

Safeguarding and Child Protection Policy

Bolder Academy

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Safeguarding and Child Protection Policy V3

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Introduction

Safeguarding and promoting the welfare of young people is the legal responsibility of us all. The Safeguarding and Child Protection policy applies to all staff, governors and volunteers working in the Academy.

Bolder Academy is determined to ensure that all necessary steps are taken to protect the young people in our community. Safeguarding and promoting the welfare of children is defined for the purposes of this Policy as:

- protecting children from maltreatment;
- preventing impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

There are seven main elements to our policy for Safeguarding:

1. Child protection policy and procedures
2. Serious violence
3. Child sexual exploitation (CSE) and child criminal exploitation (CCE) policy
4. FGM and forced marriages policy and procedures
5. Youth produced sexual imagery (sexting)
6. Peer on peer / child on child abuse
7. Sexual violence and sexual harassment
8. Extremism and radicalisation, 'Prevent' policy and procedures

Bolder's Governing Board will seek to facilitate a whole school approach to safeguarding. This means ensuring 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. Where there is a serious safeguarding concern, the Governing Board, along with the Leadership Team, will ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Children will be encouraged to express their views and give feedback.

The overarching aims of this policy are:

Bolder Academy

- To provide the safest possible environment for young people to enjoy their learning and develop safe practices.
- To create a culture which recognises and understands the importance of safeguarding; including listening to and discussing with young people.
- That all members of our school community understand the basic premise of safeguarding: *'if you see something, say something'*.
- To ensure that young people who are suffering or likely to suffer significant harm are identified and appropriate action is taken to make sure they are kept safe.
- To prevent unsuitable people from working with our young people.
- To ensure that safe practice is rigorously promoted, and any poor practice is investigated and challenged.
- To identify instances in which there are grounds for concern about a child's welfare and initiating or taking appropriate actions to keep them safe.
- To contribute to effective partnership working between all those involved with providing safeguarding services for young people.

Bolder Academy will ensure that:

- The welfare of the child remains paramount.
- We will consider, at all times, what is in the best interests of the child.
- All our students, whatever their age, culture, disability, gender, language, racial origin, religious beliefs and/or sexual identity have the right to be protected from harm.
- All our students will be taught about Safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- All staff (paid or unpaid) have a duty to keep students safe and to protect them from physical and emotional harm.
- All staff are aware that effective safeguarding is not just about protecting children where problems are just emerging, but also those already known to social care, on child in need or child protection plans.
- The Academy holds more than one emergency contact number for all of its students, which is regularly checked by the Governing Board.
- All staff have a duty to report without delay any concerns about a person's safety to **Adam Walthaus**, who is the Designated Safeguarding Lead for Child Protection, **Frances Gibney**, **Debra Knights**, **Heidi Swidenbank** or **Adam Bones** the Deputy Designated Safeguarding Leads or **Andrew Dodge**, the Governor for Safeguarding.
- Staff also have a duty to take care of themselves (Health & Safety at Work Act 1974).

- Where no specific guidance exists, staff make professional judgements about their behaviour in order to secure the best interests and welfare of students and, in so doing, will be deemed to be acting **REASONABLY**.
- The Academy contributes fully to interagency working.
- The Academy adheres to statutory employment checks and safer recruitment. Governors will ensure there are Safer Recruitment Policies in place, including the changes from 1st January 2021 with regards to the TRA Teacher Services. See Safer Recruitment Policy.

Safeguarding and promoting the welfare of all young people in our community

Information Sharing and Confidentiality

Information sharing is vital in identifying and tackling all forms of abuse and neglect. As part of meeting a child's needs, it is important for governing bodies and proprietors to recognise the importance of information sharing between practitioners and local agencies. This should include ensuring arrangements are in place that set out clearly the processes and principles for sharing information within the school or college and with the three safeguarding partners, other organisations, agencies and practitioners as required. School and college staff should be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to the local authority children's social care.

It is important that governing bodies and proprietors are aware that among other obligations, the Data Protection Act 2018 and the GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

Governing bodies and proprietors should ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR. This includes:

- Being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information which is sensitive and personal, and should be treated as 'special category personal data'.
- Understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information

without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.

- For schools, not providing pupils' personal data where the serious harm test under the legislation is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harms test is met, they must withhold providing the data in compliance with schools' obligations under the Data Protection Act 2018 and the GDPR. Where in doubt schools should seek independent legal advice.
- **The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of children.** Information sharing will take place regardless of what level of involvement there is from other agencies. Information sharing should be with the right people between and within agencies.
- We recognise that all matters relating to child protection are confidential.
- The Designated Lead for Safeguarding will disclose any information about a student to other members of staff on a need to know basis only and in the strictest of confidence.
- All staff must be aware that they cannot promise a child to keep secrets.
- Staff authorised to use PMRs ('walkie talkies') will be reminded to consider the implications (potential breach of data protection and GDPR) of using unsecured communication channels, especially when discussing personal and sensitive safeguarding information.
- When a child leaves Bolder Academy, the Designated Safeguarding Lead will ensure their child protection file is transferred to the new school or college as soon as possible, ensuring secure transit, and confirmation of receipt. This will be transferred separately from the main pupil file. The DSL will also consider if it is appropriate to share any information with the new school in advance of a child leaving, in order to help safeguard and promote the child's welfare, including their educational outcomes.

Supporting Children

We recognise that children who are abused or who witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame. The Academy may be the only stable, secure and predictable element in the lives of children at risk. When at Bolder

Academy their behaviour may be challenging and defiant or they may be withdrawn.

The Academy will endeavour to support the student through:

- The teaching of safeguarding, including online safety, as part of providing a broad and balanced curriculum. This may include covering relevant issues through Relationships and Sex Education and Health Education, which will be compulsory from September 2020.
- The Academy ethos which promotes a positive, supportive and secure environment and gives students a sense of being valued.
- Personalised learning provision.
- The Behaviour and Attitudes Policy which is aimed at supporting vulnerable students in the Academy. Academy staff will ensure that the student know that some behaviour is unacceptable, but they are valued and not to be blamed for any abuse which has occurred.
- Liaison with other agencies that support the student such as Children's Services, Child and Adolescent Mental Health Service (CAMHS), Education Welfare Service and Educational Psychology Service, Encompass and Domestic Violence Support and those agencies involved in the safeguarding of children.
- Notifying Children's Social Care immediately there is a significant concern.
- Providing continuing support to a student about whom there have been concerns who leaves the Academy by ensuring that appropriate information is forwarded under confidential cover to the student's new school.
- A shared understanding that a child's poor behaviour maybe a sign that they are suffering harm or that they have been traumatised by abuse.
- Supporting the mental health and wellbeing of our students as well as their physical health.
- The Designated Lead taking on early help cases.

Mental Health

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

Bolder's Governing Board and Senior Leadership Team will ensure that there are clear systems and processes in place for identifying possible mental health

problems, including routes to escalate and clear referral and accountability systems.

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

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

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their Child Protection policy and speaking to the Designated Safeguarding Lead or a Deputy.

Section 1: Child Protection Policy and Procedures

Please see the Appendix 2 for the flow chart for raising safeguarding concerns about a child.

All staff should be alert to the signs of abuse and neglect and know to whom they should report concerns or suspicions.

This policy is to be read in conjunction with the general duty – section 175 of the Education Act 2002

As part of this Policy the Academy will ensure:

- That it has a designated senior person for child protection who has received appropriate training and support for the role.
- Every member of staff and governor knows the name of the designated senior person for child protection and their role.
- The Designated Safeguarding Lead will consider whether wider environmental factors are present in a child's life that is a threat to their safety and/or welfare.
- That all staff are aware of the Behaviour Policy and safeguarding response to children missing education and KCSIE (2021).
- That the Behaviour and Attitudes Policy includes measures to prevent bullying and cyberbullying.

Definition

The term 'abuse' is intended to include any situation where there is grave concern regarding the well-being of a student. This may include neglect as well as physical, sexual and emotional abuse.

Knowing what to look for is vital to the early identification of abuse and neglect. All staff should be aware of indicators so that they are able to identify cases where children may be in need of help or protection. If staff are unsure, they should always speak to the Designated Safeguarding Lead (or deputy).

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

Indicators of abuse and neglect

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

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

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

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on a 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 try to 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 cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of 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 such as masturbation, kissing, rubbing and touching outside 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 also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

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 from or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs, which can give rise to mental health problems.

The Academy's Responsibility

It is part of the Academy's responsibility of care to be alert to signs of abuse. This may include:

- Sudden changes in behaviour.
- Withdrawal from social relationships.

- Sudden change in attendance patterns.
- Change in working patterns.
- Loss of concentration.
- Lack of homework.
- Lack of motivation.
- Tearfulness, listlessness.
- Physical bruising.
- Issues with mental health becoming apparent.

Children with Special Educational Needs or Disabilities

According to the Safeguarding Network, children with disabilities are 3.7 times more likely than other children to be abused or neglected. Sometimes this is because of high care needs, increased vulnerability or the range of other factors that affect other children.

Professionals can sometimes miss signs of abuse due to the complexity of young people's needs, an acceptance of things being how they are, or allowing their recognition of the challenges facing parents to cloud their judgement leading to abuse or neglect being under-reported.

Children have a wide range of needs and this section considers children with a formal diagnosis or condition, as well as where issues are apparent but there is no formal diagnosis. These children are at greater risk of abuse or neglect and the barriers to identifying and intervening are also higher. It is therefore important that we maintain an open mind about what we are seeing, and as suggested by Lord Laming, maintain a professional curiosity.

For example:

- not accepting that an injury is a result of the needs of the child, but instead consider what other causes there may be and what the evidence suggests.
- considering physical issues such as self-harm markings or unexplained bruising as possibly being indicative of abuse.
- considering changes in behaviour, such as withdrawal, fear or heightened aggression as possibly being indicative of abuse.
- recognising the potential for fabricated or induced illness

It is important that there are also clear lines of communication between all involved in the child's care so that concerns can be discussed and referred as necessary.

- It is important not to make assumptions that that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability.
- Children with SEN and disabilities and or mental health concerns are disproportionately impacted by behaviours such as bullying, without actually showing any signs.
- They may find communicating their worries difficult and these barriers need to be considered.

Bolder will ensure that policies on special educational needs and disability, and supporting pupils in schools with medical conditions, are in place and are reflective of safeguarding as appropriate.

Children who need a Social Worker (Child in Need / Child Protection Plans)

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

Local authorities should share the fact a child has a social worker, and the Bolder's Designated Safeguarding Lead (or Deputies) will hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This is be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools and colleges to safeguard and promote the welfare of children.

Where children need a social worker, this will inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

Procedures and Disclosures

Staff should be receptive to any attempt a student may make to report that s/he, or another student is being or has been abused.

- They should also be observant and actively listen to the child's voice and non-verbal communication.

- They should maintain a focus on the child’s emotional needs, experiences, wishes and feelings.
- All concerns should be discussed with the DSL.
- If someone discloses to you that they are being abused either physically, emotionally or sexually you should:
 - React calmly.
 - Reassure the child that they were right to tell and that they are not to blame and take what the child says seriously.
 - Be careful not to be deemed as putting words into their mouths. It is better not to ask questions – leave that to the child protection team.
 - REMEMBER not to promise confidentiality right from the beginning. You should advise the child that you will have to pass information on if there is any suggestion of harm to themselves or somebody else.
 - Inform the child what you will do next
 - Do not delay in passing on the information. This may be verbally initially, but a full and written record of what has been said must be made as soon as possible and passed to the DSL.
 - Follow the procedures for searching screening and confiscation if applicable (see section on youth produced imagery).
- Some children with disability may be find it more difficult to express their concerns or disclose abuse, however children with disabilities are most likely to turn to a trusted adult they know well for help such as family, friend or teacher.
- All suspicious observations of staff should be immediately reported to the Designated Lead for Safeguarding (**Adam Walthaus**) or in his absence to **Frances Gibney, Debra Knights, Heidi Swidenbank** or **Adam Bones**.
- The Designated Lead for Safeguarding will inform the parents or carers, if appropriate, and record responses, statements and observations in connection with the alleged abuse.
- Staff, if appropriate, will be informed of the need to monitor a student in his/her tutor group.
- In the case of suspected sexual abuse the DSL will contact Social Services immediately.
- Emergency action – In some cases it may need to protect a child immediately – in these situations dial 999. The police are the only agency with statutory powers for the immediate protection of children. The guidance provided in [NPCC- When to call the police](#) will help the Designated Safeguarding Lead (or Deputies) understand when they should consider calling the police and what to expect when they do.

- Where staff are concerned that a child may be at risk of female genital mutilation (referred to as FGM), staff must report their concerns to the Police immediately.

Monitoring

The DSL and Dep DSLs will keep an 'at risk register' for students in the Academy and will monitor the progress and well-being of the students within the Academy.

Staff Issues

Staff should not promise confidentiality or that they will not tell anyone about a report of abuse, as this may ultimately not be in the best interests of the child and it is very likely a concern will have to be shared further.

Although staff will feel considerable sympathy for students when disclosing sensitive information, it is inadvisable to touch a student at any time.

Staff will receive training during their Induction programme and through follow up professional development as a part of the Academy's twilight CPD offer.

Staff can up-skill their understanding through accessing an online training programme on annual basis, which covers all forms of safeguarding including radicalisation and FGM.

The Bolder Governing Board and Senior Leadership Team will ensure that as part of the requirement for staff to undergo regularly updated safeguarding training (including online safety) and the requirement to ensure children are taught about safeguarding (including online safety), that safeguarding training for staff (including online safety training) is integrated, aligned and considered as part of the overarching safeguarding approach.

Whilst considering the above training requirements, the Governing Board will have regard to the Teachers' Standards, which set out the expectation that all teachers manage behaviour effectively to ensure a good and safe educational environment, and requires teachers to have a clear understanding of the needs of all students.

Staff Induction

All staff at Bolder will be made aware of systems that support safeguarding as part of their induction. This includes the:

- child protection policy;
- behaviour policy (which includes measures to prevent bullying, including cyberbullying);
- staff code of conduct (outlined in our Staff Handbook);
- safeguarding response to children who go missing from education; and
- role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies).

All staff will receive appropriate safeguarding and child protection training (including online safety) at induction. The training will 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 provide them with relevant skills and knowledge to safeguard children effectively.

During induction, staff will be informed of the local early help process and understand their role in it.

All staff will be made 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.

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.

All staff should know what to do if a child tells them he/she is being abused 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 abuse, as this may ultimately not be in the best interests of the child.

Supporting Staff

We recognise that staff working in the Academy who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting. We will support such staff by providing an opportunity to talk through their anxieties with the DSL and to seek further support as appropriate.

Responsibilities

Staff must report to the DSL any behaviour by colleagues (including supply staff and volunteers) that gives cause for concern in relation to safeguarding the wellbeing of students. In the event that this behaviour involves the DSL, concerns must be shared with the Headteacher instead. This includes incidents outside of school that might not involve children but could have an impact on a staff member's suitability to work with children. The reason for this is because of transferable risk.

If any incident occurs which may result in an action being misinterpreted and / or a concern being raised and / or allegation being made against a member of staff, then the relevant information should be recorded promptly and reported to senior staff.

See separate safeguarding policy 'Allegations against Staff'.

Whistleblowing

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the Academy regarding safeguarding. Staff should feel that they will be taken seriously by the Senior Leadership Team.

The Academy has a Whistleblowing Procedure, which is published on the website. However, where a staff member or a volunteer feels they cannot raise this issue with the Academy's Senior Leadership Team they can also make contact with the NSPCC for further advice.

<https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/>

Parents/Carers

Parents/carers will be informed of the Academy Policy via the website and hard copies will be available on request.

Children Missing from Education

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk, to support the identification of abuse and to help prevent the risks of a child going missing in future. Staff should be aware of Bolder Academy's unauthorised absence and children missing from education procedures.

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 (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Bolder Academy will seek to develop outdoor-safety lessons run by teachers or by local police staff. These lessons will focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org

Private Fostering

Private fostering occurs when a child under the age of 16 (under 18, if disabled) is provided with care and accommodation by a person who is not a parent,

person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Such arrangements may come to the attention of school staff through the normal course of their interaction, and promotion of learning activities, with children.

If a member of staff becomes aware of this arrangement for students, they should inform the DSL (Adam Walthaus). Bolder will then notify the local authority, allowing them to check the arrangement is suitable and safe for the child.

See DfE statutory guidance [Children Act 1989 Private fostering](#) for comprehensive guidance on private fostering.

Arrangements for Multi -Agency Working

Bolder has a pivotal role to play in multi-agency safeguarding arrangements. The Governing Body ensures that the Academy contributes to multi-agency working in line with statutory guidance Together to Safeguard Children.

Locally, the three safeguarding partners (the local authority; a clinical commission group for the area; and the Chief Officer of Police for the LA) will make arrangements to work together with appropriate relevant agencies to safeguard the welfare of local children, including identifying and responding to their needs. Bolder's Governing Board and its Senior Leadership Team, especially the school's Designated Safeguarding Leads, are aware of and, follow their new local arrangements.

The three safeguarding partners have a shared and equal duty to work together to safeguard and promote the welfare of children. To fulfil this role they must set out how they will work together with any relevant agencies. Relevant are those organisations and agencies whose involvement that the three partners consider may be required to safeguard and promote the welfare children with regard to local need. If named as relevant agency, Bolder Academy, in the same way as other relevant agencies, are under a statutory duty to co-operate with other agencies.

The Governing Board should understand the local criteria for action and the local protocol for assessment and, ensure they are reflected in their own policies and procedures. The Academy should also be prepared to supply information as requested by the three safeguarding partners..

Bolder will work with social care, the police, health services and other agencies to promote the welfare of children and protect them from harm. This includes the mental health and wellbeing of our students as well as physical health. To achieve this, a coordinated offer of early help will be implemented when additional needs of children are identified, and contributing to inter-agency plans to provide additional support to children subject to child protection plans.

Concerns about a child's welfare may be referred to Hounslow Children's Social Care. Where a child is suffering, or is likely to suffer from harm, it is important that a referral to Children's Social Care (and, if appropriate, the Police) is made immediately. Children's Social Care assessments consider where children are being harmed in contexts outside the home and so Bolder Academy will provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm. Chapter 1 of [Working Together to Safeguard Children](#) provides details of the assessment process.

Bolder will allow access for children's social care from the host local authority and, where appropriate, from a placing local authority, for the authority as to consider whether to conduct, a section 17 or a section 47 assessment.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The Designated Safeguarding Lead (and Deputies) are be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases school and college staff will be considering homelessness in the context of 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 children and the Designated Safeguarding Lead (or a Deputy) should ensure appropriate referrals are made based on the child's circumstances.

Use of school premises for non-school/college activities

Where the Governing Board or Senior Leadership Team agrees to hire or rent out school or college facilities/premises to organisations or individuals (for example to community groups, sports associations and service providers to run community or extra-curricular activities), they will ensure that appropriate arrangements are in place to keep children safe. When services or activities are provided by the Governing Board, under the direct supervision or management of their school or college staff, their arrangements for child protection will apply. However, where services or activities are provided separately by another body this is not necessarily the case. The Governing Board or Senior Leadership Team should therefore seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with the school or college on these matters where appropriate.

The Governing Board or Senior Leadership Team will also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

Safeguarding Bolder Academy Students who use Alternative Provision

Where Bolder Academy places a student with an alternative provision provider, the Academy will continue to be responsible for the safeguarding of that student.

Pupils in Alternative Provision often have complex needs. Bolder Academy, including its Governing Board, will reflect upon the additional risk of harm that their pupils may be vulnerable to during their placement.

Bolder Academy staff should be satisfied that the provider meets the needs of the students. The Academy will obtain written confirmation from the alternative

provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that Bolder Academy would otherwise perform in respect of its own staff.

Reasonable Force

Reasonable force is sometimes appropriate and a “no contact” policy can leave staff unable to fully support and protect their students. The decision to restrain a child is down to professional judgment of the staff concerned. Further details can be found in the Reasonable Force Policy.

Section 2 - Serious Violence

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

- Increased absence from school;
- Change in friendships or relationships with older individuals or groups;
- A significant decline in performance;
- Signs of self-harm or significant change in wellbeing, including mental health problems
- Signs of assault or unexplained injuries;
- Unexplained gifts or new possessions;
- Befriending criminal networks or gangs.

Staff are regularly made aware of the associated risks with serious violent crime and are aware of Home Office advice about Preventing Youth Violence and Gang Involvement plus Exploitation and County Lines.

Domestic abuse

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

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

may blame themselves for the abuse or may have had to leave the family home as a result.

Operation Encompass

Operation Encompass operates in the majority of police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the Designated Safeguarding Lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs. Police forces not signed up to operation encompass will have their own arrangements in place.

National Domestic Abuse Helpline

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- [NSPCC- UK domestic-abuse Signs Symptoms Effects](#)
- [Refuge what is domestic violence/effects of domestic violence on children](#)
- [SafeLives: young people and domestic abuse.](#)

Section 3 - Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) Policy

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. We recognise that CSE and CCE are areas of extreme vulnerability.

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

Child Criminal Exploitation (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, forced to shoplift or pickpocket, or to threaten other young people. Some of the following can be indicators of CCE children who:

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

Child Sexual Exploitation (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, i.e. youth-produced sexual imagery, which is defined as the sharing of naked pictures ('nudes') or semi-naked images/videos.

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).

The above CCE indicators can also be indicators of CSE, as can children who:

- have older boyfriends or girlfriends; and
- suffer from sexually transmitted infections or become pregnant.

Grooming

Sexual exploitation is commonly characterised by the grooming of young people. This process is carried out by perpetrators to gain their trust. Perpetrators often target children who are already vulnerable – who may have troubled family histories and/or be bullied outside of the home and socially isolated. Once the young people are thought to be sufficiently emotionally involved, violence and intimidation is often used to ensure compliance. In addition, perpetrators may give drugs and alcohol to victims and encourage addiction in order to ensure they become dependent on them for the supply of these substances.

Vulnerability

Sexually exploited children come from a range of backgrounds and may have no additional risk factors or vulnerabilities; therefore, professionals should always keep an open mind to the possibility that a child may be at risk of exploitation. However, children can be at increased risk of sexual exploitation if they have any additional vulnerabilities, as perpetrators may target them and try to exploit these vulnerabilities. The following are examples of factors that can make a young person more vulnerable to exploitation:

- Living in a chaotic or dysfunctional household (including parental substance use, domestic violence (DV), parental mental health issues, parental criminality). Note DV is a particular risk factor in the LB Hounslow.
- A history of abuse (including familial child sexual abuse, physical and emotional abuse and neglect).
- Learning disabilities.
- Bereavement or loss.
- Being lesbian, gay, bisexual or transgender.
- Boys and girls whose gender identity differs from the sex they were given at birth or who question their gender identity [someone who is or feels they may be trans or trans-gender].
- Having temporary leave to remain or being in the UK illegally.
- There are indications that the child has been trafficked into the UK.

- Homelessness, including living in a hostel, bed and breakfast accommodation or a foyer.
- Being a young carer.
- Living in residential care.
- Lacking friends from the same age group.
- Having low self-esteem or self-confidence.

Never giving up on a child

The provision of consistent, non-judgemental support will give more confidence to victims to disclose and give evidence. Victims talk about the importance of having a professional who listened and showed that they cared.

Students at Bolder Academy have very trusting and important relationships with staff who are there to support them. There is an ethos and culture of listening to our students built on our values be kind, be strong, be brave.

Section 4 - Female Genital Mutilation (FGM) and Forced Marriages Policy and Procedure

Female Genital Mutilation is child abuse and is illegal.

Whilst all staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a **specific legal duty on teachers**.

If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher **must** report this to the police.

If you in are ever in any doubt about any form of abuse always ask the DSL.

Information on FGM

FGM involves cutting, and sometimes sewing the girl's genitalia, normally without anaesthetic, and can take place at any time from birth onwards. It is sometimes referred to as 'female circumcision' but this misnomer belies the invasive and irreversible nature of the procedure. It is now more correctly termed female genital mutilation.

The procedure has a cultural, rather than religious, origin and is practised by disparate ethnic communities in many countries, including Ethiopia, Somalia, Sudan, Egypt, Nigeria, India, Pakistan, Yemen and Iraq.

The Female Genital Mutilation Act 2003 makes it a criminal offence, not only to carry out FGM in England, Scotland and Wales on a girl who is a UK national or permanent resident, but also to take a girl out of the UK to have FGM performed abroad, even to countries where FGM is legal.

The indicators of FGM may initially mirror those of sexual abuse. You may notice, for example, that a girl or young woman shows signs of pain or discomfort, needs to visit the toilet constantly, has vaginal blood loss or is unable to sit comfortably. She may make excuses to avoid PE and other physical activity or refuse to use the school showers. She may also become evasive or fearful if you enquire if she is unwell, and assure you that she is fine when she is clearly not. If she is a BME child, has recently arrived back from a 'holiday' abroad or a period of absence from school, seems to be in pain and has not been taken by her family to see a doctor, you should consider FGM, alongside other possible explanations.

Forced Marriage

Forced marriage occurs when a young person is forced into a marriage that they do not want with someone they have not chosen, following coercion, intimidation, threats and possibly physical and sexual abuse. It is very different from an arranged marriage, where both young people can make the decision to accept or decline the partner chosen for them by their parents.

Once again, schools can be seen to be in the front line in protecting young people from this type of abuse. A student who fears that they are likely to be forced into a marriage may disclose to a member of staff. Their initial approach, in common with many disclosures of abuse, may be seemingly innocuous, such as talking about taking a holiday abroad. Their fear that the proposed holiday will result in a forced marriage may only become apparent after a number of conversations.

These young women may also become victims of honour-based abuse. This type of violence is described in 'The Right to Choose' guidance as: 'A variety of crimes of violence (mainly but not exclusively against women), including assault, imprisonment and murder where the person is being punished by their family or their community'.

So-called 'honour based' abuse

So-called 'honour based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community,

include Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing.

All forms of so called HBA are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the Designated Safeguarding Lead.

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HPV, or already having suffered HBA.

If staff have a concern regarding a child that might be at risk of HBA, they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers that requires a different approach (see FGM section).

'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 are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been

trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

Further information on the signs of a child's involvement in county lines is available in guidance published by the [Home Office](#).

Section 5 - Youth produced sexual imagery (sexting)

If a young person has shared imagery consensually, such as when in a romantic relationship, or as a joke, and there is no intended malice, it is usually appropriate for the school to manage the incident directly.

In contrast, any incidents with aggravating factors, for example, a young person sharing someone else's imagery without consent and with malicious intent, should generally be referred to the designated safeguarding lead who will refer on to police and/or children's social care.

If they have any doubts about whether to involve other agencies, they will make a referral to the police.

Assessing the risks

The Designated Safeguarding Lead will conduct a review (including an interview with the young people involved) to establish the facts and assess the risks.

When assessing the risks, the following should be considered:

- Why was the imagery shared?
- Was the young person coerced or put under pressure to produce the imagery?
- Who has shared the imagery?
- Where has the imagery been shared?
- Was it shared and received with the knowledge of the pupil in the imagery?
- Are there any adults involved in the sharing of imagery?
- What is the impact on the pupils involved?
- Do the pupils involved have additional vulnerabilities?
- Does the young person understand consent?
- Has the young person taken part in this kind of activity before?

The DSL will always use their professional judgement along with their colleagues to assess the risk.

Informing parents/carers

Parents/carers will be informed and involved in the process at an early stage unless informing the parent will put the young person at risk of harm.

Reporting incidents to the police

If it is necessary to refer to the police, contact our safer schools officer or dial 101.

Once a report is made to the police, the report has to be recorded and the police will conduct an investigation. This may include seizure of devices and interviews with the young people involved.

Securing and handing over devices to the police

If any devices need to be seized and passed onto the police, then the device(s) should be confiscated, and the police should be called. The device should be turned off and placed under lock and key until the police are able to come and retrieve it.

Searching devices, viewing and deleting imagery

Viewing the imagery

Adults should not view youth produced sexual imagery unless there is good and clear reason to do so.

Wherever possible responses to incidents should be based on what DSLs have been told about the content of the imagery.

The decision to view imagery should be based on the professional judgement of the DSL. Imagery should never be viewed if the act of viewing will cause significant distress or harm to the student.

If it is necessary to view the imagery, then the DSL should:

- Never copy, print or share the imagery; this is illegal.
- Ensure viewing is undertaken by the DSL.

- Ensure viewing takes place with another member of staff present in the room, ideally a member of the senior leadership team. This staff member does not need to view the images.
- Wherever possible ensure viewing takes place on Academy premises, ideally in the Headteacher's Office.
- Ensure wherever possible that images are viewed by a staff member of the same sex as the young person in the imagery.
- Record the viewing of the imagery in the Academy's safeguarding records including who was present, why the image was viewed and any subsequent actions. Ensure this is signed and dated.

If youth produced sexual imagery has been unavoidably viewed by a member of staff either following a disclosure from a young person or as a result of a member of staff undertaking their daily role, the DSL should complete a safeguarding viewing form explaining how the image/s happened to be viewed.

Deletion of images

If it has been decided that other agencies do not need to be involved, then it is recommended that imagery is deleted from devices and online services to limit any further sharing of the imagery.

This policy gives the Academy the power to search students for devices, search data on devices and delete youth produced sexual imagery.

However, it is not recommended that Academy staff view imagery, it is recommended that schools should not search through devices and delete imagery unless there is good and clear reason to do so.

It is recommended that in most cases young people are asked to delete imagery and to confirm that they have deleted the imagery. The student/s should be given a deadline for deletion across all devices, online storage or social media sites.

Students should be reminded that possession of youth produced sexual imagery is illegal. They should be informed that if they refuse or it is later discovered they did not delete the image they are committing a criminal offence and the police may become involved. All of these decisions need to be recorded, including times, dates and reasons for decisions made and logged in the safeguarding records. Parents and carers should also be informed.

Section 6 - Peer on Peer / Child on Child Abuse

(This part of the Policy should be read alongside the Anti-Bullying Policy)

Children and young people may be harmful to one another in a number of ways which would be classified as peer on peer or child on child abuse. The purpose of this policy is to explore the many forms of peer on peer/child on child abuse and include a planned and supportive response to the issues.

Abusive behaviour can happen to students in schools.

Abuse is abuse and should never be tolerated or passed off as 'banter' or 'part of growing up'. Equally, abuse issues can sometimes be gender specific e.g. girls being sexually touched/assaulted and boys being subject to initiation/hazing type violence and / or rituals.

Types of peer on peer/child on child abuse:

There are many forms of abuse that may occur between peers and this list is not exhaustive. It is important to recognise that children are vulnerable to abuse in a range of social contexts as they form different relationships in their neighbourhoods, schools and online and these can feature violence and abuse which is often hidden to adults.

- **Abuse in intimate personal relationships between peers**
Teenage relationship abuse is defined as a pattern of actual or threatened acts of physical, sexual, and/or emotional abuse, perpetrated by an adolescent (between the ages of 13 and 18) against a current or former partner. This could be abuse that occurs in an intimate relationship between peers. Abuse may include insults, coercion, social sabotage, sexual harassment, threats and/or acts of physical or sexual abuse. The abusive teen uses this pattern of violent and coercive behaviour, in a heterosexual or same gender relationship, in order to gain power and maintain control over the partner. Through the PSHCE programme students are supported in understanding what constitutes a healthy relationship both on and off line, and to recognise risks.
- **Physical abuse e.g. (biting, hitting, kicking, hair pulling etc.)**
Physical abuse may include, hitting, kicking, nipping, shaking, biting, hair pulling, or otherwise causing physical harm to another person. This may include an online element which facilitates, threatens and/or encourages physical abuse. There may be many reasons why a child harms another

and it is important to understand why a young person has engaged in such behaviour, including accidentally, before considering the action or punishment to be undertaken.

- **Child-on-Child sexual violence and sexual harassment**

Sexual violence can include rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence). Sexual harassment Includes sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;

- **Sharing nudes and semi nudes images and or videos** (also known as sexting or youth produced sexual imagery);

- **Bullying**

Bullying is unwanted, aggressive behaviour among school aged children that involves a real or perceived power imbalance. The behaviour is repeated, or has the potential to be repeated, over time. Both young people who are bullied and who bully others may have serious, lasting problems. In order to be considered bullying, the behaviour must be aggressive and include:

- An imbalance of power: Young people who bully use their power—such as physical strength, access to embarrassing information, or popularity—to control or harm others. Power imbalances can change over time and in different situations, even if they involve the same people.
- Repetition: Bullying behaviours happen more than once or have the potential to happen more than once.

Bullying includes actions such as making threats, spreading rumours, attacking someone physically or verbally or for a particular reason e.g. size, hair colour, gender, sexual orientation, and excluding someone from a group on purpose.

- **Cyberbullying and online safety**

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm. Bolder will continue to seek an effective approach to online safety, which will empower us to protect and educate the whole school community in their use of technology, and will establish mechanisms to identify, intervene in, and escalate any incident where appropriate. The breadth of

issues classified within online safety is considerable, but can be categorised into three areas of risk:

- **content:** being exposed to illegal, inappropriate or harmful material; for example pornography, fake news, racist or radical and extremist views;
- **contact:** being subjected to harmful online interaction with other users; for example commercial advertising as well as adults posing as children or young adults; and
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example making, sending and receiving explicit images, or online bullying.

Cyberbullying is the use of phones, instant messaging, e-mail, chat rooms or social networking sites such as Facebook and Twitter to harass threaten or intimidate someone for the same reasons as stated above. Through the PSHCE programme the students will be taught how to keep themselves safe online.

In addition, the Academy's IT security system ensures appropriate filters and monitoring to protect learners from harmful online material. Bolder's Governing body and Senior Leadership Team will continue to ensure that has appropriate filters and monitoring systems in place.

- **Sexting**

Sexting is when someone sends or receives a sexually explicit text, image or video. This includes sending 'nude pics', 'rude pics' or 'nude selfies'. Pressuring someone into sending a nude picture can happen in any relationship and to anyone, whatever their age, gender or sexual preference.

- **Initiation/Hazing**

Hazing is a form of initiation ceremony which is used to induct newcomers into an organisation such as a private school, sports team etc. There are a number of different forms, from relatively mild rituals to severe and sometimes violent ceremonies. Many rituals involve humiliation, embarrassment, abuse, and harassment.

- **Upskirting**

This typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.

Prejudiced Behaviour

The term prejudice-related bullying refers to a range of hurtful behaviour, physical or emotional or both, which causes someone to feel powerless, worthless, excluded or marginalised, and which is connected with prejudices around belonging, identity and equality in wider society – in particular, prejudices to do with disabilities and special educational needs, ethnic, cultural and religious backgrounds, gender, home life, (for example in relation to issues of care, parental occupation, poverty and social class) and sexual identity (homosexual, bisexual, transsexual).

Expected action to be taken by all staff:

All staff should be clear as to the school's policy and procedures with regards to peer on peer abuse.

Although the type of abuse may have a varying effect on the victim and initiator of the harm, these simple steps can help clarify the situation and establish the facts before deciding the consequences for those involved in perpetrating harm.

It is important to deal with a situation of peer abuse immediately and sensitively. It is necessary to gather the information as soon as possible to get the true facts around what has occurred as soon after the child(ren) may have forgotten. It is equally important to deal with it sensitively and think about the language used and the impact of that language on both the children and the parents when they become involved. For example; do not use the word perpetrator, this can quickly create a 'blame' culture and leave a child labelled.

In all cases of peer on peer/child on child abuse it is necessary that staff dealing with such incidents, talk to the young people and instigating immediate support in a calm and consistent manner. Staff should not be prejudiced, judgemental, dismissive or irresponsible in dealing with such sensitive matters.

Staff should also consider what support might be needed for the perpetrators as well as the victims.

1. Gather the Facts

Speak to all the young people involved separately, gain a statement of facts from them and use consistent language and open questions for each account. The

easiest way to do this is not to have a line of questioning but to ask the young people to tell you what happened.

Only interrupt the young person from this to gain clarity with open questions, 'where, when, why, who'. (What happened? Who observed the incident? What was seen? What was heard? Did anyone intervene?)

- What is the age of the children involved?
- How old are the young people involved in the incident and is there any age difference between those involved?
- Where did the incident or incidents take place? Was the incident in an open, visible place to others? If so was it observed? If not, is more supervision required within this particular area?
- What was the explanation by all children involved of what occurred?
- Can each of the young people give the same explanation of the incident and also what is the effect on the young people involved? Is the incident seen to be bullying for example, in which case regular and repetitive? Is the version of one young person different from another and why?
- What is each of the children's own understanding of what occurred?
- Do the young people know/understand what they are doing? E.g. do they have knowledge of body parts, of privacy and that it is inappropriate to touch? Is the young person's explanation in relation to something they may have heard or been learning about that has prompted the behaviour? Is the behaviour deliberate and contrived? Does the young person have understanding of the impact of their behaviour on the other person?

In dealing with an incident of this nature the answers are not always clear cut. If you are concerned or unsure as to whether or not there is any risk involved, please seek advice from the Designated Safeguarding Lead.

2. Repetition

Has the behaviour been repeated to an individual on more than one occasion? In the same way it must be considered has the behaviour persisted to an individual after the issue has already been discussed or dealt with and appropriately resolved?

3. Consider the Intent (begin to Risk Assess)

Has this been a deliberate or contrived situation for a young person to be able to harm another?

4. Decide on your next course of action

If from the information that you gather you believe any young person to be at risk of significant harm you must make a safeguarding referral immediately (where a crime has been committed the police should be involved also).

If social care and the police intend to pursue this further they may ask to interview the young people in school or they may ask for parents to come to school to be spoken to also. It is important to be prepared for every situation and the potential time it may take.

It may also be that social care feel that it does not meet their criteria in which case the Designated Safeguarding Lead may challenge that decision, with that individual or their line manager. If on discussion however, the safeguarding lead agrees with the decision, you may then be left to inform parents.

5. Informing Parents

If, once appropriate advice has been sought from police/social care, you have agreement to inform parents or have been allocated that role from the other services involved then you need to inform the parents as soon as possible. If services are not going to be involved then equally, this information may need to be shared with parents.

If a young person is deemed to be 'Gillick Competent' following the 'Fraser' guidelines and does not wish you to share the information with parents, then the Academy must consider this, especially for example, if the young person is pregnant and this is why they are being bullied (unless this has occurred through significant harm in which case a criminal/social care case is likely, or the young person is under the age of 13).

In all circumstances where the risk of harm to the child is evident then you will encourage the young person to share the information with their parent or even with them (they may be scared to tell parents that they are being harmed in any way). Where the Academy can evidence they are acting in the best interests of the young person they would not be criticised, however this would not be the case if they actively breached the rights and choices of the young person.

The best way to inform parents is face to face.

6. Next Steps

Once the outcome of the incident(s) has been established it is necessary to ensure future incidents of abuse do not occur again and consider the support and intervention required for those involved.

7. For the young person who has been harmed

What support they require depends on the individual young person. It may be that they wish to seek counselling or one to one support. It may also be that they feel able to deal with the incident(s) on their own or with support of family and friends. In which case it is necessary that this young person continues to be monitored and offered support should they require it in the future.

If the incidents are of a bullying nature, the young person may need support in improving peer groups/relationships with other young people or some restorative justice work with all those involved may be required.

Other interventions that could be considered may target a whole class or year group for example a speaker on cyber bullying, relationship abuse etc. It may be that through the continued curriculum of PHSE and SMSC that certain issues can be discussed and debated more frequently.

If the young person feels particularly vulnerable it may be that a risk assessment can be put in place for them so that they have someone named that they can talk to, support strategies for managing future issues and identified services to offer additional support.

8. For the young person who has displayed harmful behaviour

In this circumstance it is important to find out why the young person has behaved in such a way. It may be that the young person is experiencing their own difficulties and may even have been harmed themselves in a similar way. In such cases support such as one to one mentoring or counselling may also be necessary.

Particular support from identified services may be necessary and the young person may require additional support from family members.

Once the support required to meet the individual needs of the young person has been met, it is important that young person receives a consequence for their behaviour. This may be in the form of restorative justice e.g. making amends with the young person they have targeted if this has been some form of bullying.

In the cases of sexually harmful behaviour it may be a requirement for the young person to engage in one to one work with a particular service or agency (if a crime has been committed this may be through the police or youth offending service).

If there is any form of criminal investigation ongoing it may be that this young person cannot be educated on site until the investigation has concluded. In which case, the young person will be provided with appropriate support and education whilst off site.

Even following the conclusion of any investigation, the behaviour that the young person has displayed may continue to pose a risk to others in which case an individual risk assessment may be required. This should be completed via a multi-agency response to ensure that the needs of the young person and the risks towards others are measured by all of those agencies involved including the young person and their parents. This may mean additional supervision of the young person or protective strategies if the young person feels at risk of engaging in further inappropriate or harmful behaviour.

The Academy may also choose a punishment as a consequence, such as exclusion or internal exclusion/inclusion/seclusion for a period of time to allow the young person to reflect on their behaviour.

9. After care

It is important that following the incident the young people involved continue to feel supported and receive help even if they have stated that they are managing the incident. Sometimes the feelings of remorse, regret or unhappiness may occur at a much later stage than the incident. It is important to ensure that the young people do not engage in any further harmful behaviour either towards someone else or to themselves as a way of coping (e.g. self-harm). In which case, regular reviews with the young people following the incident(s) are imperative

10. Preventative Strategies

Firstly, and most importantly is recognition that peer on peer abuse can and will occur even with the most stringent of policies and support mechanisms. In which case it is important to continue to recognise and manage such risks and learn how to improve and move forward with strategies in supporting young people to talk about any issues and through sharing information with all staff.

The Academy has an open and supportive ethos where young people feel safe to share information about anything that is upsetting or worrying them. This is strengthened through a strong and positive PHSCE/SMSC curriculum that tackles such issues as prejudiced behaviour and gives children an open forum to talk things through rather than seek one on one opportunities to be harmful to one another.

To enable such an open and honest environment it is necessary to ensure that every member of staff feels confident and enabled to talk about issues and challenge perceptions of young people including use of inappropriate language and behaviour towards one another.

It is incredibly important that staff do not dismiss issues as 'banter' or 'growing up' or compare them to their own experiences of childhood. It is necessary that staff consider each issue and each individual in their own right before taking action. If staff minimise the concerns raised it may result in a young person seeking no further help or advice.

Section 7 – Sexual Violence and Sexual Harassment

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable.

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

Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. It is also important that other children, adult students and school and college staff are supported and protected as appropriate. It is important to emphasise that disclosures of violence may not be immediately after the event and may not be direct.

At Bolder Academy we are aware of the importance of:

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Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;

Not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”;

Challenging behaviour (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia and flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them; and

Understanding that all of the above can be driven by wider societal factors beyond the Academy, such as everyday sexist stereotypes and everyday sexist language.

Understanding students with particular needs eg: SEND students nationally are three times more likely to be abused than their peers and or, LGBT students are often seen nationally as vulnerable to be targets of abuse.

Sexual Violence

It is important that we are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. DFE guidance defines sexual violence as rape, assault by penetration, sexual assault.

Sexual Harassment

When referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment.

Sexual harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

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

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual “jokes” or taunting;

- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature;
- online sexual harassment;
- sexual coercion;
- upskirting - the Voyeurism (Offences) Act, which is commonly known as the 'Upskirting Act', came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a 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.

This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:

- non-consensual sharing of sexual images and videos;
- sexualised online bullying;
- unwanted sexual comments and messages, including, on social media; and
- sexual exploitation; coercion and threats.

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. 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.

At Bolder we consider the NSPCC guidance of what is Harmful Sexual Behaviour and know that we can seek support and advice from Rape Crisis or The Survivors Trust.

Responding to Report Sexual Violence and Sexual Harassment

If a child reports an incident follow the steps outlined in Section 1 of this policy – Disclosures. It should also be noted that if the victim asks the staff member / volunteer not to disclose the information, the staff member must share this with the DSL.

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. Bolder will seek to provide a calm, considered and appropriate response to any reports, as a result of pre-planning, effective training and effective policies.

Where possible, two members of staff are present to manage any reports of sexual violence or sexual harassment.

It is important to note that:

- sexual violence and sexual harassment can take place within intimate personal relationships between peers
- disclosures may not be instant;
- any online element of the abuse should not be played down and should be taken seriously;
- disclosures may not be verbal;
- disclosures may not be made directly; and
- the initial disclosure may only be the first incident reported and the impact of trauma can mean that details and timelines are distorted.

The DSL is able to share this information lawfully, if it is justified in the public interest e.g.: to protect children from harm.

The DSL should consider:

- Informing the parents/carers;
- The basic safeguarding principle: refer to Social Services;
- If a report of rape, assault by penetration or sexual assault this should be reported to the police;
- Bolder will also do all that it can to protect the anonymity of any children involved in any report of sexual violence or harassment.

Ultimately, Bolder Academy will make decisions about whether to share information and/or refer on a case-by-case basis, with the Designated Safeguarding Lead (or a Deputy) taking a leading role and using their professional judgement, supported by other agencies, such as Hounslow Early Help, Children's Social Care and the Police as required. Managing cases internally and requesting additional support from outside agencies are not mutually exclusive; Bolder may decide to do both.

Paragraph 44 and Annex A in the [Sexual Violence and Sexual Harassment Between Children in Schools and Colleges](#) advice provides detailed information and links to resources.

Risk Assessment

When there has been a report of sexual violence or harassment the DSL will make an immediate (written and documented) risk assessment. The risk assessment will consider:

- The victim, especially their protection and support;
- The alleged perpetrator
- All other children in the Academy and any actions needed to protect them.

Risk assessments will be recorded, either in written form or electronically, and will be kept under review. At all times, the school or college should be actively considering the risks posed to all their pupils and students and put adequate measures in place to protect them and keep them safe.

Bolder's Designated Safeguarding Lead (or Deputies) will ensure they are engaging with children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required. The risk assessment is not intended to replace the detailed assessments of expert professionals. Any such professional assessments will be used to inform Bolder's approach to supporting and protecting our pupils and updating our own risk assessment(s).

Action following a report of sexual violence and/or sexual harassment

Bolder Academy will carefully consider any report of sexual violence and/or sexual harassment. Our Designated Safeguarding Lead / Deputies will have a complete safeguarding picture and be the most appropriate people to advise on the school's or college's initial response. Important considerations will include:

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the school's or college's duty and responsibilities to protect other children;

- the nature of the alleged incident(s), including whether a crime may have been committed and consideration of harmful sexual behaviour;
- the ages of the children involved;
- the developmental stages of the children involved;
- any power imbalance between the children. For example, is the alleged perpetrator(s) significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?;
- 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);
- that sexual violence and sexual harassment can take place within intimate personal relationships between peers;
- are there ongoing risks to the victim, other children, adult students or school or college staff; and
- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

As always when concerned about the welfare of a child, all staff at Bolder should act in the best interests of the child. In all cases, Bolder Academy will follow general safeguarding principles mentioned in this Policy. Immediate consideration will be given as to how best to support and protect the victim and the alleged perpetrator(s) (and any other children involved/impacted).

The starting point regarding any report should always be that sexual violence and sexual harassment is not acceptable and will not be tolerated. Especially important is not to pass off any sexual violence or sexual harassment as 'banter', 'part of growing up' or 'having a laugh'.

Bolder Academy will consider every report on a case-by-case basis. When to inform the alleged perpetrator(s) will be a decision that is carefully considered. Where a report is going to be made to children's social care and/or the police, then, as a general rule, Bolder Academy will speak to the relevant agency and discuss next steps and how the alleged perpetrator(s) will be informed of the allegations. However, as per general safeguarding principles, this does not and should not stop Bolder Academy from taking immediate action to safeguard our children, where required. There are four likely scenarios for schools and colleges to consider when managing any reports of sexual violence and/or sexual harassment.

Step 1 - Manage internally

In some cases of sexual harassment, for example, one-off incidents, Bolder Academy may take the view that the children concerned are not in need of early help or referrals for statutory services and that it would be appropriate to handle the incident internally, perhaps through utilising our Attitude to Learning Policy and by providing pastoral support. Our response will be underpinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated. All concerns, discussions, decisions and reasons for decisions will be recorded (written or electronic).

Step 2 - Early help

In line with 1 above, Bolder Academy may decide that the children involved do not require referral to statutory services, but, may benefit from early help. Early help means providing support as soon as a problem emerges, at any point in a child's life. Providing early help is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address nonviolent harmful sexual behaviour and may prevent escalation of sexual violence. Full details of the early help process are in Chapter one of *Working Together to Safeguard Children*.

Early help and the option to manage a report internally do not need to be mutually exclusive: Bolder could manage internally and seek early help for both the victim and perpetrator(s). Whatever the response, it will be under-pinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated. All concerns, discussions, decisions and reasons for decisions will be recorded (written or electronic).

Step 3 - Referrals to children's social care

Where a child has been harmed, is at risk of harm, or is in immediate danger, Bolder Academy will make a referral to local children's social care. At the point of referral to children's social care, Bolder will generally inform parents or carers, unless there are compelling reasons not to do so. Any such decision should be made with the support of children's social care. If a referral is made, children's social care will then make enquiries to determine whether any of the children involved are in need of protection or other services.

Where statutory assessments are appropriate, the Bolder's Designated Safeguarding Lead (or a Deputy) will work alongside, and cooperate with, the relevant lead social worker. Collaborative working will help ensure the best possible package of coordinated support is implemented for the victim and, where appropriate, the alleged perpetrator(s) and any other children that

require support. Bolder will not wait for the outcome (or even the start) of a children's social care investigation before protecting the victim and other children in the school or college.

It will be important for our Designated Safeguarding Lead (or Deputy) to work closely with children's social care (and other agencies as required) to ensure any actions that Bolder takes do not jeopardise a statutory investigation. A risk assessment will help inform any decision. Consideration of safeguarding the victim, alleged perpetrator(s), any other children directly involved in the safeguarding report and all children at Bolder Academy should be immediate.

In some cases, children's social care will review the evidence and decide a statutory intervention is not appropriate. Bolder's Designated Safeguarding Lead (or Deputy) will be prepared to refer again if they believe the child remains in immediate danger or at risk of harm. If a statutory assessment is not appropriate, our Designated Safeguarding Lead (or a Deputy) will consider other support mechanisms such as early help, specialist support and pastoral support. Whatever the response, it should be under-pinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated. All concerns, discussions, decisions and reasons for decisions will be recorded (written or electronic).

Step 4 - Reporting to the Police

Any report to the police will generally be in parallel with a referral to children's social care (as above). Bolder's Designated Safeguarding Lead (and our Deputies) are clear about the local process for referrals and will follow that process. Where a report of rape, assault by penetration or sexual assault is made, the starting point is that this should be passed on to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator(s) is under ten, the starting principle of reporting to the police remains. The police will take a welfare, rather than a criminal justice, approach. The advice in Appendix 3 will help Bolder decide when to engage the Police and what to expect of them when we do.

Where a report has been made to the police, Bolder will consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. We will also discuss the best way to protect the victim and their anonymity.

At this stage, schools and colleges will generally inform parents or carers unless there are compelling reasons not to, for example, if informing a parent or carer is likely to put a child at additional risk. In circumstances where parents or carers

have not been informed, it will be especially important that we support the child in any decision we make. This should be with the support of children's social care and any appropriate specialist agencies.

All police forces in England have specialist units that investigate child abuse. The names and structures of these units are matters for local forces. Our Designated Safeguarding Lead (and Deputies) are aware of the local arrangements.

In some cases, it may become clear very quickly that the police (for whatever reason) will not take further action. In such circumstances, Bolder will continue to engage with specialist support for the victim and alleged perpetrator(s) as required.

Whilst protecting children and/or taking any disciplinary measures against the alleged perpetrator(s), our Designated Safeguarding Lead (or a Deputy) will work closely with the police (and other agencies as required), to ensure any actions we take will not jeopardise the police investigation.

We will refer any questions we have about the investigation to the police. The police will help and support Bolder as much as they can (within the constraints of any legal restrictions).

Whatever the response, it will be under-pinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated. All concerns, discussions, decisions and reasons for decisions will be recorded (written or electronic).

Section 8 – Extremism & Radicalisation, PREVENT Policy and Procedure

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is a part of Bolder's safeguarding approach.

The government has defined these terms as follows:

***'Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.'*

***'Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.'*

*'**Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat **must** be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.'*

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral.

Bolder's Designated Safeguarding Lead (and Deputies) are aware of local procedures for making a Prevent referral.

The Prevent Strategy

Terrorist groups seek to radicalise and recruit people to their cause. The aim of Prevent is to stop people becoming or supporting terrorists by challenging the spread of terrorist ideology, supporting vulnerable individuals, and working in key sectors and institutions.

All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty.

The Prevent duty is seen as part of Bolder's wider safeguarding obligations. The Designated Safeguarding Leads and other senior leaders will regularly familiarise themselves with the revised [Prevent duty guidance: for England and Wales](#), especially paragraphs 57-76, which are specifically concerned with schools. The guidance is set out in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies.

The Prevent Strategy sets out the following responsibilities for staff. They should:

- Understand what radicalisation means and why people may be vulnerable to being drawn into terrorism as a consequence of it.
- Be aware of what the government means by the term 'extremism' and the relationship between extremism and terrorism.
- Know what measures are available to prevent people from becoming drawn into terrorism and how to challenge the extremist ideology that can be associated with it.
- Understand how to obtain support for people who may be being exploited by radicalising influences.

The Academy is committed to actively promoting the fundamental British values of democracy, the rule of law, individual liberty, mutual respect and tolerance of those with different faiths and beliefs. We actively challenge prejudice, and discrimination. We do not tolerate the expression or promotion of extremist views of any kind from any member of the school community (students, staff, parents/carers or governors), or from external the external community, such as external agencies or visitors to the Academy.

We recognise that extremism and exposure to extremist materials and influences can lead to poor educational outcomes and life chances and can involve serious risks for young people. Extremists of all persuasions aim to develop destructive relationships between different communities by promoting division, fear and mistrust of others based on ignorance or prejudice and thereby limiting the life chances of young people. We therefore address such issues as a safeguarding concern as set out in this policy. If we fail to challenge extremist views, we are failing to protect our students.

Our Approach

We aim to protect our students from being vulnerable to extremist views and radicalisation by:

- Building a cohesive community. The ethos of Bolder Academy is one of mutual respect and consideration. Our ethos and curriculum promote respect, tolerance and diversity.
- Equipping young people with the knowledge, skills to challenge and debate in an informed way. Through our focus on developing speaking and listening students are encouraged to share their views in a respectful, considered way.

- Encouraging students to be inquisitive, explore their identities and express their views through our RE and PSHCE programmes. Teachers provide a safe space for students to be able to take place in discussions which may include controversial issues.
- Valuing and promoting diversity and equal opportunities. We encourage students to understand and show empathy for others. We aim to ensure that students feel a sense of belonging in a community and wider society in which the diversity of people's backgrounds and circumstances is appreciated and valued in which strong and positive relationships.
- Supporting students' character development through our extended curriculum in order to develop resilience – independence, inquisitiveness, reflection and collaboration. Our core values underpin all that we do: courage and creativity, excellence and belonging.
- Ensuring that students are taught in a way that is consistent with the UK law and the British values of tolerance, democracy and liberty. We take extremely seriously our key role in preparing all our young people for life in modern Britain and the wider world. We promote awareness of human rights and the responsibility to uphold and defend them, to develop the skills of participation and responsible action.
- Enabling students to explore issues like terrorism and the use of violence in a considered and informed way, facilitating understanding of wider issues within the context of learning about the values on which our society is founded and our system of democratic government. Students see the school as a safe place where they can explore controversial issues safely.
- Making it clear that violent extremism is not part of any faith. Our RE and PSHCE curriculum prepares students to live and work in a diverse society. It supports students in gaining knowledge and understanding of a range of religious beliefs and encourages them to understand and respect the cultures, faith and backgrounds of others.
- Ensuring that staff have an awareness of students' circumstances and backgrounds, including an understanding of the local context.
- Training staff to identify children who are at risk and to know where and how to refer children at risk. Assessing whether any students are at risk of being drawn into terrorism.
- Checking that visiting speakers are suitable (and seeing presentations ahead of time).
- Teaching students about E-safety, how to protect themselves online and having a robust E-Safety Policy.
- Protecting all students from harm through the implementation of a rigorous Safeguarding Policy.

Responsibilities of Staff

Staff have a duty to recognise concerns and maintain an open mind. Every concern matters: concerns about extremist views or radicalisation should be recorded and reported immediately to the Prevent Leads, Adam Walthaus (also DSL) and Heidi Swidenbank, or in their absence, the Deputy Head, Adam Bones and Frances Gibney.

It is not the responsibility of staff to investigate concerns, disclosures or allegations of potential extremism or radicalisation. Where a student is thought to be vulnerable or at risk of significant harm, and/or where investigations need to be carried out, the Safeguarding Lead will make a referral to Channel (see below). Social services may also be contacted in line with the Academy's Child Protection Policy.

If a staff member becomes aware that a parent/carer or visitors to the Academy has expressed extremist views, he/she must report it immediately to the Prevent Lead.

At the point of referral, agencies such as PREVENT (part of the government's counter-terrorism strategy) may become involved.

Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages. Guidance on Channel is available at: [Channel guidance](#).

Procedures

Procedures to follow if a member of staff has concerns about a student being vulnerable to extremist views/radicalisation:

The member of staff should:

1. Write up an objective account of the concern. Any notes taken should be kept safe and confidential.

2. Contact the Prevent Lead.
3. Pass your written notes to the Prevent Lead.
4. Maintain confidentiality and do not discuss the issue further with other members of staff or outside of the Academy.

The Prevent Lead will make a referral to Channel and/or contact and take advice from the Prevent Officer for Hounslow, depending on the level of concern.

If there concerns about imminent danger to life then 999 should be called.

Channel Referral – Contact Details

Email the Prevent Engagement Officer Angela Rusby PC 165so
Email: angela.rusby@met.pnn.police.uk putting Channel Referral as the subject
Angela's mobile 07769 934659

The Counter Terrorism Officer is Gary McGinn Constable
Email: gary.McGinn@met.pnn.police.uk
Gary's mobile 07879 493035

Local Authority Prevent Lead: Mrs Joan Conlon
Email: joan.conlon@hounslow.gov.uk
Joan's mobile 07817 079190

Complaints or concerns expressed by students, parents, staff or volunteers

We recognise that listening to children is an important and essential part of safeguarding them against abuse and neglect. To this end, any expression of dissatisfaction or disquiet in relation to an individual child will be listened to and acted upon in order to safeguard his/her welfare.

We will also seek to ensure that the child or adult who makes a complaint is informed not only about the action the school will take but also the length of time that will be required to resolve the complaint. The Academy will also endeavour to keep the child or adult regularly informed as to the progress of his/her complaint.

Monitoring and Evaluation of Safeguarding within the Academy

Bolder Academy will document and report to Governors on an annual basis the following:

- The number of students the Academy has considered as needing additional support/at risk
- The number of Looked After Children.
- The number of multi-agency referrals.
- The number of referral that were accepted.
- Safeguarding and Prevent training undertaken by staff and its impact.

Specific safeguarding duties are identified in the job descriptions of the Academy staff.

This policy should be read alongside the following policies:

- The Academy's Behaviour Policy.
- The Academy's Anti-Bullying Policy.
- The Academy's Staff Code of Conduct.
- The Academy's Allegations of Abuse Against Staff Policy.
- The Academy's Safer Recruitment Policy.
- The Academy's Visiting Speakers Policy.
- The Academy's Whistle Blowing Policy.

Appendix 1: Safeguarding Contact Information

Bolder Academy Safeguarding Leads are as follows:

Safeguarding and Child Protection Lead (DSL):	Adam Walthaus
Safeguarding and Child Protection Deputies:	Debra Knights/Adam Bones/Heidi Swidenbank
Prevent Lead:	Adam Walthaus
Safeguarding Governor:	Andrew Dodge

Hounslow's Safeguarding and Child Protection

Children's Services Duty

Civic Centre, Hounslow House, 7 Bath Road, Hounslow, TW3 3EB

Tel 020 8583 6600 (option 2) Children's Services

Then option 3 for the Frontdoor

Hounslow's Safeguarding Advice and Allegations Management

For general safeguarding advice (i.e. not about a specific child or family), to discuss a concern about the conduct of a person working* with children and young people or to report a safeguarding allegation in respect of a person working* with children and young people contact the SAAM Duty Desk:

SAAM Duty Desk: 020 8583 5730

LADO: lado@hounslow.gov.uk

See also:

- London Child Protection Procedures, Section 7
http://www.londoncp.co.uk/chapters/alleg_staff.html
- Hounslow Safeguarding Children Board
<http://www.hscb.org.uk/>

Local Circumstances

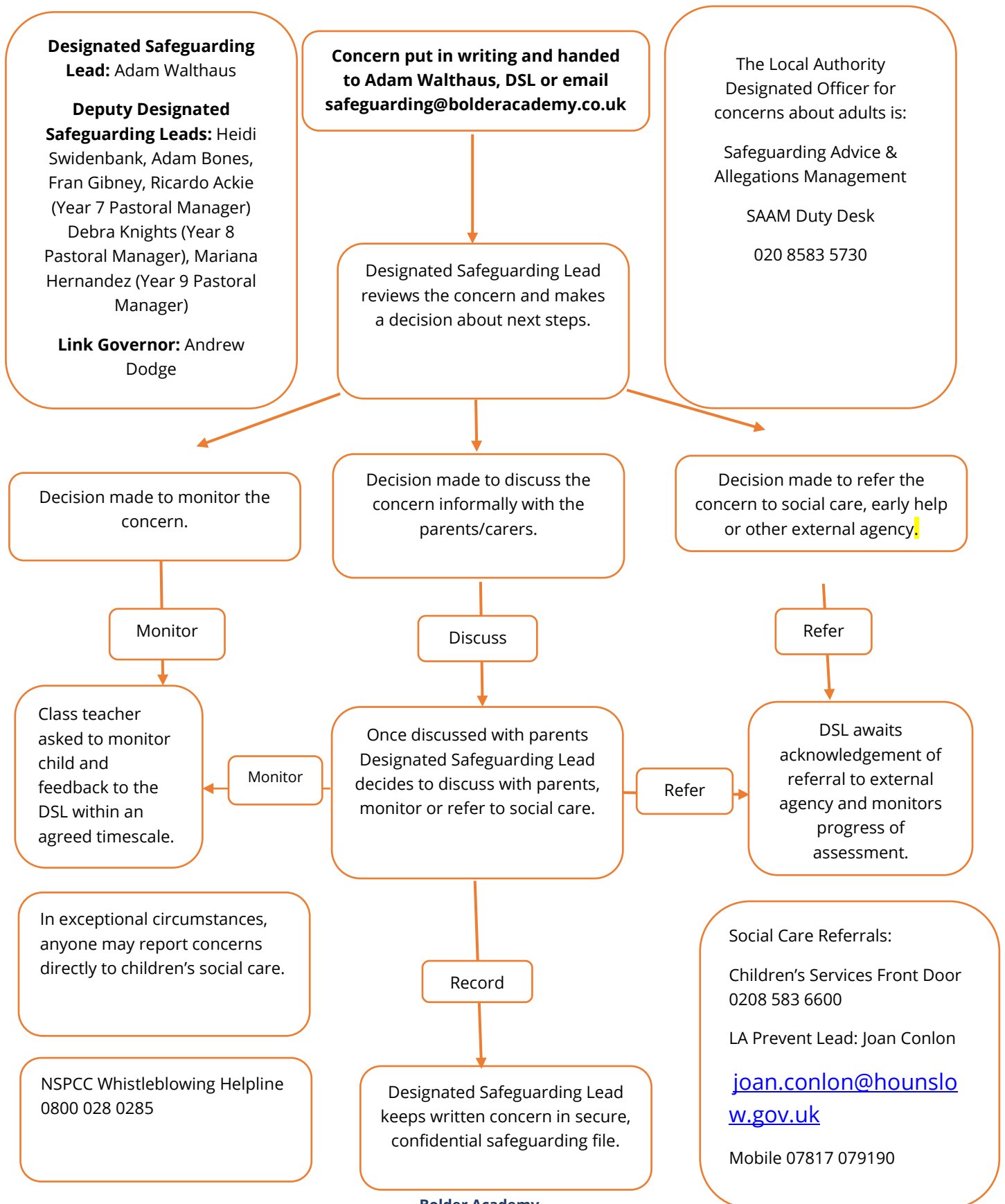
The Hounslow Safeguarding Children's Board states:

The Level 3 DSL qualification no longer exists for schools instead there are variety of courses. The training that are most prevalent to meet the local needs include:

- Managing allegations against staff.
- Early help (CFAN).
- Core groups.
- Non-accidental injury.
- Neglect.
- Familial sexual abuse.
- Sexual exploitation.
- MARAC. High risk DV.'

The Designated Safeguarding Lead and Deputy Designated Safeguarding Leads have undertaken training in each of these aspects. All other Academy staff will also undertake safeguarding training once appointed.

Appendix 2: Flow chart for raising safeguarding concerns about a child



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Appendix 3

'When To Call The Police' leaflet, NPCC

<https://www.npcc.police.uk/documents/Children%20and%20Young%20people/When%20to%20call%20the%20police%20guidance%20for%20schools%20and%20colleges.pdf>

Appendix 4

New section (Annex C) on the role of the Designated Safeguarding Lead (and Deputies), KCSIE 2021

Information about the DSL Role

The Governing Board should ensure an appropriate senior member of staff, from the school Leadership Team, is appointed to the role of designated Safeguarding Lead. The Designated Safeguarding Lead should take lead responsibility for safeguarding and child protection (including online safety). This should be explicit in the role holder's job description.

This person should have the appropriate status and authority within the school to carry out the duties of the post. The role of the designated safeguarding lead carries a significant level of responsibility and they should be given the additional time, funding, training, resources and support they need to carry out the role effectively. Their additional responsibilities include providing advice and support to other staff on child welfare, safeguarding and child protection matters, taking part in strategy discussions and interagency meetings, and/or to support other staff to do so, and to contribute to the assessment of children.

Deputy Designated Safeguarding Leads

At Bolder we operate a system where there are a number of Deputy Designated Safeguarding Leads. These deputies are trained to the same standard as the designated safeguarding lead and the role should be explicit in their job description. Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead, this lead responsibility should not be delegated.

Availability

During term time the designated safeguarding lead (or a deputy) is always be available (during school hours) for staff in the school to discuss any safeguarding concerns. Whilst generally speaking the designated safeguarding lead (or deputy) would be expected to be available in person, it is a matter for individual schools, working with the designated safeguarding lead, to define what "available" means and whether in exceptional circumstances availability via phone and or virtual platforms is acceptable. It is a matter for individual schools

and the designated safeguarding lead to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

Manage referrals

The designated safeguarding lead is expected to:

- Refer cases of suspected abuse and neglect to the Local Authority children's social care as required and support staff who make referrals to local authority children's social care;
- Refer cases to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme;
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- Refer cases where a crime may have been committed to the Police as required. NPCC- When to call the police should help understand when to consider calling the police and what to expect when working with the police.

Working with others

The designated safeguarding lead is expected to:

- Act as a source of support, advice and expertise for all staff;
- Act as a point of contact with the three safeguarding partners;
- Liaise with the headteacher or principal to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- As required, liaise with the "case manager" (as per Part four) and the local authority designated officer(s) (LADO) at the for child protection concerns in cases which concern a staff member;
- Liaise with staff (especially teachers, pastoral support staff, school nurses, IT Technicians, senior mental health leads and special educational needs coordinators (SENCOs), or the named person with oversight for SEN in a college and Senior Mental Health Leads) on matters of safety and safeguarding and welfare (including online and digital safety): when deciding whether to make a referral by liaising with relevant agencies and so that children's needs are considered holistically;
- Liaise with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health;

- Promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances;

- Promote educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and is therefore best placed to identify the impact that these issues might be having on children's attendance, engagement and achievement at school.

Working with the headteacher and other staff, the designated safeguarding lead should take lead responsibility for:

- ensuring that the school knows who its cohort of children who currently need a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and,
- support teaching staff to feel confident to provide additional academic support or reasonable adjustments to help children who need or have needed a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.

Information sharing and managing the child protection file

The designated safeguarding lead is responsible for ensuring that child protection files are kept up to date and stored securely. They should ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice as set out in Part one and Part two of this guidance.

Where children leave the school (including in year transfers) the designated safeguarding lead will 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. This will be transferred separately from the main student file, ensuring secure transit, and confirmation of receipt should be obtained.

At Bolder Academy when we receive a file this is shared immediately with the DSL.

Lack of information about their circumstances can impact on the child's safety, welfare and educational outcomes. In addition to the child protection file, the designated safeguarding lead will also consider if it would be appropriate to share any additional information with the new school in advance of a child

leaving in order to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

Raising Awareness

The designated safeguarding lead should:

- Ensure the school's child protection policies are known, understood and used appropriately;
- Ensure the school's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- Ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school or college in this; and
- Link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements; and,
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school and college leadership staff. Their role could include ensuring that the school or college, and their staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.

Training, knowledge and skills

The designated safeguarding lead (and any deputies) will undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding lead should undertake Prevent awareness training. Training will provide designated safeguarding leads with a good understanding of their own role, and the processes, procedures and responsibilities of other agencies, particularly children's social care, so they:

understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements;

- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;

- Ensure each member of staff has access to, and understands, the school's child protection policy and procedures, especially new and part time staff;

- Are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers;

- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation;

- Understand the importance of information sharing, both within the school and college, and with the three safeguarding partners, other agencies, organisations and practitioners;

- Are able to keep detailed, accurate, secure written records of concerns and referrals;

- Understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;

- Are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school;

- Can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online;

- Obtain access to resources and attend any relevant or refresher training courses; and

- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them. In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other

designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

Understanding processes and procedures

Training should provide designated safeguarding leads with a good understanding of their own role, and the processes, procedures and responsibilities of other agencies, particularly children's social care, in order to:

- Understand the assessment process for providing early help and statutory services, including local criteria for action and local authority children's social care referral arrangements;
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so; and
- Understand the importance of the role the designated safeguarding lead has in providing information and support to children social care in order to safeguard and promote the welfare of children.

Providing support to staff

Training should support the designated safeguarding lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

- Ensure each member of staff has access to, and understands, the school's or college's child protection policy and procedures, especially new and part time staff; ensure that staff are supported during the referrals processes; and
- Support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

Holding and sharing information

The critical importance of holding, using and sharing information effectively is set out in (Parts one and two), and therefore the designated safeguarding lead should be equipped to:

- Understand the importance of information sharing, both within the school and college, and with other schools on transfer including in-year and between primary and secondary education, and with the three safeguarding partners, other agencies, organisations and practitioners;

- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation; and
- Be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping.

Responding to specific needs and harms

Training will give the designated safeguarding lead the knowledge and skills to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk. This includes to:

- Be alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health needs and young carers;
- Understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes;
- Understand and support the school with regard to the requirements of the Prevent duty and be able to provide advice and support to staff on protecting children from the risk of radicalisation;
- Understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college; and
- Recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and be confident they have the capability to support children with SEND to stay safe online.

Understanding the views of children

It is important that children feel heard and understood. Therefore, designated safeguarding leads should be supported in developing knowledge and skills to:

- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school or college may put in place to protect them; and
- Understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

