Mulberry Academy Shoreditch

Child Protection and Safeguarding Policy

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Policy Version:	7

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Version	Reviewed	Changes since last version
1		Existing
2	November 2022	Wording changes – no further updates to Tower Hamlets policy to implement.
3	November 2023	Update of Keeping children safe in education document including staff names dates Updates included: Section w*hat school staff need to know* – new paragraph added in Section *Recruitment for staff and volunteers* – new paragraph added in
4	November 2024	Designated Lead and Deputy Lead names have changed throughout the policy. MASH is now referred to as MAST and updated contact details have been provided for them.
5	November 2025	Updated LADO contact details. Updated references to KCSIE as 2025 to reflect new version Link to Equality Policy included. Update guidance on reporting concerns to reflect use of CPOMs Section Online Safety – new information added to reflect KCSIE 2025 guidance
6	June 2026	Addition of Appendices – this text was originally in the main body of the policy Updated links to external websites and trust policies Policy formatting – split into clear sections
7	November 2026	Updated references to KCSIE as 2026 to reflect new version Governing Body section updated to reflect the new types of bullying happening Guidance for staff regarding safeguarding concerns has been updated to reflect the no mobile phone policy Updated section on child on child abuse Section on Serious Violence – gender questioning students added in details Section of E-safety added to the document

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		New Appendix added to the end of the document

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Child Protection and Safeguarding Contacts

The Designated Safeguarding Lead is: Joshua Mickelburgh,
jmickelburgh@mulberryschoolstrust.org.

The Deputy Designated Safeguarding Lead is: Kendra Healy
khealy@mulberryschoolstrust.org

Child Protection email address:
childprotection@mulberryacademyshoreditch.org

The Designated Lead for Looked after Children is: Karl Hatton
khatton@mulberryschoolstrust.org

The Designated Prevent Co-ordinators are: Dan Collis dcollis@mulberryschoolstrust.org and Josh Mickelburgh jmickelburgh@mulberryschoolstrust.org

Nominated Local Advisory Body Member for Safeguarding is: Jemel McKenzie and can be contacted via Fateha Zanat, PA to Executive Principal, fzanat@mulberryschoolstrust.org

The Virtual School Head Teacher for Tower Hamlets is: David Cregan:
David.cregan@towerhamlets.gov

Local Authority Designated Officer for Allegations (LADO) for London Borough of Tower Hamlets

The LADO for contact is: Melanie Benzie
Tel: 020 7364 0677 Email: LADO@towerhamlets.gov.uk

In the event of not being able to contact Melanie Benzie, then please contact the Child Protection Advice Line in the first instance on 020 7364 3444 or the Education Safeguarding Manager:
Sharifa Chowdhury: sharifa.chowdhury@towerhamlets.gov.uk

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Introduction and Context

Purpose of the Policy

Everyone working with children or young people has a responsibility to understand what safeguarding means and what their responsibilities are in relation to keeping children and young people safe.

The purpose of this policy is to provide all stakeholders with information about safeguarding children and young people, and to give guidance on the procedures to follow should there be any concerns that comes to your notice about the safety of a child or young person attending the school.

Our Policy

There are 6 main elements to our policy, which are described in the following sections:

- Roles and responsibilities for safeguarding.
- The types of abuse that are covered by the policy.
- The signs of abuse that staff and volunteers should look out for.
- Expectations of staff and volunteers with regard to safeguarding, and the procedures and processes that should be followed, including the support provided to children.
- How the academy will ensure that all staff and volunteers are appropriately trained and checked for their suitability to work within the academy.
- How the policy will be managed and have its delivery overseen.

Through implementation of this policy we will ensure that our school provides a safe environment for children to learn and develop.

Our Responsibilities

Mulberry Academy Shoreditch is committed to safeguarding children and young people and we expect everyone who works in our academy to share this commitment. This policy sets out how Mulberry Academy Shoreditch will deliver these responsibilities.

This policy should be read in conjunction with 'Keeping Children Safe in Education' (September 2026), which is statutory guidance to be read and followed by academies and colleges, and alongside 'Working together to safeguard children' (March 2026), a guide to inter-agency working to safeguard and promote the welfare of children.

All staff **must** read Keeping Children Safe in Education 2026 – Part 1 as part of the Safeguarding INSET in September, prior to the school opening.

Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education (2026) and Working together to safeguard children (2026) , and the Governance Handbook. We comply with this guidance and the arrangements agreed and published by our local safeguarding partners.

This policy is also based on the following legislation:

- Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of students
- The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques
- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of students at the school
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

The guidance **should** be read alongside:

- statutory guidance Keeping Children Safe in Education (2026);
- departmental advice What to do if you are Worried a Child is Being Abused - Advice for Practitioners; and
- departmental advice Sexual Violence and Sexual Harassment Between Children in Schools and Colleges

This policy also complies with our funding agreement and articles of association.

We will follow the procedures set out by Tower Hamlets Local Safeguarding Children Partnership: https://thscp.org.uk/
This statutory guidance should be read and followed by:

- our governing body of maintained schools (including maintained nursery schools) and colleges;
- the proprietor will be the academy trust;
- our senior leadership teams.

Our Principles

We believe that our school should provide a caring, positive, safe and stimulating environment that promotes social, physical and moral development of the individual child. We have a child centred and co-ordinated approach to safeguarding.

We recognise the importance of providing an environment within our school that will help children feel safe and respected.

We recognise the importance of enabling children to talk openly about anything that worries them and to feel confident that they will be listened to.

We will work with parents to build an understanding of the academy's responsibilities to ensure the welfare of all children, including the need for referrals to other agencies in some situations.

Safeguarding arrangements in our school are underpinned by four key principles:

- Safeguarding is everyone's responsibility: all staff, Trust Directors, Local Advisory Body members and volunteers should play their full part in keeping children safe; and
- A child centred approach: a clear understanding of the needs and views of children. This means that that everyone should consider, all times, what is in the **best interests** of the child
- No single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, **everyone** who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.
- To work with our partners and all external agencies to support children at all times

Rights of the child

The school upholds the human rights of the child in accordance with the Human Rights Act 1998.2 It is unlawful for schools to act in a way that is incompatible with the European Convention on Human Rights. Specifically, the school embeds and upholds the following Convention rights of the child across its safeguarding policies and procedures:

• Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)

• Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity

• Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination

• Protocol 1, Article 2: protects the right to education.

In accordance with the Equality Act 2010, the school must not unlawfully discriminate against students because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics). [MAS Equality Policy]. The school is committed to supporting and taking positive action towards children with regard to particular protected characteristics - including disability, sex, sexual orientation, gender reassignment and race- who may be at a disadvantage and be disproportionately vulnerable.

In fulfilment of the school's Public Sector Equality Duty the school has due regard to the need to eliminate unlawful discrimination, harassment, and victimisation (and any other conduct prohibited under the Equality Act), to advance equality of opportunity and foster good relations between those who share a relevant protected characteristic and those who do not.

Mulberry Academy Shoreditch protects and promotes the welfare of children, and supports our students with protected characteristics - including disability, sex, sexual orientation, gender reassignment and race. This can also include taking positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting students or students with a particular protected characteristic in order to meet their specific need, this includes a duty to make reasonable adjustments for disabled children, including those with long term conditions.

As evident in the Serious Case Review Child Q, the school is aware that children from ethnically diverse groups are at risk of "adultification" whereby their vulnerability as a child is reduced or set aside because of racial bias and stereotypes impacting professional judgement. All staff share in the whole school's commitment to ensure equity, diversity and inclusion remain at the centre of the school's safeguarding culture, so that all children receive the care, support, and protection they have the right to receive.

The school shares the London Borough of Tower Hamlet's commitment to being an anti-racist borough and to tackle and eliminate race discrimination. The council's Black, Asian, and Minority

Ethnic Inequalities Commission (2021) concluded that racism still exists within institutions and structures in the borough and has developed an action plan to achieve race equality at pace.

Scope

In line with the law, this policy defines a child as anyone under the age of 18 years.

This policy applies to all members of staff in our academy, including all permanent, temporary and support staff, Trust Directors, Local Advisory Body members, volunteers, contractors and external service or activity providers.

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- Protecting children from maltreatment
- Preventing impairment
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- Taking action to enable all children to have the best outcomes

Child protection is part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

Safeguarding Roles and Responsibilities

Governing Body

Our governing body should ensure they facilitate a whole school approach to safeguarding.

Safeguarding and child protection are at the forefront and underpin all relevant aspects of process and this policy development. Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart.

Where there is a safeguarding concern our governing body and school leaders should ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems should be in place, and they should be well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

Our Governing body should ensure that all staff should undergo regular updated safeguarding training, including online safety. All children should be taught about safeguarding, including online safety. Safeguarding should be integrated, aligned and considered as part of curriculum planning.

In addition to School Staff, Governors and Trustees are required to have compulsory safeguarding training as part of their induction and to maintain their knowledge through regular safeguarding training and updates. Through regular safeguarding training and updates staff are given the relevant skills and knowledge to safeguard children effectively and governors/trustees will be empowered and equipped to provide strategic challenge and gain assurance that effective safeguarding arrangements in place.

Whilst considering the above training requirements, our governing body should 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.

The Governing body should ensure that the child protection policy includes:

- procedures to minimise the risk of child on child abuse;
- the systems in place (and they should be well promoted, easily understood and easily accessible) for children to confidently report abuse, knowing their concerns will be treated seriously;
- how allegations of child on child abuse will be recorded, investigated and dealt with;
- clear processes as to how victims, perpetrators and any other children affected by child on child abuse will be supported;
- a recognition that even if there are no reported cases of child on child abuse, such abuse may still be taking place and is simply not being reported;

- a statement which makes clear there should be a zero-tolerance approach to abuse, and it should never be passed off as “banter”, “just having a laugh”, “part of growing up” or “boys being boys” as this can lead to a culture of unacceptable behaviours and an unsafe environment for children;
- recognition that it is more likely that girls will be victims and boys’ perpetrators, but that all child-on-child abuse is unacceptable and will be taken seriously; and
- the different forms child on child abuse can take, such as:
  - bullying (including cyberbullying, prejudice-based, racism, faith-based abuse, AI-generated sexual imagery and discriminatory bullying) abuse in intimate personal relationships between peers;
  - physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; or sexual violence and sexual harassment.
  - Harmful sexual behaviour, sexual harassment and sexual violence as outlined in Part 5 of KCSIE 2026
  - consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery):
  - causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
  - up skirting (which is a criminal offence 37), which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm;
  - And initiation/hazing type violence and rituals.

What school staff need to know

All staff should be aware of systems within the school which support safeguarding and these should be explained to them as part of staff induction. This should include the:

- child protection policy, which should amongst other things also include the policy and procedures to deal with peer-on-peer abuse;
- behaviour policy (which should include measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying);
- staff behaviour policy (sometimes called a code of conduct);
- How to report low level concerns, allegations against staff and whistleblowing within the staff conduct procedures
- safeguarding response to children who are missing from education or persistent and significant absentees; and
- role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies)
- Importance of understanding their expectations, roles and responsibilities around filtering and monitoring systems.

Copies of policies and a copy of Part 1 are provided for all staff at the start of the school year and for any staff joining mid-year at their induction.

Role of school staff

Staff and volunteers working within the school need to be able to identify children who require early help.

They should refer all concerns to the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead or .

These include a child who may be:

- is disabled and has specific additional needs
- has special educational needs
- Has a reduced timetable
- Mental health needs
- is a young carer
- is at risk of being a victim of sexual violence
- is engaging in sexual activity
- is showing signs of engaging in anti-social or criminal behaviour
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health, domestic violence
- has returned home to their family from care
- is a privately fostered child
- is at risk of being radicalised or exploited
- is frequently missing/goes missing from care or home
- is at risk of modern slavery, trafficking or exploitation
- is showing early signs of abuse and/or neglect

Role of the Designated Safeguarding Lead

The DSL is responsible for ensuring staff are aware of their responsibilities as follows:

- Knowing who the Designated Safeguarding Lead is: **Joshua Mickelburgh** (in his absence, Kendra Healy, the Deputy Safeguarding Officer).

- Raising any concerns with the Designated Safeguarding Lead. **If at any point there is a risk of immediate serious harm to a child a referral should be made to Tower Hamlets children's social care immediately. Anyone can make this referral by phoning 020 7364 5006.**

- Attending training as and when required.

- Being alert to the signs of abuse and their need to refer any concerns to the Designated Safeguarding Lead.

- Maintaining an attitude of 'it could happen here'. When concerned about the welfare of a child, staff members should always act in the interests of the child.

- Knowing the school's procedures for dealing with children who go missing from education, particularly on repeat occasions, or are persistent/significant absentees and reporting any such concerns to the Designated Safeguarding Lead.

- Listening to, and seeking out, the views, wishes and feelings of students

- **All** staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk.

- All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

- Sharing information and working together to provide student with the help they need

- Referring to the Principal any concerns about another member of staff, or if the concerns are about the Principal, referring them to Mulberry Schools Trust.

- Raising concerns about poor or unsafe practice and potential failures in the school's safeguarding regime through the academy's Whistle Blowing Policy.

- Being aware of Tower Hamlets safeguarding procedures and ensuring the Tower Hamlets Safeguarding Children Partnership (THSCP) procedures are followed: https://thscp.org.uk/ .

- Seeking early help where a child and family would benefit from co-ordinated support from more than one agency.

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Guidance for staff regarding safeguarding concerns

All staff are provided with training on the first day of the academic year on the different types of abuse, concerns, updates to KCSIE and issues of contextual safeguarding. Regular updates are provided throughout the year through whole school meetings and Professional Learning Briefings. New staff receive a comprehensive induction, which includes the whole school training delivered to all staff in September and any relevant updates.

This training provides staff with an understanding of the systems and processes in place to address concerns.

All staff should be aware that the school operates as a mobile phone free environment by default, further guidance can be found in the school's Mobile Phone Policy.

Guidance on responding to concerns can be found in Appendix 1.

Further guidance regarding the types of abuse and specific safeguarding concerns can be found in Appendix 2.

How to Report Concerns

Clear procedures on reporting any concerns are given to all staff/volunteers in school. This is done as part of the staff induction training. All child protection and/or safeguarding concerns should be reported to Joshua Mickelburgh, Designated Safeguarding Lead, immediately or Kendra Healy, the deputy DSL. If neither are available, then staff can report to the Headteacher or relevant Safeguarding Officers for each key stage (Joe Griffiths KS5, Gabriella McRill KS4 and Jack Lynch KS3).

All concerns should be logged on CPOMs and alerts, updates and information can be shared via the CP email address: childprotection@mulberryacademyshoreditch.org.

The DSL (or a deputy) will be available during term time. A useful flowchart of actions to take where there are concerns about a child is also reflected on page 27 of Keeping Children Safe in Education', September 2026).

What to do if a child discloses any form of abuse to you

It is important to take the following action if a child decides they want to confide or disclose to you:

- Follow the school's protocol, which is outlined below:
- Do not promise to keep it a secret – be clear that you will have to pass on the information
- Do listen to what they have to say
- Do not judge the child or show your own emotions i.e. do not show disgust; feelings of abhorrence or shock at what you are being told

- Do not give views about the allegations or the person about whom allegations are being made
- Reassure the child that they have done the right thing in speaking about what they are experiencing
- Reassure the child that whatever is happening to them is not their fault
- Take notes of what they say; if you are not able to write it down while they are disclosing, then do so as soon as possible after they have spoken to you

- Do not ask leading or probing questions or try to investigate it further yourself – this will be done by safeguarding professionals

Alert a member of the Safeguarding team as soon practically possible without interrupting the child
Any questions being asked should be to seek clarification only

Student Disclosures and the "Voice of the child".

At Mulberry Academy Shoreditch we have a clear procedure for reporting concerns. If a student talks to a member of staff about any risks to their safety or wellbeing, the staff member will need to let the student know that they must pass the information on. Staff members will allow them to speak freely and will not ask investigative questions.

All those with a responsibility to safeguard children need to recognise that it takes great courage for a child to share a concern and speak up about any form of abuse especially child sexual abuse.

There are many reasons why children are not able to articulate what they are experiencing. Children may feel embarrassed, humiliated, or are currently being threatened by the perpetrator of abuse. Also, children may not feel ready or know how to tell a trusted adult that they are being abused, exploited, or neglected. They may not even realise that their experiences are harmful.

The barriers preventing a child communicating their concerns may be connected to their vulnerability, disability, sexual orientation, or language. The child's behaviour may be the first sign that a child has experienced harm. Staff will therefore exhibit "*professional curiosity"* and understand that a child may be communicating a concern through their actions and behaviours and take a safeguarding approach when responding to behaviours.

Staff need to be aware of and promote the systems in place at the school which enable children to share their concerns and report abuse confidently. Children need to be assured that their concerns will be taken seriously by staff and action will be taken to safeguard and protect them. It is also important that staff determine how best to build safe and trusted relationships with children and young people which facilitates communication and the sharing of concerns.

The staff member will tell the student what will happen next. It is the duty of the member of staff to inform the Designated Safeguarding Lead what has been discussed. The staff member will write up details of the conversation with the student as soon as possible and log on CPOMs as well via an email to the Designated Safeguarding Lead.

All safeguarding concerns should be recorded promptly and passed to Joshua Mickelburgh or Kendra Healy.

Staff should **not** wait until the following school day to report a concern. Information will be shared on a need to know basis only.

Issues or concerns will not be discussed with colleagues, friends or family.

Relationships with Students

It is important to remain polite and respectful towards students but on no account to form friendships either in person or on social media. If students at the school or close relatives, such as a parent, request you to join their social media circle, although this will be unlikely, you must refrain from doing so.

To keep yourself safe from false allegations, ensure that you are never alone in a room or a lift with a student from the school. Never offer to give lifts or gifts, no matter how small, to a student.

In addition, if, in your role, you need to enter changing rooms or toilets, make sure that you knock and check that there is no-one inside. Wait till the rooms or toilets are vacated before entering.

Be a positive role model and professional in your behaviour towards other staff, students and visitors.

You should ensure that you do not make any physical contact with a child or young person at the school.

Do not take pictures or videos of students, on a personal device, either deliberately or by accident. Any media should be taken using school devices, which are monitored by the DSL and DDSL.

Taking Action

If at any time it is considered that a child has suffered harm or is likely to do so, a referral should be made to Tower Hamlets Duty Team on 020 7364 2972/2904/5601/5605 (out of hours telephone number, 020 7364 4079) or the Police Child Abuse Investigation Team on **101.** Call **999** if you are concerned a child needs immediate protection. If the child has an injury that requires medical attention, the child protection process will not delay the administration of first aid or emergency medical assistance.

Suspecting that a Student is at Risk of Harm

It is not always easy to recognise that a child is being hurt or is at risk, so abuse is often undetected. There will be occasions when staff may suspect that a student may be at risk, but have no ‘real’ evidence. In these circumstances, staff will try to give the student opportunity to talk.

Staff should pass on these early concerns by alerting the Safeguarding Team and logging on CPOMs.

Children may be harmed by other children or young people. Staff will be aware of the harm caused by child on child abuse as well as bullying and will use the school's **Anti-Bullying Policy** where necessary. However, there will be occasions when a student's behaviour warrants a response under child protection rather than anti-bullying procedures.

The academy acknowledges that some children can be particularly vulnerable or may have an increased risk of abuse and we accept the responsibility to take reasonable and appropriate steps to ensure their welfare. To ensure that all of our students receive equal protection, we will give special consideration to children that are considered to be vulnerable.

Notifying Parents/Carers

The school will normally seek to discuss any concerns about a student with their parents/carer. The Designated Safeguarding Lead or Deputy DSL Safeguarding Lead will make contact with the parent/carer in the event of a concern, suspicion or disclosure.

However, if the school believes that notifying parents/carers could increase the risk to the child, exacerbate the problem or compromise the safety of a staff member, advice will first be sort from Children's Social Care.

Referral to Children's Social Care and other Child Protection Agencies

Concerns about a child's welfare should be referred to local authority 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. Referrals should follow the local referral process.

Children's social care assessments should consider where children are being harmed in contexts outside the home, so it is important that the school provides 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.

Staff will follow the reporting procedures outlined in this policy. The Designated Safeguarding Lead or deputy DSL will make a referral to the relevant Children Social Care/Tower Hamlets MAST it if is believed that a student is suffering or is at risk of suffering significant harm.

At Mulberry Academy Shoreditch we also liaise with a wide variety of outside agencies. All initial referrals of requests should be shared with the DSL, Deputy DSL or the Safeguarding officer first.

The student (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.

The DSL will contact the LBTH MAST for support and advice if required: 020 7364 5006 (Option 3) 0207364 3444/5601/5606/5358/7796.

LBTH Multi Agency Support Team (MAST) for a discussion.

If a child has been receiving Early Help support from the school and other agencies and there is no improvement in the child's outcomes, then the DSL must refer the child to Children's Social Care.

Private Fostering

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

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

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

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.

Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the academy. However, it should be clear to the school who has parental responsibility.

Academy staff should notify the designated safeguarding lead or deputy DSL when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The academy itself has a duty to inform the local authority of the private fostering arrangements.

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

Record keeping

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

Records should include:

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

If in doubt about recording requirements, staff should discuss with the designated safeguarding lead (or deputy).

Storage and Handling of Records

Child protection information will be stored and handled in line with the principles set out in the Data Protection Act 1988. Child protection records will be stored in a locked facility accessed only by the Principal and the Designated Safeguarding Lead. Any electronic information will only be made available to relevant individuals. Every effort will be made to prevent unauthorised access. Sensitive information will not be stored on laptop computers, which, by the nature of their portability, could be lost or stolen. If it is necessary to store child protection information on portable media such as a CD or flash drive, these items will also be password protected and kept in locked storage.

Child protection information will be stored separately from the student's academy file will be 'tagged' to indicate that separate information is held. If such records need to be sent to a new school or college they will be sent separate from the student's file and under a confidential cover.

Child protection records are normally exempt from the disclosure provisions of the Data Protection Act, which means that children and parents do not have an automatic right to see them. If any member of staff receives a request from a student or parent to see child protection records, they will refer the request to the Principal or Designated Safeguarding Lead. The Data Protection Act does not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child.

Confidentiality and Sharing Information

Information sharing

Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. We, the school have clear powers to share, hold and use information for these purposes.

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 children's social care, the safeguarding partners, other organisations, agencies, and practitioners as required.

School 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 UK General Data Protection Regulation (UK GDPR) place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

They Governing body 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 UK 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 students' 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 UK GDPR. Where in doubt schools should seek independent legal advice.

The Data Protection Act 2018 and UK 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 and protect the safety of children.

Staff should only discuss concerns with the Designated Safeguarding Lead, or the deputy DSL, the Principal or Mulberry Academy Trust (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a need to know basis.

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

Storage and Handling of Records

Child protection information will be stored and handled in line with the principles set out in the Data Protection Act 1988. Child protection records will be stored in a locked facility accessed only by the Principal and the Designated Safeguarding Lead. Any electronic information will only be made available to relevant individuals. Every effort will be made to prevent unauthorised access. Sensitive information will not be stored on laptop computers, which, by the nature of their portability, could be lost or stolen. If it is necessary to store child protection information on portable media such as a CD or flash drive, these items will also be password protected and kept in locked storage.

Child protection information will be stored separately from the student's academy file will be 'tagged' to indicate that separate information is held. If such records need to be sent to a new school or college they will be sent separate from the student's file and under a confidential cover.

Child protection records are normally exempt from the disclosure provisions of the Data Protection Act, which means that children and parents do not have an automatic right to see them. If any member of staff receives a request from a student or parent to see child protection records, they will refer the request to the Principal or Designated Safeguarding Lead. The Data Protection Act does not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child.

Mulberry
Academy Shoreditch

Use of Media and E-Safety

1. Purpose and principles

Mulberry Academy Shoreditch is committed to safeguarding and promoting the welfare of every student, including when they use digital technologies and online services. Online safety is an integral part of safeguarding, teaching and learning, behaviour, and pastoral support. The school seeks to enable safe, responsible and informed participation online, not merely to restrict access.

This policy applies to all students, staff, governors, volunteers, contractors and other authorised users of school technology. It covers school-owned devices and accounts wherever used; personal devices and online activity insofar as these affect the safety, welfare, conduct or education of the school community; and remote learning. Safeguarding duties under KCSIE apply to children under 18; the school will also maintain appropriate welfare and conduct arrangements for students aged 18 and over.

The best interests of the child, early identification of harm, proportionate intervention, confidentiality and clear accountability underpin all decisions. No technical solution replaces professional vigilance, education or appropriate supervision.

2. Statutory and policy framework

This policy is informed by Keeping children safe in education (KCSIE) 2026, Working Together to Safeguard Children, the Education Act 2002, the Prevent duty, the DfE filtering and monitoring standards (updated September 2026), the Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025, and applicable guidance on harmful sexual behaviour and sharing nude or semi-nude imagery.

It must be read alongside the school's current Child Protection and Safeguarding Policy, Acceptable Use of ICT Policy, Mulberry Schools Trust AI Policy, Behaviour Policy, Anti-Bullying Policy, Staff Code of Conduct, Data Protection policies and relevant incident response procedures. In any safeguarding matter, the Child Protection and Safeguarding Policy and statutory guidance take precedence. The policy will be updated when legislation, technology, risks or trust arrangements change.

3. Understanding online risk

Mulberry Academy Shoreditch recognises that children must be safeguarded from potentially harmful and inappropriate online material. A whole-school approach to online safety protects and educates students and staff in their use of technology and provides clear mechanisms to identify, intervene in and escalate concerns.

In line with KCSIE 2026 (paragraphs 164–165), the school considers four interconnected categories of online risk:

- Content: exposure to illegal, inappropriate or harmful material, including pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories.
- Contact: harmful online interactions with other users or generative AI applications that simulate such interactions, including peer-to-peer pressure, commercial advertising, and

adults posing as children or young adults to groom or exploit them for sexual, criminal, financial or other purposes.

- Conduct: online behaviour that increases the likelihood of, or causes, harm, including making, sending or receiving explicit images (including those generated using AI), cyberbullying, harassment and the non-consensual sharing of images.
- Commerce: risks including online gambling, inappropriate advertising, phishing and financial scams. Suspected phishing can also be reported to the Anti-Phishing Working Group (https://apwg.org/), without delaying internal safeguarding or IT reporting.

These risks may overlap and arise through messaging, gaming, social media, livestreaming, search engines, generative AI and emerging platforms, including outside school hours. The school will consider the needs of children with SEND, EAL and other vulnerabilities, and will not assume that an absence of reports means an absence of harm.

In line with KCSIE 2026 (paragraphs 166–169), online safety is a continuous and interrelated theme across the school's safeguarding arrangements. The governing body and senior leaders will consider it when developing related policies and procedures, planning the curriculum and staff training, defining the DSL and deputy DSL responsibilities, and engaging parents and carers. The Child Protection and Safeguarding Policy will reflect the school's online safety approach, including appropriate filtering and monitoring on school devices and networks.

Where generative AI is used by staff or students, MAS will take account of current Department for Education guidance on generative artificial intelligence in education, including safeguarding, ethical, data protection and intellectual property risks. The Mulberry Schools Trust AI Policy sets out further expectations.

4. Roles and responsibilities

The Mulberry Schools Trust and relevant governing body retain strategic responsibility for online safety and assurance that appropriate filtering and monitoring arrangements are in place. They will receive appropriate information on risks, incidents, reviews and improvements.

The Executive Principal and senior leadership team will provide resources, implement this policy, ensure staff understand expectations and support the DSL and IT team. The DSL will have strategic responsibility for filtering and monitoring.

The DSL, Joshua Mickelburgh, supported by deputy DSLs, leads the safeguarding response to online concerns, advises on risk and intervention, oversees appropriate safeguarding records and contributes to annual filtering and monitoring review.

The IT/network team implements and maintains technical controls, documents coverage and limitations, investigates technical incidents, undertakes checks, and promptly shares safeguarding-relevant information with the DSL. IT staff do not independently determine child protection outcomes.

All staff must supervise use appropriately, model safe behaviour, understand the reporting route, act immediately on concerns and never assume another colleague has reported an incident. Students must follow their acceptable use agreement and report worrying activity. Parents/carers are encouraged to support safe use and report concerns.

5. Filtering and monitoring: LGfL and Senso

The school uses LGfL filtering to reduce access to illegal, inappropriate and potentially harmful online content, and Senso to monitor relevant activity and generate alerts. Filtering is preventive; monitoring supports identification and response after concerning activity. Neither is guaranteed to identify or block every risk, especially within encrypted, dynamic, personalised or AI-generated content.

The IT team will maintain a documented inventory of covered networks, accounts and devices, including arrangements for school devices used off-site, and identify any gaps. It will ensure appropriate access controls and age-sensitive settings, maintain protection against illegal content and known harmful categories, and manage requests to unblock educational resources through a documented, authorised process. Staff and students must not attempt to bypass controls.

Senso logs will be picked up daily, with the appropriate head of year and SLT link notified of any concerning logs. All logs are also analysed once per half term, allowing the safeguarding and pastoral teams to notice trends and put in appropriate interventions. Relevant incidents, actions, decisions and outcomes must be recorded on CPOMS. Access to monitoring information will be restricted to authorised personnel on a need-to-know basis.

The DSL, senior leadership, IT support and responsible governor will review filtering and monitoring at least annually, and following significant incidents or changes. The review will assess student risk profiles (including SEND and EAL), content blocked and permitted, devices and off-site coverage, AI and dynamic content, safeguarding trends, test results, gaps, staff awareness and agreed actions. Findings and actions will be documented.

Users will be informed transparently that school systems and relevant devices are subject to proportionate filtering and monitoring. Monitoring, access to files or emails and disclosure of information will comply with applicable law, privacy notices, retention rules and authorisation processes.

6. Recognising and reporting concerns

Any member of staff who becomes aware of an online safety concern must take it seriously, safeguard the child and report it in accordance with the Child Protection and Safeguarding Policy. Where there is immediate danger, emergency services must be contacted as appropriate. If the DSL is unavailable, staff must follow the school's safeguarding escalation arrangements rather than wait.

Students may report concerns to any trusted adult, the DSL or deputy DSLs. Parents/carers and visitors should report concerns through the school safeguarding contact. Staff must not promise absolute confidentiality and should explain that information may need to be shared to protect a child.

Staff should record facts, dates, platforms, users involved, the child's account, immediate actions and referrals through the approved safeguarding recording system. They must not conduct their own extensive investigation, confront an alleged perpetrator without direction, or forward harmful or illegal material unnecessarily. Preserve relevant evidence only in accordance with safeguarding guidance and advice from the DSL or police.

Concerns involving a staff member must follow the staff allegations/low-level concerns procedures, including referral to the appropriate head teacher or chair/trust lead, as applicable. Cybersecurity

and personal data incidents must also be reported promptly to the IT team and designated data protection lead, without delaying safeguarding action.

7. Cyberbullying, harassment and exploitation

Cyberbullying, discrimination, threats, hate incidents, coercive control, grooming, criminal or sexual exploitation, radicalisation and harmful sexual behaviour are not tolerated. Online incidents may require safeguarding action even where they occur outside school, on personal devices or away from the premises.

Responses will be child-centred, proportionate and coordinated across safeguarding, behaviour, pastoral and external agencies. The school will consider the safety and support needs of the child harmed and any other children involved; risks of retaliation; preservation of appropriate evidence; parental involvement where safe; and whether police, children's social care or specialist agencies should be consulted. Behaviour sanctions, where appropriate, do not replace safeguarding support.

Staff must follow the current national guidance and school procedures for reports involving nudes and semi-nudes, including AI-generated or digitally altered images. Staff must not ask a child to share or display an intimate image, nor view, copy, print, save or forward such imagery except where specifically permitted and necessary under applicable safeguarding procedures. The DSL will determine next steps, including specialist or police advice.

8. Education, prevention and parental engagement

Online safety will be taught through an age-appropriate, sequenced programme across Computing, PSHE/relationships education, assemblies and tutor time. Topics will include privacy, data, group chats, digital footprint, consent, respectful communication, online influence and radicalization, misinformation and disinformation, social media algorithms, harmful content, reporting and help-seeking, the opportunities and risks of AI, and how the internet makes money.

Teaching will be inclusive and adapted for students with SEND, EAL and additional vulnerabilities. Students will be taught how to recognise manipulation, verify information, seek help, and use reporting and blocking tools. Student voice and incident trends will inform curriculum review.

Staff will receive safeguarding induction covering online safety, relevant filtering and monitoring responsibilities and how to report concerns, with regular updates and at least annual safeguarding updates. Staff with specialist duties will receive appropriate additional training. Parents/carers will be offered clear information and practical guidance about online risks, school reporting arrangements and home safety.

9. Acceptable use, devices and account security

All authorised users must follow the school's Acceptable Use of ICT Policy. School technology is provided for educational and professional purposes. Users must protect credentials, use their own accounts, lock unattended devices, report lost or compromised devices, and avoid unauthorised software, unsafe links, malware, hacking or attempts to evade filtering.

Staff must use approved school systems for school business and communication with students or families. Personal accounts, personal messaging and social media must not be used for private communication with students. Personal devices connecting to school systems must comply with approved security arrangements. Staff must not download school personal data to personal devices unless expressly authorised under a secure approved arrangement.

The school's mobile phone, bring-your-own-device, visitor network and off-site device rules are set out in the Mobile Phone Policy.

10. Artificial intelligence and emerging technologies

AI tools may offer educational benefits but also create risks including inaccurate or biased outputs, unsafe advice, exposure to harmful content, privacy breaches, fabricated evidence, impersonation, deepfakes and AI-generated intimate images. Staff and students must comply with the Mulberry Schools Trust AI Policy and any approved-tool list or age restrictions.

Staff must not enter identifiable student, staff or parent/carer data, student work or school intellectual property into generative AI systems except where the applicable trust policy permissions, authorisations and data protection requirements have been satisfied. The Acceptable Use Policy requires explicit written student/parental permission and school authorisation in specified circumstances. Staff remain responsible for checking accuracy, appropriateness, bias, copyright and safeguarding implications of outputs.

The school will risk-assess AI products before use, including provider data practices, age suitability, safeguarding controls, output risks, filtering and monitoring limitations, and any data protection assessment required. Students will be taught responsible use, academic integrity, consent and the risks of fabricated or manipulated media. Suspected AI-enabled bullying, grooming or sexual imagery will be treated as safeguarding concerns.

11. Social media and professional boundaries

Staff must maintain professional boundaries online and must not connect with current students through personal social media accounts. Caution is required regarding former students, particularly where there are continuing school or family links. Staff must not create groups, channels or accounts using the Mulberry name or suggesting school endorsement without authorisation.

School communications and social media must use approved channels and meet professional, safeguarding, accessibility, copyright and data protection expectations. Staff should review their public digital footprint and must not publish confidential information or content that compromises professional responsibilities. Students will be taught to communicate respectfully and report harassment, impersonation or harmful posts.

12. Photography, video and publication

At admission the school will seek and record relevant permissions for taking and publishing student images, in line with its consent arrangements and applicable data protection requirements. Consent and objections will be checked before publication, and choices respected. Images must be appropriate, securely stored, used for authorised purposes and not accompanied by unnecessary identifying information.

Staff should use school-approved devices and storage wherever possible. Students should be encouraged to report concerns about images of themselves or others.

Parents, carers and relatives may photograph or film school events only subject to the academy's prior permission and event-specific rules, including restrictions designed to protect children whose images must not be shared. The school may prohibit recording where necessary for safeguarding or privacy.

13. Remote learning and off-site use

When teaching or learning takes place remotely, the school will use approved platforms, communicate professional expectations, consider privacy and safeguarding risks and explain routes for reporting concerns. Staff will maintain appropriate professional boundaries and avoid personal communications. Where school devices are taken home, the school will explain what filtering and monitoring does and does not cover; families must not assume all home networks or personal devices are protected by school controls.

Remote safeguarding concerns must be reported through the normal safeguarding channels. The DSL will consider children who may be less visible or more vulnerable during periods of remote education.

14. Data protection, privacy and cyber security

Personal data must be accessed and shared only where necessary, lawfully and securely. Staff must follow trust retention, access control, records management, secure transfer and breach-reporting procedures. The school may undertake lawful and proportionate monitoring of school systems for safeguarding, security and compliance, with appropriate transparency, authorisation and restricted access. It will not assume that a broad statement of “no expectation of privacy” removes individuals' legal rights.

Suspected phishing, malware, unauthorised access, lost devices, accidental disclosure or compromised accounts must be reported immediately to the IT team and relevant data protection lead. Staff must not conceal incidents or attempt unauthorised technical investigation. Safeguarding concerns arising from a cyber incident must also be referred to the DSL. The trust will maintain appropriate security, patching, backups and recovery arrangements through its relevant technical policies.

15. Implementation, assurance and review

The DSL will ensure this policy is communicated to staff, students and parents/carers as appropriate, that acceptable use agreements are in place, and that responsibilities and procedures are accessible. The DSL and technical lead will maintain an operational filtering and monitoring protocol, incident escalation routes, records of reviews and evidence of follow-up actions.

This policy will be reviewed at least annually, following a serious online safeguarding incident, significant technology change, or relevant statutory update. The review will consider safeguarding records, Senso and LGfL effectiveness, student and staff feedback, curriculum coverage, staff training and parental engagement. Changes will be approved through the school's normal governance arrangements.

Our Acceptable Use Policy and AI policy can be found here -
https://www.mulberryacademyshoreditch.org/wp-content/uploads/2026/01/Acceptable-use-of-ICT-Policy-Nov-25.pdf

Online Safety

We are thoroughly committed to improving student’s e-safety awareness at Mulberry Academy Shoreditch. Our Acceptable Use Policy is signed up to by all students and staff and the school will apply appropriate filters and monitoring systems as deemed to be reasonable.

It is essential that children are safeguarded from potentially harmful and inappropriate online material. The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

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

Remote learning

Where children are being asked to learn online at home the Department has provided advice to support schools and colleges do so safely: safeguarding in schools colleges and other providers and safeguarding and remote education. As a school, we always do and will follow this advice.

If a student, parent/carer or member of staff has a concern relating to on line safety students are encouraged to report it. They can report it directly to Josh Mickelburgh Designated Safeguarding Lead (DSL) or Kendra Healy, Deputy (DSL), at the school.

Photography and Images

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

To protect students we will:

- At the time of admission to the school we will seek signed consent (photographs and personal images consent form) from parents/carers and students for photographs to be taken or published (for example, on our website or in newspapers or publications)

- Ensure students are appropriately dressed
- Encourage students to tell us if they are worried about any photographs that are taken of them

Parents, carers or relatives may only take still or video images of students in the school organised activities with the prior consent of the academy. If parents do not wish their children to be photographed or filmed and express this view in writing, their rights will be respected.

Visitors and the Use of school Premises

At Mulberry Academy Shoreditch we recognise the role that external agencies and speakers can play in enhancing the learning experiences of our students. Where we use external agencies and individuals this way, we will positively vet them to ensure that their messages are consistent with, and not in opposition to, the academy's values and ethos.

Our school will assess the suitability and effectiveness of input from external agencies or individuals to ensure that:

- any messages communicated to students are consistent with the ethos of the academy and do not marginalise any communities, groups or individuals
- any messages do not seek to glorify criminal activity or violent extremism or seek to radicalise students through extreme or narrow views of faith, religion or culture or other ideologies
- activities are properly embedded in the curriculum and clearly mapped to schemes of work to avoid contradictory messages or duplication
- activities are matched to the needs of students
- activities are carefully evaluated by the academy to ensure that they are effective

Any guest speakers or external agencies will be provided with a details of safeguarding within academy and how to contact our Designated Safeguarding Lead on arrival at the academy, and will be appropriately supervised at all times.

When an agreement is made to allow non-academy groups or organisations to use the academy premises, appropriate checks will be made before agreeing the contract. Usage will be monitored and, in the event of any behaviour not in-keeping with this policy, the academy will contact the Police and terminate the arrangement.

Staffing

Safer Recruitment

Please see the MST Safer Recruitment Police here; MST Safer Recruitment Policy

The school follows the legal requirements of what we '**must** do', what we should do and what is considered best practice and important information relating too

- the recruitment and selection process;
- pre-appointment and vetting checks, regulated activity and recording of information;
- other checks that may be necessary for staff, volunteers and others, including the responsibilities on schools and colleges for children in other settings; and
- how to ensure the ongoing safeguarding of children and the legal reporting duties on employers.

The school also follows the Mulberry Schools Trust policy on Safer Recruitment. This policy can be found on the Trust's website'.

Recruitment of Staff and Volunteers

The school will ensure that Safer Recruitment practices are always followed. Every interview panel will have at least one member who has a current certificate in Safer Recruitment. We will check on the identity of the candidates, follow up references with referees and scrutinise applications for gaps in employment. We will ensure that safeguarding considerations are at the centre of each stage of the recruitment process.

The school will explicitly tell applicants that online searches will be done as part of due diligence checks ahead of their interviews.

We will ensure that agencies and third parties supplying staff provide us evidence that they have made the appropriate level of safeguarding checks on individuals working in our school.

Every job description and person specification will have a clear statement about the safeguarding responsibilities of the post holder.

We will ensure that all staff involved in recruitment are aware of government guidance on safer recruitment and that its recommendations are followed.

The Disclosure and Barring Service (DBS) helps employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups, including children. **The school will ensure the correct level of DBS certificate is sought and ensure a prohibition check is undertaken.**

The types of checks undertaken will be in accordance with the guidance given in the Keeping Children Safe in Education (September 2026) document.

Any offer of appointment made to a successful candidate (including one who has lived or worked abroad) will be conditional on satisfactory completion of the necessary pre-employment checks as required in the guidance given in the Keeping Children Safe in Education (September 2026) document.

When an enhanced DBS certificate is required it will be obtained from the candidate before or as soon as is practicable after the persons appointed.

The academy will always ask for written information about previous employment history and check that information is not contradictory or incomplete. References will be sought on all shortlisted candidates, including internal ones, before interview, so that any issues or concerns they raise can be explored further with the referee and taken up with the candidate at interview.

The academy will keep a single central record in accordance with the regulations given in the Keeping Children Safe in Education (September 2026) document.

Recruitment and/or deployment checks will be undertaken, as stated in the Keeping Children Safe in Education (September 2026) document, for the following:

- Individuals who have lived or worked outside the UK
- Agency or third party staff
- Trainee/staff teachers
- Volunteers
- Contractors

The school will carry out all relevant checks if it is concerned about an existing member of staff and refer to the DBS anyone who has harmed, or poses a risk of harm to a child or vulnerable adult.

Dealing with Allegations against Existing Staff and Volunteers who Work with Children

We will prevent people who pose risks to children from working in our academy by ensuring that all individuals working in any capacity at our academy have been subjected to safeguarding checks in line with the statutory guidance; Keeping Children Safe in Education: Statutory Guidance for Academies and Schools, September 2026.

At Mulberry Academy Shoreditch we recognise the possibility that adults working in the academy may harm children. Any concerns about the conduct of other adults in the academy should be taken to the Principal without delay (or where that is not possible to the designated safeguarding

lead); any concerns about the Principal should go to Mulberry Academy Trust who can be contacted via the PA to the Principal.

Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. Suspension is not mandatory, nor is it automatic but, in some cases, staff may be suspended where this is deemed the best way to ensure that children are protected.

Where any member of the school staff or any volunteer has concerns that a person has caused harm or poses a future risk of harm to vulnerable groups, including children they must action in accordance with the academy Policy. Under its duty of care for its employees, the academy will ensure they provide effective support for anyone facing an allegation and provide the employee with a named contact if they are suspended. The academy will ensure its obligation for confidentiality when an allegation has been made.

All staff should be aware that this guidance applies to staff who are trainees, agency staff, as well as those who are employed by Mulberry Schools Trust.

See Appendix 2 for Flow Chart outlining the process for reporting allegations.

Please see the MST Whistleblowing Policy at the following link; MST Whistleblowing Policy

Managing Situations and Exit Arrangements

For the following issues:

- Resignation and 'settlements' agreements
- Record keeping
- References
- Timescales
- Oversight and monitoring
- Suspension
- Information sharing
- Following a criminal investigation or prosecution
- On conclusion of a case
- In respect of malicious or unsubstantiated allegations

The academy will ensure compliance with the guidance and regulations contained in the appropriate sections of the Keeping Children Safe in Education (September 2026) document.

Training

For all Staff to Raise Awareness and Increase Understanding

Every year all staff (including non-teaching and volunteers) must undertake the Child Protection and Safeguarding training at the beginning of the academic year. This is recorded and logged. If staff join during the academic year, they will complete this training as part of their induction.

All staff members must read part 1 of Keeping Children Safe in Education 2026. They must also sign the staff handbook acknowledgement form confirming hey have read this.

Staff members who miss the whole academy training will be required to undertake other relevant training arranged on an alternate day by the school.

All staff are informed clearly on how to report anything of concern to Joshua Mickelburgh, the Designated Safeguarding ,and Kendra Healey, the Deputy DSL immediately.

Furthermore, all staff receive regular Safeguarding training on a half-termly basis, with additional training provide to senior and middle leaders on a termly basis.

We will ensure that staff members provided by other agencies and third parties, e.g. supply staff and contractors, have received appropriate information commensurate with their roles before starting work. They will be given the opportunity to take part in whole academy training if it takes place during their period of work for the school.

The school will maintain accurate records of staff induction and training.

For the Safeguarding Team

All members of the Safeguarding Team will undergo relevant updated child protection training every two years.

Furthermore, all members of the Safeguarding Team are actively supported to attend regular training to support with contextual safeguarding, and develop practise in relation to emerging issues.

The Designated Safeguarding Lead will provide an annual briefing to the school on any changes to child protection legislation and procedures and relevant learning from local and national serious case reviews.

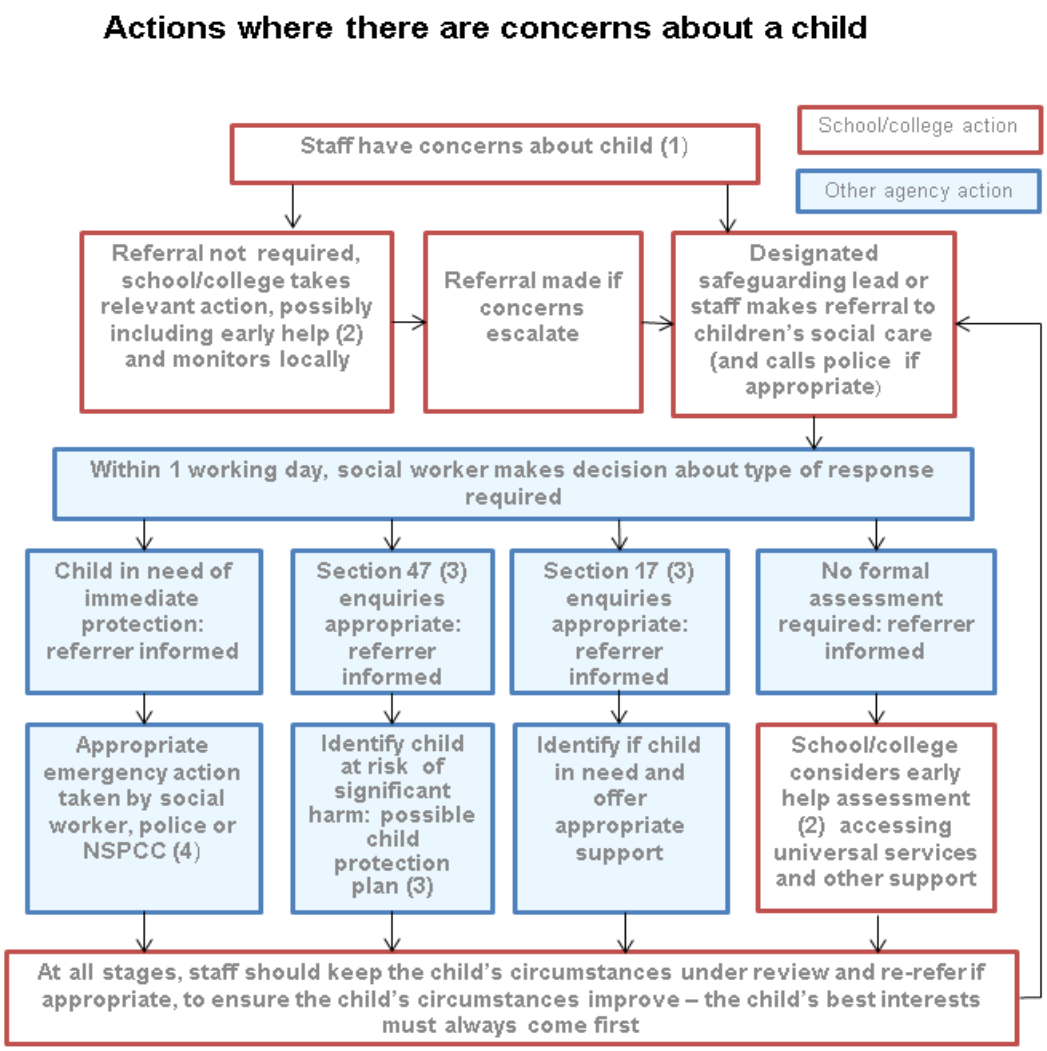
Management of the Policy

The school will at all times adhere fully to the statutory guidance in place from the Department of Education issued under Section 175 of the Education Act 2002, the Education (Independent academy Standards) Regulations 2014 and the Education (Non-Maintained Special Academies) (England) Regulations 2011.

Currently **Keeping Children Safe in Education:** statutory guidance for academies and colleges (September 2026) and the departmental advice; **what to do if you are worried a child is being abused** – Advice for practitioners (September 2026). Nothing written in this policy overrides the academy's duties under such legislation.

Mulberry Academy Trust will oversee the policy, ensure its implementation and review its content on an annual basis.

Appendix 2: Responding to a concern



Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of Working together to safeguard children provides detailed guidance on the early help process.

Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. This can include s17 assessments of children in need and s47 assessments of children at risk of significant harm. Full details are in Chapter one of Working together to safeguard children

This could include applying for an Emergency Protection Order (EPO).

Appendix 2: Types of Abuse and Safeguarding Concerns

Child Abuse

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by infiltrating harm, or by failing to act to prevent harm. They may be abused by an adult or adults, or another child or children. There are four types of child abuse as defined in 'Keeping Children Safe in Education' (September 2026) as follows:

Physical abuse

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

Most children will collect cuts and bruises and injuries, and these should always be interpreted in the context of the child's medical and social history, developmental stage and the explanation given. Most accidental bruises are seen over bony parts of the body, e.g. elbows, knees, shins, and are often on the front of the body. Some children, however, will have bruising that is more than likely inflicted rather than accidental. Important indicators of physical abuse are bruises or injuries that are either unexplained or inconsistent with the explanation give, or visible on the 'soft' parts of the body where accidental injuries are unlikely, e.g. cheeks, abdomen, back and buttocks. A delay in seeking medical treatment when it is obviously necessary is also a cause for concern.

The physical signs of abuse may include:

- unexplained bruising, marks or injuries on any part of the body
- multiple bruises – in clusters, often on the upper arm, outside of the thigh
- cigarette burns
- human bite marks
- broken bones
- scalds, with upward splash marks
- multiple burns with a clearly demarcated edge

Changes in behaviour that can also indicate physical abuse:

- fear of parents being approached for an explanation
- aggressive behaviour or severe temper outbursts
- flinching when approached or touched
- reluctance to get changed, for example in hot weather
- depression
- withdrawn behaviour
- running away from home

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. 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, though it may occur alone.

Emotional abuse can be difficult to identify as there are often no outward physical signs. Indications may be a developmental delay due to a failure to thrive and grow, however, children who appear well-cared for may nevertheless be emotionally abused by being taunted, put down or belittled. They may receive little or no love, affection or attention from their parents or carers. Emotional abuse can also take the form of children not being allowed to mix or play with other children.

Changes in behaviour which can indicate emotional abuse include:

- neurotic behaviour e.g. sulking, hair twisting, rocking
- being unable to play
- fear of making mistakes
- sudden speech disorders
- self-harm
- fear of parent being approached regarding their behaviour
- developmental delay in terms of emotional progress

Sexual abuse

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 or 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 (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children

All staff and volunteers should be aware that adults, who may be men, women or other children, who use children to meet their own sexual needs abuse both girls and boys of all ages. Indications of sexual abuse may be physical or from the child's behaviour. In all cases, children who tell about

sexual abuse do so because they want it to stop. It is important, therefore, that they are listened to and taken seriously.

The physical signs of sexual abuse may include:

- pain or itching in the genital area
- bruising or bleeding near genital area
- sexually transmitted disease
- stomach pains
- discomfort when walking or sitting down
- pregnancy

Changes in behaviour which can also indicate sexual abuse include:

- sudden or unexplained changes in behaviour e.g. becoming aggressive or withdrawn
- fear of being left with a specific person or group of people
- having nightmares
- running away from home
- sexual knowledge which is beyond their age, or developmental level; sexual drawings or languages
- bedwetting
- eating problems such as overeating or anorexia
- self-harm or mutilation, sometimes leading to suicide attempts
- saying they have secrets they cannot tell anyone about
- substance or drug abuse
- suddenly having unexplained sources of money
- not allowed to have friends (particularly in adolescence)
- acting in a sexually explicit way towards adults

Neglect

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

- provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate caregivers)
- ensure access to appropriate medical care or treatment
- neglect of, or unresponsiveness to, a child's basic emotional needs

It can be difficult to recognise neglect, however, its effects can be long term and damaging for children.

The physical signs of neglect may include:

- being constantly dirty or 'smelly'
- constant hunger, sometimes stealing food from other children
- losing weight, or being constantly underweight
- inappropriate or dirty clothing

Neglect may be indicated by changes in behaviour which may include:

- mentioning being left alone or unsupervised
- not having many friends
- complaining of being tired all the time
- not requesting medical assistance and/or failing to attend appointments

Contextual Safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside the school or college. **All** staff, but especially the designated safeguarding lead (and deputies) should be consider the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Children's social care assessments should consider such factors so it is important that schools and colleges provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

In addition to physical, sexual, emotional abuse and neglect, the following are further risks to children and young people identified in Keeping Children Safe in Education and risks that staff need to be aware of and be vigilant about:

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. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers.

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed.

Children missing in education

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 child criminal exploitation. 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.

Additionally, a child being absent from education can also be a warning sign of safeguarding concerns, including sexual abuse, sexual exploitation or child criminal exploitation.

Elective Home Education (EHE)

Many home educated children have an overwhelmingly positive learning experience. We would expect the parents' decision to home educate to be made with their child's best education at the heart of the decision. However, this is not the case for all, and home education can mean some children are less visible to the services that are there to keep them safe and supported in line with their needs.

From September 2016 the Education (Student Registration) (England) Regulations 2006 were amended so that schools must inform their LA of all deletions from their admission register when a child is taken off roll

Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, we will work other key professionals to coordinate a meeting with parents/carers where possible. Ideally, this would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker.

Children with family members in prison

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health.

Child Criminal Exploitation (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Child Sexual Exploitation

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16- and 17-year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

Child sexual exploitation (CSE) involves exploitative situations, contexts and relationships where young people under the age of 18 receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs or groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim, which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of violence, coercion, intimidation or enticement, and includes unwanted pressure from peers to have sex, sexual bullying including online bullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

Boys and young men and girls and young women can be victims of CSE. Key indicators of children being sexually exploited may include:

- going missing for periods of time or regularly coming home late
- regularly missing education or not taking part in education
- displaying inappropriate sexualised behaviour
- receiving unexplained gift or gifts from unknown sources
- associating with other young people involved in exploitation
- having multiple phones
- mood swings or changes in emotional wellbeing
- seen at strange meeting places (hotels or known places of concern)
- having older boyfriends/girlfriends who are believed to be a risk to children
- self-harming/drug or alcohol misuse
- physical injuries (e.g. bruising suggestive of sexual assault)
- secretive behaviour

Staff should also be aware that many children and young people who are victims of sexual exploitation do not recognise themselves as such.

These include:

- **Inappropriate relationships** – Usually involves just one abuser who has inappropriate power – physical, emotional or financial – or control over a young person. The young person may believe they have a genuine friendship or loving relationship with their abuser.

- **Boyfriend/Girlfriend** – Abuser grooms the victim by striking up a normal relationship with them, giving then gifts and meeting in cafes or shopping centres. A seemingly consensual relationship develops but later turns abusive. Victims may be required to attend parties and sleep with multiple men and threatened with violence if they try to seek help.

- **Organised exploitation and trafficking** – Victims are trafficked through criminal networks, often between towns or cities, and forced or coerced into sex with multiple men. They may also be used to recruit new victims. This serious organised activity can involve the buying and selling of young people.

County lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell 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 (mainstream and special), further and higher educational institutions, student referral units, children's homes and care homes.

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing and are subsequently found in areas away from their home;
- have been the victim or perpetrator of serious violence (e.g. knife crime);
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity;
- owe a 'debt bond' to their exploiters;
- have their bank accounts used to facilitate drug dealing.

Modern slavery

Child slavery occurs when a child is exploited for someone else's gain. It can include child trafficking, child marriage and child domestic slavery.

Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include;

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;
- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,

- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

Domestic abuse

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socioeconomic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

Staff should be aware that 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. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children and have a detrimental and long-term impact on their health, well-being, development, and ability to learn. In some cases, a child may blame themselves for the abuse or may have had to leave the family home because of the abuse.

Young people can also experience domestic abuse within their own intimate relationships. This form of child on child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

The school has signed up to the Metropolitan Police's Operation Encompass project. Operation Encompass ensures that when police are called to an incident of domestic abuse, and where there are children in the household, the police will notify the school's Designated Safeguarding Lead before the child arrives at school the following day, so that the school can provide 'silent support' to the child.

Grooming

This is a process by which adults and other children, especially older children, use to establish control over a child with the ultimate purpose of exploiting them. The grooming can be for:

- Sexual exploitation
- Criminal exploitation
- Fundamentalism and terrorism.
- The process of grooming for sexual exploitation involves:
- Targeting the victim – often someone who is vulnerable, lonely, emotionally needy, lacking in confidence or self-esteem
- Gaining the victim's trust – groomers are very patient and invest a great deal of time in gaining trust. They have the long-term gain in mind.
- Filling a need – making the victim feel better about themselves; giving attention and also gifts and presents.
- Isolating the victim – creating situations where the victim is alone with the groomer and, little by little, cutting the victim off from friends and family.
- Sexualising the relationship – this occurs where the groomer has created sufficient emotional dependency so that the victim does not resist/cannot resist.
- Maintaining control - this is possible because through the processes above, the victim no longer trusts anyone else and trusts the groomer above all, which enables the groomer to manipulate the victim and control them completely.

Grooming for criminal exploitation or into fundamentalism is not very different. These also involve careful targeting, gaining trust, isolating the victim, filling a need, providing propaganda to make the victim willing to commit crimes, includes desensitising them to violence, and maintaining control.

Those individuals involved in grooming children are adept at convincing adults around them, and

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should 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.

Female Genital Mutilation

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

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

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

Risk factors for FGM include;

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

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out of academy to visit an 'at risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM.

Indications that FGM may have already taken place may include;

- difficulty walking, sitting or standing and may even look uncomfortable
- spending longer than normal in the bathroom or toilet due to difficulties urinating
- spending long periods of time away from the classroom during the day with bladder or menstrual problems
- frequent urinary, menstrual or stomach problems
- prolonged or repeated absences from academy, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return
- reluctance to undergo normal medical examinations
- confiding in a professional without being explicit about the problem due to embarrassment or fear
- talking about pain or discomfort between her legs

The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify the Police when they discover that FGM appears to have been carried out or preventing it from happening to a girl under 18.

FGM mandatory reporting duty for teachers

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers, along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through

disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases may face disciplinary sanctions.

It will be rare for teachers to see visual evidence, and they should not be examining students or students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss any such case with the school's designated safeguarding lead (or deputy) and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures.

Forced Marriage and Honour Based Violence

Prevention of Forced Marriage

Schools are well placed to raise concerns and take action to prevent young people from being forced into marriage whilst on extended visits to their parents' home country or that of extended family. While the majority of extended holidays or visits to family overseas are for valid reasons, this guidance aims to raise awareness amongst education professionals of children at risk of forced marriage. Where staff have concerns or become aware that Forced Marriage or abuse may take place or is taking place, they should discuss this with the Designated Safeguarding Lead or the Deputy (DSL) will take action, as appropriate.

What is forced marriage?

A forced marriage is a marriage in which one or both spouses do not or, in the case of some adults with learning or physical disabilities, cannot consent to the marriage but are coerced into it. Duress can include physical, psychological, financial, sexual and emotional pressure.

This is not the same as an arranged marriage. In arranged marriages, the families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.

Since 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014.

Honour based violence

So-called honour based violence occurs in communities where the concepts of honour and shame are fundamentally bound up with the expected behaviour of families and individuals, particularly that of women. The term describes a form of domestic violence motivated by the notion of 'honour' and includes practices such as breast ironing. The victim can be subjected to long term low level physical abuse and bullying as 'punishment' for 'bringing dishonour on the family' and, in some extreme cases, may be killed.

Where staff have concerns or become aware that honour based violence or abuse may take place or is taking place, they should discuss this with the Designated Safeguarding Lead or the Deputy (DSL) who will take action, as appropriate.

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.

All staff should also be aware of severe mental health problems—including self-harm and suicidal ideation—must be handled as standalone safeguarding concerns rather than just indicators of external abuse or neglect

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Consultants however, are well placed to observe children when visiting schools and learner centres 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 consultants have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the school's or centre's child protection policy and speaking to the designated safeguarding lead or a deputy.

Preventing Radicalisation

The Counter-Terrorism and Security Act 2015 places a duty on specified authorities, including local authorities and childcare, education and other children's service providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism ("the Prevent Duty").

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

We use the curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet.

We are committed to ensuring that our students are offered a broad and balanced curriculum that aims to prepare them for modern Britain. Teaching the school's core values alongside the

fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

Recognising Extremism

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies outside academy
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent)
- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality
- graffiti, art work or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views
- advocating violence towards others

Interventions with individuals who have been highlighted as a concern may include:

- increased adult support, supervision and encouragement
- mentoring programmes
- signposting to positive activities in and out of academy
- behaviour support/anger management programmes
- attendance support
- counselling
- intensive family support or parenting programmes with a Preventing Violent Extremism element
- links with relevant voluntary or religious organisations for theological/education programmes
- support from the Safer Schools Police Officer or Prevent Team
- advice on online safety (for students and parents)
- referrals to targeted youth support, CAMHS or the Youth Crime Prevention Worker

Prevention work which is embedded into the curriculum and extracurricular activities includes:

- Work on community cohesion, tolerance and anti-violence addressed throughout the curriculum: promoting alternative positive narratives to counteract extremist ideologies.
- Open discussion and debate of issues and the law in a supportive environment

- Critical appraisal of sources/internet resilience/identifying propaganda – relevant for all subjects but especially when using the internet for research
- Programmes of study which highlight British Values
- Social and emotional aspects of learning
- Anti-bullying work including work with Stonewall to tackle homophobia.
- Learning for Life curriculum with focus on building positive relationships, free from violence (including focusing on reducing violence against women/domestic violence)
- Rewarding positive behaviour
- Pastoral and induction support
- Work on safety, risk and crime prevention
- Opportunities for channelling positive engagement e.g. charities/community work
- Positive activities such as Enrichment
- Ensuring consistent messages between home and the school

Child on Child Abuse

The school has put in place safeguards to reduce the likelihood of child on child allegations. There is an established ethos of respect, friendship, courtesy and kindness and clear expectations and consequences for unacceptable behaviour, together with visible staff presence around the school.

All staff should be aware that children can abuse other children . And that it can happen both inside and outside of school or college and online. It is important that all staff recognise the indicators and signs of **child on child** abuse and know how to identify it and respond to reports.

All staff should understand that child on child abuse is a safeguarding issue for both victim and alleged perpetrator, it is preventable and it may involve serious physical harm or threats involving weapons

All staff should understand, that even if there are no reports in our schools, it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have **any** concerns regarding child on child abuse they should speak to their designated safeguarding lead (or deputy).

All staff should understand that racism, faith based abuse and misogyny should be treated as standalone forms of child-on-child abuse that must be recognized and recorded under safeguarding frameworks, not just handled as behavior infractions.

It is essential that **all** staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

<u>As with all forms of abuse the occurrence of child-on-child abuse is an infringement of a child’s human rights.</u>

The school seeks to educate all students on healthy relationships through the curriculum however we recognise that, despite this, we need to be alert to child on child abuse. It is important to

recognise that children do engage in sexual play and experimenting, which is usually age appropriate, and it is important not to criminalise behaviour that is a perfectly normal and healthy part of growing up. The presence of one or more of the following points in situations where there has been sexual activity between children should always trigger some concern:

- One of the children is significantly more dominant than the other
- One of the children is significantly more vulnerable than the other e.g. in terms of disability, confidence, physical strength
- There has been some use of threats, bribes or coercion to secure compliance or to maintain secrecy

Any allegation of child on child abuse must be referred to the Designated Safeguarding Lead (DSL) or Deputy (DSL), and advice and guidance will be sought from Children's Social Care where necessary. Where it is clear a crime has been committed, or there is a risk of a crime being committed, the Police will be contacted. The school will respond to unacceptable behaviour to prevent reoccurrence and work with external agencies where appropriate. For example, if a student's behaviour negatively impacts on the safety and welfare of others then safeguards will be put in place to promote the well-being of the students affected.

Sexual violence and sexual harassment

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. 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.

It is essential that **all** victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with special educational needs and disabilities (SEND) and LGBT children are at greater risk.

Staff should be aware of the importance of:

- challenging inappropriate behaviours;
- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;

- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and,
- challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

What is sexual violence and sexual harassment?

Sexual violence
It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way and that it can happen both inside and outside of school/college. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003[1] as described below:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents. Where a report of rape, assault by penetration or sexual assault is made, this will be referred to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of referring to the police remains. In parallel to this the school will make a referral to Children’s Services via the Multi Agency Safeguarding Hub.

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

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent, or touching someone’s bottom/breasts/genitalia without consent, can still constitute sexual assault.)

Causing someone to engage in sexual activity without consent

A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

What is consent?

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

anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

Sexual consent

- a child under the age of 13 can never consent to any sexual activity;
- the age of consent is 16;
- sexual intercourse without consent is rape.

Sexual harassment

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

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

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. [139] It may include:
- consensual and non-consensual sharing of nudes and semi-nudes images and/or videos.

On a case-by-case basis the school will liaise with Children's Services and the Police as well as specialist services as part of the immediate response to child-on-child sexual harassment and the ongoing support for all the children involved.

Harmful Sexual Behaviours

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. School recognises that Harmful Sexual Behaviours can, in some cases, progress on a continuum. It is therefore important for all staff to address inappropriate behaviours to help prevent problematic, abusive and/or violent behaviour in the future. Children displaying harmful sexual behaviours have often experienced their own abuse and trauma.

The School takes seriously its duty to respond appropriately to all reports and concerns about children's sexual behaviours both online and offline, in and outside of the school, including reports of sexual violence and/or sexual harassment. The DSL has completed relevant training in responding to and managing harmful sexual behaviours and will draw upon appropriate resources such as the AIM Checklists and Assessment Tools. The DSL will liaise where appropriate with Children's Services, the Police and other specialist services.

Sexting

Sexting is inappropriate and unsafe behaviour which threatens the social, emotional and/or physical safety of students. Although sexting is typically voluntary at first, it raises many serious legal and social concerns, especially when the images are spread beyond the control of the sender. Sexting can result in humiliation, bullying and harassment of students. The school has a responsibility to prevent sexting and the dissemination of inappropriate or offensive material and to educate both students and staff about both the legal and social dangers of sexting.

Definition

The term 'sexting' is derived from texting and refers to the sending of sexually provocative material (including photos, videos and sexually explicit text) from modern communication devices or applications, such as mobile phones, tablets, email, social networking sites and instant messaging services.

Legal Implications for Students

Sexting may breach laws that prohibit the creation, distribution or possession of child pornography regardless of whether all parties involved consent to the images being taken and shared, or whether the images are sent to other minors, even minors of the same age.

By sending an explicit image, a young person is producing and distributing child abuse images and risks being prosecuted, even if the picture is taken and shared with their permission.

Sexting may also fall under 'sexual harassment' under the Commonwealth *Sex Discrimination Act 1984 or* if more than one 'sext' is sent to a recipient this may also constitute unlawful stalking. It is also an offence under the Malicious Communications Act 1988.

Sexting may also be considered a form of cyberbullying when nude or sexually suggestive images are uploaded and shared on the internet and social media. This is especially the case where images are shared past the intended audience or when accompanied by nasty comments.

Upskirting

The Voyeurism (Offences) Act 2019, 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 sex, can be a victim.

The response to a report of sexual violence or sexual harassment

The initial response to a report from a child is incredibly important. How we, the school responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward. Schools and colleges not recognising, acknowledging or understanding the scale of harassment and abuse and/or downplaying of some behaviours can actually lead to a culture of unacceptable behaviour. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

If staff have a concern about a child or a child makes a report to them, they should follow the referral process. If staff are in any doubt as to what to do they should speak to the designated safeguarding lead (or a deputy).

All staff members are required to notify the Designated Safeguarding Lead immediately upon becoming aware that sexting by a student is likely to have occurred. The allegation will first be investigated by the Designated Safeguarding Lead and the parents of all students involved will be contacted.

Serious violence

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

All staff should be aware of the associated risks and understand the measures in place to manage these. Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance.

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

Gender Questioning Students

- **Safeguarding-Led Approach:** All decisions regarding a student questioning their gender must place the **welfare and best interests** of the child at the centre, rather than viewing it as a purely administrative or pastoral issue.

- **Social Transition Restrictions:** The school will **not facilitate broad social transition** (e.g., changes to names, pronouns, or uniforms) unless exceptional circumstances apply and a rigorous best-interests assessment supports it.
- **Parental Engagement:** Parents must be actively involved in decision-making **unless** there is clear, evidence-based reason to believe that doing so would place the child at risk of significant harm.
- **Protected Spaces:** Single-sex toilets, changing facilities, and residential accommodations remain strictly protected under statutory expectations
- In any instances of gender-questioning, the Safeguarding Team will consult paragraphs 252 – 282 in KCSIE 2026

Appendix A. Online safety incident pathway

1. Identify or receive a concern: make the student safe; do not promise secrecy.
2. For immediate danger, seek emergency assistance and follow the school safeguarding emergency procedure.
3. Report without delay to DSL/deputy via CPOMS; staff concerns about adults follow allegations/low-level concerns routes.
4. Record facts and actions in the approved safeguarding system; do not unnecessarily copy intimate or illegal imagery.
5. DSL assesses risk, support, parent contact where safe, referrals and evidence-handling advice.
6. IT assists with technical containment and relevant monitoring records under DSL direction.
7. DSL documents decisions, follow-up, student support and closure; identify learning for prevention.

Mulberry
Academy Shoreditch

Appendix 3: Reporting Allegations

