



# London South East Education Trust (Bromley)

---

## Safeguarding Policy

<b>Responsible post holder</b>	Executive Headteacher
<b>Approved by / on</b>	Trust Board 9 <sup>th</sup> March 2016
<b>Reviewed</b>	1 <sup>st</sup> September 2016
<b>Reviewed</b>	1 <sup>st</sup> September 2017
<b>Reviewed</b>	1 <sup>st</sup> September 2018
<b>Reviewed</b>	1 <sup>st</sup> September 2019
<b>Reviewed</b>	1 <sup>st</sup> September 2020

## **CONTENTS**

1. Introduction, principles and aims
2. Terminology
3. Context
4. Early Help
5. Key personnel in the school
6. Roles and responsibilities
7. Good practice guidelines
8. Abuse of trust
9. Children who may be particularly vulnerable
10. Support for those involved in a child protection issue
11. Supporting pupils with a parent or close relative in prison or at risk.
12. Supporting Young Carers
13. Complaints procedure
14. If you have concerns about a colleague
15. Allegations against staff
16. Staff Training/ Teaching Pupils
17. Safer recruitment
18. Extended school and off-site arrangements
19. Photography and images
20. Record Keeping
21. e-safety
22. Filtering and Monitoring
23. Safeguarding Procedures:
  - Recognising abuse
    - Physical
    - Emotional
    - Sexual
    - Neglect
    - Domestic Violence
    - Child Missing from Education
    - Child Sexual Exploitation
    - Serious Violent Crime
    - County Lines
    - Mental Health
    - Honour Based Abuse
    - Female Genital Mutilation
    - Radicalisation and Extremism
    - Peer on Peer Sexual Abuse
    - Upskirting
    - Bullying
  - Indicators of abuse
  - Impact of abuse
  - Taking action
    - If you suspect a child is at risk
    - If a child discloses abuse
    - Notifying parents
    - Children with sexually harmful behaviour
    - Confidentiality and information-sharing
    - Reporting directly to child protection agencies

## **APPENDICES**

- 1 Code of ethical practice for school staff
- 2 Whistle blowing code
- 3 Images consent form
- 4 Cause for Concern for
- 5 Exemplar of Child Going Missing Process
- 6 COVID19 appendix - separate document

## 1. Introduction

The core safeguarding principles of the London South East Academies Trust (LSEAT) are:

- It is the LSEAT's responsibility to safeguard and promote the welfare of children, creating a culture of safety across the Hub.
- Children who are and feel safe make more successful learners.
- Representatives of the Trust's community of pupils, parents, staff and Trustees will be involved in policy development and review.
- Policies will be reviewed annually, unless an incident, new legislation or guidance suggests the need for an earlier review.
- The Trust Safeguarding policy has been revised to reflect "Keeping Children Safe in Education" (September 2020) and "Working Together to Safeguard Children" (July 2018).

***We recognise our moral and statutory responsibility to safeguard and promote the welfare of all children. We will provide a safe and welcoming environment where children are respected and valued. We will be alert to the signs of abuse and neglect and follow established procedures to ensure that children receive effective support, protection and justice.***

The procedures contained in this policy apply to all staff and Trustees and are consistent with those of Bromley and Surrey Safeguarding Children Partnerships and statutory safeguarding children partnership arrangements with our three key partners.

### Principles

- The London South East Academies Trust will ensure that the welfare of children is given paramount consideration when developing and delivering all school activities, creating a culture of effective safeguarding.
- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity have equal rights to protection; Trust schools should act in the best interests of the child at all times. School leaders should ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide.
- All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm in accordance with this guidance; all staff should be aware that safeguarding and promoting the welfare of children is everyone's responsibility and identify children that may benefit from early help.
- All pupils and staff involved in child protection issues will receive appropriate support from the senior management of the school who will then follow this policy guidance in dealing with such matters.

### Aims

- To provide all staff with the necessary information to enable them to meet their statutory responsibilities to promote and safeguard the wellbeing of children.
- To ensure consistent good practice across the Trust Schools.
- To demonstrate the Trust's commitment with regard to safeguarding children.

## 2. Terminology

**Safeguarding and promoting the welfare of children** refers to the process of protecting children from abuse or neglect, preventing the impairment of their mental and physical health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective and nurturing care and undertaking that role so as to enable those children to have optimum life chances and to enter adulthood successfully.

**Child protection** refers to the processes undertaken to meet statutory obligations laid out in the [Children Act 1989](#) and associated guidance (see [Working Together to Safeguard Children, An Interagency Guide to Safeguard and Promote the Welfare of Children](#)) in respect of those children who have been identified as suffering, or being at risk of suffering harm.

**Staff** refers to all those working for or on behalf of the Trust, full time or part time, in either a paid (including supply) or voluntary capacity.

**Child** refers to all young people who have not yet reached their 18th birthday.

**Parent** refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents.

### 3. Context

[Section 175 of the Education Act 2002](#) requires local education authorities and the governors of maintained schools and further education (FE) colleges to make arrangements to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of children.

[Section 157](#) of the same act and the [Education \(Independent Schools Standards\) \(England\) Regulations 2003](#) require proprietors of independent schools (including academies and city technology colleges) to have arrangements to safeguard and promote the welfare of children who are pupils at the school.

Research suggests that more than 10 per cent of children will suffer some form of abuse. Due to their day-to-day contact with children, school staff are uniquely placed to observe changes in children's behaviour and to recognise the outward signs of abuse. Children may also turn to a trusted adult in the school when they are in distress or at risk. It is vital that all staff are alert to the signs of neglect and abuse and understand the local procedures for reporting and acting upon their concerns (see section 6 for further guidance on this).

### 4. Early Help

All school staff should be prepared to identify children who may benefit from early help. Detailed information for 'early help' is highlighted in [Chapter 1 of Working together to safeguard children](#). 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. In the first instance staff should discuss early help requirements with the designated safeguarding lead. Staff may be required to support other agencies and professionals in an early assessment.

### 5. Key personnel:

The **designated safeguarding lead** for child protection at **Bromley Trust Academy Hayes** is:

**Marcia White – Assistant Head of School (Hayes Campus)**

Contact details: [marcia.white@bromleytrustacademy.org.uk](mailto:marcia.white@bromleytrustacademy.org.uk)

020 8290 0274

07739267699

Bromley Trust Academy, Hayes Campus, Hayes Lane, Bromley BR2 9EA

The **deputy designated safeguarding lead** for child protection at **Bromley Trust Academy Hayes** is:

**Jo Denhart – Family Worker (Hayes Campus)**

Contact details: [jo.denhart@bromleytrustacademy.org.uk](mailto:jo.denhart@bromleytrustacademy.org.uk)

020 8290 0274

Bromley Trust Academy, Hayes Campus, Hayes Lane, Bromley BR2 9EA

The **Head of School** at **Bromley Trust Academy Hayes** is:

**Julie Loizou – (Hayes Campus)**

Contact details: [Julie.loizou@bromleytrustacademy.org.uk](mailto:Julie.loizou@bromleytrustacademy.org.uk)

020 8290 0274

Bromley Trust Academy, Hayes Campus, Hayes Lane, Bromley BR2 9EA

The **designated safeguarding lead** for child protection at **Bromley Trust Academy Blenheim** is:

**Marcia White – Assistant Head of School (Hayes Campus)**

Contact details: [marcia.white@bromleytrustacademy.org.uk](mailto:marcia.white@bromleytrustacademy.org.uk)

020 8290 0274

07739267699

The **deputy designated safeguarding lead** for child protection at **Bromley Trust Academy Blenheim** is:

**Michele Barrett – Student Welfare Officer**

Contact details: [Michele.barrett@bromleytrustacademy.org.uk](mailto:Michele.barrett@bromleytrustacademy.org.uk)

01689 829648

Blenheim Children and Family Centre, Blenheim Road, Orpington BR6 9BH

The **Head of School** at **Bromley Trust Academy Blenheim** is:

**Julie Loizou – (Hayes Campus)**

Contact details: [Julie.loizou@bromleytrustacademy.org.uk](mailto:Julie.loizou@bromleytrustacademy.org.uk)

01689 829648

Blenheim Children and Family Centre, Blenheim Road, Orpington BR6 9BH

The **designated safeguarding lead** for child protection at **BTA Midfield Campus** is:

**Paul Bailey – Assistant Head of School (Midfield Campus)**

Contact details: [paul.bailey@bromleytrustacademy.org.uk](mailto:paul.bailey@bromleytrustacademy.org.uk)

020 83089620

Bromley Trust Academy, Midfield Campus,

The Grovelands Centre, Grovelands Road, St Pauls Cray, Orpington.

BR5 3EG

The **deputy safeguarding lead** for child protection at **BTA Midfield Campus** is:

**Deborah Blake Behaviour Manager (Midfield Campus)**

Contact details: [deborah.blake@bromleytrustacademy.org.uk](mailto:deborah.blake@bromleytrustacademy.org.uk)

020 83089620

Bromley Trust Academy, Midfield Campus,

The Grovelands Centre, Grovelands Road, St Pauls Cray, Orpington.

BR5 3EG

The **Head of School** at **Bromley Trust Academy Midfield** is:

**Rob Freeman (Midfield Campus)**

Contact details: [rob.freeman@bromleytrustacademy.org.uk](mailto:rob.freeman@bromleytrustacademy.org.uk)

020 83089620

Bromley Trust Academy, Midfield Campus,

The Grovelands Centre, Grovelands Road, St Pauls Cray, Orpington.

BR5 3EG

The **Head of Bromley Trust Academy Alternative Curriculum College** and **Designated Safeguarding Lead** is:  
**Grant Monaghan**

Contact details: [grant.monaghan@lsec.ac.uk](mailto:grant.monaghan@lsec.ac.uk)

LSEC Bromley Campus, Rookery Lane, Bromley, BR2 8HE

The **designated safeguarding lead** for child protection at **Bromley Beacon Academy Bromley Campus** is:

**Rani Chahal – Assistant Head of School Inclusion**

Contact details – [kuldip.chahal@bromleybeaconacademy.org.uk](mailto:kuldip.chahal@bromleybeaconacademy.org.uk)

BBA Bromley Campus

Old Homesdale Road

Bromley

BR2 9LJ

0203 319 0503

The **deputy safeguarding lead** for child protection at **Bromley Beacon Academy Bromley Campus** is:

**Sophie Grinham – Welfare Officer**

Contact details: [sophie.grinham@bromleybeaconacademy.org.uk](mailto:sophie.grinham@bromleybeaconacademy.org.uk)

BBA Bromley Campus

Old Homesdale Road

Bromley

BR2 9LJ

0203 319 0503

The **Head of School at Bromley Beacon Academy Bromley Campus** is:

**Philip Tagoe – (BBAB Campus)**

Contact details: [philip.tagoe@bromleybeaconacademy.org.uk](mailto:philip.tagoe@bromleybeaconacademy.org.uk)

BBA Bromley Campus

Old Homesdale Road

Bromley

BR2 9LJ

0203 319 0503

The **designated safeguarding lead** for child protection at **Bromley Beacon Academy Orpington Campus** is:

**Andrea Townsley – Assistant Head of School**

[andrea.townsley@bromleybeaconacademy.org.uk](mailto:andrea.townsley@bromleybeaconacademy.org.uk)

BBA Orpington Campus

Avalon Road

Orpington

Kent

BR6 9BD

01689 821205

The **deputy safeguarding leads** for child protection at **Bromley Beacon Academy Orpington Campus**:

**Jezreel Asare and Vittoria D’Urso – Behaviour and Safeguarding Officers**

Contact details: [jezreel.asare@bromleybeaconacademy.org.uk](mailto:jezreel.asare@bromleybeaconacademy.org.uk) and

[vittoria.d'urso@bromleybeaconacademy.org.uk](mailto:vittoria.d'urso@bromleybeaconacademy.org.uk)

01689 821205

The **Head of School at Bromley Beacon Academy Orpington** is:

**Helena Hamilton – (BBAO Campus)**

Contact details: [helena.hamilton@bromleybeaconacademy.org.uk](mailto:helena.hamilton@bromleybeaconacademy.org.uk)

01689 821205

Bromley Beacon Academy – Orpington Campus, Avalon Road, Orpington, Kent BR6 9BD

The **designated safeguarding lead** for child protection at **Bramley Oak Academy** is:

**Kim Coppinger – Assistant Head of School**

[Kim.coppinger@bramleyoakacademy.org.uk](mailto:Kim.coppinger@bramleyoakacademy.org.uk)

Bramley Oak Academy

Horsham Road

Bramley

GU5 0BJ

The **deputy designated safeguarding lead** for child protection at **Bramley Oak Academy** is:

**Chelsea Stewart – Welfare Officer**

[Chelsea.stewart@bramleyoakacademy.org.uk](mailto:Chelsea.stewart@bramleyoakacademy.org.uk)

Bramley Oak Academy

Horsham Road

Bramley

GU5 0BJ

The **Head of School at Bramley Oak Academy** is:

**Peter Forrest**

Contact details: [peter.forrest@bramleyoakacademy.org.uk](mailto:peter.forrest@bramleyoakacademy.org.uk)

Bramley Oak Academy

Horsham Road

Bramley

GU5 0BJ

**The Executive Headteacher for Bromley Trust Academy, Bromley Beacon Academy and Bramley Oak Academy is a designated safeguarding lead at all London South East Academies Trust Bromley Hub sites:**

Neil Miller

Contact details: [neil.miller@bromleybeaconacademy.org.uk](mailto:neil.miller@bromleybeaconacademy.org.uk)

## **6. Roles and responsibilities**

All schools/ provisions must nominate a senior member of staff to coordinate child protection arrangements and this person is named in this policy guidance. The local authority maintains a list of all **designated safeguarding lead (DSLs)** for safeguarding and child protection.

The London South East Academies Trust has ensured that the DSL for each site (BTA - Hayes Campus, Midfield Campus, BBA – Bromley Campus, Orpington Campus and Bramley Oak Academy) will:

- Ensure all staff know who the designated safeguard lead is and their deputy for all Child Protection issues.
- Refer promptly all cases of suspected child abuse to the local social care department using Pan London Child Protection Procedures.
- Should be aware of the link ‘NSPCC – When to call the police’.
- Remind key staff that if a parent arrives to collect the child before the social worker has arrived then it must be remembered that we have no right to prevent the removal of the child. However if there are clear signs of physical risk or threat, the Police should be called.
- Maintain and update as necessary the Safeguarding Monitoring list.
- Organize regular training on Child Protection within the school, including new staff through Induction Programme.
- Ensure staff are able to recognise the 4 main types of abuse and also have knowledge of Child Missing Education, Child Sexual Exploitation, Female Genital Mutilation and Preventing Radicalisation and Extremism, Peer on Peer Abuse and any other forms of abuse.
- Ensure the LAs telephone procedures are followed.
- Co-ordinate action where child abuse is suspected.
- Facilitate and support the development of the policy on Safeguarding – ensuring it is reviewed and updated annually.
- Liaise with Human Resources to ensure all staff who work in the school and have direct contact with students are DBS checked to enhanced level and all other staff are DBS checked to standard level including volunteers and governors.
- Attend case conferences or nominate an appropriate member of staff to attend on their behalf.
- Maintain records of case conferences and other sensitive information in a secure, locked and confidential file and to disseminate the information only on a “Need to know basis”.
- Pass on records and inform the key worker when a child who is on the Safeguarding list register leaves the school.
- Keep up to date with current practice and procedures by participating in training opportunities wherever possible.
- To be the Educational Champion of children who have a social worker and ensure they are fully supported in their academic studies.

The **deputy designated person(s)** is appropriately trained and, in the absence of the designated person, carries out those functions necessary to ensure the ongoing safety and protection of children. In the event of the long-term absence of the designated person, the deputy will assume all of the functions above.

The Trust ensures that all provisions have:

- A DSL for safeguarding and child protection who is a member of the senior leadership team and who has undertaken the approved Level 4/5 training in inter-agency working, in addition to basic child protection training,
- A child protection policy and procedures that are consistent with each local authority requirements, reviewed annually and made available to parents on request,
- Procedures for dealing with allegations of abuse made against members of staff including allegations made against the Head of School and Executive Headteacher,
- Safer recruitment procedures that include the requirement for appropriate checks in line with national guidance (see: *Keeping Children Safe in Education September 2020 pages 33 to 55*).

- A training strategy that ensures all staff, including the Executive Headteacher, receive child protection training, with refresher training annually and updates more frequently where applicable. The DSL should receive refresher training annually,
- Arrangements to ensure that all temporary staff, supply staff and volunteers are made aware of the Trust's arrangements for child protection,
- The Trust nominates a member to be responsible for liaising with the local authority and other agencies in the event of an allegation being made against the Executive Headteacher.

#### **The Executive Headteacher:**

- Ensures that the safeguarding and child protection policy and procedures are implemented and followed by all staff,
- Allocates sufficient time and resources to enable the DSLs and deputies to carry out their roles effectively, including the assessment of pupils and attendance at strategy discussions and other necessary meetings,
- Ensures that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the Trust's whistle blowing procedures,
- Ensures that child's safety and welfare is addressed through the curriculum.

#### **7. Good practice guidelines**

To meet and maintain our responsibilities towards children, the London South East Academies Trust agrees to the following standards of good practice:

- All children will be treated with respect.
- We will set a good example by conducting ourselves appropriately.
- Children will be involved in decision-making which affects them.
- We will encourage positive and safe behaviour among children.
- We will be good listeners.
- We will be alert to changes in a child's behaviour.
- We will recognise that challenging behaviour may be an indicator of abuse.
- All staff will read, understand and be familiar with all of the school's safeguarding and guidance documents on wider safeguarding issues, for example bullying, physical contact, e-safety plans and information-sharing.
- We will ask the child's permission before doing anything for them which is of a physical nature, such as assisting with dressing, physical support during PE or administering first aid, providing this does not hinder an action which is urgently required.
- We will maintain appropriate standards of conversation and interaction with and between children and avoiding the use of sexualised or derogatory language.
- We will be aware that the personal and family circumstances and lifestyles of some children lead to an increased risk of neglect and or abuse.

#### **8. Abuse of trust**

All Trust staff are aware that inappropriate behaviour towards children is unacceptable and that their conduct towards all children must be beyond reproach.

In addition, staff should understand that, under the [Sexual Offences Act 2003](#), it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the school staff and a child under 18 may be a criminal offence, even if that child is over the age of consent.

The Trust's Code of Conduct sets out the expectations of staff (see: appendix 1).

#### **9. Children who may be particularly vulnerable**

Some children may be at increased risk of neglect and or abuse. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and

reluctance on the part of some adults to accept that abuse happens, or who have a high level of tolerance in respect of neglect.

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

- Looked After Children,
- In need of or already have a social worker (Child in Need or Child Protection Plan)
- Requiring mental health support
- Disabled or have special educational needs,
- Living in a known domestic abuse situation,
- Affected by known parental substance misuse,
- Asylum seekers,
- Living away from home,
- Vulnerable to being bullied, or engaging in bullying,
- Living in temporary accommodation or family facing homelessness
- Living transient lifestyles,
- Living in chaotic, neglectful and unsupportive home situations,
- Family member in prison
- Vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion or sexuality,
- Involved directly or indirectly in prostitution or child trafficking, or,
- Do not have English as a first language.

Special consideration includes the provision of safeguarding information, resources and support services in community languages and accessible formats.

#### **10. Support for those involved in a child protection issue**

Child neglect and abuse is devastating for the child and can also result in distress and anxiety for staff who become involved. We will support the children and their families and staff by:

- Taking all concerns and disclosures seriously.
- Nominating a link person who will keep all parties informed and be the central point of contact. Where a member of staff is the subject of an allegation made by a child, a separate link person will be nominated to avoid any conflict of interest.
- Responding sympathetically to any request from a child or member of staff for time out to deal with distress or anxiety.
- Maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies.
- Storing records securely.
- Offering details of help lines, counselling or other avenues of external support.
- Following the procedures laid down in our whistle blowing, complaints and disciplinary procedures.
- Cooperating fully with relevant statutory agencies.

#### **11. Complaints procedure in respect of poor practice or behaviour**

Our complaints procedure will be followed where a child or parent raises a concern about poor practice towards a child that initially does not reach the threshold for child protection action. Poor practice examples include unfairly singling out a child, using sarcasm or humiliation as a form of control, bullying or belittling a child or discriminating against them in some way.

Complaints are managed by senior staff, the Executive Headteacher and Trust Board. Complaints from staff are dealt with under the complaints and disciplinary and grievance procedures.

#### **12. Support for pupils with a parent or close relative in prison or at risk of custodial sentence.**

The London South East Academies Trust is committed to support the children and young people who have a parent or close relative in prison and will:

- Raise awareness of the needs of the pupils with a parent or close relative in prison.
- Secure the educational achievement and attendance of those pupils during their time in our school.
- Promote their social inclusion and equal opportunities within our school community.

The DSL or Deputy DSL for the relevant site will be appointed as 'Designated Person for Children of Prisoners' and their role will include:

- Keeping the Executive Headteacher fully informed of pupils with a parent in prison.
- Liaise with other relevant school staff on a 'need to know' basis.
- Provide a point of contact in the school for external agencies in order to share information.
- Liaise with the family and seek their consent to provide additional support for the child as necessary.
- Liaise with other statutory and voluntary agencies as appropriate.
- Promote the use of the Common Assessment Framework (CAF) to identify the needs of the child unless a Core Assessment has been completed.
- Consider convening a multi-agency meeting to address the needs of the child and to identify a key worker for that child following the completion of a CAF.
- Consider the use of an individual education plan for the child concerned.
- Monitor the achievement, attendance and behaviour of the child with a parent or close relative in prison.
- Act as an advocate for children with a parent/ close relative in prison, particularly if the child is a Looked After Child (LAC) as LAC have poor levels of visiting a parent in prison.
- Consider purchase of books and resources on the subject of prisons and prisoners for the school library.
- Keep appropriate and current records with reference to information sharing.

### **13. Supporting Young Carers**

The London South East Academies Trust believes that all children and young people have the right to an education, regardless of what is happening at home. When a young person looks after someone in their family who has a serious illness, disability or substance misuse problem, he or she may need extra support to help him or her get the most out of school. We will help any pupil who helps to look after someone at home.

The London South East Academies Trust will:

- Designate a member of staff with special responsibility for young carers. This member of staff will introduce themselves and their responsibilities to all new pupils.
- Run PSHE lessons including the challenges faced by young carers during year.
- Consider referring young carers to the local Young Carers Service. We can also put families in touch with other support services.
- Ensure we are accessible to parents who have mobility and communication difficulties and ensure they are given the opportunity to be involved in Academic Review Days.
- Respect right to privacy and only share information with those who need to know.
- Consider alternatives if a young carer is unable to attend out of school activities e.g. detention, sports coaching, concerts, due to their caring role.
- Allow young carers to telephone home during breaks and lunchtimes.
- Provide advice to parents regarding transporting their children to school where there are difficulties in this area.

### **14. Concerns about a colleague**

Staff who are concerned about the conduct of a colleague (including supply staff and volunteers) towards a child may consider themselves placed in a difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career or their future professional relationship with that colleague.

All staff must remember that the welfare of the child is paramount. The provision's whistle blowing code (appendix 2) enables staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place. All concerns include:

- i) Behaved in a way that has harmed a child, or may have harmed a child;

- ii) Possibly committed a criminal offence against or related to a child;
- iii) Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
- iv) Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

All concerns should be reported to the Head of School or Executive Headteacher at the earliest opportunity. Complaints about the Executive Headteacher should be reported to the Chair of the Trust.

If a staff member feels unable to raise an issue or their concerns are not addressed, other whistleblowing channels may be open including [NSPCC Whistleblowing helpline](#).

### **15. Staff who are the subject of an allegation**

When an allegation is made against a member of staff, set procedures must be followed. It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events can and do happen. A child may also make an allegation against an innocent party because they are too afraid to name the real perpetrator. Even so, we must accept that some adults do pose a serious risk to children's welfare and safety and we must act on every allegation made. Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. Suspension is not mandatory, nor is it automatic but, in some cases, staff may be suspended where this is deemed to be the best way to ensure that children are protected.

Allegations against staff should be reported to the Head of School or Executive Headteacher at the earliest possible opportunity. Allegations against the Executive Headteacher should be reported to the Chair of the Trust.

The full procedures for dealing with allegations against staff can be found in Keeping Children Safe in Education September 2020 pages 56 - 68.

For further information on managing allegations against staff contact your Local Authority Designated Officer (LADO) at the following email address:

[lodo@bromley.gov.uk](mailto:lado@bromley.gov.uk)

### **Anonymity Clause**

It is extremely important that when an allegation is made, the school or college makes every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The Education Act 2002 introduced reporting restrictions preventing the publication of any material that may lead to the identification of a teacher who has been accused by, or on behalf of, a pupil from the same school (where that identification would identify the teacher as the subject of the allegation). The reporting restrictions apply until the point that the accused person is charged with an offence, or until the Secretary of State or the General Teaching Council for Wales publishes information about an investigation or decision in a disciplinary case arising from the allegation. The reporting restrictions also cease to apply if the individual to whom the restrictions apply effectively waives their right to anonymity by going public themselves or by giving their written consent for another to do so or if a judge lifts restrictions in response to a request to do so. The provisions commenced on 1 October 2012.

The legislation imposing restrictions makes clear that "publication" of material that may lead to the identification of the teacher who is the subject of the allegation is prohibited. "Publication" includes "any speech, writing, relevant programme or other communication in whatever form, which is addressed to the public at large or any section of the public". This means that a parent who, for example, published details of the allegation on a social networking site would be in breach of the reporting restrictions (if what was published could lead to the identification of the teacher by members of the public).

### **On Conclusion of Case**

If the allegation is substantiated and the person is dismissed or the employer ceases to use the person's services, or the person resigns or otherwise ceases to provide his or her services, the designated officer(s)

should discuss with the case manager and their personnel adviser whether the school or college will decide to make a referral to the DBS for consideration of whether inclusion on the barred lists is required; and, in the case of a member of teaching staff, whether to refer the matter to the Teaching Regulation Agency (TRA) to consider prohibiting the individual from teaching.

Where it is decided on the conclusion of a case that a person who has been suspended can return to work, the case manager should consider how best to facilitate that. Most people will benefit from some help and support to return to work after a stressful experience. Depending on the individual's circumstances, a phased return and/or the provision of a mentor to provide assistance and support in the short term may be appropriate. The case manager should also consider how the person's contact with the child or children who made the allegation can best be managed if they are still a pupil at the school or college.

#### **16. Staff Training/ Teaching Pupils**

It is important that all staff have training to enable them to recognise the possible signs of abuse and neglect and to know what to do if they have a concern. New staff and Trustees will receive training during their induction. All staff, including the Executive Headteacher (unless the Executive Headteacher is the DSL) and Trustees will receive training that is updated on an annual basis and the DSL will receive training updated on annual basis, including training in inter-agency procedures. All staff have received, read and understood Part 1 of Keeping Children Safe in Education 2020 and Annex A of KCSIE 2020 and all senior leaders within the Trust have received, read and understood Part 2 KCSIE 2020.

All schools should ensure children are taught about safeguarding, including online safety, through teaching and learning opportunities as part of a broad and balanced curriculum. This may include covering relevant issues for schools through PSHE and Relationships Education (Primary) and Relationships and Sex Education (Secondary) which is statutory from September 2020.

#### **17. Safer recruitment**

The London South East Academies Trust endeavours to ensure that we do our utmost to employ 'safe' staff by following Part Three of Keeping Children Safe in Education September 2020 pages 33 to 55 together with the local authority and the provision's individual procedures.

Safer recruitment means that all applicants will:

- Complete an application form,
- Provide two referees, including at least one who can comment on the applicant's suitability to work with children,
- Provide evidence of identity and qualifications,
- Be checked through the Disclosure and Barring Service as appropriate to their role and undertake a formal interview process.

All new members of staff will undergo an induction that includes familiarisation with the Trust's safeguarding and child protection policy and identification of their own safeguarding and child protection training needs. All staff will sign to confirm they have received a copy of the child protection policy.

#### **18. Extended school and off-site arrangements**

Where 'extended school' activities are provided by and managed by the provision, our own safeguarding and child protection policy and procedures apply. If other organisations provide services or activities on our site we will check that they have appropriate procedures in place, including safer recruitment procedures.

When our children attend off-site activities including Alternative Provision or Work Experience, we will check that effective child protection arrangements are in place.

#### **19. Photography and images**

The vast majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse children through taking or using images, so we must ensure that we have appropriate safeguards in place. To protect children we will:

- Seek the consent of both parents and children for photographs to be taken or published (for example, on our website or in newspapers or publications),
- Use only the child's first name with an image,
- Ensure that children are appropriately dressed,
- Encourage children to tell us if they are worried about any photographs that are taken of them (For an example image consent form, see: appendix 3).

## **20. Record Keeping**

Department of Education guidance says that the Designated Teacher should keep detailed, accurate, secure written records of referrals and concerns. These should be kept separately from academic records, in a confidential file stored in a secure cabinet, accessible only by appropriate senior staff members. They are exempt from records available for examination by parents or children unless subject to a court order. All Bromley Hub use C-POMS to record all safeguarding matters.

## **21. E-Safety (see E-Safety Policy)**

Most of our children will use mobile phones and computers at some time. They are a source of fun, entertainment, communication and education. However, we know that some people, including other young people, will use these technologies to harm children. The harm might range from sending hurtful or abusive texts and emails, to enticing children to engage in sexually harmful conversations, webcam photography or face-to-face meetings. The provision's e-safety policy explains how we try to keep children safe in the school environment. It has also been reviewed to support working from home following the COVID19 Pandemic where children were expected to work online and it is the school's responsibility to ensure appropriate filters and monitoring systems are in place (see Annex C of KCSIE 2020).

Cyber-bullying by children, via texts and emails, will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures.

Chat rooms and social networking sites are the more obvious sources of inappropriate and harmful behaviour and children are not allowed to access these sites whilst in school. Some children will undoubtedly be 'chatting' on mobiles or social networking sites at home and we are able to work with and help parents and children understand the possible risks.

## **22. Filtering and Monitoring**

All Trust Schools must ensure appropriate filters and appropriate monitoring of IT usage are in place. Pupils should not be able to access harmful or inappropriate material from the school IT equipment. The filter system for all schools is operated by London Grid for Learning (LGFL), who are careful not to over block, ensuring pupils can learn online however ensure safeguarding is paramount for schools and therefore pupils are unable to access specific areas of the web (Please see E-Safety Policy for further details).

No filtering system can be 100% effective and needs to be supported by good monitoring. The main way of monitoring is through physical monitoring by the class teacher and any additional classroom support which is highly effective in small group settings such as in our schools. Any concerns should be reported to senior leadership immediately and further investigation can occur as to the pupil's internet usage and history (Please see E-Safety Policy for further details).

The Trust operates zero tolerance to mobile phones and other electronic tablets etc. being brought into school and therefore, we do not have to operate any filtering or monitoring within this specific area.

## **23. Safeguarding and Child Protection Procedures**

### **Recognising abuse**

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

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home

alone, or leaving knives or matches within reach of an unattended toddler. All staff should be aware that safeguarding incidents and poor behaviours can be associated with factors outside the school and/or can occur between children outside of school. This links closely with contextual safeguarding and specific children being more at risk due circumstances that they live in.

There are four main categories of abuse: physical abuse, emotional abuse, sexual abuse and neglect.

### **Physical abuse**

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child (this used to be called Munchausen's Syndrome by Proxy, but is now more usually referred to as Fabricated or Induced Illness).

### **Emotional abuse**

Emotional abuse is the persistent emotional maltreatment of a child, such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate or valued only for meeting the needs of another person. It may feature age, or developmentally, inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.

It may involve seeing or hearing the ill-treatment of another or may involve serious bullying, causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

### **Sexual abuse**

Sexual abuse involves forcing or enticing a child 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 penetrative and non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

### **Neglect**

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.

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

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

### **Other key types of abuse that are necessary to identify include:**

#### **Domestic Violence**

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/ or violence can have serious, long lasting emotional and psychological impact on children.

Operation Encompass allows police and schools to work together to provide emotional and practical help to children. Police will inform a key person at school if they have attended an incident of domestic violence/ abuse. This will allow the school to provide essential support for the child.

### **Child Missing from Education**

All children, regardless of their circumstances, are entitled to a full time education which is suitable to their age, ability, aptitude and any special educational needs they may have. Local authorities have a duty to establish, as far as it is possible to do so, the identity of children of compulsory school age who are missing education in their area.

A child going missing from education is a potential indicator of abuse or neglect. School and college staff should follow the school's or college's procedures for dealing with children that go missing from education (appendix 4), particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future.

Schools should put in place appropriate safeguarding policies, procedures and responses for children who go missing from education, particularly on repeat occasions. It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, FGM, forced marriage and Child Criminal Exploitation.

The law requires all schools to have an admission register and, with the exception of schools where all pupils are boarders, an attendance register. All pupils **must** be placed on both registers.

All Trust Schools **must** inform their local authority of any pupil who is going to be deleted from the admission register following **The Education (Pupil Registration) (England) (Amendment) Regulations 2016**.

The local authority **must** be notified when a school is to delete a pupil from its register under the above circumstances. This should be done as soon as the grounds for deletion are met, but no later than deleting the pupil's name from the register. It is essential that schools comply with this duty, so that local authorities can, as part of their duty, identify children missing from education and follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse or neglect.

All schools must inform the local authority of any pupil who fails to attend school regularly, or has been absent without the school's permission for a continuous period of 10 school days or more.

### **Child Sexual Exploitation**

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

The power imbalance can be due to age, gender, sexual identity, cognitive ability, physical strength, status and access to economic or other resources.

A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point. Some of the following signs may be indicators of sexual exploitation:

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;
- Children who have older boyfriends or girlfriends;
- Children who suffer from sexually transmitted infections or become pregnant;
- 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 don't take part in education.

### **Child Criminal Exploitation**

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying

potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation.

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

### **Serious Violent Crime**

All staff should be aware of key indicators for students who may be at risk from or involved in serious violent crime. The risks associated with serious violence are very similar to CCE and CSE. Any concerns, staff should report to DSL urgently.

### **County Lines**

County Lines is a term used for gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated phone lines or other forms of deal line. They target vulnerable groups of children. The victims carry the drugs/ money and in return are offered, promised or given something in return – tangible such as cash, drugs or clothes or intangible such as status or protection. There is a direct link with CSE and CCE due to the imbalance of power. Victims can be coerced into county lines to prevent something negative happening to themselves or their family. The Government has now created a National Referral Mechanism (NRM) to support multi agency approach and unified approach by police forces

### **Key Terms used in connection with County Lines:**

Cuckooing – targeting vulnerable people with SEND or mental health

Trap house – a base for drug storage and selling runners to stay

Lines – refers to telephone lines that callers use to obtain drugs

Runners – children will travel as runners to deliver drugs and collect money using rail networks and buses etc

Plugging – carrying drugs internally

### **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 mental health problems. School staff are well placed however to identify those whose behaviour suggests that they may be experiencing a mental health problem or at risk of developing one.

Where children have suffered abuse and neglect or any other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is vital that staff are aware of how these experiences can impact on 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 normal procedures.

### **Honour Based Abuse (HBA)**

These encompass incidents or crimes which have been committed to protect or defend the honour of the family and/or community and includes FGM, forced marriages and practices such as breast ironing. This type of abuse often involves a wider network of family or community pressure and can include multiple perpetrators.

Any type of suspected HBA should be reported to the DSL and then local safeguarding procedures will be activated.

## **Female Genital Mutilation**

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It 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.

As part of our RSE curriculum, FGM and other harmful practices, including forced marriage and honour based abuse will be covered. We will ensure that students through our RSE curriculum are taught the concepts of, and laws relating to forced marriage, honour-based violence and FGM, and how these can affect current and future relationships.

### **Indicators**

There are a range of potential indicators that a girl may be at risk of FGM. Warning signs that FGM may be about to take place, or may have already taken place, can be found in the Multi-Agency Practice Guidelines (July 2020), and clear guidelines are also provided on the role of schools.

### **Actions**

If staff have a concern regarding a girl that might be at risk of FGM they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Since 31 October 2015 there has been a mandatory reporting duty placed on **teachers** that requires a different approach where FGM has taken place (see following section).

### **Mandatory Reporting**

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers**, 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 disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Information and guidance can be found at- Mandatory reporting of female genital mutilation procedural information.

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the school's designated safeguarding lead and involve children's social care as appropriate.

### **Radicalisation and Extremism**

Protecting children from the risk of radicalisation should be seen as part of schools' wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation it is possible to intervene to prevent vulnerable people being radicalised.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people.

As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include making a referral to the Channel programme.

### **Prevent**

From 1 July 2015 specified authorities, including all schools as defined in the summary of this guidance, are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 ("the CTSA 2015"), in the exercise of their functions, to have "due regard **must** have regard to statutory guidance issued under section

29 of the CTSA 2015 (“the Prevent guidance”). Paragraphs 57-76 of the Prevent guidance are concerned specifically with schools (but also cover childcare). This duty is known as the Prevent duty. It applies to a wide range of public-facing bodies. The statutory Prevent guidance summarises the requirements on schools in terms of four general themes: risk assessment, working in partnership, staff training and IT policies.

- Schools are expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them. Schools and colleges should have clear procedures in place for protecting children at risk of radicalisation. These procedures may be set out in existing safeguarding policies. It is not necessary for schools to have distinct policies on implementing the Prevent duty.
  - The Prevent duty builds on existing local partnership arrangements. For example, governing bodies and proprietors of all schools should ensure that their safeguarding arrangements take into account the policies and procedures of Local Safeguarding Partners.
  - The Prevent guidance refers to the importance of Prevent awareness training to equip staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas. Individual schools are best placed to assess the training needs of staff in the light of their assessment of the risk to pupils at the school of being drawn into terrorism. As a minimum, however, schools should ensure that the designated safeguarding lead undertakes Prevent awareness training and is able to provide advice and support to other members of staff on protecting children from the risk of radicalisation.
  - Schools **must** ensure that children are safe from terrorist and extremist material when accessing the internet in schools. Schools should ensure that suitable filtering is in place. It is also important that schools teach pupils about online safety more generally.

The Department for Education has also published advice for schools on the Prevent duty. The advice is intended to complement the Prevent guidance and signposts other sources of advice and support.

### **Channel**

School staff should understand when it is appropriate to make a referral to the Channel programme. Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual’s engagement with the programme is entirely voluntary at all stages.

Section 36 of the CTSA 2015 places a duty on local authorities to ensure Channel panels are in place. The panel **must** be chaired by the local authority and include the police for the relevant local authority area. Following a referral the panel will assess the extent to which identified individuals are vulnerable to being drawn into terrorism, and, where considered appropriate and necessary consent is obtained, arrange for support to be provided to those individuals. Section 38 of the CTSA 2015 requires partners of Channel panels to co-operate with the panel in the carrying out of its functions and with the police in providing information about a referred individual. Schools and colleges which are required to have regard to Keeping Children Safe in Education are listed in the CTSA 2015 as partners required to cooperate with local Channel panels.

### **Peer on Peer Abuse**

Children can abuse other children. This is generally referred to as peer on peer abuse and can take many forms. This can include (but is not limited to) bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; upskirting; sexting and initiating/hazing type violence and rituals.

### **Child on Child Sexual Violence and Sexual Harassment**

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

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

appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

We will ensure that students are taught through our RSE curriculum, the concepts of, and laws relating to, sexual concept, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse and other forms of sexual violence.

### **Sexual violence**

It is important that school staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

**Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

**Assault by Penetration:** A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

**Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

### **What is consent?**

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

### **Sexual harassment**

When referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual “jokes” or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (schools should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
  - non-consensual sharing of sexual images and videos;
  - sexualised online bullying;
  - unwanted sexual comments and messages, including, on social media; and
  - sexual exploitation; coercion and threats

**For further advice and guidance regarding Child on Child Sexual Violence and Sexual Harassment please see separate policy on this matter which includes how to report any concerns etc. All staff are expected to read and sign to state they have read and understood the 'Sexual Violence and Sexual Harassment Between Children in Schools Policy'.**

**Further guidance on recognising signs & symptoms of abuse can be found in London Child Protection procedures (March 2020) and on the NSPCC website: <http://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect>**

### **Upskirting or Voyeurism**

'Upskirting is typically when a photograph is taken under a person's clothing without them knowing, for sexual gratification or to cause the victim humiliation, distress or alarm'.

As of 12 April 2019 'upskirting' offenders can be arrested and sent to prison as a new law banning the invasive practice came into force across England and Wales. The criminal offence of 'upskirting' was created under the Voyeurism Act when it received Royal Assent in February 2019. Police and prosecutors have now updated their guidance to ensure the law is properly enforced – with offenders facing up to 2 years in jail and being placed on the sex offenders register. Anyone of any gender, can be a victim.

The practice typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks. The Voyeurism Act outlaws 'upskirting' where the purpose is to obtain sexual gratification, or to cause humiliation, distress or alarm. This includes instances where culprits say images were just taken 'for a laugh' or when paparazzi are caught taking intrusive images. It creates 2 new offences under the Sexual Offences Act 2003.

### **Bullying**

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

All incidences of bullying should be reported and will be managed through our anti-bullying procedures. All pupils and parents receive a copy of the anti-bullying procedures on joining the school and the subject of bullying is addressed at regular intervals in the personal, social and health education (PSHE) curriculum. If the bullying is particularly serious, or the anti-bullying procedures are deemed to be ineffective, the head of school / Executive Headteacher and the DSL will consider implementing child protection procedures.

### **Indicators of abuse and what you might see**

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

Remember, it is your responsibility to report your concerns. It is not your responsibility to investigate or decide whether a child has been abused.

A child who is being abused and/or neglected may:

- Have bruises, bleeding, burns, fractures or other injuries,
- Show signs of pain or discomfort,
- Keep arms and legs covered, even in warm weather,
- Be concerned about changing for PE or swimming,
- Look unkempt and uncared for,
- Change their eating habits,
- Have difficulty in making or sustaining friendships,

- Appear fearful,
- Be reckless with regard to their own or other's safety,
- Self-harm,
- Frequently miss school or arrive late,
- Show signs of not wanting to go home,
- Display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn,
- Challenge authority,
- Become disinterested in their school work,
- Be constantly tired or preoccupied,
- Be wary of physical contact,
- Be involved in, or particularly knowledgeable about drugs or alcohol, or,
- Display sexual knowledge or behaviour beyond that normally expected for their age.

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSL to decide how to proceed. It is very important that you report your concerns – you do not need 'absolute proof' that the child is at risk.

### **The impact of abuse**

The impact of child abuse should not be underestimated. Many children do recover well and go on to lead healthy, happy and productive lives, although most adult survivors agree that the emotional scars remain, however well buried. For some children, full recovery is beyond their reach, and the rest of their childhood and their adulthood may be characterised by anxiety or depression, self-harm, eating disorders, alcohol and substance misuse, unequal and destructive relationships and long-term medical or psychiatric difficulties.

### **Taking action**

Key points to remember for taking action are:

- In an emergency where a child is in immediate danger or at risk of harm take the action necessary to help the child using Trust procedures.
- Report your concern to the DSL before the end of the day.
- If the DSL is not around, ensure the information is shared with the most senior person in the school that day and ensure action is taken to report the concern to children's social care.
- Do not start your own investigation.
- Share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family.
- Complete a cause for concern form.
- Seek support for yourself if you are distressed.

### **If you suspect a child is at risk of harm**

There will be occasions when you suspect that a child may be at serious risk, but you have no 'real' evidence. The child's behaviour may have changed, their artwork could be bizarre or you may have noticed other physical but inconclusive signs. In these circumstances, you should try to give the child the opportunity to talk. The signs you have noticed may be due to a variety of factors and it is fine to ask the child if they are alright or if you can help in any way.

All 'cause for concern' should be recorded on CPOMs to record these early concerns. If the child does begin to reveal that they are being harmed you should follow the advice in the section 'If a child discloses to you'.

If, following your conversation you remain concerned, you should discuss your concerns with the designated safeguarding lead.

### **If a child discloses information to you**

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

If a child talks to you about any risks to their safety or wellbeing you will need to let them know that **you must** pass the information on – you are not allowed to keep secrets. The point at which you do this is a matter for professional judgement. If you jump in immediately the child may think that you do not want to listen - if you leave it till the very end of the conversation, the child may feel that you have misled them into revealing more than they would have otherwise.

#### **During your conversation with the child:**

- Allow them to speak freely.
- Remain calm and do not over react – the child may stop talking if they feel they are upsetting you.
- Give reassuring nods or words of comfort – ‘I’m so sorry this has happened’, ‘I want to help’, ‘This isn’t your fault’, ‘You are doing the right thing in talking to me’.
- Do not be afraid of silences – remember how hard this must be for the child.
- Under no circumstances ask investigative questions – such as how many times this has happened, whether it happens to siblings too, or what does the child’s mother think about all this.
- Use the 4W’s – who, what, when, where to guide you.
- At an appropriate time tell the child that in order to help them you must pass the information on.
- Do not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused.
- Avoid admonishing the child for not disclosing earlier. Saying ‘I do wish you had told me about this when it started’ or ‘I can’t believe what I’m hearing’ may be your way of being supportive but the child may interpret it that they have done something wrong.
- Tell the child what will happen next. The child may agree to go with you to see the designated person. Otherwise let them know that someone will come to see them before the end of the day.
- Report verbally to the designated person.
- Write up your conversation on CPOMs as soon as possible and if urgent find designated person then as well.
- Seek support if you feel distressed.

#### **Notifying parents**

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

However, if the DSL believes that notifying parents could increase the risk to the child or exacerbate the problem, then advice will first be sought from children’s social care.

#### **Referral to children’s social care**

The DSL will make a referral to children’s social care if it is believed that a child is suffering or is at risk of suffering significant harm. The child (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.

#### **Confidentiality and sharing information**

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

Staff should only discuss concerns with the designated person, Head of School or Executive Headteacher or Chair of Trust (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a ‘need-to-know’ basis.

Child protection information will be stored and handled in line with General Data Protection Regulation 2018 and Data Protection Act 1988. Information is:

- Processed for limited purposes.
- Adequate, relevant and not excessive.
- Accurate.
- Kept no longer than necessary.
- Processed in accordance with the data subject's rights.
- Secure.

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

Every effort should be made to prevent unauthorised access and sensitive information should not be stored on laptop computers, which, by the nature of their portability, could be lost or stolen. No child protection information will be stored on portable media, such as a CD or flash drive. Child protection information will be stored separately from the child's 'school file' and the 'school file' will be 'tagged' to indicate that separate information is held.

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

The GDPR and Data Protection Act does not prevent school staff from sharing or withholding information with relevant agencies, where that information may help to protect a child.

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

It is also important to refer to DfE Guidance on Information Sharing (2015) and to the (Anonymity Clause in Keeping Children Safe in Education Page 61 Paragraph 233) regarding Allegations Against Staff.

#### **Reporting directly to child protection agencies**

Staff should follow the reporting procedures outlined in this policy.

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

- The situation is an emergency and the designated senior person, their deputy, the Executive Head Teacher and the Chair of the Trust are all unavailable.
- They are convinced that a direct report is the only way to ensure the child's safety.

#### **Key service contacts:**

##### **Bromley**

All referrals to MASH (Multi Agency Safeguarding Hub)  
[mash@bromley.gov.uk](mailto:mash@bromley.gov.uk)

**Telephone:** 020 8461 7373 / 7379 / 7404 / 7309 / 7026

**Fax:** 01689 897475

**Address:** Civic Centre, Stockwell Close, Bromley, BR1 3UH

##### **Surrey**

All referrals to Children's Single Point of Access (C-SPA)  
[cspa@surreycc.gov.uk](mailto:cspa@surreycc.gov.uk)

**Telephone:** 0300 470 9100

**Fax:** 01483 519862

**Address:** County Hall, Penrhyn Road, Kingston upon Thames, KT1 2DN

---

**Emergency out of hours contacts**

---

In an emergency, outside of office hours and all day on Saturdays, Sundays and Bank Holidays the emergency out of hours contact for child protection concerns is:

**020 8464 4848 (Bromley) or 01483 517898 (Surrey)**

**If you are seriously concerned about a child's immediate safety, dial 999.**

---

**Key professional contacts:**

---

**Bromley****Title****Address/Telephone**

Joan Keenan O'Malley – Education  
Safeguarding Officer – telephone

02084617266 – email –  
[Joan.Keenan-O'Malley@bromley.gov.uk](mailto:Joan.Keenan-O'Malley@bromley.gov.uk)

Stuart Hills – Head of Service

02084617801 – email –  
[Stuart.Hills@bromley.gov.uk](mailto:Stuart.Hills@bromley.gov.uk)

Gemma Taylor  
Lead Officer for Education Safeguarding  
(Education LADO)

[Gemma.taylor@bromley.gov.uk](mailto:Gemma.taylor@bromley.gov.uk)  
[lado@bromley.gov.uk](mailto:lado@bromley.gov.uk)  
St Blaise,  
Room B40a,  
Civic Centre,  
Stockwell Close,  
Bromley BR1 3UH

**Surrey**

Clare Stewart  
Education Safeguarding Team Manager

[clare.stewart@surreycc.gov.uk](mailto:clare.stewart@surreycc.gov.uk)  
01483 517008

Patricia Denney  
Director for children's Quality Assurance

[patricia.denney@surreycc.gov.uk](mailto:patricia.denney@surreycc.gov.uk)

Rita Dada  
Manager, South West Surrey LADO

[rita.dada@surreycc.gov.uk](mailto:rita.dada@surreycc.gov.uk)  
[lado@surreycc.gov.uk](mailto:lado@surreycc.gov.uk)  
0300 123 1650  
Fairmount House,  
Bull Hill,  
Leatherhead,  
Surrey, KT22 7AH

**Bromley Safeguarding Children Partnership**

Social Services, Bromley Civic Centre, Stockwell Close, Bromley, BR1 3UH

tel: 0208 461 7816

web: [www.bromleysafeguarding.org](http://www.bromleysafeguarding.org)

**BSCP Independent Chair** – Jim Gamble

**BSCP Business Manager:** Kerry Davies and Joanna Gambhir,

**BSCP Administrator:** Hazel Blackman

## **Surrey Safeguarding Children Partnership**

SSCP Team, Fairmount House, Bull Hill, Leatherhead, Surrey, KT22 7AH

Tel: 01372 833330

Web: <https://www.surreyscp.org.uk>

**SSCP Chair: Simon Hart, Email: [partnership.team@surreycc.gov.uk](mailto:partnership.team@surreycc.gov.uk)**

**SSCP Support Team: 01372 833330, Email: [partnership.team@surreycc.gov.uk](mailto:partnership.team@surreycc.gov.uk)**

## Appendix 1

### LSEAT Staff Code of Conduct September 2020

#### Introduction

- All staff who work for London South East Academies Trust will demonstrate high standards of conduct in order to encourage children and young people to do the same.
- All staff must establish and maintain professional boundaries in their relationships with children and young people to avoid putting themselves at risk of allegations.
- The Code of Conduct will help all staff to understand what is considered acceptable.

#### Safeguarding Children and Young People

- All staff have a duty to safeguard children and young people from:
  - i. Physical abuse
  - ii. Sexual abuse
  - iii. Emotional abuse
  - iv. Neglect
- The duty to safeguard children and young people includes the duty to report concerns about a child/young person to the School's Designated Safeguarding Officer.
- All staff should have READ and UNDERSTOOD the School's Safeguarding Policy and procedures and Keeping Children Safe In Education 2020 Part One and Annex A.
- All staff should also be aware of the School's Whistleblowing procedures.
- Staff must take all reasonable steps to ensure safety and wellbeing of children and young people under their supervision and provide early help where required.
- Staff must not use personal cameras, phones or any other electronic equipment to take images of students.
- Staff must have signed the Acceptable User Agreement for IT Usage on an annual basis.
- When staff are informed of safeguarding issues regarding specific children, they are to treat this information confidentially and if heard gossiping then they will be warned and then could be dismissed.

#### Development of Children and Young People

- Staff must comply with the School's policies and procedures that support the well-being, development and progress of children and young people.
- Staff must co-operate and collaborate with colleagues and external agencies where necessary to support the development of children and young people.
- Uphold children and young people's rights and help them to understand their responsibilities.
- Listen to children and young people, consider their views and preferences, and involve them in decisions that affect them, including those related to their learning.

#### Honesty and Integrity

- Staff must maintain high standards of honesty and integrity in their work, including in the use of school property and finance.
- Teaching staff exercise their responsibilities in relation to the examination and assessment of achievement and attainment in a fair, transparent and honest way.
- All staff represent their professional status accurately and avoid taking advantage of their professional position.
- All staff should ensure that personal beliefs are not expressed in ways which exploit children and young people's vulnerability or might lead them to break the law. Staff should uphold

British Values and ensure their professional conduct complies with Part 2 of the Teacher Standards at all times.

- All staff, if presented with any gifts from parents, must declare these as part of the Trust's Financial Regulations to ensure they are not open to bribery or coercion.

## **Dress Code**

The purpose of our dress code is to establish basic guidelines on appropriate clothing and appearance at our workplace, so that we:

- promote a positive image and Staff look professional;
- respect religious, racial and gender-specific clothing requirements and those of Staff with disabilities where possible;
- take account of health and safety requirements; and
- help staff decide what clothing is appropriate to wear to work.

Different departments within the School may have specific requirements that result in particular clothing demands, for example, because their work raises health and safety risks. It is important that all Staff dress in a manner appropriate to their working environment and the type of work they do.

## **Appearance**

Staff are required to appear clean and smart at all times when at work and should have no extreme hairstyles. Staff should not wear casual clothes to work, this includes track suits, sweat-shirts, and casual or sports t-shirts or shorts, combat trousers, jogging bottoms, denim or leggings (with the exception of PE Staff who may wear the school sports clothing or other staff where this has been agreed with HoS).

Clothing should not be dirty, frayed or torn. Tops should not carry wording or pictures that might be offensive or cause damage to the School's reputation. It is inappropriate to wear clothing such as cut-off shorts, crop tops, short skirts, low cut tops, see through material or clothes that expose areas of the body normally covered at work. Tattoos should be covered at all times.

Footwear must be safe and clean and take account of health and safety considerations.

Where the School provides safety clothing and equipment, including protective footwear, it should be worn or used as appropriate and directed.

Staff should not wear clothing or jewellery that could present a health and safety risk.

## **Religious and cultural dress**

Staff may wear religious and cultural dress (including clerical collars, head scarves, skullcaps and turbans) unless it breaches this policy or compromises the health and safety of the wearer, their colleagues or any other person.

Where necessary your Line Manager can disseminate appropriate information explaining cultural dress and customs.

Priority is at all times given to health and safety requirements. Where necessary, advice will be taken from Human Resources.

## **Learning Environment**

- Create a safe and stimulating learning environment: clean, tidy and clutter free
- Ensure that displays are in good condition and changed as/ when appropriate
- Promote whole school improvement priorities
- Model high standards of literacy
- Create displays that support learning
- Plan for opportunities for students to engage with the learning environment
- Plan for opportunities for students to engage with each other as a resource; promoting interdependent learning
- Display exemplar work so that students can aspire to their target grades and beyond
- Reward success so that students feel motivated and valued

**Conduct Outside of Work**

- Staff must not engage in conduct outside work which could seriously damage the reputation and standing of the School or the employee's own reputation or the reputation of other members of the School community or contravene British Values as well as KCSIE 2020 Part Four Para 211.
- Staff must exercise caution when using information technology and be aware of the risks to themselves and others.
- Staff must ensure they adhere to the School's Acceptable User and Social Media Policies at all times both within the school settings and outside.
- Staff must be aware of social relationships with parents outside of school and ensure approval is provided by senior leaders if the relationship extends beyond the usual parent/ professional relationship.

**Confidentiality**

- Where staff have access to confidential information about children and young people or their parents or carers, staff must not reveal such information except to those colleagues who have a professional role in relation to the child/ young person.
- All staff are likely to witness actions at some point which need to be confidential. These actions will be reported and dealt with in accordance with School procedures and must not be discussed with anyone internal or external of the School community except the member of staff who is dealing with the matter.
- All staff have an obligation to share with the Designated Safeguarding Officer, Head of School or Executive Headteacher any information which gives rise to concern about the safety or welfare of a child/ young person.

**Disciplinary Action**

- All staff need to recognise that failure to meet appropriate standards of behaviour and conduct may result in disciplinary action.

**I state that I have read the Code of Conduct, the Safeguarding Policy and KCSIE 2020 Part One and Annex A and am aware of procedures regarding reporting concerns regarding Child Protection matters.**

**Signed:**

**Date:**

## Appendix 2

### Whistle blowing code for issues relating to children and young people

#### Purpose of the code

London South East Academies Trust adheres to London South East Colleges Group whistle-blowing policy and procedures that enable staff to raise concerns relating to:

- Crime
- A miscarriage of justice
- Illegality
- Health and safety
- Environmental or property damage
- Unauthorised use of public funds
- Concealing or attempting to cover up any of the above.

This code provides additional information to help staff to understand the role of whistle blowing in the context of poor practice and unacceptable conduct and attitudes towards children.

#### When to use the code

The whistle blowing procedures and this code may be used by anyone employed by the school in a paid or voluntary capacity who believes they have reason to suspect that the conduct of an employee towards a child is inappropriate.

Inappropriate conduct includes, but is not confined to:

- Bullying or humiliation
- Contravening health and safety guidelines
- Serious breaches of the school's code of ethical practice
- Professional practice that falls short of normally accepted standards
- Compromising pupils' welfare but in a way that does not meet the threshold for child protection intervention.

#### Reasons for blowing the whistle

Staff will naturally be reticent to report a concern about the conduct of a colleague. However, each individual must take responsibility for ensuring that children are fairly treated. If poor practice is allowed to continue unchecked, it could escalate with serious consequences.

Your action not only protects children, but also deters any suggestion that you have colluded with poor practice that you knew was occurring but chose to ignore.

Whistle blowing can also support the member of staff who is the subject of the concern. Their conduct may result from inexperience or lack of training that can be addressed by the school, or they may be under stress and be relieved when their conduct is questioned.

Staff who deliberately fail children and show no remorse or desire to improve are unlikely to welcome being exposed, but their conduct has to be confronted for the sake of the child and the reputation of the whole Trust.

#### Barriers to whistle blowing

You may worry that you have insufficient evidence to raise a concern that you will set in train an unstoppable chain of events, that there will be adverse repercussions for your career, that you may suffer harassment or victimisation, or that your suspicion or concern might be totally misplaced.

These concerns are entirely understandable but you can be reassured that whistle blowing procedures addresses these issues.

The Public Interest Disclosure Act 1998 protects employees from reprisals for public interest whistle blowing. Your union, a solicitor or the local authority legal services can provide you with information about your legal position.

### **Confidentiality and anonymity**

All concerns are treated in confidence and, as far as possible, your identity will not be revealed if that is your wish. However, absolute confidentiality cannot be guaranteed if, as a result of an investigation, you are required to provide a witness statement or attend a court hearing.

You can, if you prefer, raise your concern anonymously. LSEAT would need to decide whether the levity and credibility of the concern warrants investigation if the source of the concern, and the key evidence, is not readily available.

LSEAT will fully support you and do all it can to protect you from any harassment or adverse repercussions that may arise from whistleblowing. Allegations that prove to be deliberately fabricated and malicious will be dealt with through staff disciplinary procedures. However, no action will be taken against any member of staff who raises a genuine concern that proves to be unfounded.

### **Reporting procedure**

It may help if you write down, for your own benefit, what you have observed or heard that is causing alarm. One useful way to decide whether your concern should be reported is to consider whether you would want the conduct of this member of staff to continue unchecked if your own child or another young family member was involved.

- You may raise your concern verbally or in writing. You should report your concern directly to the head of school or Executive Headteacher.
- If the Executive Headteacher is the subject of your concern, speak to the Chair of the Trust.
- A friend, colleague or union representative may accompany you to the meeting if you wish.
- Ensure the head or chair informs you of their proposed action and sets a date for a second meeting.
- Timescales will depend on the complexity of the initial inquiry but the case should not be allowed to stall and you should receive initial feedback within 10 working days. The timescale for subsequent feedback should then be agreed.
- Ask for clarification about confidentiality and ensure you have your wishes regarding the protection of your identity recorded.

The Executive Head Teacher or chair will make enquiries to establish the facts of the matter and whether poor practice or inappropriate conduct has occurred.

Members of the LSEAT community, including Trustees, may be asked to provide information or advice.

- External advice, for example, from legal or human resources or children's services may be sought.
- A written record of the conduct, established facts and outcome of the inquiry will be kept.
- The whistle-blower will be kept informed of the progress of the inquiry.

The outcome of the inquiry will be one of the following:

- No poor practice or wrongdoing is established and the case is closed
- The concern has some substance and the subject of the concern will receive advice and support from the head teacher to improve practice
- Poor practice or wrongdoing is established and disciplinary proceedings are initiated
- The concern is more serious and an investigation is initiated. This investigation may involve the local authority's legal team, children's social care or the police.

If, at any stage in the process, there is reason to believe that a child is at risk of significant harm, children's social care will be immediately involved.

### **Further action**

If you raise a concern and you are dissatisfied with the way it is managed, or the outcome, you may contact the Trust Board or local authority for advice.

Alternatively you can seek advice from your union or professional association, a solicitor, the police, children's social care or Public Concern at Work (PCaW), a registered charity that offers free and confidential legal advice on workplace malpractice.

Public Concern at Work  
3rd Floor, Bank Chambers, 6-10 Borough High Street, London SE1 9QQ  
020 7404 6609  
[whistle@pcaw.co.uk](mailto:whistle@pcaw.co.uk)  
[www.pcaw.co.uk](http://www.pcaw.co.uk)

**Appendix 3**

Photographic Consent Form (Under 18s)

London South East Academies Trust take the issue of child safety very seriously, and this includes the use of images of pupils of borough schools and local residents under the age of 18 years old. Including images of minors in Trust publications and on Trust Academy websites can be motivating for the minors involved, and provide a good opportunity to promote the work of the Trust. However, the Trust has a duty of care towards minors, which means that minors must remain unidentifiable, reducing the risk of inappropriate contact, if images are used in this way.

We ask that parents/legal guardians consent to the Trust taking and using photographs and images of their children. We will not ordinarily include the full name of the minor alongside an image but may seek individual permission from the parent/guardian to do so on occasion.

Please complete, sign and return this form to the relevant academy within the Trust.

I consent to photographs and digital images of the child named below, appearing in **London South East Academies Trust** printed publications or **publications produced by or on the website of the London South East Academies Trust**. I understand that the images will be used only for Trust purposes and that the identity of my child will be protected unless I have agreed to the publication of my child’s full name. I also acknowledge that the images may also be used in and distributed by other media, such as CD or DVD, as part of the promotional activities of the Trust.

**Name of child:** \_\_\_\_\_

**Name of parent/carers:** \_\_\_\_\_

**Address:** \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**Phone:** \_\_\_\_\_

**Email:** \_\_\_\_\_

**Signature:** \_\_\_\_\_

**Date:** \_\_\_\_\_

Queries regarding this form should be addressed to the relevant Head of School at the Trust Academy your child attends.

**Appendix 4 – Exemplar of Child Going Missing (Bromley Beacon Academy)**

Initial Operational Procedures that need to be followed by Senior Leaders if child goes missing from Home/ School

