CITY OF LONDON ACADEMY
HIGHBURY GROVE

Child Protection and Safeguarding Policy

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*Note that the highlighted "March 2026 updates" was reviewed by the Safeguarding Governor on 30th April 2026

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Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated safeguarding Lead (DSL)	Jon Bellinger	0207 288 8927 safeguarding@highburygrove.cola.org.uk
Child Protection Officer	Louise Furgason	0207 288 8956 safeguarding@highburygrove.cola.org.uk
Deputy Designated Safeguarding Leads (DDSL)	Aimee Lyall Andre Martins Dolores Assan Rachel Halpin	safeguarding@highburygrove.cola.org.uk
Local authority designated officer (LADO)	Timur Djavit	0207 527 8102
Chair of Governors	Martyn Jermyn	governors@highburygrove.cola.org.uk

Introduction and Ethos

City of London Highbury Grove is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment.

- Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children has an important role to play.
- School and college staff are particularly important as they are in a position to identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating. It is important all staff (including those who do not work directly with children) recognise the important role they play in protecting children1

City of London Highbury Grove recognises the importance of creating and maintaining a safeguarding culture that will help all pupils to feel safe, secure and respected; encourage them to talk openly; and enable them to feel confident that they will be listened to. We are committed to providing an environment where children can play, learn, develop and achieve and where they are safeguarded and are enabled to disclose if they are being harmed in some way. We are alert to the signs of abuse and neglect and follow our procedures to ensure that all pupils receive effective support, protection and justice.

We recognise that some children may be especially vulnerable to abuse. We understand that children who are abused or neglected may find it difficult to develop a sense of self-worth and to view the world in a positive way. Behaviour may be challenging and or concerning and at times this may impact on other children either directly or indirectly. We will always take a reflective, considered and sensitive approach in order that we can support all of our pupils.

[1] Keeping Children Safe in Education (DfE, 2025)

Our Setting's core safeguarding principles are:

- That schools are an important part of the wider safeguarding system for children.
- It is a whole school responsibility to safeguard and promote the welfare of children
- All children (defined as those up to the age of 18) have equal rights to protection regardless of age, gender, ability, culture, race, language, religion or sexual identity
- All children have a right to be heard and to have their wishes and feelings taken into account
- All staff understand safe professional practice 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 policy

Please note that the procedures contained in this policy apply to all staff (including teaching and non-teaching, temporary staff and volunteers) and governors and are consistent with the London Safeguarding Children Procedures

Definitions

Safeguarding is not just about protecting children, learners and vulnerable adults from deliberate harm, neglect and failure to act, other aspects of care and education are related:

- children's and learners' health and safety and well-being, including their mental health
- meeting the needs of children who have special educational needs and/or disabilities (SEND)
- the use of reasonable force
- meeting the needs of children and learners with medical conditions
- providing first aid
- educational visits
- intimate care
- emotional well-being
- online safety and associated issues including disinformation, misinformation, conspiracy theories, and generative AI.
- appropriate arrangements to ensure children's and learners' security, taking into account the local context

Within this document:

- Safeguarding is defined as:
  - Providing help and support to meet the needs of children as soon as problems emerge
  - protecting children from maltreatment, whether that is within or outside the home, including online
  - preventing the impairment of children's mental and physical health or development
  - Ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and
  - Taking action to enable all children to have the best outcomes

- Child Protection is an aspect of safeguarding, but is focused on how we respond to children who have been significantly harmed or are at risk of significant harm.
- Staff applies to all those working for or on behalf of the Setting, full time or part time, in either a paid or voluntary capacity. This also includes governors.
- Child refers to all young people who have not yet reached their 18th birthday or Looked After Children and SEND young people who have not yet reached their 25th birthday. The policy will also extend to visiting children and students from other establishments
- Parent refers to birth parents and other adults in a parenting role for example adoptive parents, step-parents, guardians and foster carers.
- Abuse could mean neglect, physical, emotional or sexual abuse or any combination of these. Parents, carers and other people can harm children either by direct acts and / or failure to provide proper care.

Context

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related guidance (see below). In addition, Section 175 (Section 157 for academies and independent schools) of the Education Act, 2002 requires governing bodies of maintained schools and further education colleges (including sixth form colleges) to ensure they safeguard and promote the welfare of children who are either pupils at the Setting or who are students under 18 years of age attending the further education institution. KCSIE 2025 states that colleges include providers of post-16 education, 16-19 academies, special post-16 institutions and Independent Training Providers.

Guidance includes the following:

- Working Together to Safeguard Children 2023
- DfE guidance Keeping children safe in education 2025 (publishing.service.gov.uk)
- Teaching online safety in Schools (DfE, 2019)
- London Safeguarding Children Procedures 7th Edition
- Inspecting safeguarding Ofsted Handbooks and Frameworks
- County Lines Professional Toolkit
- Early years foundation stage (EYFS) statutory framework - GOV.UK (www.gov.uk)
- https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information
- The right to choose: government guidance on forced marriage - GOV.UK (www.gov.uk)

All safeguarding policies will be reviewed on an annual (minimum) basis by the Governing Body which has responsibility for oversight of the safeguarding and child protection systems. The DSL/Head Teacher will ensure regular reporting on safeguarding activity and systems in the Setting to the Governing Body. The Governing Body will not receive details of individual pupil situations or identifying features of families as part of their oversight responsibility.

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 Setting's integrated safeguarding portfolio and should be read in conjunction with any related policies. Please also see Part 1 and Annex B of KCSIE 2025. All staff and volunteers at City of

London Highbury Grove recognise that children experiencing specific safeguarding issues are no different to safeguarding against any other vulnerability or concern and will respond in the same way as they do to protect children from any other risks.

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

- What to do if you're worried a child is being abused - Publications - GOV.UK
- Information Sharing advice May 2024
- Guidance for Safer Working Practice 2022 :
- Mental health and behaviour in Schools - Publications - GOV.UK
- Teachers' Standards
- Safeguarding Disabled Children Practice Guidance
- Preventing & Tackling Bullying
- Promoting children and young people's emotional wellbeing
- Public Health England Every Mind Matters - Teaching RSHE
- Education for a Connected World (publishing.service.gov.uk)
- Behaviour in Schools Feb 2024
- Suspension and permanent exclusion guidance September 2023

Scope of policy

This policy applies to all staff, Governors, volunteers, students and parents/carers at The City of London Academy Highbury Grove.

Key requirements/Legal duties

This policy responds to the requirements of the statutory guidance from the Department for Education issued under Section 175 of the Education Act 2002, the Education (Independent School Standards) Regulations 2014 and the Education (Non-Maintained Special Schools) (England) Regulations 2011.

This requires Schools and Academies to have regard to statutory guidance when carrying out their duties to safeguard and promote the welfare of children.

The Academy acknowledges its legal duties with respect to the statutory guidance outlined in:

- Keeping Children Safe in Education 2025
- Working Together to Safeguard Children 2023
- Contextual Safeguarding: An overview of the operations, strategic and conceptual framework 2017
- Departmental Advice: What to do if you are Worried a Child is Being Abused – Advice for Practitioners
- Departmental Advice COVID -19: safeguarding in schools, colleges and other providers
- Prevent Duty Guidance for England and Wales 2015

This policy reflects the Government's broader definition of safeguarding and promoting the welfare of children as: protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

Children includes everyone under the age of 18.

The Governors and staff of The City of London Academy Highbury Grove fully recognise the contribution we make to Safeguarding children. We recognise that safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who comes into contact with children and their families and carers has a role to play in safeguarding children. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that they should consider, at all times, what is in the **best interests** of the child.

All staff, including volunteers, have a full and active part to play in protecting our children from harm: where a child is suffering significant harm, or is likely to do so, we will take action to protect that child; we will also promote the welfare of a child in need of additional support, even if they are not suffering harm or at immediate risk.

We acknowledge our responsibility to work with social care, the police, health services and other services to promote the welfare of children and protect them from harm.

All staff have an awareness of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47.

Where a child is suffering, or is likely to suffer from harm, a referral to Children's Social Care (and if appropriate the police) will be made immediately. Referrals will follow the local referral process.

This policy sets out our procedures and provisions to support the delivery of these outcomes. It defines the roles and responsibilities of staff in Safeguarding Children.

Roles and responsibilities

Designated Safeguarding Lead (DSL) – Jon Bellinger, Assistant Principal - is the Academy's Designated Safeguarding Lead who has responsibility for Child Protection and who undertakes regular training for this role. His certification is updated every two years.

Deputy Designated Safeguarding Leads (DDSL) – Aimee Lyall, Andre Martins, Rachel Halpin and Dolores Assan act in the DSL's absence. They also undertake regular training for this role. Their certification is updated every two years.

Child Protection Officer (CPO)- Louise Furgason is responsible for supporting the monitoring and recording of Safeguarding Incidents. She supports the DSL in his duties on a daily basis.

The DSL, DDSLs and CPO will have a complete safeguarding picture and will give advice on any safeguarding concerns raised. They will always consider the wider context and sources of influence on the young person.

Responsibilities of Designated Safeguarding Lead and Deputy Safeguarding Leads

- Ensure each member of staff has access to and understands the Academy's Child Protection and Behaviour Policies and procedures, especially new and part time staff and volunteers.
- Ensure that all new members of staff are given a copy of the Academy's Child Protection Policy and Part One of Keeping Children Safe in Education 2025 as part of their induction into The City of London Academy Highbury Grove. The DSL should ensure that all staff members have read and understood the above document.
- Ensure that all staff are aware of the Academy's Whistleblowing Policy.
- Ensure that all staff members undergo Child Protection training at least annually. New staff members receive training as part of their induction.
- Ensure all staff members receive safeguarding and child protection updates (i.e., via email, ebulletins and staff meetings), as required, to provide them with the relevant skills and knowledge to safeguard effectively.
- Link with the Local Authority to make sure staff are aware of training opportunities and the latest local policies on Safeguarding.
- Act as a source of support, advice and expertise to staff on matters of safety and Safeguarding and when deciding whether to make a referral by liaising with relevant agencies.
- Encourage a culture of listening to children and taking account of their wishes and feelings among all staff.
- Be alert to the specific needs of children on a Child Protection Plan, Children in Need, those with Special Educational Needs and/or Disabilities and Young Carers.
- Liaise with the local authority and work with other agencies in line with Working Together to Safeguard Children 2023
- Refer all cases of suspected abuse, neglect and exploitation to the local authority children's social care. In particular, following a disclosure:
    - Obtain information from staff, volunteers, children or parents and carers who have child protection concerns and record this information.
    - Assess the information quickly and carefully and ask for further information as appropriate. o Consult with Islington Children Services in the first instance (or the borough in which the student lives).
    - The Designated Safeguarding Lead should make a referral to the police without delay if it is agreed during the consultation or if there is an immediate risk to the child.
- Liaise with the Principal to inform him or her of issues concerning Children's Social Care Core Assessments of a child's needs and/or police investigations.
- Liaise with the Principal to inform him or her of issues – especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an appropriate adult present, while a student is being questioned or detained by the police. This would usually be a parent, guardian or Social Worker.
- Undergo updated Child Protection training every two years.
- Keep detailed, accurate and chronological written records of referrals and concerns even if there is no need to make an immediate referral.
- Ensure that all such records are kept confidentially and securely and are separate from student records.

- Check the attendance of students subject to a Child Protection Plan on a daily basis and refer any absence immediately to Children's Social Care.
- Attendance policy reflects statutory guidance in Working Together to Improve School Attendance (2023).
- Ensure that where a student who is subject to a Child Protection Plan leaves, their information is transferred to the new placement immediately and the child's social worker is informed.
- Ensure the Academy's Child Protection Policy is reviewed annually, and that procedures and implementation are updated and reviewed regularly.
- Ensure the Child Protection Policy is available publicly and that all parents, as part of the student induction process, are made aware of the Safeguarding and Child Protection Policy which is on the Academy's website: www.highburygrove.cola.org.uk
- Ensure parents/carers are aware that referrals about suspected abuse or neglect may be made and of the role of the Academy in this.
- When students about whom there are or have been safeguarding concerns leave the Academy, ensure that their file is transferred to the new school or Academy as soon as possible. This should be transferred separately from the main student file, secure transit must be ensured, and confirmation of receipt should be obtained.
- If the student's destination is not known, keep the file in a secure place for five years.

Responsibilities of Staff and Volunteers

*No single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time**, everyone** who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action* - Keeping Children Safe in Education 2025.

Staff working with children are advised to maintain an attitude of **'it could happen here'** where safeguarding is concerned. When concerned about the welfare of a child staff will always act in the **best** interests of the child.

If in exceptional circumstances the DSL or Deputies are not available, staff will speak to a member of the Senior Leadership Team and/or take advice from local children's social care. In these circumstances, any action taken should be shared with the DSL or Deputy as soon as is practically possible.

Staff will not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. Staff are aware that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision. If in any doubt about sharing information, staff should speak to the DSL or Deputies. 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.

Staff are aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected and/or they may not recognise their experiences as harmful e.g. children may feel embarrassed, humiliated or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns.

Staff are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. All staff should be aware of the indicators of abuse,

neglect and exploitation, understanding that children can be at risk of harm inside and outside of the school, inside and outside of home, and online. This includes where children see, hear, or experience the effects of domestic violence abuse. Staff should be aware that abuse can take place wholly online and that technology may be used to facilitate offline abuse.

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

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Staff are aware of how these children's experiences can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action will always be taken in line with the usual process for reporting safeguarding concerns.

All staff understand and have been trained in the following:

- Part 1 of Keeping Children Safe in Education September 2025. They have also read this.
- Providing a safe environment in which children can learn.
- Ensuring that their behaviour and actions do not place children or themselves at risk of harm or of allegations of harm to children. In particular, they ensure that conduct when in a 1:1 situation with a child is managed in a way that would not lead any reasonable person to question their motives or intentions.
- Staff relationships and associations in school and outside (including online), may have an implication for the safeguarding of children in the school. Where this is the case, the member of staff must speak to the DSL or the Principal.
- The warning signs and symptoms of child abuse, neglect and exploitation 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 are 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.
- The Academy's Whistleblowing Policy and procedures.
- Identifying children who may be in need of extra help or who are suffering, or are likely to suffer, significant harm.
- The signs and indicators of abuse.
- Their responsibility for referring any concerns to Designated Safeguarding Leads at the Academy.
- Taking appropriate action, working with other services as needed.
- Supporting social workers to take decisions about individual children.
- How to respond to a student who discloses abuse. This is also detailed in Appendix A

In addition to this, all staff will be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs
- has special educational needs (whether or not they have a statutory education, health and care plan)
- is a young carer

- is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- is frequently missing/goes missing from care or from home
- is at risk of modern slavery, trafficking or exploitation
- is at risk of being radicalised or exploited
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues or domestic abuse
- is misusing drugs or alcohol themselves
- has returned home to their family from care
- is a privately fostered child

Significant harm

The Children Act 1989 introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interests of the children and gives local authorities a duty to make enquiries to decide whether they should take action to safeguard or promote the welfare of a child who is suffering, or likely to suffer significant harm.

It is acknowledged that a child can be abused, harmed or neglected in a family, institution or community setting by someone known to them, or less commonly, by a stranger. This includes someone in a position of trust such as a teacher or other professional.

Safeguarding and the promotion of a child's welfare covers all aspects of the child's life and the Academy is committed to ensuring that all its actions are compatible with this aim. This includes where there are concerns about a child's welfare that do not meet the thresholds.

If there are concerns about a child's welfare that do not meet the thresholds of child abuse the Academy will consider all other options available to them and will work in partnership with all agencies.

Types of abuse and neglect

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

All staff are aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the DSL (or Deputies) will consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation and serious youth violence.

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or another child or children.

Physical Abuse

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

The following signs may or may not be indicators that physical abuse has taken place, but the possibility should be considered. This is not an exhaustive list and many of the signs and symptoms could fall into more than one category:

- Unexplained injuries, bites, bruises or burns, particularly if they are recurrent.
- Improbable excuses given to explain injuries.
- Refusal to discuss the causes of injuries.
- Untreated injuries.
- Disclosure of punishment which appears excessive.
- Withdrawal from physical contact/aggressive behaviour.
- Arms and legs kept covered in hot weather (excluding for reasons of cultural dress).
- Fear of returning home.
- Fear of medical help.
- Self-destructive tendency.
- Running away.

Emotional Abuse

This is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development.

It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.

It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

The following signs may or may not be indicators that emotional abuse has taken place, but the possibility should be considered.
This is not an exhaustive list and many of the signs and symptoms could fall into more than one category:

- Physical, mental, emotional or developmental lag.
- Domestic violence.
- Disclosure of punishment which appears excessive.
- Over-reaction to making mistakes or fear of punishment.
- Continual self-deprecation.
- Sudden speech disorders.

- Fear of new situations.
- Inappropriate responses
- Neurotic behaviours.
- Self-harm.
- Fear of parents being contacted.
- Extremes of passivity or aggression.
- Drug or solvent abuse.
- Running away.
- Compulsive stealing, scavenging.

Sexual Abuse

This involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.

Sexual Abuse may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

The following signs may or may not be indicators that sexual abuse has taken place, but the possibility should be considered. This is not an exhaustive list and many of the signs and symptoms could fall into more than one category:

- Sudden changes in behaviour.
- Displays of affection which are inappropriate.
- Alleged promiscuity or sexualised behaviour.
- Fear of undressing.
- Regression to younger behaviour.
- Inappropriate internet use and possible ‘grooming’ concerns.
- Genital itching or other genital/anal pain/injury.
- Distrust of familiar adult.
- Unexplained gifts of money, mobile phones etc.
- Depression and withdrawal.
- Apparent secrecy about social activities or the identity of “special friends.”
- Wetting or soiling, day and night.
- Sleep disturbances or nightmares.
- Chronic illness, especially throat infections and sexually transmitted disease.

Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. Abuse can be, but is not limited to; psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development and ability to learn.

Neglect

This is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

The following signs may or may not be indicators that neglect has taken place, but the possibility should be considered. This is not an exhaustive list and many of the signs and symptoms could fall into more than one category:

- Self-destructive tendency.
- Running away.
- Constant hunger.
- Poor personal hygiene.
- Constant tiredness.
- Poor state of clothing.
- Frequent lateness or non-attendance at the Academy.
    - Attendance policy reflects statutory guidance in Working Together to Improve School Attendance (2023).
- Untreated medical problems or unmet special needs.
- Low self-esteem.
- Neurotic behaviour.
- Poor social relationships.
- Deterioration in school performance.
- Compulsive stealing or scavenging.

Other specific safeguarding issues

Sexual violence and sexual harassment between children

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

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. City of London Academy Highbury Grove will ensure that **all** victims are taken seriously and offered appropriate support. City of London Academy Highbury Grove will always consider the following:

It is more likely that girls will be the victims of sexual violence and more likely that sexual harassment will be perpetrated by boys. The Academy is fully aware of the importance of:

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

Vulnerable groups

Children with Special Educational Needs and Disabilities (SEND) can be especially vulnerable. Disabled and deaf children are three times more likely to be abused than their peers. Additional barriers can sometimes exist when recognising abuse in SEND children. These can include:

- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- the potential for children with SEND or certain medical conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs;
- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child’s disability rather than abuse or neglect, without further exploration;
- Speech, language and communication needs which may make it difficult to tell others what is happening and managing or reporting these challenges.

Children who are Lesbian, Gay, Bi, or Trans (LGBTQ+) can be targeted by their peers. In some cases, a child who is perceived by their peers to be LGBTQ+ (whether they are or not) can be just as vulnerable as children who identify as LGBTQ+.

The Academy is aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence in this section of the policy, we do so in the context of child on child sexual violence. For the purpose of this advice, when referring to sexual violence we are referring to sexual offences (such as rape, assault by penetration and sexual assault) as defined by the Sexual Offences Act 2003.

What is consent?

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

Sexual harassment

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

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

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; sexual "jokes" or taunting.
- physical behaviour, such as: deliberating brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include consensual and non-consensual sharing of nude and semi-nude images and/or videos.

The Academy will always consider sexual harassment in broad terms and treat all allegations very seriously. Sexual harassment creates an atmosphere that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

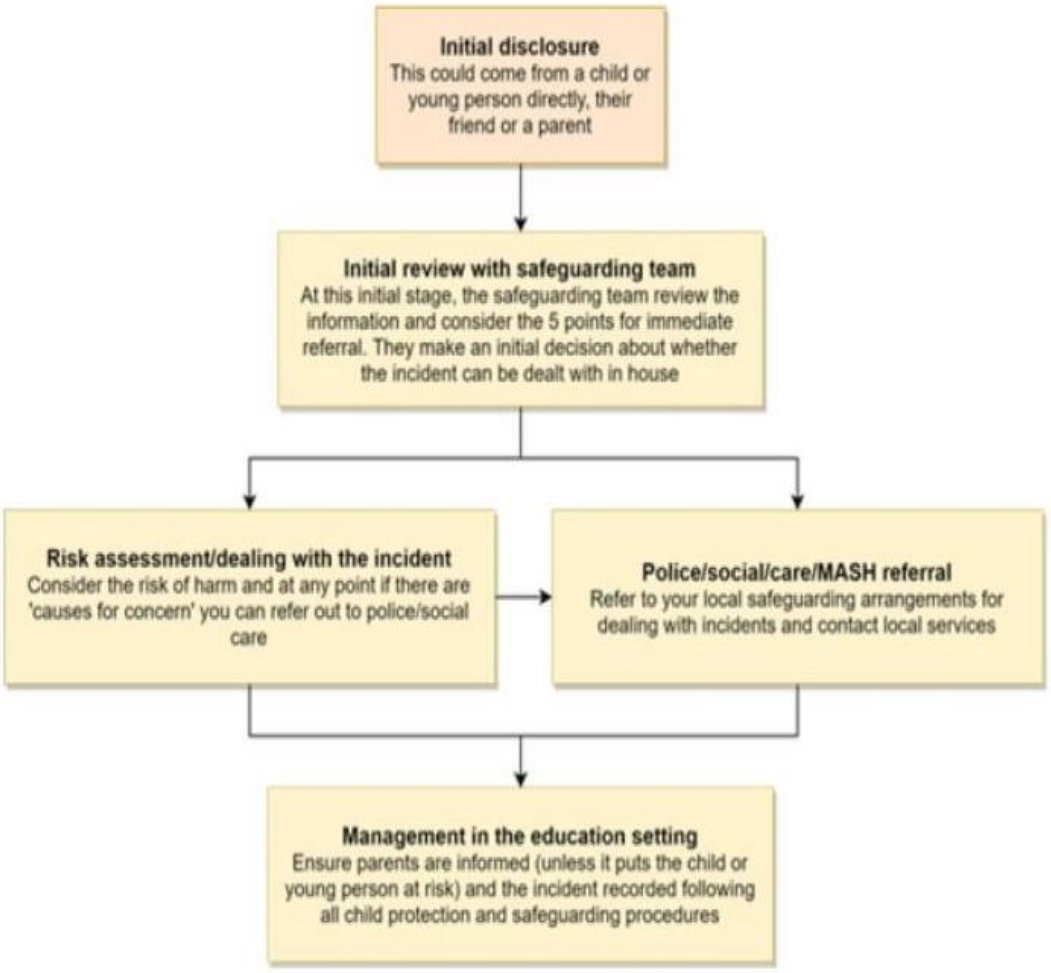
Some situations are statutorily clear:

- upskirting is a criminal offence – The Voyeurism (Offences) Act 2019.
- a child under the age of 13 can never consent to any sexual activity;
- the age of consent is 16;
- sexual intercourse without consent is rape;
- rape, assault by penetration and sexual assault are defined in law; and
- taking and sharing nude photographs and videos of under-18s is a criminal offence. This includes children taking and sharing nude photographs and videos of themselves.

When an incident involving nudes and / or semi-nudes comes to the attention of any member of staff in the Academy:

- the incident will be referred to a DSL as soon as possible.
- a decision will be made on whether it is necessary to view the images. In most case this will not be necessary. In all cases, any image needing to be viewed, would only ever be done so by a DSL.
- the DSL will hold an initial review meeting with appropriate staff, this may include the staff member(s) who heard the disclosure
- parents and carers will be informed at an early stage and involved in the process in order to best support the child or young person unless there is good reason to believe that involving them would put the child or young person at risk of harm
- a referral will be made to children's social care and/or the police immediately if there is a concern that a child or young person has been harmed or is at risk of immediate harm at any point in the process

The below summarises the approach the Academy takes when responding to an incident of this nature:



Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator of facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults and can also be facilitated and/or take place online. The abuse can be one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Some of the following can be indicators that CSE or CCE has taken place. This is not an exclusive list and many of the signs and symptoms could fall into more than one category:

- Appear with unexplained gifts, money or new possessions.
- Associate with other children involved in exploitation.
- Suffer from changes in emotional well-being.
- Missing from home or care.

- Involvement in offending
- Physical injuries.
- Drug and/or alcohol misuse.
- Repeat STIs, pregnancies or terminations.
- Display sexual behaviours beyond expected sexual development
- Absent from the Academy.
- Change in physical appearance
- Evidence of sexual bullying/vulnerability through the internet/social networking sites.
- Estranged from their families.
- Recruiting others into exploitative situations.
- Self-harm.
- Thoughts of or attempted suicide.
- Physical injuries.
- Older boyfriends and girlfriends.
- Missing for periods of time or regularly coming home late.

‘**Honour based’ abuse (HBA)**

So-called ‘honour-based’ abuse encompasses crimes which have been committed to protect or defend the honour of the family and / or the community, including Female Genital Mutilation, forced marriage, and practices such as breast ironing.

All forms of HBA are abuse (regardless of motivation) and should be handled and escalated as such.

Common triggers for HBA include:

- Refusing an arranged marriage.
- Having a relationship outside the approved group.
- Loss of virginity.
- Pregnancy.
- Spending time without the supervision of a family member.
- Reporting domestic violence.
- Attempting to divorce.
- Pushing for custody of children after divorce.
- Refusing to divorce when ordered to do so by family members.

Female Genital Mutilation (FGM)

- FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to female genital organs. It is illegal in the UK and a form of child abuse.
- As of October 2015, the Serious Crime Act 2015 (Home Office, 2015) introduced a duty on teachers (and other professionals) to notify the police of known cases of female genital mutilation where it appears to have been carried out on a girl under the age of 18.
- We will operate in accordance with the statutory requirements relating to this issue, and in line with local safeguarding procedures. Whilst all staff should speak to the DSL with regard to any concerns about FGM, there is a specific legal duty on teachers.

- If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to Police 101. See Annex B of KCSIE, 2025 for further detail and Summary of Mandatory FGM reporting duty
    - If there are concerns that a girl is going to be cut, the DSL should complete the ISCP FGM Risk Assessment Tool (contact Heather.vaccianna@islington.gov.uk) to identify the relevant indicators and inform further action (we will call Police 999 if a girl is at immediate risk of harm as a result of the risk assessment)
    - The DSL will complete the FGM e-Learning package (FGM E-Learning Course – National FGM Centre)
    - The DSL will also ensure that information and training is made available as appropriate to all members of staff. This includes FGM The Facts

Risk Factors include:

- Low level of integration into UK society.
- Mother or sister who has undergone FGM.
- Girls who are withdrawn from PSHE.
- A visiting female elder from the country of origin.
- Being taken on a long holiday to the family's country of origin.
- Talk about a 'special' event or procedure to 'become a woman.'

Forced marriage

A forced marriage is one entered into without the full consent of one or both parties. It is where violence, threats or other forms of coercion is used and it is a crime. Threats can be physical, or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Some communities use religion and culture as a way to coerce a person into marriage.

This is very different to an arranged marriage, which both people will have agreed to.

- Our staff understand how to report concerns where this may be an issue. We will contact the Forced Marriage Unit for advice or information on 020 7008 0151 or email fmu@fco.gov.uk .
- The Forced Marriage Unit has published Multi-agency guidelines, with pages 32-36 focusing on the role of Schools and colleges. Staff should report concerns regarding forced marriage to the DSL or can contact the Forced Marriage Unit if they need advice or information
- Since February 2023 any marriage that takes place under the age of eighteen years, whether there is consent or coercion, is illegal.

Individuals facing forced marriage may appear anxious, depressed and emotionally withdrawn with low self-esteem.

This is not an exhaustive list and many of the signs and symptoms could fall into more than one category:

- Absence and persistent absence.
- Request for extended leave of absence and failure to return from visits to country of origin.
- Surveillance by siblings or cousins.
- Decline in behaviour, engagement, performance or punctuality.
- Poor examination results.
- Being withdrawn from the Academy by those with parental responsibility and not being provided
- with suitable education at home.
- Not being allowed to attend extracurricular activities.
- Sudden announcement of engagement to a stranger.
- Prevented from going on to further education.

Radicalisation and Extremism

We acknowledge that protecting children from the risk of radicalisation is part of the Academy's wider Safeguarding duties and is similar in nature to protecting children from other forms of harm and abuse. We understand that it is possible to intervene to prevent vulnerable people being radicalised during the process of radicalisation itself.

- Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:
    1. negate or destroy the fundamental rights and freedoms of others; or
    2. undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
    3. intentionally create a permissive environment for others to achieve the results in (1) or (2).

- The types of behaviour below are indicative of the kind of promotion or advancement which may be relevant to the definition and are an important guide to its application. The further context below is also an essential part of the definition.
- Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.
- We recognise that exposure of children (and adults) to extremist ideology can hinder their social development and educational attainment alongside posing a very real risk that they could support or partake in an act of violence. Radicalisation of young people can be compared to grooming for sexual exploitation.
- All staff recognise that children exposed to radicalisation and extremism should be protected and safeguarded in the same way as protecting children from other risks and will report concerns regarding radicalisation and extremism to the DSL who will follow local and national guidance.
- All staff will complete one of the following approved training packages which includes guidance on how to identify people anyone who may be being drawn into terrorism, and how to refer them into the Channel process, from the following link:

Prevent duty training: Learn how to support people susceptible to radicalisation

There are a number of behaviours which may indicate a child is at risk of being radicalised or exposed to extreme views. These may include:

- Spending increasing time in the company of other suspected extremists.
- Changing their style of dress or personal appearance to accord with the group.
- Day-to-day behaviour becoming increasingly centred on an extremist ideology, group or cause.
- Loss of interest in other friends and activities not associated with the extremist ideology, group or cause.
- Possession of materials or symbols associated with an extremist cause.
- Attempts to recruit others to the group/cause.
- Communications with others that suggests identification with a group, cause or ideology.
- Using insulting to derogatory names for another group.
- Increase in prejudice-related incidents committed by that person, such as physical or verbal assault, provocative behaviour, derogatory name calling, refusal to co-operate, attempts to recruit to prejudice-related organisations or condoning or supporting violence towards other groups.

Risk Assessment

Our staff are expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them.

We have clear procedures in place for protecting children at risk of radicalisation including (and not restricted to) a robust PSHE programme, a broad and balanced curriculum and support structures for disaffected and vulnerable young people.

Working in Partnership

Our Safeguarding arrangements take into account the policies and procedures of City and Hackney Safeguarding Children Partnership (CHSCP) and the Local Authority. We work very closely with both.

Staff Training

Our DSL and Deputy DSLs Leads undertake relevant Prevent Awareness Training which is then cascaded to staff and Governors. We aim to equip staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

IT systems

Our ICT services provider, who have a technical responsibility for maintaining and managing our system, works in partnership with the London Grid for Learning (LGfL) to ensure that we have strong filtering in place, and we are vigilant to the risks posed by the internet: we want our students to be safe from terrorist and extremist material when accessing the internet. Our students are also taught about online safety (including disinformation, misinformation, conspiracy theories, and generative AI).

Filtering and Monitoring

Staff have been trained in being aware of inappropriate websites and how to report these to the Academy. Immediate action is taken to block a website found to be inappropriate. If staff are made aware of any cyber online bullying or anything that relates to safeguarding i.e., unsafe behaviour, inappropriate content etc. staff know to report this to a DSL in the same way they would with any safeguarding concern.

For staff this includes:

- If staff witness or suspect unsuitable/inappropriate content has been accessed
- If staff can access unsuitable material
- If there is failure in the software or an abuse of the system
- If staff notice abbreviations or misspellings that allow access to restricted material
- If staff are teaching topics that could create unusual activity on the filtering logs
- If staff think there are some unreasonable restrictions that affect teaching and learning or administrative tasks

Monitoring, evaluation and review

IT service provider Marsworth and the DSL meet termly to review our filtering and monitoring processes for effectiveness.

This will include:

- What are we blocking and allowing?
- Are students managing to bypass?
- Who is the material blocked for?
- Are there times of the day /week that we should allow access.
- ‘Are we over blocking?’

All web activity is monitored through the Academy's internet connection/Academy's network and applies to all devices; phones, laptops etc. and adheres to government stator guidelines.

Child Missing from Education (CME)

We acknowledge that a child going missing from education is a potential indicator of abuse and neglect. This may include sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, 'honour'-based abuse or risk of forced marriage. The Academy has robust attendance procedures for dealing with children that go missing from education, particularly on repeat occasions. All Academy staff are aware that a child who has unexplainable and/or persistent absences or who are missing from education can be potential indicators of abuse, neglect or exploitation. Attendance section reflects statutory guidance: Working Together to Improve School Attendance (2023).

The Academy informs the local authority of any student who is going to be deleted from the admission register where they:

- Have been taken out of the Academy by their parents and are being educated outside the school system e.g., elective home education.
- Have ceased to attend the Academy and no longer live within reasonable distance of the Academy at which they are registered.
- Are in custody for a period of more than four months due to a final court order and the Academy does not reasonably believe they will be returning to the Academy at the end of that period; or
- Have been permanently excluded.

Child on child abuse

Children can abuse other children. All staff recognise that children are capable of abusing their peers. This is generally referred to as child on child abuse and can take many forms. This can include, but is not limited to:

- All members of staff recognise that children are capable of abusing other children. Child-on-child abuse is most likely to include, but may not be limited to:
- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence and could take place inside or outside our setting, offline or online)
- sexual violence and harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery);
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and

- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element
- We believe that abuse is abuse and it will never be tolerated, dismissed or minimised. Any incidents of child-on-child abuse will be managed in the same way as any other child protection concern and will follow the same procedures, as outlined in this policy, and in accordance with the ISCP Protocol for Managing Child-on-Child Sexual Abuse, Violence and Harassment
- Staff should always use a safeguarding first approach and explain to children that the law is in place to protect them rather than criminalise them. This should be done with tact to avoid alarming or distressing them
- We will take steps to minimise the risk of all forms of child-on-child abuse. We will ensure that appropriate curriculum time is dedicated to enable children to develop an awareness and understanding of abusive behaviour and to ensure that children recognise warning signs and have access to support both within the Setting and externally (such as Islington Police, ChildLine etc.).
- Sharing nudes and semi-nudes or 'Sexting' or 'Youth Produced Sexual Images' will not be tolerated and we will respond to such cases in line with the UKCCIS guidance Sharing nudes and semi-nudes: advice for education settings working with children and young people
- 'Upskirting' is a criminal offence and will not be tolerated. It typically involves someone taking a photograph under a person's clothes (not necessarily a skirt) without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any gender, can be a victim.

Serious violence

All staff are aware of the indicators that may signal children are at risk from or are involved with serious violent crime. These may include, but are not limited to:

a) Increased absence from school
b) A change in friendships
c) Relationships with older individuals or groups
d) A significant decline in performance
e) Signs of self-harm
f) A significant change in wellbeing
g) Signs of assault or unexplained injuries
h) Unexplained gifts or new possessions

E-Safety

We recognise that the use of technology presents particular challenges and risks to children and adults both inside and outside of our Setting. The DSL and leadership team taken particular note of paragraphs 134-151 regarding Online Safety within KCSIE 2025.
Online safety risks expanded: disinformation, misinformation, conspiracy theories, and generative AI.

Members of staff with appropriate skills, interest and expertise regarding online safety are encouraged to help support the DSL when developing curriculum approaches or making technical decisions. However, the DSL retains overall responsibility for online safety and the setting's filtering and monitoring system.

We identify that the issues classified within online safety are considerable, but can be broadly categorised into four areas of risk

- content: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- contact: being subjected to harmful online interaction with other users; for example: child-on-child pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- commerce - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (https://apwg.org/)

We recognise the specific risks that can be posed by mobile phones and cameras and in accordance with KCSIE 2025 has appropriate policies in place that are shared and understood by all members of the Setting community.

Our approach to online safety will always consider the 4 cs above. We have clear rules relating to the use of mobile and smart technology that means pupils are not allowed to access their mobile phones. In doing so we are preventing and deterring the use of mobile phone networks during school time for pupils to sexually harass their peers via their mobile and smart technology, share indecent images: consensually and non-consensually (often via large chat groups), and view and share pornography and other harmful content. Online safety risks expanded: disinformation, misinformation, conspiracy theories, and generative AI.

The DSL monitors E-Safety issues and is aware of the potential for serious child protection issues that may arise from:

- Sharing of personal data.
- Access to illegal / inappropriate materials.
- Inappropriate on-line contact with adults / strangers.
- Potential or actual incidents of grooming.
- The sharing / distribution of personal images without consent and / or knowledge
- Access to unsuitable video / internet games
- Cyber-bullying.

The DSL works closely with the IT management team to minimise the risk (within and outside the Academy) posed by the use of new technologies.

Supporting children and young people

We support our students through:

- Promoting a caring, safe and positive environment within the Academy, giving students a sense of being valued while maintaining firm boundaries where all can succeed.
- Encouraging self-esteem and self-assertiveness whilst not condoning aggression or bullying.

- Ensuring they cover relevant issues across the PSHCRE curriculum, Assemblies and Tutor Time. The Computing and ICT curriculum further supports student safety online. Students are taught to recognise when they are at risk and how to get help when they need it.
- Ensuring children know there are adults in the Academy whom they can approach if they are worried.
- Liaising and working together with all other support services and those agencies involved in the Safeguarding of children.

Prevention

We recognise that the Academy plays a significant part in the prevention of harm to our children by providing children with good lines of communication with trusted adults, supportive friends and an ethos of safety.

The Academy community will therefore:

- Establish and maintain an ethos where children feel secure, are encouraged to talk and are always listened to.
- Ensure that all children know there is an adult in the Academy whom they can approach if they are worried or in difficulty.

Confidentiality and information sharing

We recognise that all matters relating to Child Protection are confidential.

The Principal and Designated Safeguarding Lead will disclose information about a child to other members of staff on a need to know basis only.

All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children. Staff must be aware that they cannot promise a child to keep secrets.

Where possible, consent is sought. However, the Data Protection Act 2018 allows practitioners to share information without consent, if:

- it is not possible to gain consent,
- it cannot be reasonably expected that a practitioner gains consent,
- or if to gain consent would place a child at risk.

Safer recruitment

The Academy follows the guidance set out in Keeping Children Safe in Education 2025, and the Local Authority and Local Safeguarding guidance.

As part of our safeguarding culture, we have robust recruitment procedures that deter and prevent people who are unsuitable to work with children from applying for or securing employment, or volunteering opportunities in our Setting.

Any members of staff who are involved in the recruitment and selection process are appropriately trained in safer recruitment, covering the topics contained in Part 3 of KCSIE 2025 at a minimum. In accordance with The School Staffing (England) Regulations 2009 and the Education (Pupil Referral Units) (Application of Enactments) (England) Regulations 2007 we will ensure that at least one of the persons who conducts an interview has completed safer recruitment training recommended by the Islington Safeguarding Children Partnership and should be repeated every three years.

When appointing new staff, we ensure that:

- We verify a candidate's identity.
- We obtain references.
- We obtain a certificate for an enhanced DBS check, which will include barred list information.
- We obtain a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available.
- We verify the candidate's mental and physical fitness to carry out their work responsibilities.
- We verify the person's right to work in the UK.
- We make further checks if the person has lived or worked outside the UK.
- We verify professional qualifications, as appropriate.
- A candidate to be employed as a teacher is not subject to a prohibition order issued by the Secretary of State, or any sanction or restriction imposed (that remains current) by the GTCE before its abolition in March 2012.
- We check that **all** candidates are not subject to a section 128 direction made by the Secretary of State. Such a direction prohibits an individual from taking part in the management (including Governors if the trustee body is the proprietor body for the school) of independent educational institutions in England and/or Wales respectively. A person prohibited under section 128 is also disqualified from holding or continuing to hold office as a trustee/governor of a maintained school.
- We may carry out an online search as part of our due diligence of shortlisted candidates. This is intended to help identify any incidents or issues that have happened, and are publicly available online, which we might want to explore with the applicant at interview

Recruitment adverts will highlight the priority that the Academy places on its commitment to safeguarding. We ensure that at least one member in every recruitment panel has had Safer Recruitment training.

Whistleblowing

Our approach to whistleblowing is covered in more detail in a separate Whistleblowing Policy.

We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.

All staff must be aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues.

All staff must be aware of their duty to raise concerns, where they exist, about poor or unsafe practice and potential failings in the Academy's safeguarding regime and know that such concerns will be taken seriously by the Senior Leadership Team.

Staff must also be aware that they are protected by law if they 'blow the whistle'.

Physical intervention

Staff must only ever use physical intervention as a last resort, and that at all times it must be the minimal force necessary to prevent injury to another person.

We understand that physical intervention of a nature which causes injury or distress to a child may be considered under child protection or disciplinary procedures. Staff need to be aware that if a child sustains an injury as a result of physical intervention Child Protection processes must be adhered to.

Bullying

Bullying can happen to anyone. This policy covers all types and forms of bullying including:

- Bullying related to physical appearance
- Bullying of young carers, children in care or otherwise related to home circumstances o Bullying related to physical/mental health conditions.
- Physical bullying
- Emotional bullying
- Sexual bullying
- Bullying via technology, known as online or cyberbullying
- Prejudicial bullying (against people/students with protected characteristics):
    - Bullying related to race, religion, faith and belief and for those without faith
    - Bullying related to ethnicity, nationality or culture
    - Bullying related to Special Educational Needs or Disability (SEND)
    - Bullying related to sexual orientation (homophobic/biphobic bullying)
    - Gender based bullying, including transphobic bullying.
    - Bullying against teenage parents (pregnancy and maternity under the Equality Act)

Responding to bullying:

The following steps may be taken when dealing with all incidents of bullying reported to the school:

- If bullying is suspected or reported, the incident will be dealt with immediately by the member of staff who has been approached or witnessed the concern.
- The Pastoral Team and/or Senior Leadership Team must be informed of any incidents of bullying.
- The school will provide appropriate support for the person being bullied – making sure they are not at risk of immediate harm - and will involve them in any decision-making, as appropriate.
- The relevant member of the Pastoral Team will interview all parties involved.
- The DSL will be informed of all bullying issues where there are safeguarding concerns.
- The school will speak with and inform other staff members, where appropriate.
- The school will ensure parents/carers are kept informed about the concern and action taken, as appropriate and in line with child protection and confidentially policies.
- Sanctions, as identified within the school behaviour policy, and support will be implemented in consultation with all parties concerned.
- If necessary, other agencies may be consulted or involved, such as the police if a criminal offence has been committed, or other local services including early help or children's social care, if a child is felt to be at risk of significant harm.
- Where the bullying of or by students takes place off school site or outside of normal school hours (including cyberbullying), the school will ensure that the concern is fully investigated. If required, the Designated Safeguarding Lead will collaborate with other schools. Appropriate action will be taken, including providing support and implementing sanctions in school in accordance with this policy and the school's behaviour policy.
- A clear and precise account of bullying incidents will be recorded by the school in accordance with existing procedures. This will include recording appropriate details regarding decisions and action taken.
-

Supporting students:

Students who have been bullied will be supported by:

- Reassuring the student and providing continuous pastoral support.
- Offering an immediate opportunity to discuss the experience with their teacher, the Designated Safeguarding Lead, or a member of staff of their choice.
- Being advised to keep a record of the bullying as evidence and discuss how respond to concerns and build resilience as appropriate. o Working towards restoring self-esteem and confidence.
- Providing ongoing support. This may include working and speaking with staff, offering formal counselling, engaging with parents and carers.
- Where necessary, working with the wider community and local/national organisations to provide further or specialist advice and guidance. This could include support through Early Help or Specialist Children's Services, or support through the Children and Young People's Mental Health Service (CYPMHS).

Students who have perpetrated bullying will be helped by:

- Discussing what happened, establishing the concern and the need to change.
- Informing parents/carers to help change the attitude and behaviour of the child.
- Providing appropriate education and support regarding their behaviour or actions.
- If online, requesting that content be removed and reporting accounts/content to service provider.
- Sanctioning, in line with school behaviour/discipline policy; this may include, detentions, removal of online access when encountering cyberbullying concerns, internal exclusions and fixed-term or permanent exclusions.
- Where necessary, working with the wider community and local/national organisations to provide further or specialist advice and guidance; this may include involvement from the Police or referrals to Early Help, Specialist Children's Services, or the Children and Young People's Mental Health Service (CYPMHS)

Racial incidents

Our policy on racist incidents is set out in our Equality Policy and acknowledges that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures.

Secure environment

We ensure the safety of our environment through:

- Controlling access to the site:
  - Appropriate coloured lanyards worn by all staff members, agency workers, volunteers, contractors and visitors at all times, in line with the checks that have been completed for them.
  - Visitors are met at Reception and escorted into the Academy.
  - CCTV monitoring of the site, internal and external.
  - A signing-out book for students with permission to leave the site.
  - A record of staff and visitors signing in/ out.
- Ensuring that students are supervised at break and lunchtimes.
- Special arrangements for students and staff with disabilities to access all areas of the site.
- Ensuring that we comply with Health and Safety requirements for all on-site activities.
- Requiring risk assessments before allowing any trips, visits or work experience placements.

- A record of accidents and the actions taken as a consequence.
- Vigilant monitoring to guard against intruders, antisocial behaviour and drug and alcohol misuse on site.
- Ensuring that curriculum activities and social areas comply with Health and Safety requirements.
- Ensuring that work experience arrangements include information for employers and a requirement that they accept their Child Protection responsibilities.
- Safe storage of medicines and dangerous substances.
- Notices displayed at Reception, on visitors' lanyards, around the Academy and in the weekly bulletin for all staff reinforcing the School's Safeguarding requirements.
- Child Protection Information on the School's website.

Allegations against staff

The Academy follows statutory guidance laid out in Keeping Children Safe in Education 2025, Part 4.

We recognise that it is possible for staff, supply staff and volunteers to pose a risk of harm to children by behaving in a way that might cause them harm. We will take seriously any allegation received and follow the guidance in Part 4, KCSIE 2025.

A referral to the Local Authority Designated Officer (LADO) should be made immediately if a member of staff, volunteer or supply staff has:

- Behaved in a way that has harmed a child, or may have harmed a child;
- Possibly committed a criminal offence against or related to a child;
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children (eg where they are involved in an incident outside of Setting which did not involve children but could have an impact on their suitability to work with children (one example being domestic abuse.)

In the event that there are concerns regarding any one or more of the above criteria the following will take place:

- Basic enquiries to establish facts before contacting LADO
- The headteacher to lead the investigation only after being given the go ahead to do so by the LADO
- The headteacher to discuss any concerns about the welfare of other children in the community or member of staff's family with DSL and make a risk assessment
- DSL may then decide to make a referral to children's social care
- Where a member of staff has acted in a way outside of Setting that may question their suitability to work with children (transferable risk), a risk assessment should be carried out when appropriate
- If staff have safeguarding concerns, or an allegation is made about another member of staff (including supply staff and volunteers) posing a risk of harm to children, then:
    - this should be immediately referred to the headteacher;
    - where there are concerns/allegations about the headteacher, this should be referred to the chair of governors, chair of the management committee or proprietor of an independent Setting; and
    - in the event of concerns/allegations about the headteacher, where the headteacher is also the sole proprietor of an independent Setting, this should be reported directly to the LADO.

- Where there is an allegation against an agency or supply member of staff, the Setting will usually take the lead because agencies do not have direct access to children or other staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process. Supply teachers, whilst not employed by the Setting, are under the supervision, direction and control of the governing body or proprietor when working in the Setting. Their agency will be notified about the allegation. They will be advised to contact their trade union representative if they have one, or a colleague for support.

Low level concerns

The Academy promotes an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a particular way.

Examples of such behaviour could include, but are not limited to:

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone, contrary to school policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating children

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the headteacher as soon as possible. If the concerns/allegations are about the headteacher, speak to the chair of Governors.

If the allegation made to a member of staff concerns the Principal, the member of staff will immediately inform the Chair of Governors who will consult with the Local Authority Designated

Officer (LADO). This must be done on the same working day. If the Chair of Governors is not available, the member of staff must make direct contact with the LADO.

Monitoring, evaluation and review

- All staff (including temporary staff and volunteers) will have access to a copy of this policy and will have the opportunity to consider and discuss the contents prior to approval of the Governing Body being formally sought. The policy will also be available to parents/carers.
- This policy has been written in July 2024 to reflect the new guidance and legislation issued in relation to safeguarding children and promoting their welfare which comes into force on 1st September 2024.
- The policy forms part of our development plan and will be reviewed at least annually.
- All staff should have access to this policy and sign to the effect that they have read and understood its contents.

- The DSL will review the policy following any child protection concerns (including following learning identified from serious case reviews) or allegations against staff (even considering learning when they are not substantiated) to ensure that it reflects appropriate, accurate and up-to-date safeguarding practice.

March 2026 updates

Zero Tolerance to abuse

Considering Ofsted's report detailing the normalising the culture of sexual assault and sexual harassment, including students' views that adults are not aware of the reality of their lives and that senior staff downplay reports, it is essential that leaders must recognise that it can and almost certainly is happening to students in COLAT schools.

Schools must establish simple and effective systems where students can report abuse and ensure students are confident that they can ask for and will receive, appropriate help, for both the victims and perpetrators.

Information Sharing and Transferring KCSIE

The designated safeguarding lead (DSL) is responsible for ensuring that child protection files are kept up to date. Information should be kept confidential and stored securely.

- a clear and comprehensive summary of the concern
- details of how the concern was followed up and resolved
- a note of any action taken, decisions reached and the outcome

The DSL should ensure the file is only accessed by those who need to see it and where the file or content within is shared, this happens in line with information sharing advice set out in Parts one and two of KSCIE guidance.

Where children leave the school or college (including in year transfers) the DSL should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and special educational needs co-ordinators (SENCOs) or the named person with oversight for SEND in colleges, are aware as required.

Regular online safety risk management

Schools must identify processes for online risk management and plan how to mitigate risks and planning for each of the following:

- Hazard Identification: recognising potential online hazards and risks associated with online services
- Risk management: evaluating the likelihood and severity of risks to users
- Mitigation controls: implementing measures to reduce or eliminate risks
- Roles and responsibilities: clearly identifying who is responsible for each aspect of the risk management plan

- Monitoring and reviews: regularly reviewing the effectiveness of the risk management plan and making necessary adjustments
- Documentation control: keeping detailed records of the risk management activities and outcomes

Effective DSL guidance to safeguard pupils and support their attainment
Schools must ensure that DSLs support are:

- Identifying children at risk: DSLs actively seek out and identify children who may be at risk of harm or abuse
- Managing referrals: DSLs handle referrals to external agencies and provide support to staff with safeguarding concerns
- Building a safeguarding culture: DSLs work to create a culture of care and vigilance within the school community
- Continuous learning: DSLs engage in ongoing professional development and learning to stay informed about the latest safeguarding developments
- Collaboration: DSLs collaborate with colleagues in other schools and organisations to share experiences and create effective safeguarding strategies
- Supporting staff: DSLs provide advice and support to other staff on child welfare and safeguarding matters
- Participating in meetings: DSLs attend safeguarding partnership meetings and strategy discussions to contribute to the safeguarding efforts in their organisations

Appendix A

Dealing with disclosures of abuse

- Stay calm, listen to the child, try not to show it if you are shocked by what is being said.
- Do not promise confidentiality. You can promise privacy. Reassure the child they have done the right thing, explain who you will have to tell and why.
- If a child is making a disclosure the pace should be dictated by the child.
- It is our role to listen not to investigate. Do not ask leading questions for example, 'what did they do next?' as this could potentially later undermine a case. Use open questions such as 'is there anything else you wish to tell me?'
- Accept what they are telling you, do not make judgements.
- Reassure the child that they have done the right thing in telling you. Do acknowledge how hard it was for them to tell you.
- Do not criticise the perpetrator, this may be someone they love.
- Do not express disapproval in any way e.g. 'I wish you had told me sooner' • Tell them what you will do next and with whom the information will be shared.
- Pass this information on immediately to the DSL, Deputy DSLs, or other Designated Safeguarding Leads in their absence. This should be done verbally to begin with where possible.
- With the DSL prepare a detailed report itemising the information revealed by the student, with absolutely no opinion, and the actions taken, including when the suspicions were reported, to who the suspicions were reported and follow-up taken within the academy.
- Date and sign any written record of events. The DSL will keep a copy of the report in absolute confidence.
- It is the right of any individual to make direct referrals to the child protection agencies. If for any reason you believe that the designated persons within the Academy have not responded appropriately to your concerns, it is then your responsibility to consider contacting the child protection agencies directly.
  - After a child has disclosed abuse, the designated person should carefully consider whether or not it is safe for a child to return home to potentially abusive situation. On these rare occasions it may be necessary to discuss with Children's Social Care putting safety measures into effect.

In an emergency, where there is a risk of immediate serious harm to a child, staff may refer to Children's Social Care on 020 7527 7400 immediately. In this situation staff must then inform the DSL as soon as possible.

If you see or hear anything which concerns you:

- Don't ignore it
- Make a mental note and seek advice
- Trust your gut instinct and don't feel silly. If it worries you, someone else needs to know. You are never wasting anyone's time reporting a concern
- See a DSL immediately
- All staff may raise concerns directly with Children's Social Care

The DSL will, if appropriate, take the following steps:

- where it is clear that a Child Protection Referral (significant harm) is needed, contact Children's Social Care without delay.
- where the DSL is not sure whether it is a child protection issue, or where they need to check the child protection register, they may seek advice from MASH, Children's Social Care

- follow locally agreed protocols which can be found on the local Children's Services website under the safeguarding section

Where appropriate, the DSL will attend a child protection conference. We recognise the importance of multi-agency working and will ensure that staff including the DSL are able to attend all relevant meetings, case conferences, core groups and strategy meetings.

If a disclosure is made or you have any concerns about a child, you MUST report them:

Concern about a child
Immediately inform the Designated Safeguarding Lead or any other Designated Safeguarding Officer

Concern about a member of staff
Immediately inform the Principal If the concern is about the Principal, inform the Chair of Governors

Where there is an immediate risk to the child, Children's Social Care should be contacted immediately on 020 7527 7400
No child should go home without external agency involvement if the DSL is concerned that they may be at risk

Where the DSL is unsure whether a referral is required they may seek advice from Islington Children Services Telephone Number: 020 7527 7400 or the relevant

Where it is clear that a Referral is needed, the DSL will make this without delay. Anyone can make a referral.

Ensure immediate completion and dispatch of the Referral
Send copies to: csctreferrals@islington.gov.uk or other relevant Local Authorities.

If you are asked to monitor the situation, ensure that you are clear what you are expected to monitor, for how long, and to whom you should feedback information

Remember to make a written record of all events and actions taken, and sign and date this record

Useful telephone numbers:

Islington Social Services: 020 7527 7400
Hackney Children's Social Care: 0208 356 5500
Police: 999

Appendix B- National Support Organisations

Support for staff

Education Support Partnership: www.educationsupportpartnership.org.uk

Professional Online Safety Helpline: www.saferinternet.org.uk/helpline

Support for Pupils

NSPCC: www.nspcc.org.uk
ChildLine: www.childline.org.uk
Papyrus: www.papyrus-uk.org
Young Minds: www.youngminds.org.uk
The Mix: www.themix.org.uk

Support for adults

Family Lives: www.familylives.org.uk
Crime Stoppers: www.crimestoppers-uk.org
Victim Support: www.victimsupport.org.uk
Kidscape: www.kidscape.org.uk
The Samaritans: www.samaritans.org
Mind: www.mind.org.uk
NAPAC (National Association for People Abused in Childhood): www.napac.org.uk
Action Fraud: www.actionfraud.police.uk

Support for Learning Disabilities

Respond: www.respond.org.uk
Mencap: www.mencap.org.uk

Domestic Abuse

Refuge: www.refuge.org.uk
Women's Aid: www.womensaid.org.uk
Men's Advice Line: www.mensadviceline.org.uk
Mankind: www.mankindcounselling.org.uk

Honour based Abuse

Forced Marriage Unit: https://www.gov.uk/guidance/forced-marriage
FGM: Summary of Mandatory FGM reporting duty
Islington FGM Risk Assessment

Sexual Abuse and CSE

Lucy Faithfull Foundation: www.lucyfaithfull.org.uk
Stop it Now!: www.stopitnow.org.uk
Parents Protect: www.parentsprotect.co.uk
CEOP: www.ceop.police.uk
Marie Collins Foundation: www.mariecollinsfoundation.org.uk
Internet Watch Foundation (IWF): www.iwf.org.uk

Online Safety

Online safety risks expanded: disinformation, misinformation, conspiracy theories, and generative AI.

Childnet International: www.childnet.com
UK Safer Internet Centre: www.saferinternet.org.uk
Parents Info: www.parentinfo.org
Internet Matters: www.internetmatters.org
Net Aware: www.net-aware.org.uk
ParentPort: www.parentport.org.uk
Get safe Online: www.getsafeonline.org

Radicalisation

Educate against Hate: www.educateagainsthate.com
Counter Terrorism Internet Referral Unit: www.gov.uk/report-terrorism
True Vision: www.report-it.org.uk (hate crime)
New definition of extremism (2024) - GOV.UK (www.gov.uk)

Appendix C: Local and National Support Organisations

Local Support Organisations

Islington Children's Services Contact Team	Telephone: 020 7527 7400 CSCTreferrals@islington.gov.uk
Islington LADO	Telephone: 0207 527 8101/02 Email: lado@islington.gov.uk LADO Referral Form
Islington Police	101 (or 999 if there is an immediate risk of harm)
NPCC- When to call the police	when-to-call-the-police--guidance-for-schools-and-colleges.pdf (npcc.police.uk) should help DSLs understand when they should consider calling the police and what to expect when they do
Islington Safeguarding Children Partnership (ISCP)	iscp@Islington.gov.uk
Islington Family Information Service	Telephone: 0207 527 5959 http://www.islington.gov.uk/fis
Islington Family Directory	http://directory.islington.gov.uk/kb5/islington/directory/service.page
Principal Officer Safeguarding in Education	Anastasia.georgiou@islington.gov.uk Pupil Services PupilServices@islington.gov.uk Telephone 020 7527 5845 Alternative number Pupil Services: 020 7527 3747
Domestic Abuse, Violence against Women and Girls, FGM, Forced Marriage	Heather Vaccianna Anti-Bullying Coordinator heather.vaccianna@islington.gov.uk 0207 527 7793, 07584 370797
The Sunflower Project offers direct support to children and schools to identify and implement gender equality initiatives	Tanya.Pinnock@islington.gov.uk 07815 990 366
Prevent	Prevent Education Lead: Bev Thomas Beverley.Thomas@islington.gov.uk; Tel : 020 7527 3018 prevent@islington.gov.uk

National Support Organisations

Galop's National LGBT+ Domestic Abuse Helpline - support and advice for lesbian, gay, bisexual, trans+ people who have experienced abuse -	0800 999 5428 help@galop.org.uk
Hourglass - support and information for older people and those concerned about an older person experiencing abuse or exploitation	0808 808 8141 Live chat
IKWRO Women's Rights Organisation - support for Middle Eastern, North African and Afghan survivors	020 7920 6460 Out-of-hours emergencies Kurdish/Arabic/English: 07846 275246 Farsi/Dari/English: 07846 310157

IKWRO Women's Rights Organisation - support for Middle Eastern, North African and Afghan survivors	020 7920 6460 Out-of-hours emergencies Kurdish/Arabic/English: 07846 275246 Farsi/Dari/English: 07846 310157
Jewish Women's Aid	0808 801 0500
Latin American Women's Rights Service - support for Latin American women	0808 145 4909 Monday to Friday 11am to 1pm info@lawrs.org.uk
Muslim Women's Network	0800 999 5786 0303 999 5786 info@mwnhelpline.co.uk
SignHealth - support for deaf people and those with hearing loss in British Sign Language (BSL)	020 3947 2601 Text: 07970 350366 da@signhealth.org.uk
Stay Safe East - support for disabled survivors of domestic abuse	020 8519 7241 Text: 07587 134 122 enquiries@staysafe-east.org.uk
Southall Black Sisters - support for gender-related abuse against Asian and African-Caribbean survivors	020 8571 9595 Web form
Victim Support community-based domestic abuse services	Web form Live chat My Support Space
Forced Marriage and Honour Based Abuse	UK Helpline: 0800 5999 247 https://karmanirvana.org.uk/
Forced Marriage Unit	020 7008 0151 or email fmu@fcdo.gov.uk https://www.solacewomensaid.org/ 0808 802 5565

Appendix D: Safeguarding in Education links

Preventing neglect, abuse and exploitation

- Working together to safeguard children 2023
- The right to choose: multi-agency statutory guidance
- What to do if you're worried a Child is being Abused
- Child sexual exploitation: definition and guide for practitioners
- Child abuse linked to faith or belief: national action plan
- Working-together-to-improve-school-attendance

Keeping children safe in education and other settings

- Keeping children safe in education 2025
- Supervision of activity with children
- Protecting children from radicalisation: the prevent duty
- Children missing education
- Drugs: advice for Schools
- Behaviour in Schools - Advice for Headteachers and School Staff 2022

Online safety

Online safety risks expanded: disinformation, misinformation, conspiracy theories, and generative AI.

- Teaching online safety in Schools
- Sharing nudes and semi-nudes: advice for education settings working with children and young people
- Harmful online challenges and online hoaxes
- Education for a Connected World
- Safeguarding children and protecting professionals in early years settings: online safety considerations

Safeguarding children with Special Education Needs and Disabilities

- Safeguarding disabled children
- SEND Code of Practice 0-25 years
- Supporting Pupils at School with Medical Conditions
- Islington SEND Information and Support Service
- MENCAP

Runaway and homeless children

- Children who run away or go missing from home or care
- Provision of accommodation for 16 and 17 year olds who may be homeless and/or require accommodation

Cross-border child protection

- Cross-border child protection cases: the 1996 Hague Convention
- Safeguarding children who may have been trafficked
- Care of unaccompanied migrant children and child victims of modern slavery
- Find help to get your child back from abroad or arrange contact