staff by providing opportunities for them to talk through their experiences and anxieties with the DSL and to seek further support as appropriate. All staff and volunteers should feel able to raise concerns about poor or unsafe practice, such concerns will be addressed sensitively and effectively in accordance with the Whistle Blowing Policy.

- 24.2 We believe that working within an Academy that has clear safeguarding and child protection policies and procedures also helps to support staff in carrying out their duties and responsibilities effectively.

## **25. Allegations Against Staff**

- 25.1 It is essential that the high standards of concern and professional responsibility adopted with regard to alleged child abuse by parents or carers are similarly displayed when members of staff are accused of abuse (see Appendix B).
- 25.2 This guidance should be followed where it is alleged that anyone working in the college, including supply teachers and volunteers has: behaved in a way that has harmed a child, or may have harmed a child; possibly committed a criminal offence against or related to a child; behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- 25.3 Only authorised agencies may investigate child abuse allegations (local authority Children's Social Care, the police or in some areas, the NSPCC). Whilst it is permissible to ask the learner(s) simple, non-leading questions to ascertain the facts of the allegation, formal interviews and the taking of statements is not appropriate and may prejudice investigations.
- 25.4 All allegations should be recorded by the person receiving the disclosure. That person should also contact the managing director immediately after any allegation is made.
- 25.5 Where a staff member, volunteer or supply staff is accused of abuse, the Principal should in the first instance contact the Safeguarding in Education Service. If the allegation is not of abuse then the Academy's normal Disciplinary Policy and Procedure will apply.
- 25.6 Through discussion and consultation with the Safeguarding in Education Service, a decision will be made whether to make a referral to local authority Children's Social Care and/or the police. Where the allegation is against a member of the senior management team the Principal will take this action. Where the allegation is against the Principal, the Chair of Governors will take this action.
- 25.7 The member of staff against whom the allegation is made will be kept informed about the allegation and the progress of the complaint, unless to do so may cause the risk harm to the complainant.
- 25.8 If after discussion with the Safeguarding in Education Service it is decided that a referral to local authority social services or police is not appropriate, it may still be necessary to address matters in accordance with the Academy's Disciplinary Policy and Procedure.

## **26. Managing Visitors on Site**

- 26.1 Visitors to Big Creative Academy are carefully managed to ensure safeguarding for learners. Upon arrival, visitors are briefed on the Academy's safeguarding responsibilities and given the document 'Keeping Children Safe' at Appendix D. Visitors are collected from reception by a member of staff and returned to reception. Visitors are never left alone with learners.

26.2 For visitors that will be engaging with learners for workshops, sessions and talks, checks are carried out prior to the visitor attending as follows:

- 10 working days prior to visit the member of staff to let the Attendance Officer know who they plan to invite in with their contact details.

- The Attendance Officer will send visitors the Visitor Form to complete and submit prior to visit. The form gives requests details of why visitor is coming on site and the content of their session with learners.

- The Attendance Officer will do checks on internet search engines and social media platforms to check for anything that gives a cause for concern. This will be noted on the Visitors Form.

- Any causes for concern will be reported to the DSL and appropriate action will be taken i.e. report to local authority or to the Waltham Forest PREVENT link. Visitors will be unable to access the Academy site.

- If there are no concerns, the form will be kept at reception in a file and signed off when visitor arrives and reused if repeat visits are made.

- Visitor forms will remain on file for the academic year.

## **27. Learners with Special Educational Needs and/or Disabilities**

27.1 Research suggests that learners with disabilities and/or learning difficulties are more vulnerable to abuse. The risks may be increased by their need for practical assistance and physical dependency including intimate care, which may be delivered by a number of different carers, by possible communication difficulties and lack of access to strategies to keep themselves safe, or by the increased risk that they may be socially isolated. Please also refer to the Special Educational Needs (SEN) Policy.

27.2 Staff who work with learners in any capacity must be particularly aware of and sensitive to how the effects of abuse or harm may present and be able to pick up on any changes in behaviour or presentation that might indicate a concern (see Appendix C on indicators of abuse). Staff should not assume that possible indicators of abuse such as behaviour, mood and injury relate to disability without further explanation. Concerns should be shared immediately with the DSL.

28.3 Staff in the Academy will have important information about an individual learner's presentation, their levels of understanding and how best to communicate with them. All staff working with learners with special educational needs or disabilities will receive appropriate training to enable them to meet the needs of the learner appropriately and to recognise and report any concerns.

## **28. Intimate Care**

28.1 The Academy is committed to supporting and meeting the needs of learners with disabilities and will ensure that no learner is put at a substantial disadvantage compared with her or his non- disabled peers (please see the Academy's Disability and Accessibility Policy).

28.2 If a learner has particular needs which require intimate care or the administration of medication, a meeting will be held with the learner, their parents, carers and relevant health professionals to ensure that an individual support plan is drawn up to meet those needs appropriately. The learner's wishes and feelings will be taken into account and respected throughout this process. Please see the Academy's policy on Supporting Learners with Medical Conditions.

## **29. Working in Partnership with Parents and Carers**

- 29.1 The Governing Body and staff of the Academy are committed to creating and maintaining a culture of openness and honesty and strive at all times to work in partnership with parents and carers. We believe that this is in the best interests of students and their families. Only by developing co-operative working relationships within which parents and carers feel respected will we be able to work holistically with students.
- 29.2 Parents and carers will be encouraged to access to our Safeguarding Policy, and a summary of it is included in the literature given to students and families on admission to the Academy. We believe it is important that parents and carers are aware of our statutory duty to safeguard and promote the welfare of students and that we will, where necessary, share concerns about students with Children's Social Care or appropriate agencies.
- 29.3 Wherever possible and appropriate we will aim to discuss concerns about students with their parents or carers and inform them if we intend to make a referral to Children's Social Care. There may be instances however, when we judge that it is not appropriate to speak to a parent or carer before contacting Children's Social Care. This would happen when the DMS or a Deputy DMS in her absence, judges that a student's wellbeing will be imperilled if the parent or carer is aware that a referral to Children's Social Care is to be made. We will also bear in mind 'Fraser competence' and this will inform judgements and decisions.

## **30. Site Security**

- 30.1 All learners and staff should be able to feel safe when they are in the Academy.
- 30.2 All staff and learners will wear their ID at all times and will not be allowed to enter a site without it. Visitors will be asked to show their ID where appropriate (for example Ofsted and other professionals who are visiting the site), and to sign in and wear a visitor's badge at all times. No visitor will be admitted on site unless they are accompanied by a member of Academy staff.

## **31. Contractors**

- 31.1 Regular contractors who work on site will be DBS checked as part of the service level agreement between them and the Academy and will be expected to read and adhere to this Safeguarding Policy. Occasional contractors who have not undergone DBS checks will be supervised at all times while they are on site.

## **32. Agency Staff**

- 32.1 Agency staff and those who work at the Academy for one or two days will be asked to provide their DBS check before they can begin work. They will be given a summary copy of the Child Protection and Safeguarding Policy and will be asked to sign to confirm that they have read and will adhere to it.
- 32.2 Although BCA is not the direct employer of Agency Staff and therefore do not have jurisdiction in applying disciplinary procedures to Agency Staff, we still have a duty to ensure that any allegation is dealt with properly. All Agency Staff are under the supervision, direction and control of BCA's governing body and Principal when working in the school or college.
- 32.3 BCA will not cease working with an Agency Staff due to an initial safeguarding concern, until the concern is fully investigated and consultation has taken place with Waltham Forest's local authority designated officer (LADO) to determine a suitable outcome.
- 32.4 The DSL, Governor in charge of Safeguarding and Principal either separately or in a

joint effort will discuss with the Supply Agency whether it is appropriate to suspend the Agency Staff or deploy them to another area of the college whilst the investigation is carried out.

- 32.5 This section, as well as the entire Safeguarding and Child Protection Policy is available to both the Supply Agency and Agency Staff upon request.

### **33. Restraint and Reasonable Force**

- 33.1 Academy staff (including support staff, non-teaching staff and voluntary staff) are able to use such force as is reasonable in the circumstances to prevent a learner from:
- Committing an offence;
  - Causing personal injury to any person (including themselves) or damage to any property;
  - Prejudicing the maintenance of good order and discipline at the Academy

This includes occasions when the learner is not on Academy premises e.g. on Academy visits.

- 33.2 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom.

- 33.3 Big Creative Academy recognises that reasonable force should be considered especially carefully when dealing with learners with SEN, disabilities or medical conditions. These groups are particularly vulnerable and the staff should refer to individual learning plans as necessary.

- 33.4 The Principal and authorised staff have the right to search pupils for weapons without their consent, where they have reasonable cause to suspect they are carrying a weapon (see Search and Confiscation Policy). If resistance is expected the police must be called. Further guidance is at [www.teachernet.gov.uk](http://www.teachernet.gov.uk). The security staff at the Academy is trained in the use of reasonable force and restraint. Guidance is given to staff on appropriate behaviour including the use of physical restraint.

- 33.5 There should be a rigorous recording system and procedures in the Academy and reporting to the Local Authority. Parents/carers should be informed when restraint has been used and protocols agreed with parents/carers if use of restraint is thought likely. It is good practice for the member of staff with responsibility for child protection to check the record and to give the member of staff involved in the incident a copy. Learners displaying extreme behaviour in relation to a learning disability, autistic spectrum disorders, behavioural, emotional and social difficulties or pupils with severe behavioural difficulties should be handled according to the guidance in [www.teachernet.gov.uk/wholeschool/sen/piguide](http://www.teachernet.gov.uk/wholeschool/sen/piguide).

- 33.6 Section 548 Education Act 1996 states that the use of force as a punishment is unlawful. Academies have two duties under Part 4 of the Disability Discrimination Act 1995 (as amended by the Special Educational Needs and Disability Act 2001):
- Not to treat a disabled child unfavourably without justification
  - To take reasonable steps to avoid putting disabled pupils at a substantial disadvantage

### **34. Recording**

- 34.1 Concerns about learners should be recorded on the Academy's individual learning plan and on the central at risk register, which will detail the concerns about a learner, discussion with the DSL and parents or carers where appropriate and any agreed actions and outcomes. The reasons for decisions will also be recorded.

- 34.2 Tracking sheets, referrals to Children's Social Care and Child Protection Conference and Core Group meeting minutes will be held confidentially, separately from a learner's main Academy records. Records should be signed and dated and kept in chronological order. Academy actions minuted in child protection conferences/strategy meetings must be implemented.
- 34.3 Recording is a tool of professional accountability and is central to safeguarding and protecting learners. The Academy should keep a central record of staff child protection training. It is not always possible to know whether a small or vague concern held today may increase as the days or weeks pass and later form the substance of a child or vulnerable adult protection referral. For this reason it is vital that concerns are recorded accurately so that they can be monitored and emerging patterns noticed.

### **35. Referral**

- 35.1 If a learner discloses that they have been subjected to abuse or radicalisation, the staff member must report this to the DSL. The DSL will then respond within an hour and make the necessary referrals to Children's Social Care in the child's home borough. See Appendix A – PREVENT statement.
- 35.2 Where a learner is transferring to another education provider, the DMS should liaise with the appropriate counterpart to copy and forward records.

### **36. Learners Under 18 living alone or without any parental or guardian support**

- 36.1 The most common reason for children becoming looked after is as a result of abuse and/or neglect. A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.
- 36.2 Academy staff must report any learners who are living alone or without parental or guardian support immediately to the DSL who is also the named lead for looked after children (see Looked After Children (LAC) Policy).

### **37. Private Fostering**

- 37.1 A private fostering arrangement occurs when someone other than a parent or a close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16, or aged under 18 if the child is disabled. Children looked after by the local authority or who are placed in a residential school, children's home or hospital are not considered to be privately fostered.

Private fostering occurs in all cultures, including British culture and children may be privately fostered at any age.

Most privately fostered children remain safe and well but safeguarding concerns have been raised in some cases so it is important that schools are alert to possible safeguarding issues, including the possibility that a child has been trafficked into the country.

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's care services as soon as possible.

- 37.2 Where a member of staff becomes aware that a pupil may be in a private fostering

arrangement they will raise this with the DSL and the school should notify the local authority of the circumstances.

### **38. The role of schools, academies and colleges in England in responding to concerns relating to child trafficking**

38.1 Child trafficking is the recruitment and movement of children for the purpose of exploitation. It is a form of child abuse. Identifying if a child has been trafficked is not easy. Trafficked children are often hidden; they may be scared or unaware that they have been trafficked. There is a wide variety of reasons why children are trafficked to the UK, including:

- sexual exploitation work or labour exploitation
- domestic servitude in private homes criminal activity
- drugs trafficking
- illegal inter-country adoption forced marriage
- removal of organs.

38.2 Traffickers can be parents, family members, organised gangs or individuals – they can be men or women.

38.3 Schools' legal responsibilities are outlined in HM Government (2011) Safeguarding Children who may have been trafficked (2011). Schools should also refer to department of Education Statutory Guidance (2015) Children Missing Education (2015)

38.4 Schools should create an ethos that encourages all staff to feel confident in expressing concerns about a child having been subjected to possible trafficking, no matter how far-fetched they may believe this is. Concerns of this nature are regarded as child abuse and the school's child protection procedures should be followed in all cases.

38.5 Children trafficked into the country may be registered at a school for a term or so, before being moved to another part of the UK or abroad again. Schools therefore need to be alert to this pattern of registration and de-registration. This pattern has been identified in schools near ports however it could happen anywhere in the UK.

Schools need to be alert to the possibility that a child who goes missing from school, may be, or have been, a trafficked child, who is living with or is running away from an exploitative situation.

Victims of trafficking may find it difficult to speak out because:

- English is not their first language
- They are frightened of their abusers or of retribution
- They are frightened or suspicious of adults who are trying to help them
- They fear for their immigration status or fear getting a criminal record
- They may not see themselves as victims
- They have a false sense of loyalty to their abuser, including a sense of respect for elders and not wanting to get them into trouble.

It can be difficult to identify a trafficked child, but the following are possible indicators:

- children have no documents when registering with school (birth certificate or passport)
- it is unclear who the child lives with or the relationship between the child and carer is unclear
- the adult speaks for the child
- children look intimidated and behave in a way that does not correspond with behaviour typical of children their age
- children and young people being overly tired in school
- not being registered with a school or a GP practice, or appearing to change school and GP frequently
- symptoms of STIs or pregnancy, signs of sexual or physical assault, poor dental health

- poor school attendance with no or vague explanation/s given for absences
- receiving repeated unexplained or unidentified phone calls seen entering or leaving vehicles driven by unknown adults
- possesses money or goods not accounted for
- having a history with gaps and unexplained moves or going missing for periods
- having what appears to be a prepared story, which lacks credibility

In some cases, children may disclose exploitation, for example being made to do excessive household work or being forced to commit crime.

- 38.6 Preventative measures: The Designated Safeguarding Lead should be aware of the issue and should consider running an awareness-raising session for all staff and the Governing Body, The DSL should also be aware of local protocols and procedures in response to child trafficking. The school should link with external agencies and be aware of any locally based projects or interventions. Schools should also display posters for helplines about children's concerns, including sexual exploitation or trafficking, so that they know there are other places to seek help and support if they don't feel comfortable approaching a member of staff.
- 38.7 Response and action to be taken: The impact of trafficking on children's health and welfare can be considerable. Trafficked children are not only deprived of their rights to health care and freedom from exploitation and abuse, but may also not be provided with access to education or only to fragmented and interrupted schooling. In addition, the creation of a false identity with an implied criminality, together with loss of family and community, may seriously undermine their own sense of identity. The nationality or immigration status of the child does not affect a school's responsibilities to act, but bear in mind some children may be very worried about their immigration status, application or appeals. Schools can contact the NSPCC's Child Trafficking Advice Centre (CTAC) for advice or to talk through the concerns. CTAC can provide guidance and advice and make or support a referral to children's services.
- 38.8 Working with parents: Trafficked children are unlikely to be living with their parents. Many trafficked children will be staying in informal fostering arrangements with unrelated adults. Often these adults will claim to be related but often don't have anything to prove this relationship where there are concerns about trafficking, the DSL should refer to Children's Social Care for advice and not engage with carers directly.

### **39. Forced Marriage/Honour Violence/Killings**

- 39.1 A 'forced' marriage is distinct from a consensual 'arranged' marriage because it is without the valid consent of both parties and where duress is a factor. A learner who is forced into marriage is at risk of significant harm through physical, sexual and emotional abuse. Information about a forced marriage may come from the learner themselves, or the learner's peer group, a relative or member of the learner's local community or from another professional.

### **40. Female Genital Mutilation (FGM) and So-called honour-based abuse**

- 40.1 FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM.
- 40.2 FGM refers to procedures of any alteration involving partial or total removal of the external female genital organs. The procedure may lead to short term and long-lasting harmful consequences such as death, trauma, infections, flashbacks, infertility, kidney problems, sexual dysfunctions, incontinence, post-traumatic stress disorder etc. It is

known to be practised in the North African countries, the Middle-East, Indonesia, Malaysia, India and Pakistan. However, with migration worldwide it is also practised in the UK, the USA, Canada, Australia etc.

40.3 One of the prominent reasons for the practice is to suppress women's sexual desire. There is a social pressure on women to undergo the procedure otherwise they may be segregated by their peers, or labelled "unclean". Furthermore, FGM is often a requirement for getting married in practicing communities. FGM is not a religious practice.

40.4 There is a range of potential indicators that a girl may be at risk of FGM.

- FGM often takes place in the summer holidays, as the recovery period after FGM can be 6 to 9 weeks. Professionals should be mindful of at risk times when children go on long holidays and/or are getting a visit by female elder from their country of origin. Additionally, girls are considered at risk where their mother or sisters have undergone FGM, and girls are talking about a 'special' event or procedure to 'become a woman.'
- The post FGM symptoms include, but are not limited to, difficulty in walking, sitting or standing, spending longer than normal in the bathroom or toilet, unusual behaviour after a lengthy absence, reluctance to undergo normal medical examinations, and asking for help but not be explicit about the problem due to embarrassment or fear. They can sometimes ask about their friend's problem rather than their problem. Professionals should raise an alert to Children's Social Care via the MASH if they have any FGM concerns.
- Further information on warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 16-17 of the Multi-Agency Practice Guidelines , and Chapter 9 of those Guidelines (pp42-44), which focuses on the role of schools and colleges.

40.5 The United Nations addresses FGM as violation of human rights. In the UK FGM is a criminal offence and a harmful form of child abuse. It is illegal to practice in the UK and/or anyone involved in taking girl outside of the UK to have FGM carried out will be punished under the FGM act 2003 and Serious Crime Act 2015. LBWF follows a comprehensive approach comprising prevention, punishment, enforcement, support and protection measures to safeguard young girls from FGM.

40.6 If staff have a concern they should activate local safeguarding procedures via the MASH, using existing national and local protocols for multi-agency liaison with police and Children's Social Care. Where a teacher discovers that an act of FGM appears to have been carried out on a girl who is aged under 18, there is a **legal duty** upon that individual to report it to the police.

40.7 Mandatory Reporting Duty: Section 5C of the Female Genital Mutilation Act 2003 (as inserted by section 75 of the Serious Crime Act 2015) gives the Government powers to issue statutory guidance on FGM to relevant persons. Once the government issues any statutory multi-agency guidance this will apply to schools and colleges.

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) will place a statutory duty upon teachers<sup>1</sup>, along with social workers and healthcare professionals, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face

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disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils – it is likely that discovery will be made by disclosure by the student, parent or otherwise. These cases must be referred to police (via the local CAIT team or by calling 101). Immediate reporting is required if FGM has been performed recently, and in historical cases, reporting must take place within one month.

Mandatory reporting duty commenced in October 2015. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve Children's Social Care as appropriate.

Schools can also:

- Circulate and display materials about FGM
- Display relevant information (for example, details of the NSPCC's Helpline and appropriate black and minority ethnic women's groups)
- Ensure that a private telephone is made available should students need to seek advice discreetly
- Inform colleagues/raise awareness of the issues around FGM – as well as including appropriate training in continuing professional development
- Introduce FGM into the school curriculum in relevant classes, such as personal, social and health education (PSHE), citizenship, religious knowledge, drama and history

Reference and further information

- Keeping children safe in education, DfE (see pages 14-15)
- Multi-agency practice guidelines: FGM, Home Office, DfE (see pages 8, 16, 17 and 42)
- <http://www.londonscb.gov.uk/fgm/>

40.8 FGM and forced marriage are examples of honour-based abuse.

40.9 In forced marriage, one or both spouses do not consent to the marriage, but are coerced into it. Duress can include physical, psychological, financial, sexual and emotional pressure. In the cases of some vulnerable adults who lack the capacity to consent, coercion is not required for a marriage to be forced. Honour-based abuse can be a trigger for forced marriage.

## 41. Domestic Violence

41.1 Domestic violence is any incident of threatening behaviour, violence or abuse (psychological, physical, sexual, financial or emotional) between adults who are or have been intimate partners or family members, regardless of gender or sexuality. The harm caused to learners can be significant – through emotional and physical abuse and/or neglect. From 2006, the definition of significant harm was amended to include “the harm suffered by seeing or hearing the ill-treatment of another, in the home”.

41.2 Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

41.3 Therefore, if staff are aware that a learner is witnessing or hearing domestic violence, they should inform the DSL, who should in turn refer the matter to Children's Social Care team or to Children's Social Care for the borough in which the learner lives. Staff should also be alert to possible violence in relationships between students and report this to the DSL immediately.

42. **Contextual Safeguarding:** All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the designated

safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

### **43. Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)**

43.1 Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity.

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults.

The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

#### **43.2 Child Criminal Exploitation (CCE)**

43.3 CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence.

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

Some of the following can be indicators of CCE:

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

43.4 **Child Sexual Exploitation (CSE)** : CSE 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 is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

43.5 The Academy includes the risks of sexual exploitation in the PSHE and SRE curriculum. A common feature of sexual exploitation is that the child often doesn't recognise the coercive nature of the relationship and doesn't see themselves as a victim. The child may initially resent what they perceive as interference by staff, but staff must act on their concerns, as they would for any other type of abuse.

43.6 All staff are made aware of the indicators of sexual exploitation and all concerns are reported immediately to the DSL.

43.7 The MASE is the Multi-Agency Sexual Exploitation meeting, which is held on a monthly basis and is co-chaired by Children's Social Care and the Metropolitan Police. The MASE has two purposes:

- For professionals to refer young people who are at risk of or are experiencing sexual exploitation: who are subject to a plan (Child Protection, Multi-agency or Child in Need) but for whom the risks are not decreasing and specialist advice or support is required
- To refer information/intelligence about possible venues/people involved in sexual exploitation. This information will then contribute to developing a strategic overview and understanding of sexual exploitation in Waltham Forest.

#### 44. **Peer on Peer sexual violence and sexual harassment:**

44.1 The Academy follows government advice found at [Sexual violence and sexual harassment between children in schools and colleges](#).

44.2 The Academy's initial response to a report of peer on peer sexual violence or harassment is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

44.3 As per all other concerns, this should be reported immediately to the DSL.

44.4 When there has been a report of sexual violence, the DSL should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

- the victim, especially their protection and support
- the alleged perpetrator
- all the other children (and, if appropriate, adult students and staff) at the school or college, especially any actions that are appropriate to protect them

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

44.5 There are four likely options to deal with a report of peer on peer sexual violence or sexual harassment:

- Manage the situation internally
- Early help
- Referrals to social care
- Report to the Police

44.6 Big Creative Academy operates a zero tolerance towards sexual violence and sexual harassment and will choose the most appropriate option in accordance with the risk assessment. All care will be taken to support both the victim and the perpetrator.

## 45. Young Carers

45.1 In many families, learners contribute to family care and wellbeing as part of normal family life. A young carer is a child who is responsible for caring on a regular basis for an adult or a sibling who has illness or disability. Caring responsibilities can significantly impact upon a child's health and development. Report any concerns to the DSL who will refer to Children's Social Care, a young carer who is:

- (a) Unlikely to achieve or maintain a reasonable standard of health or development because of their caring responsibilities
- (b) At serious risk of harm through abuse or neglect
- (c) Providing intimate bodily care.

## 46. Missing Persons/Young Runaways

46.1 Some young people are pushed away from their home by factors that make an environment difficult to live in, such as problems at home, difficult relationships, family breakdown and maltreatment or abuse, problems at the Academy including bullying and personal problems including mental health issues. Other young people are pulled away to be near friends and family or following grooming by adults for sexual exploitation or trafficking.

46.2 The Academy will support learners by enabling them to understand the dangers of running away and encourage them to seek support rather than run away; some learners run away because they feel there is no other option. Learners need to know where they can access help if they are thinking of running away and what alternatives are open to them. The Academy is well placed to advise young people about the dangers of running away and to point them to available support. If Academy staff become aware of a young

runaway, they should ensure they inform their Police Liaison Officer and the Education Welfare Service.

- 46.3 Should a young person be suspected as missing the Academy will fully co-operate to determine the safety of the young person. If a young person is reported as missing to the Academy by the parent, carer or guardian we will advise that this should be reported to police. If there is refusal to do so by the parent, carer or guardian the Academy will report the missing young person to the police.

#### **47. Gang Violence and Gang Grooming and county lines exploitation/ serious youth violence**

- 47.1 As part of the teaching and wellbeing offer Academy staff are well placed to pick up signs of anti-social behaviours, aggression, bullying and gang activity amongst young people and identify those at risk of harm as victims and/or the perpetrators. Poor academic achievement is one of the most consistently- reported risk factors found to increase the likelihood of violent behaviour and crime. Academy staff should follow the Academy's behaviour management and anti-bullying and harassment procedures and if necessary work collaboratively with external bodies such as Connexions and Reality Around Gangs, when managing gang related issues on site.
- 47.2 **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".
- 47.3 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.
- 47.4 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.
- 47.5 Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.
- 47.6 One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism<sup>103</sup> should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.
- 47.7 The national picture on county lines continues to develop but there are recorded cases of:
- Children as young as 12 years old being exploited by gangs to courier drugs out of their local area; 15-16 years is the most common age range.
  - Both males and females being exploited.
  - White British children being targeted because gangs perceive they are more likely to evade police detection.
  - The use of social media to make initial contact with children and young people.
  - Class A drug users being targeted so that gangs can takeover their homes (known as 'cuckooing').
- 47.8 The Academy understands that county lines exploitation is widespread, with gangs from big cities including London, Manchester and Liverpool operating throughout England, Wales and Scotland. Gangs are known to target vulnerable children and adults; some

of the factors that heighten a person's vulnerability include:

- Lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example);
- Social isolation or social difficulties;
- Economic vulnerability;
- Homelessness or insecure accommodation status;
- Connections with other people involved in gangs;
- Having a physical or learning disability;
- Having mental health or substance misuse issues;
- Being in care (particularly those in residential care and those with interrupted care histories).

*(Definitions taken from Criminal Exploitation of children and vulnerable adults: county lines guidance July 2017)*

#### 47.9 Serious Youth violence preventative measures:

The DSL of the Academy works closely with Waltham Forest Safer Schools Officer to help identify and support learners who are at risk of/involvement with serious youth violence. The Academy carries out knife arch operations throughout the academic year with the support of Waltham Forest metropolitan police. The Academy recognizes that learners may carry weapons for a variety of reasons and we are dedicated to supporting and educating our learners on the potential risks involved when carrying a bladed weapon. If a learner is to bring a bladed weapon onto the premises we will work closely with them, their parents/carers and police to ensure that the incident has been reported to the relevant local agencies and to ensure that appropriate intervention and support is put in place. The Academy security team carry out random searches of learners to ensure that they are not carrying any offensive or dangerous weapons, any weapons found will be reported to and seized by the Metropolitan Police with a likely referral to the local authority Children's Services/ Bronze panel.

#### 48. **Fabricated illness**

48.1 Fabricated or induced illness (FII) in children is a difficult and complex subject but schools can play a key role in recognising concerns that may relate to this rare form of child abuse.

48.2 Fabricated/induced illness occurs when a child is presented for medical attention with signs or symptoms which have been fabricated or induced by the child's carer. Research shows that it is usually, though not exclusively, carried out by a female carer, usually the child's mother. FII includes:

- Fabrication of signs and symptoms of illness, including fabrication of a child's medical history
- Fabrication and falsification of medical records, letters and test results
- Deliberately inducing illness in the child

48.3 School ethos, policy and training: Although symptoms may not be visible in a school context, schools should create an ethos that encourages all staff to feel confident in expressing concerns of this nature no matter how far-fetched they may believe they are. Fabricated or induced illness is a form of child abuse and it should be included in schools' safeguarding and child protection policies, procedures and training.

48.4 Schools' legal responsibilities are set out in *Safeguarding Children in whom Illness is Fabricated or Induced* (HM Government, 2008).

48.5 Preventative measures: Schools should promote an ethos which encourages children and young people to approach staff with any concerns they may have.

48.6 Recognition of possible signs and indicators: The signs and indicators of FII can be ambiguous. School staff are particularly well placed to notice outward signs of harm or to observe if a child is repeatedly unwell for no apparent reason. The following factors may alert you to the possibility of F/I.I.:

- (a) Frequent and unexplained absences from school, and from particular lessons/activities, especially PE
  - (b) Regular absences to keep a doctor's or a hospital appointment, where no reason has been there has been given.
  - (c) Regular failures to keep medical and other health related appointments e.g. opticians, physiotherapists.
  - (d) Refusal of permission for school medicals and/or other school based health related checks (e.g. hearing).
  - (e) Repeated claims by the parent/s that a child is frequently unwell and requires medical attention for symptoms which are vague or difficult to diagnose.
  - (f) Frequent illness, exaggeration of symptoms or excessive treatments or ailments not consistent with the child's general health or, in relation to a child's disability.
  - (g) Parent/carer alleges the child has psychological difficulties.
  - (h) The child's supposed symptoms are only mentioned when the parent or carer is present.
  - (i) The parent/carer appears to have an unusually high level of knowledge about medical matters.
  - (j) Documents or other sources indicate that the parent/carer has changed doctors frequently, and/or has visited different hospitals for the child's treatment.
- 48.7 Response and action to be taken: where a teacher or other member of staff has reasonable cause to believe that a child is at risk from, or is the subject of, FII, child protection procedures will apply. Staff should refer any child welfare concern to the designated safeguarding lead.
- (a) The DSL should refer to guidance given by the LSCB and work within the agreed procedures.
  - (b) Schools should develop a chronology of concerns by collating a record of absences and, where known, the reasons given by the carer for the absence. Where attendance levels fall below threshold, the school should liaise with Education Welfare Officers to aim to improve attendance. Liaise with health professionals involved with the child, including School Nursing Services, GP and other therapy services.
  - (c) Ensure any visits the child makes to the school medical room are logged and cross referenced to any concerns reported by other staff or the illness described by the parent/carer.
  - (d) If the child has siblings, the DSL should ascertain whether similar concerns or patterns of illness or absence apply to other children in the family.
  - (e) Schools should not advise parents/carers about the suspicion of fabricated illness as there is evidence that this can increase the harm and it may also damage evidence. The designated safeguarding lead should discuss with Children's Social Care what the parent/carers will be told, by whom and when.
  - (f) The designated safeguarding lead should be invited to attend any strategy discussions or child protection conferences.

Information sharing: In suspected cases of FII it is especially important that information is shared between relevant agencies. Schools should follow the protocols set out by the LSCB and the DSL should seek advice from Children's Social Care about what information will be shared with parents/carers.

## 49. Peer on peer abuse

49.1 Children can abuse other children. This is generally referred to as peer on peer abuse and can take many forms. The different forms peer on peer abuse can take, such as:

- bullying (including cyberbullying);
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence and sexual harassment.
- 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;
- sexting (also known as youth produced sexual imagery): the policy should include the school's or college's approach to it.
- initiation/hazing type violence and rituals.

49.2 Before enrolment, prospective learners are given the opportunity to state whether they have a criminal conviction. Learners' names will be sent to our Metropolitan Police Schools Officer who can run a background check on learner with details of all previous convictions. Head of Curriculum will then complete a risk assessment and discuss any concerns with SMT/DSL as to whether the Academy can accept the learner who could potentially pose a threat to other young people and staff in the building.

49.3 The Academy will respond to allegations by using the steps in our disciplinary policy, taking into account case-by-case and note the need for contextual safeguarding for response. The Academy understands that peer on peer abuse must never be tolerated as 'banter' and will be investigated with utmost importance.

49.4 The Academy ensures to listen and take into account the wishes of the victim/victims and perpetrator in moving forward. Referral to DSL/Student Services department will establish what support will be offered to both victim and perpetrator ensuring that the child's education is not compromised. Cases may be referred to external organisations such as local authority social care in order to provide the victim/perpetrator with the support needed.

49.5 The Academy will investigate allegations in line with our disciplinary procedure. Criminal allegations will be reported to the police but the Academy must not wait for the outcome of police investigation to determine internal disciplinary action (as this could be detrimental to the young person receiving education on-site).

## 50. Upskirting

The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. Upskirting' is where someone takes a picture under a persons clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

## 51. Sexting/ Youth Produced Imagery

51.1 Sexting is defined as the production and/or sharing of sexual photos and videos of and by young people who are under the age of 18. It includes nude or nearly nude images and/or sexual acts. It is also referred to as 'youth produced sexual imagery'. 'Sexting' does not include the sharing of sexual photos and videos of under-18 year olds with or by adults. This is a form of child sexual abuse and must be referred to the police.

51.2 When an incident involving youth produced sexual imagery comes to a school or college's attention:

- The incident should be referred to the DSL as soon as possible
- The DSL should hold an initial review meeting with appropriate school staff
- There should be subsequent interviews with the young people involved (if



appropriate)

- Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm
- At any point in the process if there is a concern a young person has been harmed or is at risk of harm a referral should be made to children's social care and/or the police immediately.

51.3 When a learner discloses an allegation of sexual violence and/or sexual harassment from their peer this must be immediately shared with Designated Safeguarding Lead who will meet with the victim and accused learner to understand the nature of the incident. Staff members must ensure that all victims are being taken seriously and that they will be supported and kept safe. When dealing with a response of sexual violence/harassment it is vital that staff take into consideration the wishes of the victim, how they would like to move forward and to assure all victims that their allegation is being taken seriously. The DSL will strongly consider the following advice:

- The wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered;
- The nature of the alleged incident(s), including: whether a crime may have been committed and consideration of harmful sexual behaviour
- Any power imbalance between the children. For example, is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?;
- Is the alleged incident is a one-off or a sustained pattern of abuse?;
- Are there ongoing risks to the victim, other children, adult students or school or college staff?; and
- Other related issues and wider context.

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

- The victim, especially their protection and support;
- The alleged perpetrator; and
- All the other children (and, if appropriate, adult students and staff) at the school or college, especially any actions that are appropriate to protect them;

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

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

*(Definitions taken from 'Sexual violence and sexual harassment between children in schools and colleges May 2018)*

## APPENDIX A: PREVENT STATEMENT

At Big Creative Academy we are fully aware and committed to the on-going protection and safety of our pupils, staff and wider community in accordance with DfE guidance '*Working together to Safeguard Children*' (2015) and '*Keeping Children Safe in Education*' (2020). An integral part of that work relates to the governments PREVENT strategy and the duties it places on academic institutions.

Our school is committed to providing a secure environment for pupils, where children feel safe and are kept safe. All adults in our school recognise that safeguarding is everyone's responsibility irrespective of the role they undertake or whether their role has direct contact or responsibility for children or not. Staff will be alert to issues including:

- Disclosures by pupils of their exposure to the extremist actions, views or materials of others outside of school, such as in their homes or community groups
- Graffiti symbols, writing or art work promoting extremist messages or images
- Pupils accessing extremist material online, including through social networking sites
- Parental reports of changes in behaviour, friendship or actions and requests for assistance
- Use of extremist or 'hate' terms to exclude others or incite violence
- Intolerance of difference, whether secular or religious or, in line with our equalities policy, views based on, but not exclusive to, gender, disability, homophobia, race, colour or culture

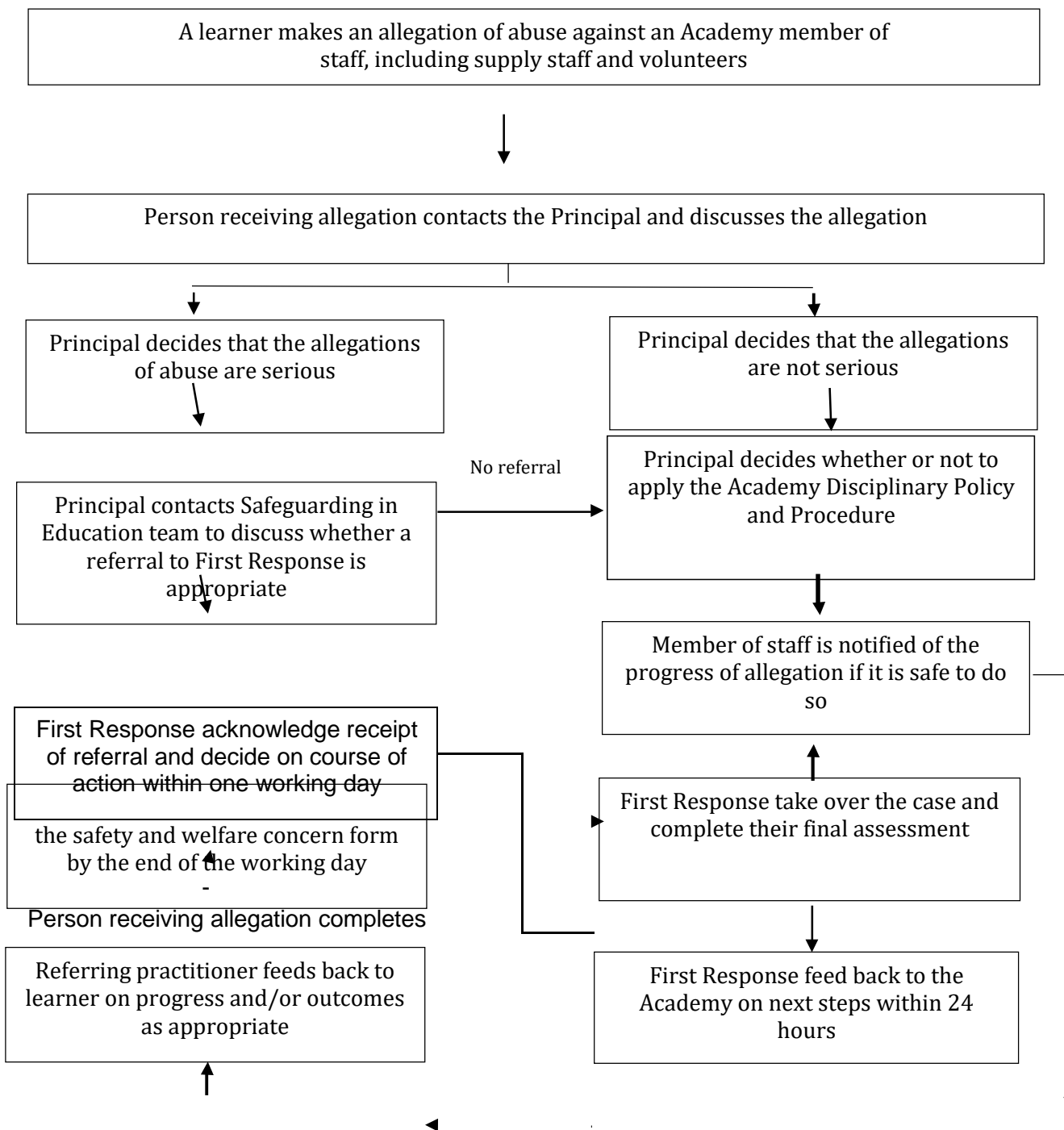
By continually developing our leadership and accountability practices, staff training opportunities (primarily the Home Office developed WRAP Training), referral systems and management of those referrals, we strive to demonstrate a pro-active and diligent approach to this aspect of our responsibilities as educators and safe-guarders.

Aligned with a consistent delivery of a broad and balanced curriculum and use of the Local Authority-approved Self-Assessment framework, we strive to protect our students - and the wider community - against the threats of extremism, through the promotion of both fundamental values and cohesion amongst our communities.

We also recognise that further information and support is available from the Multi-Agency Safeguarding Hub (0208 496 2310), the Local Authority's Community Safety Team (0208 496 3000) and the PREVENT Education Officer/Citizenship and Cohesion Advisor for WF [sean.thomson@walthamforest.gov.uk](mailto:sean.thomson@walthamforest.gov.uk) 0208 496 3447.

The self-assessment framework referenced in this policy can also be found on the Waltham Forest Education Network **The Hub**, using the following link:  
<https://thehub.walthamforest.gov.uk/>

## APPENDIX B: ALLEGATIONS AGAINST STAFF REFERRAL FLOWCHART



## APPENDIX C: GUIDANCE ON HOW TO SPOT INDICATORS OF POTENTIAL ABUSE

This appendix has been adapted from information provided by the NSPCC.

- 1.1 Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child either directly by inflicting harm, or indirectly, by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting; by those known to them; or, more rarely, by a stranger. They may be abused by an adult or adults, or another child or children.
- 1.2 These definitions and indicators are not meant to be definitive, but only serve as a guide to assist you. It is important too, to remember that many children may exhibit some of these indicators at some time, and that the presence of one or more should not be taken as proof that abuse is occurring. There may well be other reasons for changes in behaviour such as a death or the birth of a new baby in the family or relationship problems between parents/carers. In assessing whether indicators are related to abuse or not, the authorities will always want to understand them in relation to the child's development and context.

### Signs of abuse

- 2.1 Recognising child abuse is not easy. It is not your responsibility to decide whether or not child abuse has taken place or if a child is at significant risk of harm from someone. You do however, have both a responsibility and duty, as set out in your organisation's child protection procedures, to act in order that the appropriate agencies can investigate and take any necessary action to protect a child.

### Definitions

- 3.1 There are five types of child abuse as defined below in accordance with UK Government guidance, Working Together to Safeguard Children (2018). All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.
- 3.2 Definitions of Types of Abuse:

- (j) **Physical abuse:** this may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child or failing to protect a child from that harm. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child.

Most children will collect cuts and bruises as part of the rough-and-tumble of daily life. Injuries should always be interpreted in light of the child's medical and social history, developmental stage and the explanation given. Most accidental bruises are seen over bony parts of the body, e.g. elbows, knees, shins, and are often on the front of the body. Some children, however, will have bruising that is more than likely inflicted rather than accidental.

Important indicators of physical abuse are bruises or injuries that are either unexplained or inconsistent with the explanation given, or visible on the 'soft' parts of the body where accidental injuries are unlikely, e.g. cheeks, abdomen, back and buttocks. A delay in seeking medical treatment when it is obviously necessary is also a cause for concern, although this can be more complicated with burns, as these are often delayed in presentation due to blistering taking place sometime later.

The physical signs of abuse may include:

- unexplained bruising, marks or injuries on any part of the body
- multiple bruises- in clusters, often on the upper arm, outside of the thigh
- cigarette burns
- human bite marks
- broken bones
- scalds, with upward splash marks,
- multiple burns with a clearly demarcated edge.

Changes in behaviour that can also indicate physical abuse:

- fear of parents being approached for an explanation
- aggressive behaviour or severe temper outbursts
- flinching when approached or touched
- reluctance to get changed, for example in hot weather
- depression
- withdrawn behaviour
- running away from home.

(ii) **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 insofar as they meet 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, though it may occur alone.

Emotional abuse can be difficult to measure, as there are often no outward physical signs. There may be a developmental delay due to a failure to thrive and grow, although this will usually only be evident if the child puts on weight in other circumstances, for example when hospitalised or away from their parents' care. Even so, children who appear well-cared for may nevertheless be emotionally abused by being taunted, put down or belittled. They may receive little or no love, affection or attention from their parents or carers. Emotional abuse can also take the form of children not being allowed to mix or play with other children.

Changes in behaviour which can indicate emotional abuse include:

- neurotic behaviour e.g. sulking, hair twisting, rocking
- being unable to play
- fear of making mistakes
- sudden speech disorders
- self-harm (see Self Harm Policy)
- fear of parent being approached regarding their behaviour
- developmental delay in terms of emotional progress

(iii) **Sexual Abuse:** sexual abuse involves forcing or enticing a child or young 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 either penetrative or non-penetrative acts such as kissing, touching or fondling the child's genitals or breasts, vaginal or anal intercourse or oral sex. 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.

Adults who use children to meet their own sexual needs abuse both girls and boys of all ages, including infants and toddlers. Usually, in cases of sexual abuse it is the child's behaviour that may cause you to become concerned, although physical signs can also be present. In all cases, children who tell about sexual abuse do so because they want it to stop. It is important, therefore, that they are listened to and taken seriously.

The physical signs of sexual abuse may include:

- pain or itching in the genital area
- bruising or bleeding near genital area
- sexually transmitted disease
- vaginal discharge or infection
- stomach pains
- discomfort when walking or sitting down
- pregnancy

Changes in behaviour which can also indicate sexual abuse include:

- sudden or unexplained changes in behaviour e.g. becoming aggressive or withdrawn
- fear of being left with a specific person or group of people
- having nightmares
- running away from home
- sexual knowledge which is beyond their age, or developmental level
- sexual drawings or language
- sexting (also known as youth produced sexual imagery)
- bedwetting
- eating problems such as overeating or anorexia
- self-harm or mutilation, sometimes leading to suicide attempts
- saying they have secrets they cannot tell anyone about
- substance or drug abuse
- suddenly having unexplained sources of money
- not allowed to have friends (particularly in adolescence)
- acting in a sexually explicit way towards adults
- initiation/hazing type violence and rituals

All staff should be aware that safeguarding issues can manifest themselves via peer on peer abuse.

- (iv) **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 health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food and clothing; 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.

Neglect can be a difficult form of abuse to recognise, yet have some of the most lasting and damaging effects on children.

The physical signs of neglect may include:

- constant hunger, sometimes stealing food from other children
- constantly dirty or 'smelly'
- loss of weight, or being constantly underweight
- inappropriate clothing for the conditions.

Changes in behaviour which can also indicate neglect may include:

- complaining of being tired all the time
- not requesting medical assistance and/or failing to attend appointments
- having few friends
- mentioning being left alone or unsupervised.

- (v) **Peer-on-peer abuse:** may be defined as deliberately hurtful behaviour, usually repeated over a period of time, where it is difficult for those abused to defend themselves. It can take many forms, but the three main types are physical (e.g. hitting, kicking, theft), verbal (e.g. racist or homophobic remarks, threats, name calling) and emotional (e.g. isolating an individual from the activities and social acceptance of their peer group).

The damage inflicted by peer-on-peer abuse can frequently be underestimated. Evidence of peer-on-peer abuse should never be dismissed as normal adolescent aggression (the idea that 'boys will be boys', etc.), 'banter', or as harmless. It can cause considerable distress to children to the extent that it affects their health and development or, at the extreme, cause them significant harm (including self-harm). All settings in which children are provided with services or are living away from home should have in place rigorously enforced anti-bullying (peer-on-peer abuse) strategies.

Peer-on-peer abuse is not always easy to recognise as it can take a number of forms. A child may encounter attacks that are:

- physical: pushing, kicking, hitting, pinching and other forms of violence or threats
- verbal: name-calling, sarcasm, spreading rumours, persistent teasing
- emotional: excluding (sending to Coventry), tormenting, ridiculing, humiliating.

Persistent peer-on-peer abuse can result in:

- depression
- low self-esteem
- shyness
- poor academic achievement
- isolation
- threatened or attempted suicide

Signs that a child may be being abused by a peer can be:

- coming home with cuts and bruises
- torn clothes
- asking for stolen possessions to be replaced
- losing dinner money
- falling out with previously good friends
- being moody and bad tempered
- wanting to avoid leaving their home
- aggression with younger brothers and sisters
- doing less well at school
- sleep problems
- anxiety
- becoming quiet and withdrawn

- (vi) **Children who may be particularly vulnerable.** Some children may have an increased risk of abuse. It is important to understand that this increase in risk is due more to societal attitudes and assumptions or child protection procedures that fail to acknowledge children's diverse circumstances, rather than the individual child's personality, impairment or circumstances. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and a reluctance on the part of some adults to accept that abuse can occur.

To ensure that all of our pupils receive equal protection, we will give special consideration to children who are:

- disabled or have special educational needs
- young carers
- affected by parental substance misuse, domestic violence or parental mental health needs
- asylum seekers
- living away from home
- vulnerable to being bullied, or engaging in bullying
- living in temporary accommodation
- live transient lifestyles
- living in chaotic and unsupportive home situations
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality
- at risk of sexual exploitation
- do not have English as a first language
- at risk of female genital mutilation (FGM)
- at risk of forced marriage
- at risk of being drawn into extremism.

This list provides examples of additionally vulnerable groups and is not exhaustive. Special consideration includes the provision of safeguarding information and resources in community languages and accessible formats for children with communication needs.

**(vii) Children who need a social worker (Child in Need and Child Protection Plans)**

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

Where children need a social worker, further care should be given towards their safeguarding. Incidents such as unauthorised absence or missing education should be paid particular attention. Increased care should be given to promoting the welfare of CIN/ CPP students, such as further pastoral and academic support from staff.

- (viii) Mental Health.** All staff should 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.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic



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

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy and speaking to the designated safeguarding lead or a deputy.

- (vii) **Children requiring mental health support.** All staff have an important role to play in supporting the mental health and wellbeing of our learners. 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.

All staff should refer to Mental Health First Aid training to identify possible mental health problems, and should follow the same procedure as reporting any safeguarding issue if they suspect a learner is suffering from a mental health issue.

## **APPENDIX D: KEEPING SAFE – INFORMATION TO VISITORS**

### **Safeguarding and Health and Safety Information for Visitors and Contractors**

Welcome to Big Creative Academy. Please read this leaflet about keeping safe when visiting the site. Big Creative Academy expects all Visitors and Contractors to:

- Wear their Visitor's badge at all times and return this to security when leaving the building.
- Sign the Notification of Visitor's Form.
- Take care of themselves and those who may be affected by their actions.
- Co-operate with the Academy on all matters relating to Health and Safety.
- Report any hazards or suspicious activities
- Report all accidents that occur on the Academy grounds to the Buildings Manager.

### **Safeguarding**

Big Creative Academy is committed to keeping its learners safe in the environment. The Academy believes that everyone including young people and vulnerable adults have rights as individuals and should be treated with respect and dignity.

If you have any concerns regarding abuse it is your responsibility to report these concerns to the Academy's Designated Safeguarding Lead on: 07555 316 888

### **Fire Evacuation and Fire safety**

If you discover a fire you should activate the nearest break glass point. If the Fire alarm sounds continually you are to evacuate the building immediately. Follow the Fire Evacuation Signs to the appointed assembly point.

### **First Aid**

In case of an Accident or Incident please contact either Reception or the Security Desk who will arrange for a First Aider to attend

### **General Health and Safety Points**

- Please do not leave any of your possessions unattended
- If you see any unattended item or items of lost property, please contact reception
- If you notice anything that is unsafe, hazardous, broken or requires maintenance please report this to Reception who will arrange for Facilities staff to attend
- If you are given keys to use for a room, please ensure that it is locked when you leave and the keys returned to the Facilities staff
- If you have any other enquiries, please ask a member of staff who can be identified by the black lanyard they wear

### **Hazardous areas or Substances**

All contractors are to check the Asbestos register prior to starting any building work.

### **Contractors Specific Information**

All contractors must have a Permit to Work when working on the Academy premises: if the work involves working at height, working on high voltage electrical systems, working directly on the mains system or work that affects the infrastructure of Big Creative Academy. The Permit for Work can be obtained from the Buildings Manager. Contractors are expected to follow a safe system of work at all times.