



# **Eko Pathways School**

## **Early Help, Safeguarding and Child Protection Policy**

**Reviewed and amended July 2024 and ratified by the Trust Board in July 2024**

**Next review Summer 2025**

This Early Help, Safeguarding and Child Protection Policy is written with due regard to the Department for Education statutory guidance [Keeping Children Safe in Education](#) (last updated September 2023) and will be reviewed each time any subsequent guidance is issued by the Secretary of State, or annually, whichever is the most appropriate.

## KEY CONTACT DETAILS

IF A CHILD IS IN IMMEDIATE DANGER, CALL THE **POLICE ON 999**

EXTERNAL SAFEGUARDING SERVICES		
SERVICE/ROLE	ONLINE CONTACT	CONTACT NUMBER
MASH Team	Newham Childrens Social Care	0203 373 4600
NSPCC: Report child abuse	<a href="#">Report Online</a> / <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>	0808 800 5000
CEOP: Report online sexual abuse	<a href="http://www.CEOP.police.uk">www.CEOP.police.uk</a>	-
Refuge: Domestic abuse support	<a href="https://www.refuge.org.uk/">https://www.refuge.org.uk/</a>	0808 2000 247
Prevent	Newham MASH	0203 373 4600
NSPCC: Whistleblowing	<a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>	0800 028 0285
Metropolitan Police	<a href="#">Report a crime</a>	101 (non-emergency number)

EKO PATHWAYS SCHOOL SAFEGUARDING TEAM	
ROLE	NAME
Designated Safeguarding Lead	Stacey Ellis
Deputy Designated Safeguarding Lead	Sabrine Abdi
Deputy Designated Safeguarding Lead	Karam Kaur

SCHOOL MENTAL HEALTH LEAD AND FIRST AIDERS	
ROLE	NAME
Mental Health First Aider	Stacey Ellis
First Aider	Sabrine Abdi
	Ade Cole
	Felicia Ellis
	Clair Osokpo
	Michelle Green

GOVERNANCE AND TRUST	
Eko Pathways School Safeguarding Link Governor	Kathy Rees
Eko Trust Safeguarding Link Trustee	Mehreen Ara

EKO TRUST SAFEGUARDING TEAM	
ROLE	NAME
Trust Leader of Education	Deborah Strain
Safeguarding Lead for Eko Trust	Lucie Baxter-Lacey

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## INTRODUCTION AND POLICY STATEMENT

Eko Pathways School is committed to providing Early Help, Safeguarding and Child Protection in order to promote the welfare of all its pupils. Governors expect all staff and volunteers to share this commitment.

Schools and their staff are an important part of the wider safeguarding system for children. Staff are in a position to identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating. This system is described in the statutory guidance [Working Together to Safeguard Children](#).

All schools are required to have an Early Help, Safeguarding and Child Protection Policy that guides the procedures and practices of staff when safeguarding children and promoting their welfare. The School takes very seriously its duty towards all its pupils who have been entrusted to its care and seeks to provide a school environment where all children are safe, secure, valued, respected, and listened to.

We understand the term *Safeguarding* to mean that we will take all reasonable measures to ensure that the risk of harm to children's welfare is minimised. We also understand that where we have any concerns about a child's welfare we will take all appropriate action to address those concerns by working in full partnership with other agencies.

Eko Pathways School believes that a range of other school policies are central to many aspects of the school's **Early Help, Safeguarding and Child Protection Policy**, and this document should therefore be read in conjunction with our policies and procedures which are referenced throughout this policy.

Safeguarding and promoting the welfare of children for the purposes of this policy is defined as per [Keeping Children Safe In Education 2024](#)

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

The definition of a child includes everyone under the age of 18.

Our School procedures for safeguarding children will always be compliant with the [London Child Protection Procedures](#) and adhere to local safeguarding arrangements.

Our procedures will be followed by all adults, including volunteers and agency staff, working with or on behalf of the school, through regular briefings and safeguarding guidelines documents.

This policy will be reviewed in July each year together with the review of the Section 11 Safeguarding Audit, each time there is an update or change to government guidance.

This policy is available to all parents either in hard copy or from our website:  
[Eko Pathways School](#)

## SECTION 1

### THE SCHOOL EARLY HELP, SAFEGUARDING AND CHILD PROTECTION POLICY

- 1.1 All staff must be clear about their responsibility and that of others in providing a caring and safe environment for all pupils to learn.
- 1.2 All staff must be clear about our systems which support safeguarding, including the staff code of conduct, the role of the designated safeguarding lead (DSL), the behaviour policy, and the safeguarding response to children who go missing from education.
- 1.3 To this end the school will ensure that all staff, whether permanent or temporary, and volunteers are aware of systems within the school which support early help and safeguarding and should be explained to them as part of staff induction. If staff have **any concerns** about a child's welfare, they should act on them **immediately**.
- 1.4 **All** staff have a responsibility to identify children who may be in need of extra help or who are suffering, or are likely to suffer, significant harm. **All** staff then have a responsibility to take appropriate action, working with other services as needed.
- 1.5 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/college, inside and outside of home, and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.
- 1.6 All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk.
- 1.7 All school and college staff should be aware that abuse, neglect, exploitation, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap.
- 1.8 **All** staff should be aware 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 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.
- 1.9 **All** staff should know who the Designated Safeguarding Leads (DSL) and Deputy Designated Safeguarding Leads (DDSLs) are.
- 1.10 **All** Designated Safeguarding Leads have received training in order to undertake the role and support staff to carry out their early help and safeguarding duties and responsibilities.
- 1.11 In the absence of the Designated Safeguarding Leads on a day-to-day basis, schools will ensure that they have members of staff who have the knowledge and skills necessary to deputise.
- 1.12 There is a Link Safeguarding Governor for the School.
- 1.13 All staff will receive appropriate safeguarding and child protection training (including online safety which, amongst other things, will include an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) at induction. The training should be regularly updated. In addition, all staff will receive safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins, and staff meetings), as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively.

- 1.14 The School will always follow [safer recruitment procedures](#) so that we can be confident that all adults working in our school are safe to do so. This may include an online search for candidates at the shortlisting stage of the recruitment process.
- 1.15 All staff should be aware of systems within their school which support safeguarding, and these should be explained to them as part of staff induction. This should include:
- [Keeping Children Safe in Education Part One or Annex A \(2024\)](#)
  - School Early Help, Safeguarding and Child Protection Policy [Eko Pathways Website](#)
  - Behaviour Policy [Eko Pathways website](#)
  - Staff [Eko Trust Code of Conduct Policy](#)
  - [Eko Trust Attendance and Punctuality Policy including CME](#)
  - Role of the Designated Safeguarding Lead (including the identity of the designated safeguarding lead and any deputies).
- 1.16 **All** staff must speak to the DSL and follow the school's Early help, Safeguarding and Child Protection policy if they have concerns about a child.
- 1.17 **All** concerns should be discussed with Designated Safeguarding Lead (DSL) or Deputy DSL as they are most likely to have the complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns.
- 1.18 **All staff** have the responsibility to ensure their concerns are recorded onto the school online safeguarding system prior to the end of the school day. Reporting of concerns should include a clear and comprehensive summary of the concern and any additional information after the concern is raised
- 1.19 Early help cases will generally be led by the DSL or Pastoral Lead of each school.
- 1.20 Assessments of children will be considered with wider environmental factors which are present in a child's life that are a threat to their safety and/or welfare ("contextual safeguarding").
- 1.21 **All staff** should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments.
- 1.22 **All staff**, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.
- 1.23 **All staff** should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.
- 1.24 **All** staff should make sure that their approach is child centred. This means that they must consider, at all times, what is in the **best interests** of the child as safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who comes into contact with children and their families has a role to **play**.
- 1.25 **All** staff are expected to read and agree that they will adhere to all expectations outlined in this policy and [Keeping Children safe in Education 2024 Part One - for School & College Staff](#) This agreement will be recorded and monitored.
- 1.26 The school understands that no single professional 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.

## SECTION 2

### SAFEGUARDING CHILDREN IN SCHOOL

#### 2.1 Providing a Safe Environment

- 2.1.1 We believe that safeguarding is paramount in enabling children to thrive academically, socially, and emotionally. We recognise the moral and statutory responsibility placed on all staff to safeguard and promote the welfare of all children. We aim to provide a safe and welcoming environment in which children can learn, underpinned by a culture of openness where both children and adults feel secure, are able to raise concerns and believe they are being listened to, and that appropriate action will be taken to keep them safe. We encourage open communication and collaboration among all members of our school community to promote the well-being of every child.

#### 2.2 Mobile Phones and cameras

- 2.2.1 Staff are allowed to bring their personal phones to school for their own use, but must limit such use to non-contact time when pupils are not present. Staff members' personal phones must remain in their bags or lockers during contact time with pupils and when in areas where pupils are present, this includes during trips. Staff should be aware if their phone name can be seen and search as a hotspot.
- 2.2.2 **Staff will not take pictures or recordings of pupils on their personal phones or cameras.**
- 2.2.3 We will follow GDPR (May 2018) (also see: [Information Commissioner's Office](#)) when taking and storing photos and recordings for use in the school.

#### 2.3 Visitors and use of school premises for non-school activities

- 2.3.1 All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.
- 2.3.2 If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.
- 2.3.3 Visitors are expected to sign in and wear a visitor's badge.
- 2.3.4 All visitors to our setting, including visiting speakers, will be accompanied by a member of staff at all times if they are not DBS checked. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.
- 2.3.5 Where the school hires or rents facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) they should ensure that appropriate arrangements are in place to keep children safe.
- 2.3.6 The guidance on [Keeping children safe in out-of-school settings](#) details the safeguarding arrangements that schools should expect these providers to have in place.

#### 2.4 Health & Safety

- 2.4.1 We have a Health & Safety Policy, which demonstrates the consideration we give to minimising any risk to the children when on the school premises and when undertaking activities out of school under the supervision of our staff: [Eko Trust Health and Safety policy](#)

## SECTION 3

### MANAGEMENT OF SAFEGUARDING

#### 3.1 The Designated Safeguarding Lead (DSL)

- 3.1.1 Our DSLs currently are per as follows: Stacey Ellis, Sabrine Abdi, Karam Kaur

- 3.1.2 The DSL takes lead responsibility for child protection and wider safeguarding (including online safety and understanding the filtering and monitoring systems and processes in place). There may be additions or changes to the staff and if that will be the case all staff of the relevant school will be informed.
- 3.1.3 Any deputies should be trained to the same standard as the designated safeguarding lead. We will use [The National College](#) as a minimum level of training. Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, remains with the designated safeguarding lead, this lead responsibility should not be delegated.
- 3.1.4 If the DSL or DDSL(s) are unavailable you must contact: a member of SLT - Charlie Cornish, Stella McAteer or Emma Lane
- 3.1.5 The designated safeguarding lead is responsible for ensuring that child protection files are kept up to date. Information should be kept confidential and stored securely. Records should include: 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.
- 3.1.6 Where children leave the school, the designated safeguarding lead should ensure their child protection file is transferred to the new school 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 to allow the new school to have support in place for when the child arrives. The designated safeguarding lead should ensure secure transit, and confirmation of receipt should be obtained
- 3.1.7 The full responsibilities of the DSL are set out in their job description. Please ask each school for a job description of its Designated Safeguarding Lead.

Also see [Keeping Children Safe in Education Annex C: Role of the designated safeguarding lead](#)

## **3.2 Governance of Safeguarding**

- 3.2.1 The Trust Board has overall responsibility for ensuring that safeguarding arrangements across the Trust are effective and compliant with legislation.
- 3.2.2 School local governing bodies have a strategic leadership responsibility for their school's safeguarding arrangements and must ensure that they comply with their duties under legislation.
- 3.2.3 The Trust Board will appoint a Safeguarding Lead Trustee to take leadership responsibility for the Trust's safeguarding arrangements
- 3.2.3 Local governing bodies should have a Safeguarding Link Governor to take leadership responsibility for their school's safeguarding arrangements.
- 3.2.4 Local governing bodies should ensure an appropriate senior member of staff, from the school leadership team, is appointed to the role of designated safeguarding lead.
- 3.2.5 The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). This should be explicit in the role holder's job description.
- 3.2.5 Local governing bodies should ensure they facilitate a whole school approach to safeguarding. This means involving everyone in the school, and ensuring that safeguarding, and child protection are at the forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart.
- 3.2.6 The Trust Board should ensure that all local governors and trustees receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.

- 3.2.7 Local governing bodies should ensure that, as part of the requirement for staff to undergo regular updated safeguarding training and for children to be taught about safeguarding, including in relation to online safety and that safeguarding training for staff, including online safety training, is integrated, aligned and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning.
- 3.2.8 Local governing bodies should ensure that children are taught about how to keep themselves and others safe, including online. It should be recognised that effective education will be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs or disabilities.
- 3.2.9 Local governing bodies should be aware of their obligations under the Human Rights Act 1998 21, the Equality Act 2010 22, (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements.
- 3.2.10 For further details of the role of governance in safeguarding see section 7.10 of [the Academy Trust Governance Guide](#).

## SECTION 4

### KEEPING CHILDREN SAFE: EARLY HELP, SAFEGUARDING AND CHILD PROTECTION

#### 4.1 Responding to Concerns

- 4.1.1 All children attending the school must be able to place their confidence in any adult working in the school. They must feel sure that they can speak about any worries or concerns they may have and that they will be listened to, taken seriously and responded to appropriately. All staff must therefore know what to do if a child chooses to talk to them about any matter which raises child protection concerns.
- 4.1.2 **All staff** should be 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. For example, children may feel embarrassed, humiliated, or 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 about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.
- 4.1.2 **All staff** should know what to do if a child tells them he/she is being abused, exploited or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the designated safeguarding lead (or a deputy) and children's social care. **Staff should never promise a child that they will not tell anyone about a report of any form of abuse, as this may ultimately not be in the best interests of the child.**
- 4.1.3 **All staff** should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. **Nor should a victim ever be made to feel ashamed for making a report.**
- 4.1.4 **All staff** must:
- o Listen to what the child is saying without interruption and without asking leading questions.
  - o Respect the child's right to privacy but not promise confidentiality.
  - o Reassure the child that he/she has done the right thing in telling.
  - o Explain to the child that in order to keep him/her safe from harm, the information that has been shared must be passed on.
  - o Verbally report the disclosure to the DSL/DDSL as soon as is practicable.
  - o Record, as soon as practicable, what was said using the child's actual words
  - o Use the school's online system for reporting concerns

**Note: Any staff member can make a direct referral to children's social care, but they must inform the Designated Safeguarding Lead as soon as possible.**

- 4.1.5 **All staff** will report any concerns **immediately** to the Designated Safeguarding Lead of their school. They are also aware that they can report concerns directly to the appropriate body without going through the schools' Designated Safeguarding Leads.
- 4.1.8 The Designated Safeguarding Lead will decide whether to consider offering Early Help to support the family or to make a referral to Newham Children's Social Care when there are complex needs or child protection concerns. We will use the [Early Help Strategy](#) in conjunction with: [Local Safeguarding Procedures](#) to inform our decision making.
- 4.1.9 If a referral to Children's MASH (Multi-Agency Safeguarding Hub) has not met the threshold for targeted support or statutory intervention, the Designated Safeguarding Lead will make a full written record of the decision and outcome. The school will continue to offer early help and interventions, supported by the use of the Early Help Record and Plan through the schools' pastoral teams.

## **4.2 Recognition and Response**

- 4.2.1 Owing to the nature of the day-to-day relationship children in the school have with staff; all adults working in the school are particularly well placed to notice any physical, emotional or behavioural signs that a child may be suffering significant harm.
- 4.2.2 We understand that harm means the ill-treatment or impairment of a child's health and/or development, including that caused as a result of witnessing the ill-treatment of another person and we understand that not all children will choose to talk, but may communicate through different ways. We will always be aware of and alert to any possible indicators that a child is suffering harm.

## **4.3 Whistleblowing**

If you're worried about poor or unsafe safeguarding practices, or potential failures in the school talk to the Designated Safeguarding Lead, any senior leader, the Chair of Governors, or Eko Trust Safeguarding Lead. See the [Eko Trust Whistleblowing Policy](#) for more support.

If you feel you're unable to talk to someone in school, you can call the [NSPCC whistleblowing helpline](#) on 0800 028 0285 or email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

# **SECTION 5**

## **CHILDREN WHO ARE PARTICULARLY VULNERABLE**

- 5.1 Some children are more vulnerable to abuse and neglect and additional barriers exist when recognising abuse for some children. This increase in risk is due more to societal attitudes and assumptions or child protection procedures which fail to acknowledge children's diverse circumstances, rather than the individual child's personality, impairment or circumstances.
- 5.2 Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff.
- 5.3 In some cases possible indicators of abuse such as a child's mood, behaviour or injury might be assumed to relate to the child's impairment or disability rather than giving a cause for concern. Or a focus may be on the child's disability, special educational needs or situation without consideration of the full picture.
- 5.4 Some children may also find it harder to disclose abuse due to communication barriers, lack of access to school adults or not being aware that what they are experiencing is abuse.

To ensure that all children receive equal protection we will give special consideration to children who are;

- o Disabled or have special educational needs
- o Young carers
- o LGBTQ+
- o Affected by parental substance misuse, domestic abuse or parental mental health needs
- o Asylum seekers
- o Living away from home
- o Vulnerable to being bullied or engaged in bullying
- o Living in temporary accommodation and/or live transient lifestyles
- o Living in chaotic and unsupportive home situations
- o Vulnerable to discrimination on the grounds of race, ethnicity, religion, disability or sexuality
- o Do not have English as a first language
- o Looked after children

Also see: [Safeguarding Deaf and disabled children and young people](#) and [NSPCC: LGBTQ+](#)

## **SECTION 6**

### **INDICATORS OF ABUSE AND NEGLECT**

#### **ABUSE**

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. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. 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 by another child or children.

#### **PHYSICAL ABUSE**

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.

Also see: [NSPCC: Physical Abuse](#)

#### **EMOTIONAL ABUSE**

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.

Also see: [NSPCC: Emotional Abuse](#)

#### **SEXUAL ABUSE**

Sexual abuse: 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. They 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.

Also see: [NSPCC: Sexual Abuse](#) and [NHS: Spotting signs of child sexual abuse](#)

## **NEGLECT**

Neglect: 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)

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

Also see: [NSPCC: Neglect](#) and [What to do if you're worried a child is being abused; Advice for practitioners](#) and [Keeping Children Safe in Education: Annex B; further information](#) and [Working Together to Safeguard Children 2024](#)

## **SECTION 7**

### **EARLY HELP, SAFEGUARDING AND CHILD PROTECTION IN SPECIFIC CIRCUMSTANCES**

#### **ADOLESCENT SUICIDE**

Young people can be put at risk of significant harm from their own behaviour. Suicidal feelings should be treated as a **child protection issue** and trigger a similar level of response to children at risk of harm from others. School children spend the majority of their waking hours at school: teachers and school staff have the opportunity to recognise the signs that a student might be at risk of suicide and they are best placed to respond effectively.

**Every warning sign of suicide should be taken seriously and acted on accordingly.**

Also see: [DfE Mental health and behaviour in schools](#) and [Public Health England every mind matters](#) [NSPCC: Suicide Learning from Serious Case Reviews](#) and [Papyrus: Save the Class of 2018](#)

#### **ATTENDANCE AND CHILDREN WHO ARE ABSENT FROM EDUCATION**

We are aware that a pupil's unexplained absence from school could mean that they are at risk from harm. Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. It is important the school or college's response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.

Where a school places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and should be satisfied that the placement meets the pupil's needs.

It is important the school response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future.

#### **Follow full guidance:**

Keeping children safe in education 2024: Children who are absent from education, pg 48, point 178

Also see: [Eko Trust Attendance and Punctuality](#) and [Working together to improve school attendance](#) and [Children missing education](#) and [Missing Children and Adults strategy](#)

## BULLYING

We understand that bullying is harmful to children. We have an anti-bullying policy that sets out our aim of ensuring no child becomes a victim of bullying and the work that we carry out in school to foster an environment where bullying behaviour is known to be unacceptable. We will always take seriously any reports of bullying and respond appropriately.

We understand that bullying may take different forms and may include racist or homophobic behaviour. Any such reported or observed incident will be dealt with in accordance with our Trust [Anti-Bullying Policy Feb23 \(1\).pdf](#)

Also see: [Preventing and tackling bullying: Advice for head teachers, staff and governing bodies](#) or [Cyberbullying: Advice for head teachers and school staff](#)

## BREAST IRONING

**Breast Ironing** also known as **Breast Flattening** is a practice whereby young pubescent girls usually aged between 9 - 15 years old and from practising communities have their breasts ironed, massaged and/or pounded down through the use of hard or heated objects to delay the development of the breasts or to attempt to cause the breasts to disappear entirely.

Professionals working with children and young people must be able to identify the signs and symptoms of girls who are at risk of or have undergone breast ironing. **Staff must inform the Designated Safeguarding Lead immediately if there are indicators that breast ironing may have occurred.**

Also see: [National FGM Centre: Breast Flattening](#)

## CARE LEAVERS

Local authorities are the corporate parent to care leavers and are under a duty to help further the education and career aspirations and ambitions of care leavers in their area, including through participation in further education. The DSLs with pupils in such situations in the school will therefore have details of the local authority Personal Advisor that has been appointed to guide and support the care leaver, and should liaise with them as necessary regarding any issues of concern affecting the care leaver.

## CHILD ABDUCTION AND COMMUNITY SAFETY INCIDENTS

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. As children get older and are granted more independence (e.g, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe.

Further information is available at: [www.actionagainstabduction.org](http://www.actionagainstabduction.org) and [www.clevernevergoes.org](http://www.clevernevergoes.org)

## CHILDREN AND THE COURT SYSTEM

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11-year olds and 12-17 year olds. They explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

Also see: [GOV.UK: Get help with child arrangements](#)

## **CHILD CRIMINAL EXPLOITATION (CCE)**

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

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

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Some of the following can be indicators of CCE:

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

Also see: [NSPCC: Criminal Exploitation and Gangs](#) or [Protecting children from criminal exploitation, human trafficking and modern slavery: an addendum](#) or [Criminal Exploitation of children and vulnerable adults: County Lines guidance](#)

## **CHILDREN MISSING FROM EDUCATION**

A child going missing from education is a potential indicator of abuse or neglect, and such children are at risk of being victims of harm, exploitation or radicalisation. There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- o Are at risk of harm or neglect
- o Come from Gypsy, Roma, or Traveller families
- o Come from the families of service personnel
- o Go missing or run away from home or care
- o Are supervised by the youth justice system
- o Cease to attend a school
- o Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Also see: [Attendance and Punctuality Policy](#) or [Children missing education](#) or [Missing Children and Adults strategy](#)

## **CHILD-ON-CHILD ABUSE**

Child-on-child abuse is most often used to mean sexual violence and sexual harassment or sexual abuse between children. It can occur between two children of any sex or through a group of children sexually assaulting or sexually harassing a single child or group of children.

Even if there are no reports in our school it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding child-on-child abuse they should speak to their designated safeguarding lead (or deputy). [Child on child sexual violence & harassment response procedure](#)

At Eko Pathways School all staff will be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBTQ+ children are at greater risk. [Sexual Behaviours Traffic](#)

[Light Tool](#) supports professionals working with children and young people by helping them to identify and respond appropriately to sexual behaviours.

All staff must understand the importance of challenging inappropriate behaviours between children that are actually abusive in nature. Downplaying certain behaviours can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

**All staff have a responsibility of:**

- o making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- o not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"
- o challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them
- o being aware of sexual violence and the fact children can, and sometimes do, abuse other children in this way. When referring to sexual violence we are referring to sexual offences under the [Sexual Offences Act 2003](#).

**Child-on-child abuse is most likely to include, but may not be limited to:**

- o bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- o abuse in intimate personal relationships between children
- o 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)
- o 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)
- o sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- o 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
- o consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery)
- o 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
- o 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)

Follow the guidance: [Child on child sexual violence & harassment response procedure](#)

## **CHILD SEXUAL EXPLOITATION (CSE)**

Child Sexual Exploitation (CSE) CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator.

The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology.

CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media). Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

Also see: [NSPCC: Child sexual exploitation](#) or [Department for Education: Child sexual exploitation](#) or [Department for Education: Child sexual exploitation annexes](#) or [Met Police: Child sexual exploitation](#)

## **CHILDREN WHO ARE LESBIAN, GAY, BISEXUAL OR GENDER QUESTIONING**

A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are.

However, the Cass review identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism spectrum disorder and/or attention deficit hyperactivity disorder.

It recommended that when families/carers are making decisions about support for gender questioning children, they should be encouraged to seek clinical help and advice. When parents are supporting pre-pubertal children, clinical services should ensure that they can be seen as early as possible by a clinical professional with relevant experience.

As such, when supporting a gender questioning child, schools should take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying.

Risks can be compounded where children lack trusted adults with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff.

## **CHILDREN WITH FAMILY MEMBERS IN PRISON**

Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. [NICCO](#): National information centre on children of offenders provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

## **CONTEXTUAL SAFEGUARDING**

As well as threats to the welfare of children from within their families, children may be vulnerable to abuse or exploitation from outside their families. These extra-familial threats might arise at school and other educational establishments, from within peer groups, or more widely from within the wider community and/or online.

These threats can take a variety of different forms and children can be vulnerable to multiple threats, including: exploitation by criminal gangs and organised crime groups such as county lines; trafficking, online abuse; sexual exploitation and the influences of extremism leading to radicalisation.

Extremist groups make use of the internet to radicalise and recruit and to promote extremist materials. Any potential harmful effects to individuals identified as vulnerable to extremist ideologies or being drawn into terrorism should also be considered.

Also see: [Contextual Safeguarding](#)

## **COUNTY LINES**

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

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

Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes.

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

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school). If a child is suspected to be at risk of or involved in county lines you must inform your DSL immediately.

Also see: [National Crime Agency: County Lines](#) or [CSA centre of Expertise on Child Sexual abuse](#)

## **DOMESTIC ABUSE**

The Domestic Abuse Act 2021 introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse.

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That 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.

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

Also see: [NSPCC: Domestic-abuse signs symptoms effects](#) or [Refuge: Effects of domestic violence on children](#) or [Safe Lives: Young people and domestic abuse](#)

## **FEMALE GENITAL MUTILATION**

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

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

Also see: [Fact Sheet: FGM \(Serious Crime Act 2015\) Ministry of Justice/Home Office](#) or [Multi-agency Statutory guidance on Female Genital Mutilation](#) or [FORWARD UK](#) or [Daughters of Eve](#) or [Online training \(Home Office\)](#)

NSPP FGM Helpline: 0800 028 3550 or [fgmhelp@nspcc.org.uk](mailto:fgmhelp@nspcc.org.uk)

## **FORCED MARRIAGE**

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They must then report this to the DSL.

Also see: [Forced Marriage](#) or [The right to choose: government guidance on forced marriage](#)

For support: Forced Marriage Unit on 020 7008 0151 or [fmf@fco.gov.uk](mailto:fmf@fco.gov.uk)

## **GANGS AND SERIOUS YOUTH VIOLENCE**

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime.

Children and young people involved with, or on the edges of, gangs might be victims of violence, or they might be pressured into doing things like stealing or carrying drugs or weapons. They might be abused, exploited or put into dangerous situations.

For lots of young people, being part of a gang makes them feel part of a family so they might not want to leave. Even if they do, leaving or attempting to leave can be a really scary idea. They might be frightened about what will happen to them, their friends or their family if they leave.

There are lots of reasons why young people feel the pressure to join gangs. They might be bored and looking for excitement or feel attracted to the status and power it can give them. They might join due to peer pressure, money or family problems. Gang membership can also make a child feel protected and that they belong.

Also see: [Preventing youth violence and gang involvement: practical advice for schools and colleges](#)

## **HARMFUL SEXUAL BEHAVIOUR**

Children's sexual behaviour exists on a wide continuum, from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage.

A useful umbrella term is "harmful sexual behaviour". The term has been widely adopted in child protection and is used in this advice. **Harmful sexual behaviour can occur online and/or offline and can also occur simultaneously between the two.** Harmful sexual behaviour should be considered in a child protection context.

Also see: [Think U Know: Recognising harmful sexual behaviour by young people](#) or [Brook sexual behaviours traffic light tool](#)

## **HOMELESSNESS**

Eko Pathways School recognises that being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

In most cases, School staff will consider homelessness in the context of child or children) who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support.

Children's services will be the lead agency for these young people and the Designated Safeguarding Lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances.

For further information: [Keeping Children Safe in Education September 2024 Annex B](#) or [Homelessness Reduction Act: policy factsheets](#)

## **SO-CALLED HONOUR BASED ABUSE (HBA)**

So-called 'Honour' based abuse is a violent crime or incident which may have been committed to protect or defend the honour of the family or community.

It is often linked to family members or community members who mistakenly believe someone has brought shame to their family or community by doing something that is not in keeping with the traditional beliefs of their culture. For example, honour-based abuse might be committed against people who:

- o become involved with a boyfriend or girlfriend from a different culture or religion
- o want to get out of an arranged marriage
- o want to get out of a forced marriage
- o wear clothes or take part in activities that might not be considered traditional within a particular culture

Women and girls are the most common victims of honour-based violence however it can also affect men and boys. Crimes of 'honour' do not always include violence. Crimes committed in the name of 'honour' might include:

- o domestic abuse
- o threats of violence
- o sexual or psychological abuse
- o forced marriage
- o being held against your will or taken somewhere you don't want to go
- o assault

If staff believe that a pupil is at risk from Honour Based Violence the DSL will follow the usual safeguarding referral process, however, if it is clear that a crime has been committed or the pupil is at immediate risk the Police will be contacted. It is important that if HBV is known or suspected that communities and family members are NOT spoken to prior to referral to the police or social care as this could increase risk to the child.

Also see: [Met Police](#)

## **POLICE AND SOCIAL CARE INTERVIEWS OR SEARCHES**

The Head teacher and DSL must be alerted to any attendance of police or social care at school immediately.

The DSL, with support from the Head Teacher, must be the lead school professional working with police and social care 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. Further information can be found in the Statutory guidance - [PACE Code C 2019](#)

If the DSL or Head Teacher are unavailable, the DDSL (with support from SLT) should act as the lead school professional.

In the absence of the Head Teacher, contact will be made with the Trust Safeguarding Lead or a member of the Executive Team to provide support and guidance.

Staff must seek clarity about actions police or social care intend to take while on school grounds prior to any action being taken.

Staff must request a statement of rationale from police/social care management, and seek advice from Eko Trust, if there are concerns that the actions being taken are not focused on safeguarding the needs of the child.

A member of staff will remain with the child/young person during an interview when a section 47 inquiry is initiated during school hours.

Staff will not intervene in a section 47 interview (e.g. comment, ask questions etc.) unless it is deemed necessary in order to uphold the best interests of the child.

A member of staff will act as the appropriate adult when a child has been arrested or suspected of an offence in school if the child's parent, carer or guardian is unavailable or unable to act in that capacity.

The member of staff acting as the appropriate adult must not be the victim of the suspected offence or have any bias toward the arrest/offence which may impact the safety of the child or right to a fair investigation. **School staff must not act as an appropriate adult** if there have been admissions or denials about the offence(s) before they act as an appropriate adult, or if they are a victim or witness to the offence(s) concerned.

If the child is arrested, the Police must ensure that the child has access to an appropriate adult who is trained for the role. The Police will usually approach Social Services to request an appropriate adult.

However, if the child is already known to Social Care the school can advise the Police and assist in making contact with the right professional.

**Strip searching of children will not take place on school property or when children are in the care of the school.** Strip searching of a child must be undertaken by a Police Officer of the same sex as the child being searched. If the child is 17 years old or under, a strip search can only take place in the presence of an appropriate adult. **Members of staff will not act as an appropriate adult for strip searches.**

## PREVENTING EXTREMISM AND RADICALISATION

The School is clear that extremism and radicalisation should be viewed as safeguarding concerns. We value freedom of speech and the expression of beliefs and both pupils/students and adults have the right to speak freely and voice their opinions.

- o Extremism is views and actions that promote:
  1. violence against others
  2. hatred towards others
  3. undermining the rights of others
- o Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism.

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

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

As a School we will minimise the risk of radicalisation by:-

- o Providing a developmentally appropriate PSHE syllabus which develops students' understanding of fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs.
- o Having systems in place for any student to raise concerns with staff, knowing that they will be listened to, believed and valued
- o Developing robust risk assessments & providing targeted work for pupils identified as being a potential risk to other pupils.

If staff have a concern they must speak to DSL and together should follow local safeguarding procedures and local protocols for multi-agency liaison with police and children's social care. In an emergency, call 999 or the confidential terror hotline.

Also see: [Keeping Children Safe in Education September 2024 Annex B](#) or [Prevent Duty for England and Wales](#) or [Channel Guidance](#)

## PRIVATE FOSTERING

We recognise that some children may be living in private fostering arrangements, and that this could make them vulnerable to harm. Many arrangements are 'hidden' and not brought to the attention of the local authority, even though it is an offence not to inform them.

Also see: [Children Act 1989: private fostering](#)

## PUPIL BEHAVIOUR

We will always aim to maintain a safe and calm environment by expecting good behaviour from our pupils in line with our behaviour policy.

We are aware that any physical response from a member of staff to a pupil's poor behaviour could lead to a child protection concern being raised by the child or parent/carer.

- (1) No member of staff will use force when dealing with a pupil's breach of our behaviour policy unless the potential consequences of not physically intervening are sufficiently serious to justify such action
- (2) We will always record any occasion when physical intervention has been necessary
- (3) We will always notify parents or carers of any such incident

Also see: [Behaviour Principles Policy](#) and [Eko Pathways Behaviour Policy](#)

## **YOUTH PRODUCED IMAGERY**

This is imagery that is being created by under 18s themselves and involves still photographs, video, and streaming. It includes consensual and non-consensual sharing of nudes and semi-nudes images and/or videos.

In the latest advice for schools ([UKCCIS](#), 2016), sexting is defined as the production and/or sharing of sexual photos and videos of and by young people who are under the age of 18. It includes nude or nearly nude images and/or sexual acts. It is also referred to as 'youth produced sexual imagery'.

Youth produced imagery does not include the sharing of sexual photos and videos of under-18 year olds with or by adults. This is a form of child sexual abuse and must be referred to the police.

### ***What to do in an incident involving youth produce imagery comes to your attention***

- o Report it to your Designated safeguarding Lead (DSL) immediately
- o **Never** view, download or share the imagery yourself, or ask a child to share or download – **this is illegal**
- o If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSL
- o Do not delete the imagery or ask the young person to delete it
- o Do not ask the young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL
- o Do not share information about the incident to other members of staff, the young person(s) it involves or their, or other, parents and/or carers
- o Do not say or do anything to blame or shame any young people involved
- o Do explain to them that you need to report it and reassure them that they will receive support and help from the DSL

When responding to Sexting DSL's should follow [UKCCIS guidance](#)

## **UPSKIRTING**

'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender can be a victim. It is now a criminal offence under the [Voyeurism \(Offences\) Act 2019](#).

## **SECTION 8**

### **THE ROLE OF THE DESIGNATED TEACHER FOR LOOKED AFTER CHILDREN AND PREVIOUSLY LOOKED AFTER CHILDREN**

- 8.1 Many looked-after and previously looked-after children have suffered disrupted learning, may have missed extended periods of school, and many of them have special educational needs (SEN). The gaps in their learning and, in many cases the emotional impact of their experiences, are likely to have become significant barriers to their progress. The complexity of this fragmented educational experience with high incidence of SEN, needs careful assessment and planning.

- 8.2 The designated teacher role is statutory and is a leadership role.
- 8.3 The designated teacher should be a central point of initial contact within the school. This helps to make sure that the school plays its role to the full in making sure arrangements are joined up and minimise any disruption to a child's learning.
- 8.4 Designated teachers should take lead responsibility for ensuring school staff understand the things which can affect how looked-after and previously looked-after children learn and achieve and how the whole school supports the educational achievement of these pupils.
- 8.5 Designated teachers should work closely with other staff in school to make sure the child's progress is rigorously monitored and evaluated. This includes ensuring that the child's PEP is effective in supporting everyone to help the looked-after pupil to make good educational progress.
- 8.6 The designated teacher is fundamental to helping looked-after children make a smooth transition to their next school or college. This includes arrangements to: achieve speedy transfer of the looked-after child's school records to a new school; ensure the child's PEP is up to date; and that the local authority responsible for looking after the child has the most recent version of the PEP.
- 8.7 When children cease to be looked-after, their educational needs are unlikely to have changed significantly simply because their care status has changed. Although they will no longer be required to have a PEP, designated teachers will wish to consider what is best for continuity and meeting the child's educational needs.

For full expectations of the role see: [The designated teacher for looked-after and previously looked-after-children February 2018](#)

## **SECTION 9**

### **MENTAL HEALTH AND SUPPORTING CHILDREN REQUIRING MENTAL HEALTH SUPPORT**

- 9.1 Schools have an important role to play in supporting the mental health and wellbeing of their pupils
- 9.2 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.
- 9.3 All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- 9.4 Only trained professionals should make a diagnosis of a mental health problem, but staff are well placed to observe children and identify those whose behaviour suggests they may be experiencing a mental health problem, or be at risk of developing one.
- 9.5 Abuse, neglect and other traumatic adverse childhood experiences can have a lasting impact, and it's key that staff are aware of how these experiences can affect children's mental health, behaviour and education.
- 9.6 If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy, and speaking to the designated safeguarding lead or a deputy.

Also see: [Department for Education: preventing and tackling bullying](#) or [Department for Education: mental health and behaviour](#) or [Public Health England: promoting children's emotional health and wellbeing](#) or [Public Health England: Rise Above](#)

## **SECTION 10**

### **ONLINE SAFETY**

We recognise that children's use of the Internet is an important part of their education but that there are risks of harm associated with its use. We have an [Online Safety Essentials document](#) that

addresses how we minimise those risks in school and teach children how to stay safe when using the internet in their lives out of school.

All staff must be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

Many children have unlimited and unrestricted access to the internet via mobile phone networks (i.e., 3G, 4G and 5G). This access means some children, whilst at school, sexually harass, bully, and control others 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. The school will carefully consider how this is managed on our premises and keep a log of blocked sites which will be shared with the Trust to inform other schools of concerning sites.

We also recognise that all members of staff and volunteers must always be mindful of the need to follow our policy of acceptable use of our IT equipment.

### **10.1 Responding to an online safety incident:**

- 1) Preserve the evidence

**Note:**

- *If the incident involves the discovery of indecent images or videos of children, the police should always be contacted immediately for advice. The image should not be downloaded or forwarded on.*
- *If the incident involves unacceptable, inappropriate or potentially illegal use of schools: computer, iPad, mobile phone or camera, make sure no one else comes into contact with the equipment. Do not shut down the equipment down, but do turn the display off. Where possible lock the equipment away.*
- *Seek technical advice.*

- 2) Consider the impact of the online safety incident

- If the incident is solely against the school's Acceptable Use Policy, consider applying the consequences indicated in that policy or the overarching behaviour policy.
- If the incident is of a potentially criminal nature, the police should be contacted.
- If the incident involves an adult, the local authority Designated Officer(s) (LADO) must be contacted for further advice (see section on "Managing allegations against staff")

Also see: [Harmful online challenges and online hoaxes](#) or [UK Council for Child Internet Safety \(UKCCIS\)](#) [Child Exploitation and Online Protection Centre \(CEOP\)](#) or [Think U Know](#) or [UK Safer Internet Centre](#) or [South West Grid for Learning](#)

### **10.2 Children and online safety when educated at home**

It is important that all staff who interact with children, including online, continue to look out for signs a child may be at risk. Any such concerns should be dealt with as per the Child Protection Policy and where appropriate referrals should still be made to children's social care and as required, the Police.

Online teaching should follow the same principles as set out in the school code of conduct. Eko Pathways School will ensure any use of online learning tools and systems is in line with privacy and data protection/GDPR requirements.

Also see: [BBC App: Own It](#) or [SafeToNet](#) or [London Grid for Learning](#)

### **10.3 Educating parents and carers about children's access to online sites when away from school**

Schools are likely to be in regular contact with parents and carers. Those communications should be used to reinforce the importance of children being safe online and parents and

carers are likely to find it helpful to understand what systems schools use to filter and monitor online use. It will be especially important for parents and carers to be aware of what their children are being asked to do online, including the sites they will be asked to access and be clear who from the school (if anyone) their child is going to be interacting with online.

## **SECTION 11**

### **CHILD-ON-CHILD SEXUAL VIOLENCE AND SEXUAL HARASSMENT**

#### **11.1 Recognition**

- 11.1.1 Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.
- 11.1.2 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.
- 11.1.3 Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support.
- 11.1.4 Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.
- 11.1.5 Whilst any report of sexual violence or sexual harassment should be taken seriously, staff should be aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys.
- 11.1.6 It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.
- 11.1.7 Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. The designated safeguarding lead (or a deputy) should take a leading role and use their professional judgement, supported by other agencies, such as children's social care and the police as required.

#### **11.2 Awareness**

- 11.2.1 Staff should be aware of the importance of:
  - o making clear that there is a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated. It should never be passed off as "banter", "just having a laugh", "a part of growing up" or "boys being boys". Failure to do so can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it
  - o recognising, acknowledging, and understanding the scale of harassment and abuse and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported
  - o challenging physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them
  - o Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up

#### **11.3 Responding to reports of sexual violence or sexual harassment**

- 11.3.1 Children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not

make a direct report. For example, a friend may make a report or a member of school staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong. If staff have any concerns about a child's welfare, they should act on them immediately rather than wait to be told.

- 11.3.2 The initial response to a report from a child is incredibly important. How the school or responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward.
- 11.3.3 Schools not recognising, acknowledging or understanding the scale of harassment and abuse and/or downplaying of some behaviours can actually lead to a culture of unacceptable behaviour.
- 11.3.4 It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the school should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.
- 11.3.5 If staff have a concern about a child or a child makes a report to them, should act on them immediately and speak to the designated safeguarding lead.

#### **11.4 Effective Safeguarding Procedures**

- 11.4.1 If possible, reports should be managed with two members of staff present, (preferably one of them being the designated safeguarding lead or a deputy). However, this might not always be possible
- 11.4.2 Where the report includes an online element, the key consideration is for staff not to view or forward illegal images of a child. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection.
- 11.4.3 Not promising confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with the designated safeguarding lead or children's social care) to discuss next steps.
- 11.4.4 Staff should only share the report with those people who are necessary in order to progress it.
- 11.4.5 It is important that the victim understands what the next steps will be and who the report will be passed to.
- 11.4.6 It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child.
- 11.4.7 Recognising that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so children may not be able to recall all details or timeline of abuse.
- 11.4.8 Keeping in mind that certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and/or sexual orientation;
- 11.4.9 Listening carefully to the child, reflecting back, using the child's language, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc. It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was.

#### **11.5 Making a record of the report**

- 11.5.1 Best practice is to wait until the end of the report and immediately write up a thorough

summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present).

11.5.2 However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made; only recording the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. Schools should be aware that notes of such reports could become part of a statutory assessment by children's social care and/or part of a criminal investigation;

11.5.3 Informing the designated safeguarding lead (or deputy), as soon as practically possible, if the designated safeguarding lead (or deputy) is not involved in the initial report.

## **11.6 Risk assessment**

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

11.6.2 The risk and needs assessment should consider:

- o the victim, especially their protection and support
- o whether there may have been other victims
- o the alleged perpetrator(s)
- o all the other children, (and, if appropriate, adult students and staff) at the school, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms
- o the time and location of the incident, and any action required to make the location safer

11.6.3 Risk assessments should be recorded (written or electronic) and should be kept under review. All schools should use: [Child on child sexual violence & harassment response procedure](#)

11.6.4 At all times, the school should be actively considering the risks posed to all their pupils and students and put adequate measures in place to protect them and keep them safe.

11.6.5 Schools, as relevant agencies, should be part of discussions with statutory safeguarding partners to agree the levels for the different types of assessment and services to be commissioned and delivered, as part of the local arrangements. Safeguarding partners should publish a local threshold document which includes the process for the local early help assessment and the type and level of early help services to be provided, and DSLs (and their deputies) will need to familiarise themselves with this document.

11.6.6 Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required. Any such professional assessments should be used to inform the school's approach to supporting and protecting their pupils and students and updating their own risk assessment.

## **11.7 Action following a report of sexual violence and/or sexual harassment**

Important considerations will include:

- o the wishes of the child who has been harmed in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. The child should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the school's duty and responsibilities to protect other children
- o the nature of the alleged incident(s), including whether a crime may have been committed and/or whether HSB (Harmful Sexual Behaviour) has been displayed
- o the ages of the children involved
- o the developmental stages of the children involved

- o any power imbalance between the children. For example, is/are the alleged perpetrator(s) significantly older, more mature, confident and well-known social standing? Does the victim have a disability or learning difficulty?
- o if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature)
- o that sexual violence and sexual harassment can take place within intimate personal relationships between children
- o importance of understanding intra familial harms and any necessary support for siblings following incidents
- o are there ongoing risks to the victim, other children, adult students or school staff, and
- o other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation

Resources: [‘Undressed’ LGFL](#) and [Childnet: Star SEND toolkit](#) Support young people with special educational needs and disabilities and [Childnet: Just a Joke?](#) (for children age 9-12) and [Childnet: Step Up, Speak Out](#) (for young people age 13 – 17) and [Preventing Harmful Sexual Behaviour toolkit by the Lucy Faithfull Foundation](#) and [NSPCC: Harmful sexual behaviour framework](#) and [Contextual Safeguarding Network](#)

Follow full guidance: [Keeping Children Safe in Education September 2024](#) Part five: Child-on-child sexual violence and sexual harassment, page 111

## **SECTION 12**

### **WORKING TOGETHER WITH PARENTS AND CARERS**

#### **12.1 Pupil Information**

We recognise the importance of keeping up-to-date and accurate information about pupils. We will regularly ask all parents/carers to provide us with the following information and to notify us of any changes that occur:

- o names and contact details of persons with whom the child normally lives
- o names and contact details of all persons with parental responsibility
- o emergency contact details - more than one emergency contact number for pupils will be collected where possible by each school.
- o details of any persons authorised to collect the child from school (if different from above)
- o any relevant court orders in place including those which affect any person’s access to the child (e.g. Residence Order, Contact Order, Care Order, Injunctions etc.)
- o name and contact details of the child’s GP
- o name and contact details of the child’s social worker (if applicable)
- o any other factors which may impact on the safety and welfare of the child

#### **12.2 Confidentiality**

Information about pupils given to us by the children themselves, their parents or carers, or by other agencies will remain confidential. Staff will be given relevant information on only a “need to know” basis in order to support the child if that is necessary and appropriate.

We are, however, under a duty to share any information which is of a child protection nature. We understand that this is in the best interests of the child and overrides any other duties we have regarding confidentiality and information sharing.

We have a duty to keep any records which relate to child protection work undertaken by us or our partner agencies and to ensure that these are kept apart from the main pupil record, stored securely and only accessible to key members of staff. We also have a duty to send copies of these records to any school to which the pupil transfers.

#### **12.3 Referrals to partner agencies**

If we have a reason to be concerned about the welfare of a child we will always seek to discuss this with the child’s parents or carers in the first instance. On occasion, according to the nature of our concern, or due to information held by a safeguarding partner such as social care, health or police, it

may be necessary for us to make an immediate referral to Children's Services as to do otherwise may put the child at risk of further harm. Depending on the context of the referral, the school may be directed by social services and/or police to not disclose the referral to the child's parent/carer.

#### **12.4 Sharing our Policy**

This policy is available to all parents of pupils and prospective pupils via our website and can be made available by hard copy on request.

#### **12.5 Information sharing**

Information sharing is an important aspect of safeguarding children and vulnerable people. Serious Case Reviews often record that a failure to share information has been a key factor. It is important however that information is shared legally.

The duty to share information arises from: [Children Act 1989](#) and [Children Act 2004 Section 11](#) and [General Data Protection Regulations](#) section five; Article 23.

When children are suffering or may be at risk of suffering significant harm, concerns must always be shared with children's social care or the police.

Schools should make it clear to parents that they have a general duty to share information with other agencies where they have safeguarding concerns. It is good practice that schools should work in partnership with parents and carers. This means that in general schools should share information with other agencies with the parents' knowledge and consent.

If parents do not consent, the duty to refer overrides this, as the safety of the child is paramount.

Seeking consent is not required, if to do so would: place a person at increased risk of harm (usually the child, but also a family member or another person); prejudice the prevention, detection or prosecution of a serious crime; or lead to an unjustifiable delay in making enquiries.

### **SECTION 13**

#### **SAFER RECRUITMENT**

Eko Pathways School is committed to ensuring that all staff and volunteers working with children in the school will be recruited safely.

A part of our whole school approach to safeguarding, we have a culture that safeguards and promotes the welfare of children in our school. As part of this culture, we have adopted 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 school.

We will only accept copies of a curriculum vitae alongside an application form. A curriculum vitae on its own will not provide adequate information.

As part of our safer recruitment process an online search for candidates may be undertaken at the shortlisting stage of the process. This may help identify any incidents or issues that have happened, and are publicly available online, which the school might want to explore with the applicant at interview. Schools should inform shortlisted candidates that online searches may be done as part of due diligence checks.

Eko Pathways School has set out a set of Safer recruitment practices to help ensure that our staff, agency staff and volunteers are suitable to work with children and young people. It's a vital part of our commitment to creating a safe and positive environment and making a commitment to keep children safe from harm.

For detailed information on the Eko Trust approach to Recruitment and Selection see: [EKO Recruitment and Selection Policy June 2020](#)

### **SECTION 14**

## MANAGING ALLEGATION AGAINST STAFF, AGENCY STAFF OR VOLUNTEERS

If staff have safeguarding concerns, or an allegation is made about another member of staff (including agency, volunteers and contractors) posing a risk of harm to children, then:

- o this should be referred to the Head Teacher, Principal or Designated Safeguarding Lead (where this is part of their role);
- o where there are concerns/allegations about the Head Teacher or Principal, this should be referred to the Trust Safeguarding Lead, the Trust Leader of Education or CEO;
- o in the event of concerns/allegations about the Head Teacher, where the Head Teacher is also the sole proprietor of an independent school, this should be reported directly to the designated officer(s) at the local authority

### 14.1 Allegations that may meet harms threshold

Allegations that might indicate a person would pose a risk of harm if they continue to work in their present position or in any capacity with children in a school. Examples of such concerns could include:

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

### 14.2 Low level concerns

The term 'low-level' concern does not mean that it is insignificant; it means that the behaviour towards a child does not meet the harms threshold.

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 Trust may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO

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, engaging with a child on a one-to-one basis in a secluded area or behind a closed door, using inappropriate sexualised, intimidating or offensive language.

For detailed information on the Eko Trust response to allegations see:

[Eko Trust Allegations of Abuse Policy](#) and [Allegations against Staff; information for those subject to allegations](#) and [Summary managing allegations against staff and volunteers procedures flow chart](#)

## SECTION 15

### MONITORING AND REVIEWING OUR POLICY AND PROCEDURE

- 15.1 Our Designated Leads for Safeguarding and Child Protection will continually monitor our child protection and safeguarding practices and bring to the notice of the Head teachers, Local Governing Bodies and the School Board any weaknesses or deficiencies.
- 15.2 The Local Governing Bodies have a duty to remedy any weaknesses that are identified.
- 15.3 An annual report will be submitted to the Local Governing Bodies, the School Board and the NSCB which will outline the child protection and safeguarding work that has been undertaken during the year. Names of children will not be shared

- 15.4 The Local Governing Bodies, the School Board, the Head teachers, the CEO and Designated Staff will work together on any aspect of Safeguarding and Child Protection that is identified as an area for development over the coming year.
- 15.5 Our Policy will be reviewed annually with the School Board.
- 15.6 This Policy was adopted in December 2016. It is reviewed yearly, most recently in July 2024. It will be reviewed again in July 2025.