



Safeguarding & Child Protection Policy 2020-21

All staff should have access to this policy and sign to the effect that they have read and understood its contents

Date of last review:	September 2020	Author:	Head of Safeguarding
Date of next review:	September 2021	Owner:	Education Directors
Type of policy:	<input type="checkbox"/> Network-wide <input type="checkbox"/> Set for school <input checked="" type="checkbox"/> Tailored by school	Approval:	Board
School:	Ark Greenwich Free School	Key Contact Name:	Governance Team
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POSITIONING WITHIN ARK OPERATIONAL MODEL

Component	Element
<input type="checkbox"/> Strategic Leadership & Planning <input type="checkbox"/> Monitoring, Reporting & Data <input type="checkbox"/> Governance & Accountabilities <input type="checkbox"/> Teaching & Learning <input type="checkbox"/> Curriculum & Assessment <input checked="" type="checkbox"/> Culture, Ethos & Wellbeing <input type="checkbox"/> Pathways & Enrichment <input type="checkbox"/> Parents & Community <input type="checkbox"/> Finance, IT & Estates <input type="checkbox"/> Our People	Safeguarding

Ark Greenwich Free School
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Ark Greenwich Free School

SAFEGUARDING & CHILD PROTECTION POLICY

Safeguarding Key Contact leaders:

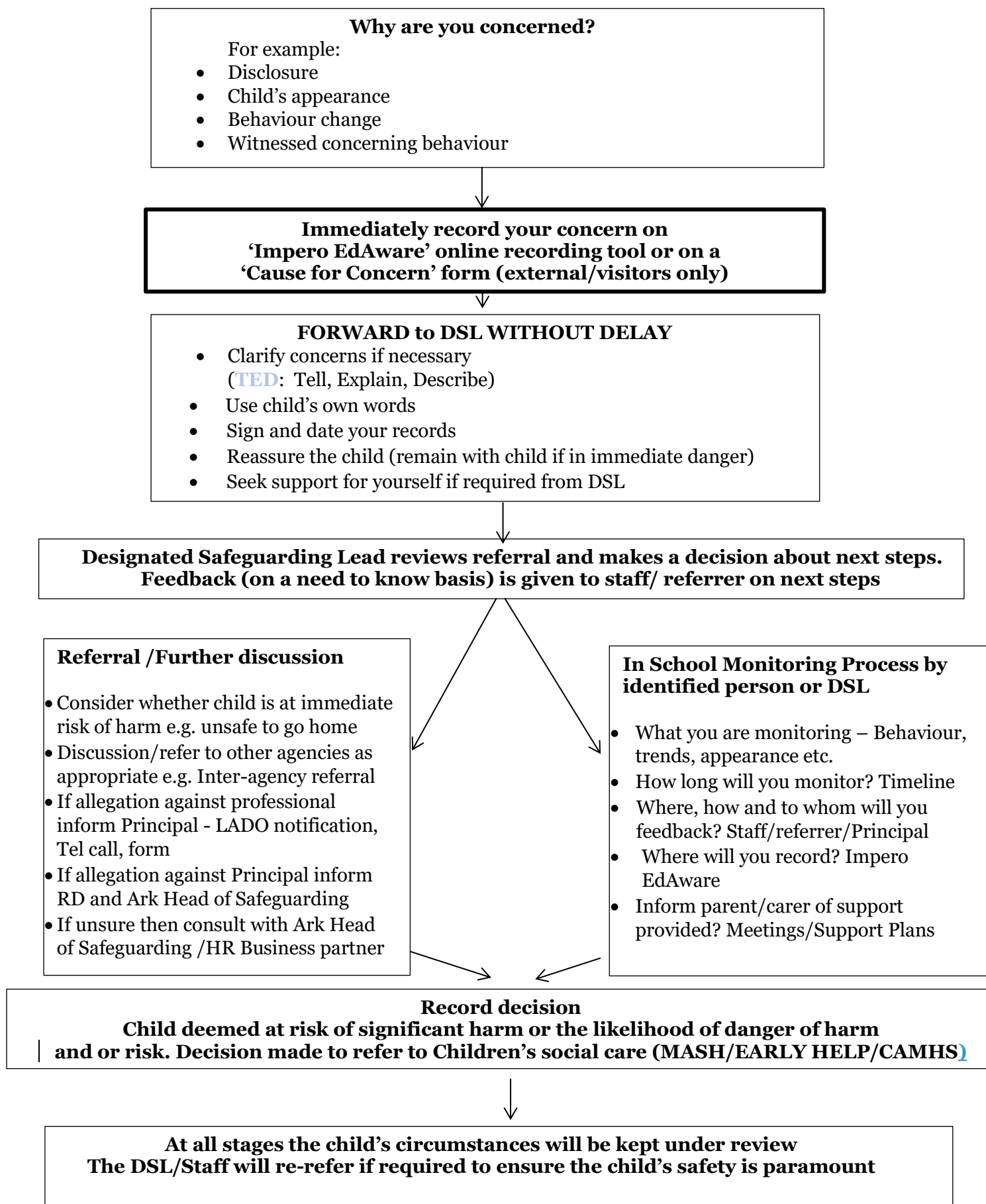
Principal	Ark's Regional Director	Designated Safeguarding Lead	Deputy Designated Safeguarding Lead/s	Designated Teacher for Looked After Child (LAC)
Rhys Spiers	Sian Madrall	Vicky Gainey	Hannah Brooks	Vicky Gainey

Designated Teacher for online safety	Data Protection Lead	SENCo	Behaviour Lead	Educational Visits Co-ordinator
Tehrim Valibhai	Victoria Hemmings	Vicky Gainey	Su Reddy	Su Reddy

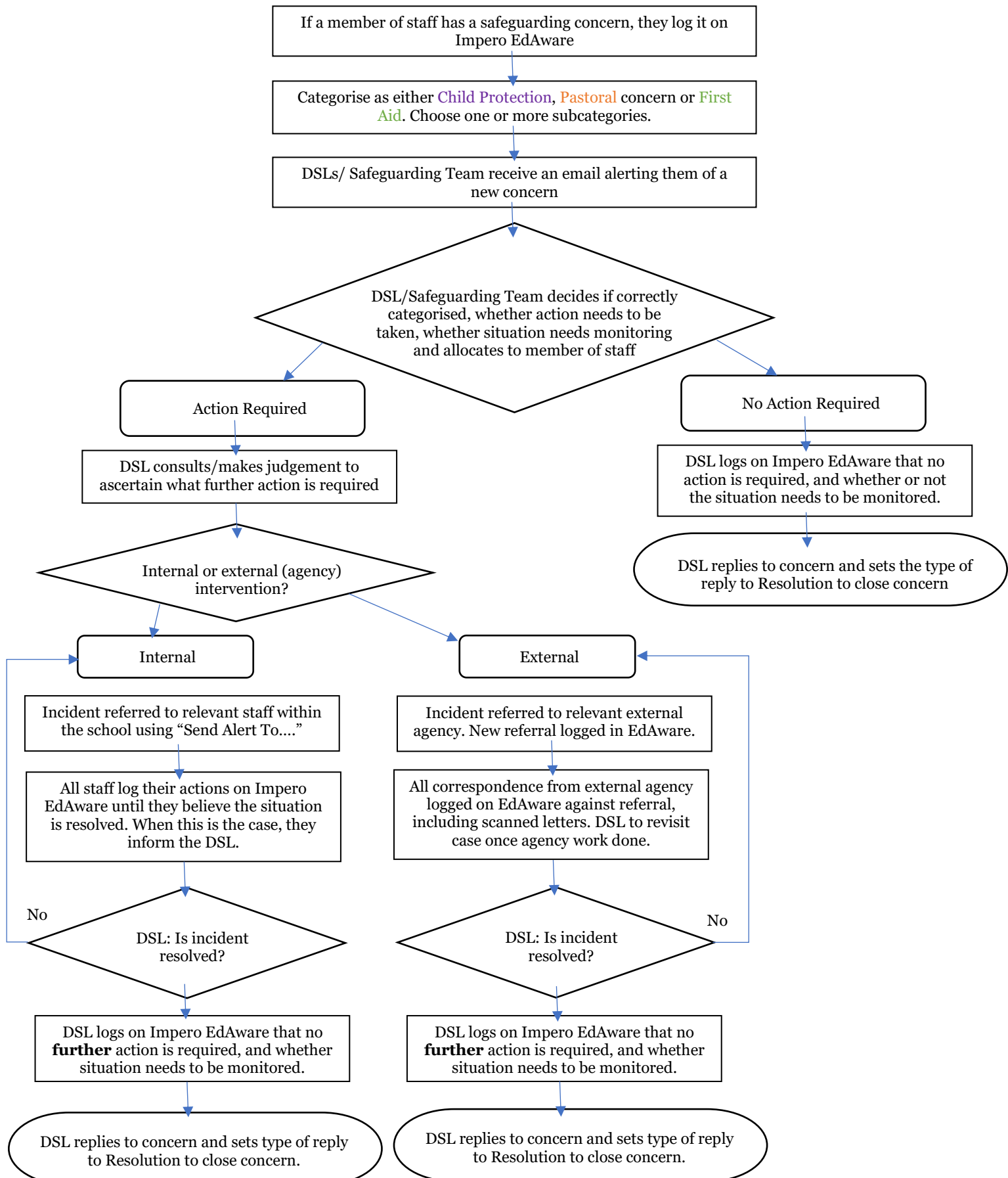
Lead First Aider	Nominated Safeguarding Link Governor	Chair of Governors	Ark's Head of Safeguarding	People Business Partner (HRBP)
Sarah Chapman	Simon Hurst	Joanna Israel	Joycelyn Thompson	Claudette Wilson

Ark's Health & Safety Lead	School Local Authority	Local Authority Designated Officer (LADO)	Virtual School Head (LAC)	Schools Police /liaison Officer
Dave Allen	Royal Borough of Greenwich	Catrin Gruffydd-Jones	Sally Kelly	None

What to do if you have a safeguarding concern in Ark Greenwich Free School



Impero EdAware Logging and Following Up on Safeguarding Concerns



1. INTRODUCTION AND ETHOS

Ark Greenwich Free School is a community and all those directly connected (staff, governors, parents, families and pupils) have an essential role to play in making it safe and secure. **Ark Greenwich Free School** recognises our moral and statutory responsibility to safeguard and promote the welfare of all children with their best interests at the centre of our work.

At **Ark Greenwich Free School** we are committed to safeguarding children and young people and we expect everyone who works in our school to share this commitment.

Ark Greenwich Free School recognises the importance of providing an ethos and environment within school that will help children to feel safe, secure and respected; encourage them to talk openly about anything that worries them; and enable them to feel confident that they will be listened to. Adults in our school take all welfare concerns seriously and are alert to the signs of abuse and neglect; and follow our procedures to ensure that children receive effective support, protection and justice.

Our school's core safeguarding principles are:

- That school is an important part of the wider safeguarding system for children.
- It is a whole school responsibility to safeguard and promote the welfare of children as its paramount concern.
- All children (defined as those up to the age of 18) regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
- All children have a right to be heard and to have their wishes and feelings taken into account.
- All staff understand safe professional practice (inc role requirements) and adhere to our code of conduct and other associated policies.
- All staff have a responsibility to recognise vulnerability in children and act on any concern in accordance with this guidance.

There are four main elements to our safeguarding policy:

- **Prevention** (e.g. positive, supportive, safe school culture, curriculum and pastoral opportunities for children, safer recruitment procedures);
- **Protection** (by following the agreed procedures, ensuring all staff are trained and supported to respond appropriately and sensitively to safeguarding concerns);
- **Support** (for all students, parents and staff, and where appropriate specific intervention for those who may be at risk of harm);
- **Working with parents and other agencies** (to ensure appropriate communications and actions are undertaken).

This safeguarding policy requires:

- staff **must** read this safeguarding and child protection policy and as a minimum at least Part 1 of Keeping Children Safe in Education (September 2020).
- all staff members and governors must receive regular refresher training, at least annually, to keep up to date with any relevant safeguarding and child protection developments.
- staff and governors are required to complete the Ark online KCSIE module to assist further to understand and discharge their role and responsibilities.
- staff and governors are required to read the Covid-19 addendum to this policy and related guidance and risk assessments.
- staff and new governors to complete [the e-learning training module on Prevent](#), produced by the Home Office to equip individuals with the knowledge necessary to help prevent vulnerable people from being exploited and drawn into terrorism and having extremist views.
- all staff will read and sign to indicate their understanding of the Ark IT Acceptable Use Agreement.
- all schools to undertake an annual internal safeguarding audit process and will be required to complete their LA section 175 audit.
- all schools to reference the UKCCIS Guidance: Sexting in schools and colleges, responding to incidents and safeguarding young people (2016).
- all schools to have a safeguarding induction and a training plan.

- all staff members are to be informed of and how to access their school’s safeguarding and child protection policy and procedures (Appendix A of their safeguarding and child protection policy), school’s behaviour policy and advice from their Local Authority safeguarding local three partner approach procedures. *(inserted in Appendix A- locally agreed multi-agency procedures that have been put in place by local three partner approach)*

2. SCOPE

This policy applies to all teaching, non-teaching, support, supply, peripatetic, contract staff and third party contractors (whose employees or sub-contractors have access to school premises), governors, volunteers and trustees working in or on behalf of the school, including those from the Ark central team. All references in this document to ‘staff’ or ‘members of staff’ or ‘adult’ should be interpreted as relating to all those specified above. Staff also includes those individuals who educate pupils off-site and when individuals undertake an educational visit with pupils, unless otherwise stated.

Rather than duplicating all content from Keeping Children Safe in Education (September 2020) in this policy, it should be understood that the school will always refer to KCSIE as the benchmark for all safeguarding practice and decision-making.

3. CONTEXT

This policy has been developed in accordance with the principles established by The Children Acts 1989 (and 2004 amendment), as amended by the Children and Social Work Act 2017 and comply with statutory and legislative requirements and guidance that seeks to protect children including:

- Keeping Children Safe in Education (KCSIE) DfE (Sept 2020)
- Working Together to Safeguard Children DfE (July 2018)
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006 which defines what ‘regulated activity’ is in relation to children
- What to do if you are worried a child is being abused DfE (March 2015)
- Information Sharing Advice for practitioners DfE (July 2018)
- Safer Working Practice for Adults who Work with Children and Young People in Education Settings (May 2019)
- Use of reasonable force: Advice for head teachers, staff and governing bodies (July 2013 reviewed July 2015)
- ‘Statutory guidance on the Prevent duty, which explains schools’ duties under the Counter-Terrorism and Security Act 2015.
- The Equality Act 2010 and the Special educational needs and disability (SEND) code of practice: HM Government 2014
- The Data Protection Act 2018 and General Data Information Protection Regulations
- Sexual violence and sexual harassment between children in schools and colleges DfE (May 2018)
- The Serious Crime Act 2015 (sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18).
- Relationships education, relationships and sex education (RSE) and health education (DfE, Feb 2019)
- ‘Early years foundation stage statutory framework (EYFS)’ (Feb 2018)
- Education Inspection Framework (Sept 2019)
- Inspecting safeguarding in early years, education and skills settings (Sept 2019)

Section 175/157 of the Education Act 2002 requires school governing bodies, local education authorities and further education institutions to arrange to safeguard and promote the welfare of all children who are pupils at a school, or who are students under 18 years of age, such arrangements will have regard to any guidance issued by the Secretary of State.

4. DEFINITION OF SAFEGUARDING

“Safeguarding is not just about protecting children from deliberate harm. It includes a wide range of issues relating to pupil’s welfare, health and safety.” (Inspecting safeguarding in early years, education and skills, Ofsted, September 2019)

Safeguarding and promoting the welfare of children, (Paragraph 4 KCSIE 2020) defines as:

- Protecting children from maltreatment;
- Preventing impairment of children’s mental or physical health or development;
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- Taking action to enable all children to have the best outcomes.

Child protection is an aspect of safeguarding but is focused on how we respond to prevent children suffering, or being likely to suffer, significant harm.

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. See [Appendix A of this policy](#) for the different types of abuse.

Neglect is a form of abuse and 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. [Appendix A](#) defines neglect in more detail.

Children include everyone under the age of 18.

Children in need: A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local safeguarding partners are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Where appropriate we will work with the procedures in place through the three local safeguarding partners.

The school acknowledges that safeguarding is what we do for all children.

Safeguarding covers more than just child protection and schools are charged with ensuring that the child is looked at holistically and at the centre of decision-making within each area below (but not limited to):

- Anti-bullying policies
- Child protection
- Early Help
- Staff conduct & Safer work practice
- Curriculum
- Attendance, Exclusions, Children Missing Education, Transitioning schools
- Health and Safety
- Behaviour Management
- Governance
- SEND & Inclusion
- Training
- Whistleblowing
- A listening School/Service
- Specific forms of abuse and safeguarding issues
- Complaints
- Managing allegations against staff
- The School Environment *Inc. Building & Security*
- Safer recruitment and selection

- Online safety

The school further acknowledges that this policy will also incorporate a range of specific forms of abuse and safeguarding issues including (but not limited to):

- Bullying including cyberbullying
- Criminal exploitation of children and vulnerable adult's county lines
- Children and the Court system
- Children with family members in prison
- Child missing education
- Child missing from home or care
- Child sexual exploitation (CSE)
- Domestic violence
- Drugs
- Fabricated or induced illness
- Faith based abuse
- Female Genital Mutilation (FGM)
- Forced Marriage
- Gangs and youth violence
- Gender based violence / violence against women and girls (VAWG)
- Hate
- Homelessness
- Mental health
- Peer on peer /child on child abuse
- Private fostering
- Preventing Radicalisation
- Protecting children from radicalisation
- Relationship abuse
- Sexual violence and sexual harassment between children in schools and colleges
- Sexting
- Serious violence
- Trafficking and modern slavery
- Upskirting

(Also see Annex A within 'Keeping children safe in education' 2020 and Appendix C of this policy).

Every member of staff at **Ark Greenwich Free School** recognises that children experiencing specific forms of abuse and safeguarding issues identified above are no different to safeguarding against any other vulnerability or concern and will be approached and responded to in the same way as protecting children from any other risks.

5. RELATED SAFEGUARDING POLICIES

We are aware that safeguarding is fundamental to the welfare of all children in our care. This policy is therefore one of a series in the school's integrated safeguarding portfolio and should be read in conjunction with the policies as listed below. (To be read and followed alongside this document)

- Behaviour Management, linked to the Use of Physical Intervention
- Searching, screening and confiscation
- Online Safety and Social Media
- Anti-Bullying
- Managing harmful behaviours
- Data Protection and Information Sharing

- IT Acceptable Use Agreement
- Image Use
- Drugs
- Supporting Transgender Pupils Code of Practice
- Relationships education, relationships and sex education (RSE) and health education
- Health and Safety
- Attendance (Children Missing Education)
- Risk Assessments (e.g. school trips, use of technology, Covid-19)
- First Aid and Accidents
- Procedure for Managing Allegations of abuse made against teachers, and other staff including supply teachers and volunteers
- Code of Conduct for Staff
- Safer Recruitment
- Whistleblowing

Supporting Guidance (to be read and followed alongside this document)

- The Children and Families Act 2014
- SEND code of practice: 0 to 25 years 2015
- Mental Health & Behaviour in Schools 2018
- Disqualification under the Childcare Act 2006 (DfE Aug 2018)
- School attendance 2016
- Exclusion from maintained schools, academies and pupil referral units in England (Sept 2017)
- Criminal Exploitation of children and vulnerable adults: County Lines guidance July 2017
- Teachers Standards 2012
- ‘When to call the police’ Guidance for schools and colleges, produced by the National Police Chiefs Council (NPCC) 2020.
- Home Office’s Preventing youth violence and gang involvement (Aug 2013)
- DfE Advice on Sexual Violence and Sexual Harassment Between Children in Schools and Colleges (SVSH)
- DfE Designated teacher for looked after and previously looked after children 2018
- Children and Social Work Act 2017.
- DfE “Teaching Online Safety in Schools” (June 2019)
- DfE Data Protection: A Toolkit for Schools
- LA Safeguarding Partnerships arrangements

6. Equality statement

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising it or disclosing it. We are committed to anti-discriminatory practice and recognise children’s diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face. All staff are particularly alert to the potential need for early help for a child who:

- Is disabled and has specific additional needs.
- Has experienced challenges during Covid-19 pandemic
- Has special educational needs (whether or not they have a statutory education, health and care plan). These children may be more prone to peer group isolation than other children and therefore additional pastoral support is provided.
- Is a young carer
- Is showing signs of being drawn into antisocial or criminal behaviour, including gang involvement and association with organised crime groups
- Is at risk of modern slavery, trafficking or exploitation
- Is showing signs of 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.

- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Is frequently missing/goes missing from care or home
- Is misusing drugs or alcohol
- Is known to be living in difficult circumstances, for example living in temporary accommodation or where there are issues such as substance abuse, adult mental health problems or domestic violence
- Is at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Is an asylum seeker
- Is a looked after child, or has returned home to their family from care (a 'care leaver')
- Is a privately fostered child
- Has a parent sent to prison. The National Information Centre of Children of Offenders (NICCO): <https://www.nicco.org.uk/> provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

7. KEY RESPONSIBILITIES

Everyone who comes into contact with children and their families has a role to play in safeguarding children. Schools and off-site provisions form part of the wider safeguarding system for children.

The Ark Schools Trust Board

The Ark Schools Board retains statutory responsibility for ensuring that all legal responsibilities in connection with Safeguarding are discharged. The Board appoints a Safeguarding Link Trustee to act as the link between the Trustees and Executive team.

Ark's Head of Safeguarding

The Head of Safeguarding holds responsibility for overseeing day-to-day safeguarding matters within the network, and will ensure schools have appropriate safeguarding processes, practices and relevant training to safeguard and promote the welfare of children.

The Head of Safeguarding will provide schools with high quality safeguarding support, advice and guidance tailored to individual needs and requirements, ensuring schools meet their statutory responsibility to keep children safe.

Ark recognises that staff anxiety around child protection can undermine good practice and so the Head of Safeguarding will ensure that there are established clear lines of accountability and case management to support staff with this process.

The Head of Safeguarding will ensure that the annual safeguarding Audit process is effectively carried out and report any inadequacies to the Network' executive team, Safeguarding Link Trustee, Regional Director, Principal, DSL and Safeguarding Link governor. This will also form part of the report to inform the Risk & Audit Committee and Trust Board.

Principal/Head of School

The Principal/Head of School will ensure that the policies and procedures adopted by the Ark Schools Board and Local Governing Body associated with protecting children are fully implemented, understood and followed by all staff and adhered to at all times.

The Principal/Head of School will ensure that the DSL and DDSs are properly supported in this role with adequate time, training and resources, and that there is always adequate cover if the DSL is absent.

The Principal/Head of School will ensure their school maintains up to date records of all safeguarding concerns, using Impero EdAware as their sole recording tool for concerns, LADO referrals, physical restraint incidents and first aid incidents.

The Principal/Head of School will ensure their school maintains secure monitoring and filtering solutions for its school's devices that can alert the DSL as soon as a problem emerges.

The Principal/Head of School will act as the ‘case manager’ in the event of an allegation of abuse made against another member of staff, volunteer or supply teacher, where appropriate and that the Head of Safeguarding is emailed to inform about any LADO referrals.

The Principal/Head of School and the DSL are responsible to ensure that children are taught about safeguarding including online safety, as part of providing a broad and balanced curriculum.

This may include covering relevant issues through Relationships Education and Relationship and Sex Education which may be delivered through PSHE tutorials.

Ark Greenwich Free School RSE policy in Appendix A of this policy.

Where alternative provision is in place, the Principal/Head of School are responsible for obtaining written confirmation from that provider that appropriate safeguarding checks have been carried out on individuals working in the provision, i.e. those checks that the school would otherwise perform in respect of its own staff.

The Principal/Head of School and DSL are responsible for communicating this policy to parents when a child joins **Ark Greenwich Free School** and via the school website

Designated Safeguarding Lead (DSL) / Deputy Designated Safeguarding Lead (DDSL)

The school has appointed a member of the senior leadership team, as the Designated Safeguarding Lead (DSL). The DSL has the overall responsibility for the day-to-day oversight of safeguarding and child protection systems in school.

The DSL will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. The DSL’s training will be updated formally every two years but may have refresher training at regular intervals, at least annually, to keep up with any developments relevant to their role.

Additionally, DSLs knowledge and skills will be updated regularly through a variety of other methods, e.g. e-bulletins and briefings, organising and participating in conferences, local meetings, other identified training, supervision, Ark network training and Ark DSL hub meetings.

The school has appointed additional staff to deputise for the DSL. The Deputy DSLs have attended appropriate training, which enables them to be fully conversant and to fulfil this role. Whilst the activities of the designated safeguarding lead may be delegated to the deputies, the ultimate lead responsibility for safeguarding and child protection remains with the designated safeguarding lead and this responsibility will not be delegated.

It is the role of the DSL to:

- Act as the central contact point for all staff to discuss any safeguarding concerns
- Maintain a confidential electronic recording system for safeguarding and child protection concerns. Impero EdAware online system is Ark’s mandatory system for safeguarding recording.
- Liaise with Ark’s Head of Safeguarding in reporting serious safeguarding issues relating to children and in matters relating to staff.
- Keep their Principal/Head of School informed of any serious safeguarding issues relating to children and staff.
- Coordinate safeguarding action for individual children. In the case of Children in Care, the DSL will ensure that the designated teacher for LAC maintains the details of the child’s social worker and the name of the virtual school head in the authority that looks after the child (DSL liaising closely with the designated teacher).
- Liaise with other agencies and professionals in line with Working Together to Safeguard Children.
- Ensure that locally established procedures are followed and make referrals to other agencies, including Early Help, LA multi agency safeguarding hub (MASH) and CAMHS as necessary.

- Represent, or ensure the school is appropriately represented at inter-agency safeguarding meetings (including Child Protection conferences).
- Manage and monitor the school's part in Early Help / Child in Need / Child Protection / TAC/ TAS plans.
- Ensure all staff access appropriate safeguarding training and relevant updates in line with the recommendations within KCSIE (2020).
- Ensure that child protection information is transferred to the pupil's new school
- Be aware of pupils who have a social worker
- Help promote educational outcomes, academic progress by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and leadership staff.
- The Head of Safeguarding and the DSL undertake a safeguarding audit annually with reviews twice a year alongside the Safeguarding Link Governor. The Safeguarding Link Governor and DSL are responsible for reporting to their LGBs regarding the audit twice a year.
- Contributing to the review of records relevant to subject access requests. The aim of this review is to determine the risks of disclosure of any safeguarding record.
- Further details about the role of the DSL can be found in 'Keeping Children Safe in Education' 2020, Annex B.

Local Governing Body (LGB)

The LGB, have read and will follow KCSIE 2020 and will provide independent advice and oversight to their school.

The LGB performs a vital role in monitoring compliance and challenging the academy to ensure that best practice is followed. Therefore, all governors must recognise their safeguarding duties towards children in their school. GB governors are required to sign in acknowledgement of this responsibility upon joining their LGB and this is to be reviewed annually

The LGB has nominated a governor for safeguarding named on the front of this document. The nominated governor will undertake independent oversight of school level delivery in safeguarding by having termly meetings with the DSL, being part of the school safeguarding audit process and presenting the audit and end of year reports to the LGB.

Members of Staff

All members of staff have a responsibility to:

- provide a safe environment in which children can learn
- maintain an attitude of 'it could happen here' where safeguarding is concerned and to always act in the best interests of the child
- ensure all children are able to develop appropriate strategies to recognise and respond to risk and build resilience
- all staff should be prepared to identify children who may benefit from early help
- recognise and know what to do if they identify a safeguarding issue or a child who may be in need of extra help or if a child tells them they are being abused or neglected, or a child who is suffering or are likely to suffer significant harm including specific issues, such as CCE/County lines and use the in school referral process
- recognise the signs of different types of abuse and neglect, as well as specific forms of abuse and safeguarding issues such as child sexual exploitation (CSE), FGM, county lines and radicalisation. See [Appendix B: Specific forms of abuse and safeguarding issues](#)
- provide the appropriate safeguarding response to pupils who go missing from education.
- understand the early help process and their role within it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals and relevant agencies to support early identification and assessment
- take appropriate action to prevent safeguarding concerns escalating and work with other services as needed to safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties

- recognise safeguarding incidents and/or behaviour can be associated with factors outside the academy and can/or occur between children outside of these environments. These are the contextual factors i.e. wider environmental factors that are present in a child's life that are or may be a threat to their safety and or welfare.
- be aware of and take appropriate action to raise concerns regarding poor or unsafe practice or potential failures in the school safeguarding regime (this may include accessing the school whistleblowing policy and or procedure for managing allegations against staff)
- respond to and refer any concerns about children or other members of the community in accordance with this policy
- contribute towards, read and adhere to the school policies
- follow safer recruitment practices of staff involved in recruitment
- to record concerns by promptly making an entry in the electronic recording system – Impero EdAware. Staff without a log in can access a concern form from the DSL or main office. (WTD charts– pg. 4 & 5).

All members of staff at **Ark Greenwich Free School** know what to do if a child tells them he/she or that another peer or sibling is being abused or neglected. Members of staff know to maintain an appropriate level of confidentiality whilst at the same time liaising with relevant professionals such as the DSL and other agencies as appropriate. Members of staff know they must never promise a child that they will not tell anyone about a concern or allegation as this may ultimately not be in the best interests of the child.

The welfare and safety of children are the responsibility of all staff in school and ANY concern for a pupil's welfare MUST always be reported to the Designated Safeguarding Lead or DDSL.

If outside of school hours you have concerns about a child or if you're worried a child in the community is being radicalised, is involved in or at risk from gangs or any other child safety concern (as opposed to a child being in immediate danger or harm) the NSPCC has a dedicated helpline you can contact: 0800 800 5000 or you can contact the charity at: help@NSPCC.org.uk. If a child is in immediate danger, call the police on 999 straight away or call 101 for non-emergency concerns.

Children and young people

Children and young people (pupils) have a responsibility to:

- contribute to the development of school safeguarding policies
- read and adhere to (at a level appropriate to their age and ability) the schools safeguarding policies and procedures
- seek help from a trusted adult if things go wrong, and support others that may be experiencing safeguarding concerns
- develop and take responsibility (at a level that is appropriate to their individual age, ability and vulnerabilities) for keeping themselves and others safe, including online
- follow the schools behaviour policy

Parents and Carers

Parents/carers have a responsibility to:

- Read the relevant school/policies and procedures, encouraging their children to adhere to them, and adhering to them themselves where appropriate
- Discuss safeguarding issues with their child/ren, support the school in their safeguarding approaches, and reinforce appropriate safe behaviours at home
- Identify changes in behaviour which could indicate that their child/ren is at risk of harm online
- Seek help and support from the school, or other appropriate agencies, if they or their child/ren encounters any safeguarding concern
- Contribute to the development of the schools safeguarding policies

Ark Greenwich Free School will undertake appropriate discussion with parents/carers prior to any proposed interagency involvement unless the circumstances preclude this action. If we believe that notifying the parents would increase the risk to the child, or exacerbate the situation, we will seek advice from the three local safeguarding partners.

In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved.

Ark Greenwich Free School will always follow up with parents/carers when pupils are not at school. This means we need to have at least two up to date contact numbers for parents/carers plus one other in case of emergencies. Parents should remember to update the school as soon as possible if the numbers change.

Parents can obtain a hard copy of the school Safeguarding and Child Protection Policy and other related policies on request to the school and can view them via the school website.

8. RECOGNITION AND TYPES OF ABUSE AND NEGLECT

All staff in school should be aware of the definitions, signs, and symptoms of abuse. There are four categories of abuse:

- Physical abuse
- Sexual abuse
- Emotional abuse
- Neglect

The most up to date definitions and possible indicators and signs of abuse are found in Appendix A of this policy. Staff should also refer to ‘Signs and Symptoms of Abuse and Neglect’ (Keeping Children Safe in Education (September 2020) Paragraphs 19 – 26) and ‘What to do if you are worried a child is being abused’ 2015.

All members of staff are aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label; in most cases multiple issues will overlap with one another.

Members of staff are aware that child welfare concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. For example, children may be abused in a family, in an institutional or community setting, by those known to them or by a stranger. An adult or adults, or another child or children may abuse them. Their peers, family members, by unknown, or in some cases unidentifiable individuals, may abuse children via the internet. In the case of honour-based abuse, including forced marriage and female genital mutilation, children may be taken out of the country to be abused. An abused child may often experience more than one type of abuse, as well as other difficulties in their lives.

Abuse and neglect can happen over a period of time but can also be a one-off event. This can have major long-term impacts on all aspects of a child's health, development and well-being.

The warning signs and symptoms of child abuse and neglect can vary from child to child. Children also develop and mature at different rates, so what appears to be worrying behaviour for a younger child might be normal for an older child. Parental behaviours may also indicate child abuse or neglect, so staff should also be alert to parent-child interactions or concerning parental behaviours; this could include parents who are under the influence of drugs or alcohol or if there is a sudden change in their mental health.

By understanding the warning signs, we can respond to problems as early as possible and provide the right support and services for the child and their family. It is important to recognise that a warning sign does not automatically mean a child is being abused.

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

We monitor attendance carefully and address poor or irregular attendance without delay.

9. SAFEGUARDING AND CHILD PROTECTION PROCEDURES

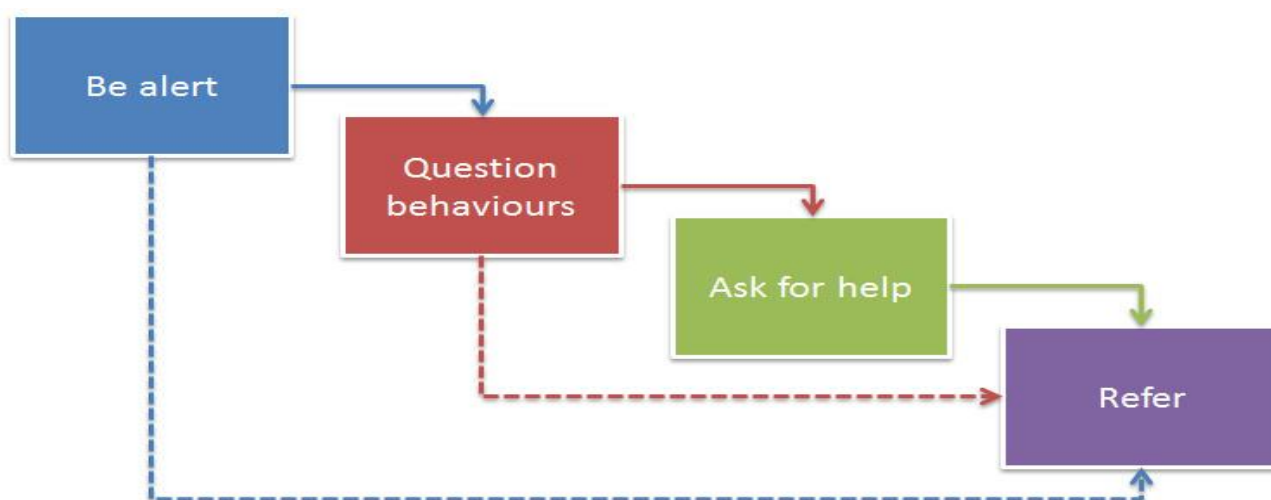
Ark Greenwich Free School adheres to their Local Authority Safeguarding three partners approach Procedures. The full procedures and additional guidance relating to specific safeguarding issues can be found on the LA Safeguarding Partnership website.

Additional guidance for staff includes

- 'What to do if you are Worried About a Child Being Abused' (DfE 2015)
- Information Sharing (2018)

'What to do if you are worried about a child being abused' (DfE 2015) p.12 (s.24) identifies that there are four key steps for professionals to follow to help identify and respond appropriately to possible abuse and/or neglect.

All members of staff are expected to be aware of and follow this approach:



It may not always be appropriate to go through all four stages sequentially and if a child is in immediate danger or is at risk of harm, a referral should be made immediately to children's social care and/or the police.

The role of the school in situations where there are child protection concerns is NOT to investigate but to recognise and refer.

It is the responsibility of the DSL to receive and collate information regarding individual children, to make immediate and on-going assessments of potential risk and to decide actions necessary (with parents / carers in most cases). This includes the need to make referrals to partner agencies and services.

- To help with this decision s/he may choose to consult with the LA multi agency safeguarding hub (MASH) / social care duty team/ Early Help team.
- Advice may also be sought from Ark Head of Safeguarding.
- Issues discussed during consultations may include the urgency and gravity of the concerns for a child or young person and the extent to which parents/carers are made aware of these.

All members of staff are made aware of the Early Help process and understand their role within it. This includes identifying emerging problems, liaising with the designated safeguarding lead, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment.

If Early Help is assessed to be appropriate, then the DSL will support staff members involved with the family in liaising with other agencies and submitting an Early Help Notification Form. The DSL will keep all early help cases under constant review and will consider making a referral to Social care if the situation does not appear to be improving for the child. New referrals to services will be made using the agreed LA multi agency referral form.

When to call the police (NPCC)

Ark Greenwich Free School follows the advice 'When to call the police' which covers incidents on school premises where students have potentially committed a crime. It provides guidance on what schools and colleges should bear in mind when considering contacting the police and aims to support schools and college to make defensible decisions when considering whether to involve the police.

This advice covers the following situations:

- Assault
- Criminal damage
- Cyber crime
- Drugs
- Harassment
- Sexual offences
- Theft
- Weapons.

In all but the most exceptional circumstances, parents /carers will be made aware of the concerns felt for a child or young person at the earliest possible stage. In the event of a referral to the LA social care team being necessary, parents/carers will be informed and consent to this will be sought unless there is a valid reason not to do so or it will place the pupil at further harm or risk.

10. RECORD KEEPING

Staff will record any safeguarding concern, first aid incident or physical restraint incident that they have about a child on Impero EdAware the safeguarding all-in-one online recording tool. Schools may also have a safeguarding incident/concern form for volunteers, supply teachers, extended staff or visitors who do not have a school email address account. These forms are held on the shared drive, in the staff room, in the main office or with the DSL. All referrals must be passed without delay to the DSL. Records will be completed as soon as possible after the incident/event, using the child's words where necessary, and will be signed and dated.

All staff at **Ark Greenwich Free School** are trained on the use of Impero EdAware. It forms part of the induction process for staff as well as within the annual safeguarding training, which is delivered to all staff.

All disclosures and concerns recorded on Impero EdAware allows school to manage all areas of safeguarding and child protection, including pupil casework, add meetings to a child's chronology, staff training, first aid and physical restraint incidents. This allows immediate follow up and management by the DSL on any issue.

The Ark schools' Head of Safeguarding can access these folders, so if a similar case was to occur, as well as being alerted by the DSL (case pertaining to a student, Principal for one pertaining to staff/supply, volunteer), they would be able to track the case through EdAware. The Ark schools' Head of Safeguarding would contact either the DSL/Principal if there was any concern regarding a lack of information, cases not resolved or updated or if it appeared, there was a concerning pattern developing.

If members of staff are in any doubt about recording requirements staff must discuss their concerns with the DSL.

Safeguarding records are kept for individual children and are maintained separately from all other records relating to the child in school. Safeguarding records are kept in accordance with data protection legislation and retained centrally and securely by the DSL and are shared with staff on a 'need to know' basis only.

DSL's will share any information about welfare, safeguarding and child protection with the relevant teachers. They should ensure the teacher knows who these children are. This will help the teacher understand these student's academic progress and attainment, maintain a culture of high expectations for them, by teachers knowing it will support them to be able to identify challenges they may face and the academic support and adjustments that may need to be made.

DSLs will ensure that half termly printed chronologies from Impero EdAware for CP/CIN and LAC pupils to keep paper files up to date.

The DSL will ensure that school has more than one available emergency contacts for pupils. School should have at least two emergency contacts for every child in the school in case of emergencies, and in case, there are welfare concerns at the home.

The Principal/Head of School will be kept informed of any significant issues by the DSL.

All safeguarding records will be transferred in accordance with data protection legislation to a child's subsequent school/setting, under confidential and separate cover to the new DSL or Principal/Head of School and a receipt of delivery will be obtained.

11. MULTI AGENCY SAFEGUARDING ARRANGEMENTS

Ark Greenwich Free School recognises and is committed to its responsibility to work with other professionals and agencies in line with statutory guidance (WTSC 2018). Ark Greenwich Free School must ensure children's needs are met and to protect them from harm. All staff will endeavour to identify those children and families who may benefit from the intervention and support of external professionals and will seek to enable referrals, in discussion with parents/carers as appropriate.

Schools are not the investigating agency when there are child protection concerns and the school will therefore pass all relevant cases to the statutory agencies. We will however contribute to the investigation and assessment processes as required and recognise that a crucial part of this may be in supporting the child while these take place.

Ark Greenwich Free School will follow the new local multi-agency safeguarding arrangements under the LA Safeguarding Partnership system. The DSL will ensure the changes are updated to staff to reflect what's new and staff should understand their roles and responsibilities under the new system.

Ark Greenwich Free School recognises the importance of multi-agency working and will ensure that staff are enabled to attend relevant safeguarding meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings and Early Help Teams around the Child / Family. The School Leadership Team and DSL will work to establish strong and co-operative relationships with relevant professionals in other agencies.

12. CONFIDENTIALITY, INFORMATION SHARING AND GDPR

Ark Greenwich Free School recognises that all matters relating to child protection are confidential. The Principal/Head of School or DSL will only disclose information about a pupil to other members of staff on a 'need to know basis'.

All members of staff must be aware that whilst they have duties to keep any information about children, families and colleagues, which have, access to because of their role confidential, they also have a professional responsibility to share information if it is necessary and proportionate with other agencies in order to safeguard children.

These organisations include the three local safeguarding partners:

- The local authority;
- A clinical commissioning group for an area within the local authority; and
- The chief officer of police for an area (any part of which falls) within the local authority area.

The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

All staff are directed for further information to the July 2018 Government guidance, Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children,

Young People, Parents and Carers, which includes “seven golden rules for sharing information”, as set out below:

1. Remember that the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and / or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from other practitioners, or your information governance lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.
5. Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up to-date, is shared in a timely fashion, and is shared securely.
7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

All staff must be aware that they cannot promise a child to keep secrets, which might compromise the child’s safety or wellbeing. Further advice on responding to disclosures can be found in Appendix A of this policy.

Everyone in this school who deals with personal data shares the responsibility for data protection.

Ark Greenwich Free School ensure that policies, training and practice give staff the confidence to know when, how and to whom they can share sensitive information when dealing with a safeguarding concern. The annual safeguarding training also covers how to record that information in a neutral and professional manner, focusing on what is necessary for the safeguarding purpose.

Data protection law is not a barrier, but it is a system of checks and balances to be borne in mind when recording, sharing, and retaining vital but sensitive data.

- School must appoint a Data Protection Lead to be responsible for guiding the school on data protection matters.
- Senior leaders who manage the ‘data ecosystem’ should be aware of the content of GDPR in order to oversee how the school is complying with data protection legislation and risks involved.
- Training and guidance are available with regards to what information can be shared and withheld when managing any data subject request (for example when an individual exercises an individual’s right to access, amend, delete or restrict processing of their peers).
- Staff who influence how data is used, processed and secured should be involved in creating high-level data maps and be aware of lawful reasons for processing data and minimising risks.

- All staff should be aware of what personal data is, how it can be used, and anonymise data. Additional training and guidance are provided to the Data Protection Lead and Senior Leadership Team of the school to support any individual when sharing or withholding personal data. Additionally, the academy's Data Protection Officer can be contacted (dataprotection@arkonline.org) in the event that any additional guidance or support is required.

When withholding personal data as part of subject access request response, this should be approved by the Data Protection Officer.

13. COMPLAINTS

The school has a Complaints Procedure available to parents, pupils and members of staff who wish to report concerns. This can be found in the school office and on the school website.

All reported concerns must be taken seriously and considered within the relevant and appropriate process. Anything that constitutes an allegation against a member of staff, volunteer, supply teacher or professional will be dealt with under the specific 'Procedure for Managing Allegations of abuse made against teachers, and other staff including supply teachers and volunteers', link is within Appendix A of this policy.

14. STAFF INDUCTION, AWARENESS AND TRAINING

All members of staff will be provided with a copy of part one of the "Keeping Children Safe in Education" (2020) which covers Safeguarding information. School leaders will read the entire document. School leaders and all members of staff who work directly with children will access Annex A within Keeping Children Safe in Education 2020. Members of staff will sign to confirm that they have read and understood Part One and Annex A of KCSIE 2020 and this information is kept on the school's Single Central Record (SCR).

Staff and governors are also required to complete the Ark online KCSIE module to assist further to understand and discharge their role and responsibilities.

The DSL will ensure that all new staff and volunteers including teaching, non-teaching, support, supply, peripatetic, contract staff and third-party contractors (whose employees or sub-contractors have access to school premises), governors, volunteers and trustees working in or on behalf of the school, including those from Ark central team are appropriately inducted as regards the school's internal safeguarding procedures and communication lines.

A summary information sheet is available to be given to staff and volunteers to support this process.

All staff members will receive appropriate safeguarding and child protection training (organised by the DSL) which will enable them to:

- **Recognise** potential safeguarding and child protection concerns involving pupils and adults (colleagues, other professionals and parents/carers)
- **Respond** appropriately to safeguarding issues and take action in line with this policy
- **Record** concerns in line with the school policies
- **Refer** concerns to the DSL and be able to seek support external to the school if required

All teaching, non-teaching and volunteers will receive appropriate training to ensure they are aware of a range of safeguarding issues (see definition of safeguarding) and are aware that behaviours linked to the likes of drug taking, alcohol abuse, truanting and peer on peer abuse such as bullying and sexting can put children in danger. The staff training will also include school responsibilities, the school/child protection procedures, online safety, safe working practice and external reporting mechanisms.

All staff members will receive regular safeguarding and child protection updates via e-bulletins, staff briefing as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. All members of staff will be made aware of the school's expectations regarding safe and professional practice via the staff behaviour policy, staff code of conduct and the IT Acceptable Use policy, which is provided and discussed as part of the induction process.

The school recognises the expertise, which members of staff build by undertaking safeguarding training and managing safeguarding concerns on a daily basis. Opportunity is therefore, provided for all staff to contribute to and shape safeguarding arrangements and the safeguarding policy via involvement in staff departmental meetings.

The DSL will work with the Safeguarding link governor and the Head of Safeguarding to produce an audit report for the Spring 1 LGB meeting. An end of year report to be presented at the LGB Summer 2 or following Autumn 1 meeting to the Governing Body detailing safeguarding training undertaken by all staff and will maintain up to date registers of who has been trained.

Although the school has a nominated lead for the governing body, all members of the governing body will access appropriate safeguarding training which covers their specific strategic responsibilities on a regular basis.

15. SAFE WORKING PRACTICE

All members of staff are required to work within clear guidelines on Safe Working Practice / the school's Code of Conduct.

Children may make allegations against staff in situations where they feel vulnerable or where they perceive there to be a possible risk to their welfare. As such, all staff should take care not to place themselves in a vulnerable position regarding child protection or potential allegations. For example, it is always advisable for interviews or work with individual children or parents to be conducted in agreed assigned areas.

Physical intervention should only be used when the child is endangering him/herself or others and such events should be recorded on Impero EdAware and signed off by the DSL. Staff should be aware of the school's Behaviour Management Policy, position of trust guidance and any physical interventions must be in line with agreed policy and procedure in which appropriate training should be provided.

Full advice and guidance can be found in Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings (2019), and Use of Reasonable Force: Advice for head teachers, staff and governing bodies (July 2013) link to both guidance is in Appendix B of this guidance.

Staff should be particularly aware of the professional risks associated with the use of social media and electronic communication (email, mobile phones, texting, social network sites etc.). Staff should familiarise themselves with advice and professional expectations outlined in Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings and the network policy [IT Acceptable Use Agreement - September 2017-September 2020.pdf](#)

16. STAFF SUPERVISION AND SUPPORT

Any member of staff affected by issues arising from concerns for children's welfare or safety can seek support from the DSL.

The induction process will include familiarisation with child protection responsibilities and procedures to be followed if staff have any concerns about a child's safety or welfare.

The school will provide appropriate supervision and support for all members of staff to ensure that:

- All staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children
- Staff are able to create an environment where members of staff feel able to raise concerns and feel supported in their safeguarding role
- All staff have regular reviews of their own practice to ensure they improve over time.
- The Head of Safeguarding will provide KIT support to those new in role and where additional supervision is required.
- A regional DSL Champion is assigned to the school to support to drive activity, best practice and approaches to safeguarding.

17. SAFER RECRUITMENT

Safer recruitment is a set of practices to help make sure your staff and volunteers are suitable to work with children and young people. It's a vital part of creating a safe and positive environment and making a commitment to keep children safe from harm. Safer recruitment should be a continuing process of improvement for every school, club, business or organisation whose work or services involve contact with children.

Ark Greenwich Free School is committed to ensure that all steps are taken to only recruit staff and volunteers who are safe to work with our pupils and have their welfare and protection as the highest priority.

Ark Greenwich Free School is responsible for safeguarding and protecting all children and young people by implementing robust safer recruitment practices when recruiting, particularly during the advertising, shortlisting, interviewing and assessment process. More information can be found in the Recruitment and Selection policy.

Ark Greenwich Free School is responsible for ensuring that safer recruitment processes outlined within guidance, including an application, vetting and recruitment process which places safeguarding at its centre, regardless of employee or voluntary role and appropriate preappointment checks.

Ark Greenwich Free School is responsible for ensuring that the school maintains an accurate Single Central Record (SCR). The SCR is a list of all staff, volunteers, agency staff, contractors and governors and includes appropriate recruitment and training information such as:

- Dates of employment
- Identity checks
- Disclosure Barring (DBS) reference number and barred list check, including date check was obtained
- Eligibility to work in the UK checks
- Prohibition, sanctions and restrictions and s128 directions
- Two references, one from the most recent employer
- Overseas police checks on those who have lived and worked outside the UK
- Professional qualifications check where applicable
- Annual Safeguarding training, DSL training and KCSIE staff read & understand confirmation

The Principal/Head of School will apply appropriate judgement regarding the need to supervise and escort visitors and will provide them with appropriate safeguarding information.

All staff are asked to disclose any reason that may affect their suitability to work with children at interview.

It is agreed that all governors will undergo an enhanced Disclosure and Barring Scheme check. Further statutory procedures for checking the suitability of staff, volunteers and professionals who work with children see Appendix D of this policy - Ark Recruitment & Appointment Policy.

18. ALLEGATIONS OF ABUSE MADE AGAINST TEACHERS, AND OTHER STAFF INCLUDING SUPPLY TEACHERS AND VOLUNTEERS

Ark Greenwich Free School recognises that it is possible for staff and volunteers to behave in a way that might cause harm to children and takes seriously any allegation received.

We understand that on occasions pupils may make allegations against a member of staff however, staff should also take care not to place themselves in a vulnerable position with a pupil where an allegation can be made. If such an allegation is made, the member of staff receiving the allegation will immediately inform the Principal or Regional Director where there is an allegation against the Principal. If the Principal/Head of school is not present, the most senior teacher present **must** then ensure that the Regional Director, Head of Safeguarding and HR Business Partner are informed as a matter of urgency.

The guidance in KCSIE (Part Four) should be followed and read in conjunction with Ark procedure on managing allegations of abuse against teachers, supply, volunteers, staff and professionals, where it is alleged that any of the above roles working in the school or activity that provides education for children under 18 years of age, has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children or to a particular child;
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

The Designated Officer (LADO) must be informed of all allegations that come to the school's attention and appear to meet the criteria to discuss the content of the allegation.

The People Business Partner should also be informed as soon as possible on any allegations against staff so that they can provide advice

Further information in relation to the Ark procedure on managing allegations of abuse against teachers, supply, volunteers, staff and professionals, can be found in Appendix A of this policy.

19. WHISTLEBLOWING

A whistleblowing disclosure must be about something that affects the general public such as:

- a criminal offence has been committed, is being committed or is likely to be committed
- a legal obligation has been breached
- there has been a miscarriage of justice
- the health or safety of any individual has been endangered
- the environment has been damaged
- information about any of the above has been concealed.

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and the senior leadership team will always take such concerns seriously.

All members of staff are made aware of the school's Whistleblowing procedure and that it is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child at risk.

Decisions never have to be taken in isolation considerations should be given to consult with the [Ark Whistleblowing Policy](#)

The NSPCC runs a whistleblowing helpline on behalf of the government. Members of Staff can also access this helpline if they do not feel able to raise concerns regarding failures internally. The number is 0808 800 5000. (8:00 AM to 8:00 PM Monday to Friday) or email: help@nspcc.org.uk.

20. PEER ON PEER /CHILD ON CHILD ABUSE (*Allegations of abuse made against other children*)

Staff should be aware that safeguarding issues can manifest themselves via peer on peer /child on child abuse. This is most likely to include, but not limited to:

- bullying (including cyberbullying);

- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence and sexual harassment
- gender-based violence
- sexting (also known as youth produced sexual imagery); and
- initiation-type violence and rituals.

Abuse is abuse and should never be tolerated or passed off as “banter” or “part of growing up”. Different gender issues can be prevalent when dealing with peer on peer abuse. This could for example include girls being sexually touched/assaulted or boys being subject to initiation-type violence.

At Ark Greenwich Free School we believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and other pupils.

We recognise that some pupils will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school’s Behaviour Policy.

Occasionally, allegations may be made against pupils by others in the school, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is likely that to be considered a safeguarding allegation against a pupil, some of the following features will be found.

The allegation:

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

At Ark Greenwich Free School we will support the victims of peer on peer /child on child abuse.

Further information in relation to the school’s approach to peer on peer /child on child abuse can be found in Appendix A and C of this policy.

Sexting

In cases of ‘sexting’ we follow guidance given to schools and colleges by the UK Council for Child Internet Safety (UKCCIS) published in 2017: ‘Sexting in schools and colleges, responding to incidents, and safeguarding young people’.

Further information about the school’s response to sexting can be located in the school’s Behaviour Management, Anti-bullying, and Online Safety Policies.

Up-skirting

The school recognises ‘Up-skirting’ as a criminal offence under changes to the Voyeurism (Offences) Act 2019 which criminalise ‘up-skirting’. This refers to the act of placing equipment such as a camera or mobile phone beneath a person’s clothing to take a voyeuristic photograph without their permission.

Further information in relation to the school’s approach to ‘up-skirting’ can be found in Appendix A and C of this policy.

21. SEXUAL VIOLENCE and SEXUAL HARASSMENT BETWEEN CHILDREN in SCHOOLS and COLLEGES

Ark Greenwich Free School recognises that the DfE Advice on Sexual Violence and Sexual Harassment Between Children in Schools and Colleges (SVSH). Schools must protect all pupils and engage social care, support services and the police as required. The guidance also makes it

clear that whilst the criminal age of responsibility is ten, schools should nonetheless report incidents of peer-on-peer abuse involving children younger than ten to the police where appropriate, who will adopt a welfare rather than a criminal response.

All staff must recognise that a child abusing another child may have been abused themselves; therefore, the need may be to support the alleged perpetrator.

Full advice and guidance can be found in: Sexual Violence and Sexual Harassment Between Children in Schools and Colleges (SVSH), which was published in December 2017, has also been updated in May 2018 – see Appendix B of this policy.

22. SERIOUS VIOLENCE

All staff must be aware of warning signs which indicate that a child may be at risk of or involved in serious violent crime. KCSIE 2020 expects schools and colleges to be aware of the risks associated with serious violence (including involvement in criminal networks or gangs) and the measures in place to manage them.

Ark Greenwich Free School protocols and training have been updated to ensure staff are able to spot indicators which may signal a child's involvement with violent crime and are aware of the Home Office guidance about how to respond appropriately.

Further information in relation to the school's approach to Serious Violence can be found in Appendix A and C of this policy.

23. SAFEGUARDING CHILDREN WITH SPECIAL EDUCATION NEEDS AND DISABILITIES (SEND)

Ark Greenwich Free School acknowledges that children with special educational needs (SEN) and disabilities can face additional safeguarding challenges as they may have an impaired capacity to resist or avoid abuse. They may have speech, language and communication needs, which may make it difficult to tell others what is happening.

Ark Greenwich Free School will ensure that children with SEN and disabilities, specifically those with communication difficulties will be supported to ensure that their voice is heard and acted upon.

Members of staff are encouraged to be aware that children with SEN and disabilities can be disproportionately impacted by safeguarding concerns such as bullying. All members of staff will be encouraged to appropriately explore possible indicators of abuse such as behaviour/mood change or injuries and not to assume that they are related to the child's disability and be aware that children with SEN and disabilities may not always outwardly display indicators of abuse.

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

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

At Ark Greenwich Free School we identify pupils who might need more support to be kept safe or to keep themselves safe.

Further information in relation to the school's approach to SEND can be found in Appendix A and C of this policy.

24. LOOKED AFTER CHILDREN (LAC) AND PREVIOUSLY LOOKED AFTER CHILDREN

Ark Greenwich Free School recognise that most children living in care are kept safe from harm. However, a small number remain at risk of abuse or neglect. Children may enter care for all sorts

of reasons but most enter because they have been abused or neglected. These experiences can leave children with complex emotional and mental health needs.

Many children also move repeatedly in and out of care, or between placements. This can prevent them from forming stable relationships with the staff, adults and peers.

A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously LAC safe.

Schools must appoint a Designated Teacher for LAC who has responsibility for promoting the educational achievement of registered pupils who are looked after and certain previously looked after children.

The Designated Teacher for LAC will maintain details of the child's social worker and information of the virtual school head in the authority.

Further information in relation to the school's approach to LAC and Previously LAC can be found in Appendix A of this policy.

25. MENTAL HEALTH AWARENESS

All staff at Ark Greenwich Free School are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect, exploitation or other potentially traumatic adverse childhood experiences that can leave them vulnerable to further harm.

School staff are not expected or trained to diagnose mental health conditions or issues but may notice behaviours that may be of concern.

Exam or assessment time can also be a time when children experience increased levels of stress and may need extra emotional support; as well as being educationally disadvantaged in facing barriers to attendance, learning and behaviour.

Where staff have a mental health concern about a child that may also be a safeguarding concern, immediate action should be taken in reporting this concern to the designated safeguarding lead or a deputy.

The DSL will ensure at induction and through regular training that staff are aware of the processes for reporting and escalating concerns about mental health. If a member of staff has a concern about the mental health of a pupil, they should speak to the DSL in the first instance.

The DSL may instigate the completion of a mental health 'Strengths and Difficulties Questionnaire (SDQ)' to assess the child's behaviour which is produced by the DfE non-statutory advice for schools in England Mental health and behaviour in schools (DfE, 2018).

The government guidance: Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools and the Rise Above resources underpin our work to safeguard our pupils' mental health.

Further information in relation to the school's approach to Mental Health Awareness can be found in Appendix A and C of this policy.

26. ONLINE SAFETY

It is recognised by Ark Greenwich Free School that the use of technology presents particular challenges and risks to children and adults both inside and outside of school.

Schools must appoint a Designated Lead for online safety with appropriate skills, interest and expertise regarding online safety and curriculum.

Ark Greenwich Free School identifies that the issues classified within online safety are considerable, but can be broadly categorised into three areas of risk:

- content: being exposed to illegal, inappropriate or harmful material
- contact: being subjected to harmful online interaction with other users
- conduct: personal online behaviour that increases the likelihood of, or causes harm

Ark Greenwich Free School ensures that monitoring and filtering is in place on school’s systems, but that this should not impose “unreasonable restrictions” on what children can be taught about safeguarding and online safety. The DfE’s guidance on “Teaching Online Safety in Schools” (June 2019) is included at Annex C of KCSIE 2020.

There are different situations in which pupils access the internet. The table below clarifies the different levels of protection that Ark Greenwich Free School will ensure is in place.

Scenario	Protection
Pupils on a school device	When pupils use the school’s network to access the internet, they are protected from inappropriate content by our filtering systems. Ark Greenwich Free School needs to maintain a Safeguarding Monitoring tool.
Pupils on a personal device using the school’s internet	When pupils use the school’s wireless system on personal devices their internet traffic is filtered to prevent accessing inappropriate content.
Pupils on personal devices using their own data plan, or public Wi-Fi	Schools can limit the use of personal devices through local policies, there are no technical controls to protect pupils on their own device in this situation.

Ark Greenwich Free School ensures that the pupils are informed of how to access online learning safely while out of school.

Further information in relation to the school’s approach to online safety/online learning while out of school can be found Annex C of KCSIE 2020 and in Appendix A and C of this policy.

27. MOBILE PHONES AND CAMERAS

We recognise that personal mobile phones have the potential to be used inappropriately and therefore Ark Greenwich Free School has developed a guidance to outline the required protocol for all employees, pupils, supply, volunteers, governors and parents/carers. Staff, volunteers, parents **must not** use personal phones or devices to take pictures of pupils while in the school environment or on educational visits.

For further information on the use of mobile phones, cameras and sharing of images please see Ark IT Acceptable Use Agreement.

28. CHILDREN WITH A SOCIAL WORKER

At Ark Greenwich Free School we recognise that when a child has a social worker, it is an indicator that the child is more at risk than most pupils.

This may mean that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health.

We take these needs into account when making plans to support pupils who have a social worker.

Further information in relation to the school’s approach to help pupils with a social worker can be found in Appendix A of this policy.

29. CHILDREN MISSING EDUCATION

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

At Ark Greenwich Free School we monitor attendance carefully and address poor or irregular attendance without delay.

We will always follow up with parents/carers when pupils are not at school. This means we need to have a least two up to date contacts numbers for parents/carers. Parents should remember to update the school as soon as possible if the numbers change.

In response to the guidance in Keeping Children Safe in Education (2020) the school has:

1. Staff who understand what to do when children do not attend regularly
2. Appropriate policies, procedures and responses for pupils who go missing from education (especially on repeat occasions).
3. Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.
4. Procedures to inform the local authority when we plan to take pupils off-roll when they:
 - a. leave school to be home educated
 - b. move away from the school's location
 - c. remain medically unfit beyond compulsory school age
 - d. are in custody for four months or more (and will not return to school afterwards); or
 - e. are permanently excluded

We will ensure that pupils who are expected to attend the school but fail to take up the place will be referred to the local authority.

When a pupil leaves the school, we will record the name of the pupil's new school and their expected start date.

Further information in relation to the school's approach to Children Missing Education can be found in Appendix A of this policy.

30. COUNTER TERRORISM AND SECURITY ACT 2015 (The Prevent Duty)

As part of the Counter Terrorism and Security Act 2015, schools have a duty to 'prevent people being drawn into terrorism'. This has become known as the 'Prevent Duty'.

Where staff are concerned that children and young people are developing extremist views or show signs of becoming radicalised, they should discuss this with the Designated Safeguarding Lead.

Staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately.

The Designated Safeguarding Lead has received training about the Prevent Duty and tackling extremism and is able to support staff with any concerns they may have. The DSL will consider the level of risk and decide which agency this concern should be referred. This could include [Channel guidance](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, that staff and governors can call to raise concerns about extremism with respect to a pupil. In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321

At Ark Greenwich Free School we use the curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet. We are committed to ensuring that our pupils are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the school's core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

Further information in relation to the school's approach to the Prevent Duty and to Prevent Radicalisation can be found in Appendix A & C of this policy.

31. CHILD SEXUAL EXPLOITATION (CSE)

The statutory definition of Child Sexual Exploitation (CSE) can be found in the guidance document *Child sexual exploitation: Definition and a guide for practitioners* (DfE 2017)

The definition, which can be found on KCSIE (2020) page 84, is:

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.

Further information in relation to the school's approach to Child Sexual Exploitation can be found in Appendix A and C of this policy.

32. CHILD CRIMINAL EXPLOITATION (CCE)

The definition of Child Criminal Exploitation, which can be found on KCSIE (2020) page 83, is:

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

Further information in relation to the school's approach to Child Criminal Exploitation can be found in Appendix A and C of this policy.

33. COUNTY LINES

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

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

Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

See KCSIE (2020) page 85. Further information in relation to the school's approach to County Lines can be found in Appendix A and C of this policy.

34. DOMESTIC ABUSE

The definition of Domestic Abuse is:

any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass but is not limited to psychological; physical; sexual; financial; and emotional.

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

children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

(See KCSIE (2020) page 86) Further information in relation to the school's approach to Domestic abuse can be found in Appendix A and C of this policy.

35. HONOUR BASED ABUSE (HBA)

So-called 'honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so called HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

Where staff are concerned that a child might be at risk of HBA, they must inform the Designated Safeguarding Lead as a matter of urgency.

Further information in relation to the school's approach to so called 'honour-based' abuse can be found in Appendix A and C of this policy.

36. FEMALE GENITAL MUTILATION (FGM)

Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK.

FGM typically takes place between birth and around 15 years old; however, it is believed that in the majority of cases, this happens between the ages of 5 and 8.

Risk factors for FGM include:

- low level of integration into UK society
- mother or a sister who has undergone FGM
- girls who are withdrawn from PSHE
- visiting female elder from the country of origin
- being taken on a long holiday to the country of origin
- talk about a 'special' procedure to become a woman

Further information in relation to the school's approach to FGM can be found in Appendix A and C of this policy.

37. PRIVATE FOSTERING

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

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

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

All staff are aware that there is a mandatory duty to inform the local authority of children in such arrangements.

On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered.

Further information in relation to the school's approach to private fostering arrangements can be found in Appendix A and C of this policy.

38. CONTEXTUAL SAFEGUARDING

The school assesses the risks and issues in the wider community when considering the well-being and safety of its pupils.

Further information in relation to the school's approach to Contextual safeguarding can be found in Appendix A and C of this policy.

39. CURRICULUM AND STAYING SAFE

We recognise that schools play an essential role in helping children to understand and identify the parameters of what is appropriate child and adult behaviour; what is 'safe'; to recognise when they and others close to them are not safe; and how to seek advice and support when they are concerned.

At Ark Greenwich Free School pupils are taught about safeguarding, including online, through various teaching and learning opportunities, as part of providing a broad and balanced curriculum. Children are taught to recognise when they are at risk and how to get help when they need it.

Ark Greenwich Free School will use the curriculum to provide opportunities for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that students have a range of contacts and strategies to ensure their own protection and understand the importance of protecting others. This will include online safety.

Students will be educated at a level appropriate to their age and ability about a range of safeguarding concerns through personal, social, health and economic education (PSHE), tutorials (if appropriate) and through sex and relationship education (SRE). This will include, but is not limited, to bullying (including cyber bullying), radicalisation, child sexual exploitation (CSE), stranger danger, road safety, sexual abuse, neglect, online safety, gender-based violence/sexual assaults and 'sexting'.

Further information in relation to the school's approach to curriculum, Relationships education, relationships and sex education (RSE) and health education and staying safe can be found in Appendix A of this policy.

40. THE USE OF SCHOOL PREMISES BY OTHER ORGANISATIONS

Where services or activities are provided separately by another body using the school premises, the Principal/Head of School will seek written assurance that the organisation concerned has appropriate policies and procedures in place with regard to safeguarding children and child protection and that relevant safeguarding checks have been made in respect of staff and volunteers.

All external services using school premises will adhere to the school's lettings agreement.

If this assurance is not achieved, then an application to use premises will be refused.

41. SECURITY

All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may become known. We operate within a whole-school community ethos and welcome comments from students, parents and others about areas that may need improvement as well as what we are doing well.

Appropriate checks will be undertaken in respect of visitors and volunteers coming into school as outlined within guidance. Visitors will be expected to sign in and out via the school's visitors log system and to display a visitor's badge whilst on school site. Any individual who is not known or identifiable should be challenged for clarification and reassurance.

The school will not accept the behaviour of any individual (parent or other) that threatens school staff /security or leads others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual onto the school site.

Further information in relation to the school's approach to security and summary on Coping with a school emergency can be found in Appendix A of this policy.

42. PROCEDURE IN THE CASE OF A COMPULSORY LOCKDOWN

In the case of the school being closed due to a compulsory full or partial closure, the school will follow the protocols outlined to ensure that our high level of vigilance and surveillance continues to safeguard our pupils.

In addition, we will provide a risk assessment relating to the care of vulnerable pupils to ensure that they continue to receive the best possible care.

Further information in relation to the school's approach in case of a compulsory lockdown can be found in Appendix A of this policy.

43. ALTERNATIVE PROVISION (AP) /MANAGED MOVES

At Ark Greenwich Free School we are responsible for the safeguarding of our pupils when they are placed in an alternative provision or arranging a managed move.

There are different situations in which pupils are placed in an alternative provision, schools can use such provision to try to prevent exclusions, or to re-engage pupils in their education, or to improve behaviour.

Whereas a managed move is a voluntary agreement between schools, parents/carers and a pupil, for that pupil to change school or educational programme under controlled circumstances. A managed move is different to the power of a school to direct a pupil off-site for the improvement of their behaviour.

At Ark Greenwich Free School when it is decided to place a pupil at an AP we will ensure:

- non-registered provisions **should not** be used
- carefully considering the provision for vulnerable pupils or pupils where there are any safeguarding concerns at home, pupils with an EHCP or LAC.
- to carry out a risk assessment on the alternative provisions.
- use of the provision should be time-limited (i.e. review regularly, clear timescales)
- to obtain written confirmation from the AP provider that they have completed all the vetting and barring checks that are necessary on their staff.
- To appoint designated teacher at school to track pupil progress and to make sure the pupil is attending daily, completing work and accessing tutors when necessary.

Under the Education Inspection Framework Sept 2019, school is aware that in their pre-inspection phone call, Ofsted will ask how many alternative providers does the school use, and how many children are placed there. Inspectors may visit AP's and assess their safeguarding procedures, the quality of education and how effectively the provision helps to improve pupil's behaviour, learning, attendance and safeguarding.

At Ark Greenwich Free School when it is agreed to arrange a managed move placement for a pupil we follow our managed move protocol as outlined in Appendix A of this policy.

Further information in relation to the school's approach to Alternative provision and AP risk assessments can be found in Appendix A of this policy.

44. LOCAL, REGIONAL AND NATIONAL SUPPORT SERVICES

All members of staff at Ark Greenwich Free School are made aware of the local, regional and national support available.

Further information in relation to a list of local, regional and national support services can be found in Appendix A of this policy and within KCSIE 2020 Annex C pgs. 105-106.

45. SCHOOL LOCAL PROCEDURES AND PRACTICE GUIDELINES –Appendix A-D

Schools are required to insert in

APPENDIX A of this policy their localised school procedure, school approaches, practice, protocols and guidance documents or links to documents specific to their school and LA Safeguarding Partnership arrangements.

Each school may wish to include documentation or links to documentation in addition to the summaries of each area listed below.

APPENDIX B contains statutory legislation and guidance and other documents and links to those documents related to safeguarding in schools. Details of other statutory guidance is available within Impero EdAware recording tool.

APPENDIX C contains documents or links to those documents highlighted in Keeping Children Safe in Education (Sept 2020), as being specific forms of abuse and safeguarding issues.

APPENDIX D contains the network Recruitment and Appointment Policy 2019-21 which is relevant to safeguarding as it covers selection and vetting processes.

APPENDIX A

Localised school procedure, practice and guidance documents/links to documents

Protection and wider safeguarding

What is Child Abuse/definitions/signs and symptoms?

Ark Greenwich Free School recognises the NSPCC definition of Child Abuse, and describes it as *“any action by another person – adult or child – that causes significant harm to a child. It can be physical, sexual or emotional, but can just as often be about a lack of love, care and attention. We know that neglect, whatever form it takes, can be just as damaging to a child as physical abuse. An abused child will often experience more than one type of abuse, as well as other difficulties in their lives. It often happens over a period of time, rather than being a one-off event. And it can increasingly happen online.”*¹

A student who is not **thriving** either socially, emotionally or academically may be the victim of abuse. The signs of child abuse may not be obvious, and a child may not tell anyone what is happening to them. Sometimes, children do not even realise they are being abused. Particular signs of abuse to be alert to include:

- Drinking alcohol regularly from an early age
- Concern for younger siblings without explaining why
- Secrecy and reluctance to share information
- Talk of running away
- Challenging or disruptive behaviour at school
- Reluctance to get changed in front of peers/ adults

Attendance/Children Missing from Education

¹ <https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/> 19.07.2018

A child going missing from education is a potential indicator of abuse or neglect and such children are at risk of being victims of harm, exploitation or radicalisation. Ark Greenwich Free School staff should follow their procedures via the Attendance Officer for unauthorised absence and for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future

Dealing with Disclosures

If a child discloses that he or she has been abused in some way the member of staff should:

- Find time and, if necessary, a suitable place to listen to the child, when information about possible abuse comes to light
- Listen to what is being said without displaying shock or disbelief
- Do not make false promises which may not be able to be fulfilled and do not promise confidentiality
- Allow the child to talk freely. Do not cross examine, interview, probe or ask to see any injury that is not visible. Listen, only asking questions when necessary to clarify. Ask open questions such as “Tell me,” and “How did that happen”
- Not criticise the alleged perpetrator
- Reassure the child that what has happened is not his or her fault
- Stress that it was the right thing to tell
- Explain what has to be done next and who has to be told
- Find out just enough to be sure of the need to refer, and keep any questions open rather than closed
- Make records that are factual, accurate and relevant and avoid subjective judgements. It is not the school's responsibility to 'check out' what any child tells nor should any abuser be questioned.
- Sign and date the record of disclosure
- Speak with the Designated Senior Person for Child Protection, and provide him/her with the signed, dated written record, using Impero EdAware without delay.

Signs and symptoms of child sexual exploitation

- Inappropriate sexual or sexualised behaviour
- Repeat sexually transmitted infections
- Having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs)
- Going to hotels or other unusual locations to meet friends
- Getting in/out of different cars driven by unknown adults
- Going missing from home or care
- Having older boyfriends or girlfriends
- Associating with other young people involved in sexual exploitation
- Truancy, exclusion, disengagement with school, opting out of education altogether
- Unexplained changes in behaviour or personality (chaotic, aggressive, sexual)
- Drug or alcohol misuse
- Getting involved in crime
- Injuries from physical assault, physical restraint, sexual assault

Staff must report to the DSL via Impero Edaware.

Child criminal exploitation (CCE): Signs and symptoms/school approach

- Having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs)
- Going to hotels or other unusual locations to meet friends
- Getting in/out of different cars driven by unknown adults
- Going missing from home or care
- Truancy, exclusion, disengagement with school, opting out of

- education altogether
- Unexplained changes in behaviour or personality (chaotic, aggressive, sexual)
- Drug or alcohol misuse
- Getting involved in crime

Staff must report any concerns to the DSL via Impero Edaware.

County Lines: Signs and symptoms/school approach

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

Signs and symptoms are the same as for CCE with the key identifier being missing episodes both from home and school.

Children and the court system

Where a child is required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed, the DSL will work alongside the family and witness service to ensure the child is supported.

Children with family members in prison

Where a child has a parent or other family member in prison, AGFS will work closely with the carer to provide appropriate support to the child.

Homelessness

Support can be sought locally [Royal Borough of Greenwich Housing Service](#).

In the event of homelessness being disclosed, the DSL will liaise with the local authority to support the family.

Female genital mutilation & mandatory reporting of FGM: Signs and symptoms /school approach

- Holiday requests made to school for significant lengths of time (Pre- warning)
- Long periods of time away from the classroom during the day with bladder or menstrual problems
- Avoidance of P.E.
- Difficulty walking, sitting or standing
- Prolonged absences from school
- Noticeable behaviour changes
- Withdrawal
- Depression
- Recurrent Urinary Tract Infections (UTI) or complaints of abdominal pain

So-called ‘honour-based’ abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so called HBA are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubts staff should speak to the DSL.

Teachers must report to the police, via the Designated Safeguarding Lead, a disclosure that FGM has been carried out.

Duties under the Counter Terrorism and Security Act 2015 (The ‘Prevent Duty’): Signs and symptoms/school approach

All staff at Ark Greenwich Free School have a duty to identify children who may be vulnerable to radicalisation. There is no single way of identifying an individual who is likely to be susceptible to

a terrorist ideology. As with other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection.

Concerns around children's vulnerability to radicalisation should be shared with the DSP either via a cause for concern form or Safeguarding Monitoring.

Peer on peer /child on child abuse including upskirting: Signs and symptoms /school approach

Signs that a child may be suffering from peer-on-peer abuse can also overlap with those indicating other types of abuse and can include:

- failing to attend school, disengaging from classes or struggling to carry out school related tasks to the standard ordinarily expected,
- physical injuries,
- experiencing difficulties with mental health and/or emotional wellbeing,
- becoming withdrawn and/or shy; experiencing headaches, stomach aches, anxiety and/or panic attacks; suffering from nightmares or lack of sleep or sleeping too much,
- broader changes in behaviour including alcohol or substance misuse,
- changes in appearance and/or starting to act in a way that is not appropriate for the child's age, and
- abusive behaviour towards others

Instances of peer-on-peer abuse must be reported to the DSL who will work with the Senior Leadership Team to investigate the allegations and determine appropriate courses of action, including but not limited to referrals to children's social care.

- Serious violence: Signs and symptoms /school approach

Contextual safeguarding: Signs and symptoms /school approach

Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships. Therefore children's social care practitioners need to engage with individuals and sectors who do have influence over/within extrafamilial contexts, and recognise that assessment of, and intervention with, these spaces are a critical part of safeguarding practices. Contextual Safeguarding, therefore, expands the objectives of child protection systems in recognition that young people are vulnerable to abuse in a range of social contexts.

- Non-collection of children
- Supporting Transgender Pupils ([Ark code of practice](#))

Medicine & First Aid

Refer to the Ark Greenwich Free School Medical Policy.

Health & Safety

Ark Greenwich Free School complies with all health and safety regulations. The site is regularly risk assessed and changes are made to the site in order to ensure children are safe.

Educational visits/Transporting children on school activities

A full risk assessment is made prior to any educational visits. These risk assessments include reference to vulnerable children and specific arrangements regarding their protection is built into the planning of any educational visit. Staff do not transport children alone or in their own vehicles. A full risk assessment of transporting children takes place prior to any educational visit being approved.

Intimate care

The school, as a rule, does not provide intimate care to its students.

SEND

Students with additional needs are more at risk of abuse and may be less likely to disclose. A student's individual needs will be taken into account by staff when speaking to them and reasonable adjustments will be made wherever possible to facilitate communication.

Using Technology Safely and internet/ online safety

In addition to featuring heavily in the computing and wellbeing curriculum, Ark Greenwich Free School helps children use technology safely through the *secure us* software. This tool sends screen shots of inappropriate or concerning use of technology to the DSP, who then follows the cause for concern reporting procedure to investigate concerns. Parents are kept informed on how to keep their children safe online through regular articles in the parent bulletin and individualised support for parents of particularly vulnerable children.

ICT Acceptable Use Policy

All staff sign the Ark ICT Acceptable Use Policy.

Whistleblowing

All staff at Ark Greenwich Free School will bring matters of concern relating to Child Protection and Safeguarding to the attention of the Headteacher (or, if the concern relates to the Headteacher, to the Ark Regional Director). This is particularly important where the welfare of a child is at risk. Whistle Blowing guidelines are communicated to all staff through annual training and the staff handbook. No action will be taken against staff if the concern proves to be unfounded and was raised in good faith. Malicious allegations may be considered as a disciplinary offence. The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 or email help@NSPCC.org.uk. There is a separate Ark GFS whistle blowing policy.

Children/young people with Medical Needs

Care plans are written for students with additional medical needs. Copies of these can be found on the All Staff Google Drive. Students with medical needs are also more vulnerable to abuse, and their welfare and progress is monitored frequently.

Responding to self-harm, suicide, mental health

All staff are trained in spotting the signs of self-harm, suicide and low mental health. There is a team of mental health ambassadors at school who receive additional training on supporting students who self-harm, seek suicide or have poor mental health. Concerns regarding mental health, self-harm and suicidal ideation should be reported to the DSP immediately, who will complete a risk assessment and involve other agencies as necessary.

Primary-Secondary transition

Safeguarding information regarding incoming students is shared with Ark Greenwich Free School in advance of their arrival and, wherever possible, Ark Greenwich Free School attends Child in Need and Child Protection meetings for students before they join. Where necessary, vulnerable students make additional visits to the school and are allocated a key worker to ensure their transition to secondary school is smooth.

Staff code of conduct

All staff sign a code of conduct when they begin working at Ark Greenwich Free School. A copy of the staff code of conduct is found in the staff disciplinary policy and a signed copy is placed on each employee's file.

Behaviour & Attitudes

Behaviour – refer to the Ark Greenwich Free School behaviour policy.

Anti – Bullying and Harassment - refer to the Ark Greenwich Free School behaviour policy.

Anti-Discrimination - refer to the Ark Greenwich Free School behaviour policy and equal opportunities policy.

Some vulnerable students and students who have committed offences may present a risk to others in a school setting. In these circumstances, a risk assessment and safety plan are completed, with full details of how key staff should respond in crisis.

Use of Reasonable force/Physical Intervention /Positive Handling – please refer to the Ark Greenwich Free school positive handling policy.

Images/photography of pupils – consent is sought by parents periodically throughout a student's time at Ark Greenwich Free School regarding school photography of pupils. Parents have the right to not give consent for their child to be photographed and this will be respected at all times. Photographs may only be taken of pupils using school photography equipment. Photographs of children may not be taken on personal devices.

Managing allegations against other pupils – Ark Greenwich Free school follows the guidance set out in Keeping Children Safe in Education 2020 , part 5 (*Child on Child Sexual Violence and Sexual Harassment*). Ark Greenwich Free School recognises that children are capable of abusing their peers and that all allegations of peer on peer abuse will be investigated and dealt with. Abuse is abuse and it will never be tolerated at Ark Greenwich Free School. The approach to managing allegations against other pupils is the following:

Risk assess the nature of the allegation and decide if outside agencies need to be contacted (e.g. police, health professionals). If outside agencies are required, take advice from them on appropriate next steps.

Separate the victim and alleged perpetrator of abuse immediately to enable a full investigation to take place.

Take a full statement from the victim of abuse.

Contact parents of both victim and alleged perpetrator, stating that an accusation of abuse has been made.

Take a full statement from the alleged perpetrator of abuse and other witnesses.

Liaise with external agencies if necessary.

Hold a case meeting with key professionals to decide appropriate outcome.

Communicate outcome with victim, perpetrator and parents.

Deliver appropriate restorative interventions.

PSHE & Citizenship/Relationship & Sex Education (RSE)/Spiritual, moral, social and cultural (SMSC) – Ark Greenwich Free School meet government requirements regarding PSHE, Citizenship, SRE and SMSC. More details on where and how these objectives are met can be found in the wellbeing curriculum and in department medium term plans.

Safety

School site security -

Visitor Management – all visitors to the school must sign in upon arrival, using the confidential visitor sign in book. Visitors with an in-date DBS certificate are issued with a green lanyard and they have free roaming access across the school. Visitors without an in-date DBS certificate are issued with a red lanyard and must be accompanied at all times. Anyone roaming the site unaccompanied and with a red lanyard must be challenged and returned to the main reception. Ark Greenwich Free School staff wear a blue lanyard.

Coping with a school emergency/Emergency response plan – Ark Greenwich Free School have comprehensive fire and lock-down emergency response plans, which can be found in all classrooms and offices. A copy of these procedures is also attached to this document.

Managing Violence Code of Practice – Refer to the Ark guidance

Alternative Provision Risk Assessments – Refer to the Ark guidance

Managed Move protocol – Refer to the Ark Greenwich Free School Behaviour Policy

HR & Governance

Safer recruitment – please refer to the Ark Greenwich Free School Safer Recruitment policy for more details. At least one member of every appointments panel will have gained accreditation through Safer Recruitment training (statutory requirement). The school will ensure that there are always sufficient numbers of suitably trained staff or governors in post.

Complaints policy – please refer to the Ark Greenwich Free School complaints policy for more details.

Allegations against staff, volunteers and other professionals –

Anyone can make an allegation.

An allegation is any information which indicates that a member of staff /volunteer may have:

- Behaved in a way that has, or may have, harmed a child
- Possibly committed a criminal offence against or in relation to a child
- Behaved towards a child or children in a way which indicates s/he would pose a risk of harm to children

This applies to any child the member of staff / volunteer has contact with in their personal, professional or community life.

To reduce the risk of allegations, all staff and volunteers must be aware of safer working practice and must be familiar with the Government document, *‘Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings.’*

The person to whom an allegation is first reported should take the matter seriously and keep an open mind. S/he should not investigate or ask leading questions if seeking clarification; it is important not to make assumptions. Confidentiality must not be promised and the person must be advised that the concern will be shared with the DSL.

Upon receipt of notification via Impero EdAware, the DSL will ensure an accurate written record of the allegation is taken using the informant’s words – including time, date and place where the alleged incident took place, brief details of what happened, what was said and who was present. The DSP may make further enquiries in order to gather additional information whilst maintaining confidentiality. This record must be signed, dated and immediately passed to the Head Teacher.

The recipient of an allegation must not unilaterally determine its validity, and failure to report it in accordance with procedures is a potential disciplinary matter.

The Head Teacher will not investigate the allegation itself, or take written or detailed statements, but will assess whether it is necessary to refer the concern to the Local Authority Designated Officer (LADO) for Education, who is Catrin Gruffydd-Jones; contact details are: 0208 921 3930

Email: childrens-LADO@royalgreenwich.gov.uk

If the allegation meets any of the three criteria set out above, then the Head Teacher shall contact

the LADO (Education) immediately, and provide the LADO with written confirmation of the allegation.

The Head Teacher shall, as soon as possible, **following briefing** from the LADO inform the subject of the allegation. The Head Teacher may appoint a member of the SLT to investigate the matter or an appropriate external body to do so. The Head Teacher will take necessary steps to safeguard all concerned parties.

If there is an allegation or concerns raised against the Head Teacher, then the Ark Regional Director and Ark Head of Safeguarding must be contacted. The Ark Regional Director for this school is: **Sian Madrell** and the Head of Safeguarding is **Joycelyn Thompson**. Contact details are held by **Victoria Hemmings**. In the absence of the Chair of Governors, the Head of Ark Secondary schools will be contacted. The Head of Ark Secondary is: **Rebecca Boomer Clark**. Contact details are held by **Victoria Hemmings**.

- Disqualification under the Childcare Act 2006 (DfE Feb 2015) – Ark Greenwich Free School operates in accordance with this guidance.
- The Governors Handbook – (requirement for Governors) – all new governors are issued with a handbook that outlines their responsibility for safeguarding.
- Local, Network and National support services for staff, parents, pupils:

Agency	Contact Details
Greenwich Safeguarding Children Board	http://www.greenwichsafeguardingchildren.org.uk/site/index.php
Greenwich Children’s Services	http://www.royalgreenwich.gov.uk/info/266/child_protection/957/initial_assessments
Greenwich Early Help	https://www.greenwichcommunitydirectory.org.uk/kb5/greenwich/fsd/advice.page?id=yiW-pTbMUkE
Greenwich Volunteering Matters	https://volunteeringmatters.org.uk/opportunity/volunteers-supporting-families-greenwich/
Childline	https://www.childline.org.uk/
National Self harm network	https://nshn.co.uk/

APPENDIX B

Statutory legislation and guidance documents links

[Keeping Children Safe in Education 2020](#)

[Working together to Safeguard Children \(DfE, 2018\)](#)

[Working together to Safeguard Children July 2018](#)

[What to do if you are worried a child is being abused \(March 2015\)](#)

[Use of reasonable force: advice for head teachers, staff and governing bodies \(July 2013\)](#)

[Information Sharing: Advice for Practitioners \(DfE, 2018\)](#)

[Prevent Duty Guidance for England and Wales' \(2015\)](#)

[Early years \(under 5s\) foundation stage framework \(EYFS\) \(2017\)](#)

[The Children Act 1989](#)

[The Children Act 2004](#)

[DfE's Data Protection: A Toolkit for Schools \(2018\)](#)

[Education Act 2002](#)

[The Children and Families Act 2014](#)

[Inspecting Safeguarding in early years, education and skills setting \(2019\)](#)

[SEND code of practice: 0 to 25 years \(DfE 2017\)](#)

[Mental Health & Behaviour in Schools Nov 2018](#)

[Disqualification under the Childcare Act \(DfE, 2006\)](#)

[The Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#)

[School attendance August 2020](#)

[Exclusion from maintained schools, academies and pupil referral units in England \(Sept 2017\)](#)

[Criminal Exploitation of children and vulnerable adults: County Lines guidance \(July 2017\)](#)

[Education Inspection Framework \(Sept 2019\)](#)

[Inspecting safeguarding in early years, education and skills settings \(Sept 2019\)](#)

[Safeguarding in schools, colleges and other providers](#)

[Safeguarding and Remote Education](#)

[Schedule 4 of the Safeguarding Vulnerable Groups Act 2006 which defines what 'regulated activity' is in relation to children](#)

[The Equality Act 2010](#)

[The Data Protection Act 2018 and General Data Information Protection Regulations](#)

[The Serious Crime Act 2015 \(sets out a duty on professionals \(including teachers\) to notify police when they discover that FGM appears to have been carried out on a girl under 18\).](#)

[The Voyeurism \(Offences\) Act, 2019 \(which is commonly known as the Upskirting Act\)](#)

['When to call the police' Guidance for schools and colleges, produced by the National Police Chiefs Council \(NPCC\) 2020.](#)

Home Office's Preventing youth violence and gang involvement

APPENDIX C

Abuse / Safeguarding Issues that can place children at risk of harm (link to guidance/advice)

Abuse

[Bullying including cyberbullying](#)

[Children and the Court System \(Ages 5-11\)](#)

[Children and the Court System \(Ages 12-17\)](#)

[Children with family members in prison](#)

[Child Missing from Education](#)

[Child Missing from home or care](#)

[Child Sexual Exploitation \(CSE\)](#)

[Criminal exploitation of children and vulnerable adult's county lines](#)

[Domestic Abuse](#)

[Drug Advice for Schools](#)

[Fabricated or Induced Illness](#)

[Faith or Belief Based Abuse](#)

[Female Genital Mutilation \(FGM\)](#)

[Forced Marriage](#)

[Gangs and Youth Violence](#)

[Gender based violence/violence against women and girls \(VAWG\)](#)

[Hate](#)

[Homelessness](#)

[Mental health](#)

[Peer on Peer / child on child](#)

[Private fostering](#)

[Preventing radicalisation](#)

[Protecting children from radicalisation](#)

[Sexting](#)

[Sexual violence and sexual harassment between children in schools and colleges](#)

[Serious Violence](#)

[Trafficking and modern slavery](#)

[Up-skirting](#)

APPENDIX D

RECRUITMENT & APPOINTMENT POLICY 2019-2021

<https://arkschools.sharepoint.com/ArkNetCentral/policies/Shared%20Documents/Forms/AllItems.aspx?id=%2FArkNetCentral%2Fpolicies%2FShared%20Documents%2FOur%20People%2FRecruitment%20and%20appointment%20policy%20April%202019%20to%202021%2Epdf&parent=%2FArkNetCentral%2Fpolicies%2FShared%20Documents%2FOur%20People>