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Safeguarding and Early Help policy for Newham PRUs

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Child Protection and Safeguarding policy for Newham PRUs

1. Introduction

Newham PRUs is committed to develop and sustain a strong safeguarding culture which supports us all to safeguard children and creates a positive and respectful learning environment in which everyone can flourish.

"Schools and colleges and their staff are an important part of the wider safeguarding system for children... Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child-centred. This means they should consider at all times, what is in the best interests of the child."

— (Keeping Children Safe in Education – DfE, September 2026)

This **Child Protection and Safeguarding Policy** is for all school and agency staff, parents, governors, volunteers and the wider school community. It forms part of the safeguarding arrangements for our school and should be read along with our **Related safeguarding policies**:

• Code of Conduct .docx	• Complaints Procedure
• Whistleblowing Policy	• Tackling bullying
• Attendance Policy	• Students with Medical Needs Policy
• Physical intervention and the use of safer handling	• Recruitment and Selection Policy for Employees and Volunteers
• Online Safety Policy	• Character Education Policy
• Behaviour Policy 2023	• Grievance and disciplinary
• Mobile Phone Policy docx	• RSHE Secondary Policy
• Low level concerns policy	• Intimate care policy
Staff are required to adhere to the below guidance: https://cscp.org.uk/wp-content/uploads/2021/03/Guidance-for-safer-working-practice-for-adults-who-work-with-children-and-young-people-DCSF.pdf	

This policy should be read in conjunction with **Keeping Children Safe in Education,**
(Dfe 2026) https://assets.publishing.service.gov.uk/Keeping Children Safe in Education 2026

…and with reference to the Education Inspection Framework, Ofsted 2025
https://www.gov.uk/government/publications/education-inspection-framework-eif/education-inspection-framework-for-use-from-november-2025

All staff must read and be signed off on:

- ➢ Part One of Keeping Children Safe in Education 2026,

- ➢ DFE statutory guidance Working together to safeguard children - GOV.UK
- ➢ 'What to do if you're worried a child is being abused: Advice for practitioners' (DfE March 2015)

Sensitivity to Language & Child-Centred Practice

Keeping Children Safe in Education (KCSIE 2026) uses terms such as 'victim' and 'perpetrator/alleged perpetrator' throughout statutory guidance, accompanied by explicit advice that such terms may not be helpful or appropriate to use directly in front of, or when addressing, children.

At Newham PRUs, we maintain an anti-discriminatory, trauma-informed, and child-centred approach to communication:

- *Direct Engagement: We always use children's names when speaking to and referring to them.*
- *Avoidance of Stigmatising Labels: We refer to a child who discloses or experiences harm as the 'reporting child' (rather than 'victim'), recognising that a young person may not identify with that label.*
- *Investigative Neutrality: When investigating safeguarding, peer-on-peer, or child-on-child incidents (including online/AI-generated harms, sexual harassment, or verbal abuse), we use the term 'reported child' rather than labels like 'bully', 'offender', or 'perpetrator'.*
- *Curricular Exploration: The meaning, power, and impact of language, labels, and respectful communication are thoroughly explored through our safeguarding curriculum, RSHE programme, and restorative practice interventions.*

Safeguarding is defined in Keeping Children Safe in Education 2026 as:

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

'Children' includes everyone under the age of 18.

2. Statutory framework and content/location of embedded safeguarding.

2.1 Section 175 of the Education Act 2002 *(Section 157 for Independent schools)* places a statutory responsibility on the governing body to have policies and procedures in place that safeguard and promote the welfare of children who are pupils of the school.

2.2 The development of appropriate procedures and the monitoring of good practice in the London Borough of Newham are the responsibilities of the **Newham Safeguarding Children Partnership (NSCP)**.

2.3 Our school works in accordance with the statutory legislation and guidance contained in **Appendix 1**.

2.4 Our Governing Body will ensure that children are taught about how to keep themselves and others safe, including online. Relevant topics will be included within Relationships Education (for all primary pupils), Relationships and Sex Education (for all secondary pupils), and Health Education (for all primary and secondary pupils).

Preventative education is most effective in the context of our whole-school approach that prepares pupils and students for life in modern Britain and creates a culture of zero tolerance for racism, sexism, misogyny/misandry, homophobia, biphobic behaviour, and sexual violence/harassment.

Our school has a clear set of values and standards, upheld and demonstrated throughout all aspects of school life. These are underpinned by our behaviour policy and pastoral support system, as well as by a planned programme of evidence-based RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum. Forthcoming DfE guidance on Gender Questioning Children will be incorporated once published.

Our programme is inclusive and developed to be age and stage of development appropriate (especially for our children with SEND).

2.4 Safeguarding in the Curriculum & Preventative Education

2.4 Our Governing Body will ensure that children are taught about how to keep themselves and others safe, including online, in full alignment with statutory KCSIE 2026 requirements.

Relevant topics will be explicitly embedded within:

- **Relationships Education** (for all primary pupils)
- **Relationships and Sex Education (RSE)** (for all secondary pupils)
- **Health Education** (for all primary and secondary pupils)

A Whole-School Culture of Prevention & Inclusivity Preventative education is most effective within our whole-school approach that prepares pupils for life in modern Britain while actively fostering anti-racist, anti-discriminatory, and inclusive practices. We maintain a culture of zero tolerance for:

- Racism, sexism, misogyny, misandry, and homophobia/biphobia/transphobia
- Sexual violence, sexual harassment, and peer-on-peer/child-on-child abuse in all forms
- AI-generated harms, deep fakes, digitally altered explicit imagery, and coerced nude or semi-nude image sharing

Standards, Values, and Curriculum Delivery Our school values are upheld throughout all aspects of school life, underpinned by our Behaviour Policy and pastoral support system. Safe relationships and emotional well-being are supported through evidence-based RSHE lessons, regular timetabled sessions (including the *Life Lessons* curriculum), and reinforcement across all subjects. Forthcoming DfE guidance on Gender Questioning Children will be incorporated once published.

Inclusive and Adaptive Support Our programme is inclusive and adapted to be age- and stage-appropriate—especially for our children with Special Educational Needs and Disabilities (SEND) or speech, language, and communication needs (SLCN). To ensure cognitive and emotional safety, preventative curriculum content is supported by:

- Clear visual scaffolding and simplified instructions
- Individual Support Plans (ISPs), Pupil Passports, and Wrap-Around team reviews
- Relational strategies anchored in emotion coaching and trauma-informed nurture principles (*"Connection Before Correction"*)

3. School roles and responsibilities

All adults working with or on behalf of children have a responsibility to protect them and to provide a safe environment that enables them to learn and achieve their full potential. However, there are identified key

adults in schools and in the Local Authority who have specific responsibilities under child protection procedures.

All staff in our school are familiar with the Early Help Offer (see Appendix 2).

The school will ensure there is a member of the senior leadership team in the DSL role and that appropriate cover is provided if they are unavailable. This person should have the status and authority within the school to carry out the duties of the post, including committing resources and, where appropriate, supporting and directing other staff.

3.1 The Governing body

The Governing body ensures that a strong safeguarding culture is embedded within the school, that our commitment to keeping children safe is explicit and understood by all in the school community, and that our practice reflects the Governing body's vision and values.

The Governing body ensures that all required policies relating to child protection and safeguarding are in place, comply with statutory requirements, and reflect local guidance. Safeguarding is a standing item on the agenda of all Governing body meetings. The policy is reviewed at least annually.

The Governing body ensures that policies, procedures, practice, professional development, and training in our school are effective and strictly comply with statutory requirements at all times. The Governing body will ensure relevant staff have due regard to data protection principles, allowing them to share (and withhold) personal information in a timely, lawful manner as provided for under the Data Protection Act 2018, UK GDPR, and relevant statutory guidance.

The Governing body ensures that there is a named Designated Safeguarding Lead (DSL) and Deputy Safeguarding Lead(s) in place, who have their safeguarding roles explicitly detailed within their job descriptions and are appropriately trained for their role as set out in *Keeping Children Safe in Education 2026*. The link governor for safeguarding visits the school regularly to meet with the DSL and observe safeguarding practice at first hand. The DSL reports directly to the Governing body on issues arising from their role that impact the school.

The Governing body checks that safeguarding is integrated into Behaviour, Online Safety, and all related policies—including the staff Code of Conduct—and is highlighted in all policies as the overarching responsibility of all staff at all times, particularly in procedures involving sanctions or searches, both in and out of school.

The Governing body ensures that the school contributes fully to inter-agency working in line with *Working Together to Safeguard Children 2026* and local guidance, utilizing appropriate multi-agency referral pathways. It ensures that information is stored and shared appropriately and in accordance with statutory requirements.

The Governing body ensures that all Governors, staff members (including non-teaching, catering, and site staff), and regular volunteers undergo appropriate safeguarding and child protection training that is updated at least annually. All staff are required to read Part One of *Keeping Children Safe in Education 2026* in full.

The Governing body ensures that all staff have the knowledge, skills, and understanding to support children who have an allocated social worker. It recognizes their additional vulnerabilities alongside those of looked-after and previously looked-after children, and monitors school action to keep them safe. The Governing body ensures that the school works closely with Virtual School Heads, who also have responsibility for promoting the educational achievement of children in kinship care.

The Governing body ensures that children are taught how to keep themselves safe, including online, by ensuring appropriate filtering and monitoring systems are in place. This includes ensuring all staff are trained at induction on expectations, applicable roles, and responsibilities regarding filtering and monitoring, as well as emerging digital harms such as AI-generated content. This responsibility extends to children accessing online learning from home. Children will also be taught how to keep themselves safe through RSHE and across a rich, balanced curriculum that proactively addresses misogyny, peer-on-peer harms, and discriminatory attitudes.

The Governing body and school leadership team are responsible for maintaining robust safer recruitment procedures that help deter, reject, or identify people who may abuse children. The school adheres to statutory responsibilities to check adults working with children and maintains clear recruitment and selection procedures. Online searches will be conducted as part of due diligence when shortlisting candidates. Risk assessments and professional judgment will be used when deciding whether to obtain an enhanced DBS certificate for volunteers undertaking unregulated activity, ensuring all volunteers are appropriately supervised.

The Governing body will ensure that safeguarding checks are provided to schools of dual-registered students upon request, along with details of staff changes. It will maintain awareness of the requirement to review alternative provision placements at least half-termly in line with the DfE statutory guidance on *Alternative Provision* and *Education for children with health needs who cannot attend school*.

3.2 The Designated Safeguarding Leads (and Deputies)

The Designated Safeguarding Lead (DSL) in school takes the lead responsibility for managing child protection referrals, safeguarding training, and raising awareness of all child protection policies and procedures in school. This includes a whole-school staff responsibility to support children affected by child-on-child abuse in all its forms, by following our protocol for listening, reassuring, and reporting to allow the child to move on. The Designated Safeguarding Lead (DSL) will ensure that everyone in school, including temporary staff, volunteers, and contractors, is aware of these procedures and that they are followed at all times.

The DSL has responsibility for online safety which, amongst other things, includes an understanding of the expectations, applicable roles, and responsibilities in relation to filtering and monitoring.

All members of the senior leadership team and DSLs are responsible for:

- Procuring filtering and monitoring systems
- Documenting decisions on what is blocked or allowed and why
- Reviewing the effectiveness of your provision
- Overseeing reports

They are also responsible for making sure that all staff:

- Understand their role
- Are appropriately trained
- Follow policies, processes, and procedures
- Act on reports and concerns

The Designated Safeguarding Lead (DSL) is a source of advice and support to other staff on all child protection matters and makes sure that timely referrals to Newham Multi-Agency Safeguarding Hub (MASH) are made in accordance with current London Child Protection Procedures. The Designated

Safeguarding Lead (DSL) works with the local authority, the Channel programme, and other agencies as required. If for any reason the Designated Safeguarding Lead (DSL) is unavailable, the Deputy Designated Safeguarding Lead will act in their absence.

The Designated Safeguarding Lead (DSL) will also be alert to the additional vulnerabilities of children with a social worker, ensuring that staff know who those children are, understand their academic progress and attainment, and maintain a culture of high aspirations for these children. The Designated Safeguarding Lead (DSL) will also support staff to identify the challenges that children in this group may face and any additional support and/or adjustments that can be made to best support them. The DSL will form a link with the Virtual School Head in the borough to communicate about children who are:

- LAC (Looked After Children)
- CIN / CP (Children in Need / Child Protection)
- In Kinship Care

In addition, in most cases, homelessness would be considered in the context of children living with their families; however, the Designated Safeguarding Lead (DSL) will be alert that some children may be homeless independently, and this will require a different level of intervention and support

Key personnel
The designated safeguarding leads (DSL) and deputy DSLs for child protection are:

Safeguarding Team
DSLs:

- **Laura O Donnell** - Safeguarding Welfare and Attendance Manager (Cross PRU), Deputy DSL
  Contact 07912 787113 laura.odonnell@prus.newham.sch.uk
- **Yasmine Dhillon** - Deputy Headteacher, SENCO, Designated Safeguarding Lead (DSL), and designated person for LAC pupils (also covering Safeguarding/LAC, Inclusion, Careers & Progression, Character Education, and Nurture Groups).
  Contact 07912787139 yasmine.dhillon@prus.newham.sch.uk

Deputy DSLs:

- **Kacey Cuskelly** – Head of School New Directions PRU
  Contact: 07432055152 kacey.cuskelly@prus.newham.sch.uk
- **Liburd Henry** – Head of School Tunmarsh PRU
  Contact 07912 787156 liburd.henry@prus.newham.sch.uk
- **Luis Cravioto-** Online Safeguarding Lead & Teacher in charge of Digital Strategy
  Contact: 07921295846 luis.cravioto@prus.newham.sch.uk

Safeguarding KeyWorkers

- **Beverley Drake – Safeguarding Keyworker**
  Contact: 07892 707965 Beverley.Drake@prus.newham.sch.uk
- **Ali Said – Safeguarding Keyworker**
  Contact: 07912787074 Ali.Said@prus.newham.sch.uk
- **Phoebe Esdaile – Safeguarding Keyworker**
  Contact: 07912295830 phoebe.esdaile@prus.newham.sch.uk
- **Athena Tsioullou – Safeguarding Keyworker**
  Contact: 07730035472 athena.tsioullou@prus.newham.sch.uk

The Nominated PREVENT Lead across Newham PRUs is Kirsten McLeod (Head Teacher)

The nominated child protection governor is Kathryn Randall-Curtis
Contact details: kathryn.randallcurtis@islington.gov.uk

The Head Teacher is Kirsten MacLeod
Contact details: email: Kirsten.Macleod@prus.newham.sch.uk tel: 07912787150

General Safeguarding Responsibilities: All staff have a responsibility for safeguarding regardless of their role, as outlined in **Part One of Keeping Children Safe in Education (KCSiE 2025 / 2026)**.

PREVENT Duty Responsibilities: The statutory duty to prevent people from being drawn into terrorism is set out under **Section 26 of the Counter-Terrorism and Security Act 2015**.

3.3 The Headteacher

The Headteacher works in accordance with the requirements placed upon all school staff and leads the whole-school safeguarding culture. In addition, the Headteacher ensures that all child protection and safeguarding policies, procedures, and statutory duties adopted by the Governing Body are rigorously implemented and followed by all staff.

Curriculum and Preventative Education The Headteacher will ensure that children are taught about keeping themselves and their peers safe—including online—as an integral part of a broad, balanced, and preventative curriculum. This includes proactively addressing:

- The emotional and legal impacts of online nude and semi-nude image sharing, AI-generated explicit harms, deepfakes, and digital coercion.
- Sexist abuse, misogyny/misandry, sexual harassment, body shaming, and peer-on-peer abuse in all forms.
- The targeted grooming or sexual exploitation of children with Special Educational Needs and Disabilities (SEND) or other protected characteristics.

These topics are delivered through regularly timetabled Relationships, Sex and Health Education (RSHE/RSE) lessons and reinforced through wider curricular and pastoral opportunities.

Student Voice and Safeguarding Culture The Headteacher ensures that all pupils—individually, or collectively through the school council and form class representatives—are actively encouraged to promote the responsible use of social media, practical physical safety around the school site, and shared responsibility for their own and others' well-being. Student voice is promoted as an explicit, valued, and essential element of a strong, trauma-informed school safeguarding culture.

Immediate Pastoral and Listening Support The Headteacher ensures there is immediate access to appropriately trained, dedicated members of staff (including the Designated Safeguarding Lead team and Safeguarding Keyworkers) to listen, reassure, and provide immediate practical and emotional support for any child in need within the school. Staff follow a clear protocol to allow children to feel heard, taken seriously, and supported to move forward safely.

Alternative Provision and Off-Site Placements The Headteacher will ensure that any pupils on the school roll placed with an Alternative Education Provider (AP) have their placements reviewed at least half-termly. The Headteacher must be satisfied that the provider can appropriately meet the child's individual needs and must obtain written confirmation from the provider that all statutory safeguarding and safer recruitment checks have been carried out prior to placement.

Prevent Duty Leadership The Headteacher serves as the Nominated PREVENT Lead across Newham PRUs, overseeing the implementation of the PREVENT duty to protect pupils from radicalisation, extremist ideology, and being drawn into terrorism.

3.4 All school staff – safeguarding children's futures

Everyone at our school has a responsibility to provide a safe, supportive, and nurturing learning environment where children can feel secure to learn. Staff must ensure that every child has access to learning, even if circumstances preclude their physical presence on site.

Staff are trained to identify children who may benefit from Early Help (see Appendix 2) and understand their roles within this process. This includes recognising emerging problems early, delivering or referring to targeted interventions, and liaising directly with the Designated Safeguarding Lead (DSL) to report concerns. All staff members are required to know, follow, and execute the school procedures set out in this policy and must know how to use the online portal to make a referral to the Newham Multi-Agency Safeguarding Hub (MASH) when necessary.

Staff must remain aware that children may not feel ready, or know how, to disclose that they are experiencing abuse, exploitation, neglect, or harm. Children may not always recognise their experiences as harmful, or they may feel embarrassed, humiliated, threatened, or fearful of consequences. Additional barriers—such as a child's vulnerability, Special Educational Needs and Disabilities (SEND), sexual orientation, or language/communication barriers—must never prevent staff from exercising **professional curiosity** and speaking to the DSL. Staff must actively build trusted, relational bonds with young people to facilitate open communication.

Staff must always reassure children that their disclosures are taken seriously and that they will be supported and kept safe. A child must **never** be made to feel ashamed, nor be given the impression that they are creating a problem by reporting abuse, sexual violence, or sexual harassment.

We recognise that high self-esteem, confidence, supportive peer relationships, and open communication with trusted adults act as powerful protective factors for children. Our safeguarding culture relies on every staff member proactively seeking opportunities to promote these factors.

Professional Boundaries & Communication Protocols

- **Digital & Online Learning:** Professional communication directly from staff to children must strictly use approved platforms, specifically **Google Classroom**. The use of personal social media platforms or messaging apps (e.g., WhatsApp, X/Twitter, Facebook, Instagram) to contact pupils is strictly prohibited and constitutes a serious breach of professional boundaries.
- **Work Mobile Phone Usage:** To maintain clear professional boundaries and protect personal time, staff must **switch off work-issued mobile phones when off duty**. If a work phone remains on outside of working hours, staff must **not** answer calls from current pupils.
- **Reporting & Logging Contact:** If a current student attempts to contact a staff member outside school hours (e.g., via missed call or voicemail), or if contact is initiated by a **former student**, this must be logged immediately upon returning to work:
    - **Report it:** Submit a CPOMS log for current students. Notify the Head of School and Headteacher via email for any contact involving previous students.
    - **Record it:** Log all communication details (date, time, and nature of the call or attempt) on CPOMS for current students.

Relational Safeguarding & Core Ethos

All staff are expected to embed our core trauma-informed and relational principles into daily practice to ensure our safeguarding culture remains active and responsive:

- **Connection Before Correction:** Establish relational safety first to help children process guidance without defensiveness.
- **Calm the State to Co-Regulate:** Support internal regulation during heightened moments to maintain safety and prevent escalation.
- **See the Need Behind the Deed:** Recognise that all behaviour is communication and look beyond surface disruptions to identify underlying unmet needs.
- **Validate to Navigate:** Acknowledge and label a child's emotional state before attempting to problem-solve or set limits.
- **Repair the Tear to Show We Care:** Approach behavioural incidents as opportunities for restorative healing and rebuilding trust rather than punitive isolation.

All staff contribute directly to promoting responsible social media use, physical and digital safety, and mutual respect, ensuring safeguarding remains an integral element of our school culture.

Work Mobile Phone Usage

To maintain clear professional boundaries and protect your personal time, staff must switch off work mobile phones outside working hours. If you inadvertently leave your work phone turned on or require it for work matters outside your scheduled hours, you must not answer calls from current pupils.

Reporting and Recording Contact

If a current pupil attempts to contact you outside school hours (e.g., via a missed call or voicemail), or if you are contacted by a former pupil, you must log and report this contact immediately upon returning to work:

- **Log on CPOMS:** Record the exact communication details—including time, date, and the nature of the call or attempt—on CPOMS for current pupils.
- **Email Leadership:** Email the Head of School regarding any contact from current pupils, and email both the Head of School and the Headteacher regarding any contact from former pupils.

3. Policy Alignment and Professional Standards

Please be reminded that these mandatory protocols are in place to safeguard you as a professional by ensuring total transparency in all workplace communications. Adherence to these measures protects staff members from potential misunderstandings or vulnerabilities while ensuring our students receive coordinated, appropriate support through correct official channels.

This protocol directly aligns with and enforces the following school policies:

- **Safeguarding and Early Help Policy**
- **Acceptable Use of IT (and AI) Policy**
- **Mobile Phone Policy**

Next Steps / Guidance:

If you have questions regarding these procedures or need to declare/discuss a recent communication that falls under these categories, email a complete record of the communication directly to both the **Head Teacher** and **Head of School**.

4. Types of Abuse and Specific Safeguarding Issues

"All school staff should be aware that abuse, neglect and safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another... All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside of school or college and/or can occur between children outside of these environments."

— **Keeping Children Safe in Education (DfE, 2025/2026)**

The four primary categories of abuse identified in statutory guidance are:

- **Physical Abuse**
- **Emotional Abuse**
- **Neglect**
- **Sexual Abuse**

Our school maintains high vigilance to identify indicators of harm early. Within these four primary categories, staff must remain alert to specific manifestations of abuse and extra-familial threats.

4.1 Child on Child Abuse

Our school may be the only stable, secure, and safe place in the lives of children at risk of harm or who have suffered past abuse. However, on occasion, their behaviour may be challenging and defiant, or they may instead be withdrawn or display abusive behaviours towards other children.

Child on child abuse can manifest itself in many ways. This includes:

- Bullying (including cyberbullying)
- Online verbal abuse
- Gender-based abuse and verbal sexist abuse
- AI-generated harms, deepfakes, and digitally altered explicit imagery
- Unwanted, unthinking, or coerced nude or semi-nude image sharing
- Sexually harmful behaviour, sexual violence, and sexual harassment

We do not tolerate any bullying, abuse, or harmful behaviour in school and will take swift action to intervene whenever it occurs.

We use the curriculum, assemblies, and targeted RSHE sessions to help children understand—in an age-appropriate way—what abuse is, encouraging them to tell a trusted adult if anyone behaves in a way that makes them feel uncomfortable. Staff are proactive, vigilant, and professionally curious in recognising when a child needs support. Staff will acknowledge a child's feelings, reassure them, and guide them through the reporting process (including referrals to MASH where necessary to ensure their safety).

Our staff understand the specific gender issues and power dynamics that can arise in child on child abuse. For full procedures regarding risk assessments, safety planning, and restorative management, please refer to our **Behaviour Policy**.

4.2 Sexual Violence and Harassment

Sexual violence and sexual harassment can occur between children of any age, individually or in groups. Experiencing sexual violence or sexual harassment is deeply distressing and will adversely affect a child's emotional well-being, sense of safety, and educational attainment. At Newham PRUs, we take all disclosures seriously; targeted pupils are provided with immediate reassurance, trauma-informed care, and ongoing protective support.

Predatory behaviour, misogyny/misandry, or dismissive attitudes towards sexual harassment—whether originating online, in friendship groups, or in wider society—directly contradict our core values of mutual respect and safety, and are strictly unacceptable.

Forms of Harm and Offending Behaviours

Harassment and abuse manifest through various physical, verbal, and digital behaviours, including:

- **'Upskirting':** Taking a photograph or video under a person's clothing without their consent with the intention of viewing their genitals or buttocks for sexual gratification, humiliation, or distress. Upskirting affects individuals of any gender and is a criminal offence under the Voyeurism (Offences) Act 2019.
- **Digital Harassment & AI Harms:** Unwanted, unthinking, or coerced sharing of nude or semi-nude images, as well as the creation or distribution of AI-generated explicit imagery, deepfakes, and digitally altered content.
- **Verbal & Relational Abuse:** Sexist abuse, body shaming, sexualized bullying, or the deliberate sexual targeting of vulnerable pupils, including those with Special Educational Needs and Disabilities (SEND).

Prevention and Whole-School Culture

Our robust safeguarding culture ensures a zero-tolerance approach to abusive behaviours, explicitly reinforced through our curriculum, school environment, and staff modelling of respectful relationships. We never dismiss sexually harmful behavior, peer-on-peer abuse, or sexual harassment as "just part of growing up" or "a joke".

Through our evidence-based RSHE programme (including the *Life Lessons* curriculum), assemblies, and daily relational practice, we proactively teach pupils about consent, healthy boundaries, digital citizenship, and the personal impact of abusive language.

Incident Management and Risk Assessment

When an incident occurs, our primary focus is safeguarding all pupils involved while avoiding stigmatising labels (referring to individuals as the 'reporting child' and 'reported child').

- **Immediate Risk and Needs Assessment:** Any report of sexual violence or harassment triggers an immediate risk and needs assessment in line with London Child Protection Procedures and Newham Safeguarding Children Partnership (NSCP) guidelines.
- **Specialist Risk Tools:** Reported pupils who initiate abusive or sexualised behaviours are subject to formal risk assessment protocols—such as the AIMs risk assessment or the Brook Traffic Light tool (for Key Stage 1/Phoenix pupils)—to evaluate harmful sexual behaviours.

- **Safety Planning:** Assessment outcomes inform a robust, individualized safety plan designed to protect the wider school community while addressing the underlying needs of the reported child.
- **Multi-Agency Interventions:** Where appropriate, concerns will be referred to the Newham Multi-Agency Safeguarding Hub (MASH) to access health services, specialist clinical interventions, or multi-agency support.

4.3 Children with Special Educational Needs and Disabilities (SEND)

Our school recognises that children with special educational needs and disabilities (SEND), or speech, language, and communication needs (SLCN), can face additional safeguarding challenges and heightened vulnerabilities. We acknowledge that unique barriers exist when identifying signs of abuse and neglect in this group.

These barriers and vulnerabilities include:

- **Diagnostic Overshadowing:** Assumptions that indicators of possible abuse or distress—such as changes in behaviour, mood, or physical injuries—relate solely to the child's disability, neurodivergence, or condition without further professional exploration.
- **Communication Barriers:** Challenges in verbal expression, auditory memory difficulties, or limited reliance on formal speech, which can make reporting abuse or describing experiences to an adult difficult without appropriate communication tools or visual scaffolding.
- **Increased Target Potential:** Statistical evidence showing that children with SEND and/or protected characteristics are significantly more likely to be targeted for peer-on-peer abuse, bullying, offline and online sexual harassment, or exploitation.
- **Peer Group Isolation:** A higher susceptibility to social isolation compared to their peers, limiting their access to supportive peer networks.
- **Child-on-Child Harm Support:** Scenarios involving child-on-child sexual abuse or harmful sexual behaviour, where both reporting and reported children require structured safeguarding intervention—noting that a significant subgroup of reported children also present with SEND.
- **Intimate and Personal Care:** The requirement for regular personal or intimate care, which increases physical vulnerability and necessitates strict adherence to professional boundaries and care protocols.

Our school actively addresses these additional vulnerabilities. Staff are trained to maintain professional curiosity, utilise trauma-informed relational strategies (*"Connection Before Correction"*), and apply multi-disciplinary support to ensure robust safeguarding for all vulnerable children.

4.4 Children Absent from and Missing from Education (CME) or Children Missing Out on Education (CMOE)

Prolonged or repeated periods of absence from education can serve as a vital early warning sign of significant safeguarding risks. These include neglect, child sexual exploitation (CSE), and child criminal exploitation (CCE)—specifically county lines. The school's response to persistent absence and children missing education must actively identify potential abuse and mitigate the risk of absent pupils escalating to CME status. This applies to emerging concerns as well as children already supported by Newham Children's Social Care, where educational absence increases known risks within the family or community.

Children Missing Education (CME)

In line with Department for Education (DfE) definitions, CME refers to Newham resident children of compulsory school age who are not registered at a school and are not receiving suitable education elsewhere. This includes Newham children who:

- Are in the process of applying for a school place (including within the first 15 days of application).
- Have been offered a place, but where no start date has been agreed between the family and the named school (i.e., pending admissions for normal entry or in-year; excludes local school moves where the pupil remains on their current register).
- Are receiving Elective Home Education (EHE) that has been formally assessed as unsuitable or unsatisfactory.
- Have been recorded as CME for an extended period (e.g., where their whereabouts remain unclear or unknown).
- Hold an Education, Health and Care (EHC) plan that does not name a school or alternative provision.
- Are permanently excluded without a Day 6 placement (or Day 1 placement for Looked After Children).
- Have parents or carers who refuse to apply for a school place or provide alternative suitable education.

CME Classification Exclusions: CME does not apply to children who are registered at a school (regardless of persistent, unexplained absence), are outside compulsory school age, are on reduced or part-time timetables, or have been confirmed by the local authority as no longer residing in the local area.

Children Missing Out on Education (CMOE)

Many pupils who do not meet the statutory DfE threshold for CME are locally identified as **Children Missing Out on Education (CMOE)**. These pupils are enrolled at a school or provision but do not receive full-time education.

In Newham, CMOE covers pupils from Reception to Year 11 who are not receiving suitable full-time education, including those who:

- Are placed on a reduced or part-time timetable (including Outreach arrangements).
- Display unexplained, persistent absence while remaining on roll.
- Have been offered a place from a waiting list at another Newham school, but where the receiving school has failed to confirm a start date.
- Are in the Reception cohort below compulsory school age, whose families opted for statutory deferred entry or summer-born deferment.

Newham PRUs Safeguarding & Attendance Procedures

Permanently Excluded Pupils & Admissions

- Pupils who are permanently excluded receive an offer of admission from Day 6.
- Pupils remain on the roll of their mainstream school until parental agreement is formally reached at an admissions meeting and throughout any ongoing appeals process.
- During this transition, pupils are held in a designated holding group and are not considered on roll at Newham PRUs.
- Where a child is not on roll and fails to engage, Newham PRUs will consider referring the case to the Local Authority for a School Attendance Order (SAO).

Attendance Monitoring & Emergency Contacts

- Parents and carers must supply a minimum of two emergency contact details and keep these updated regularly.
- Every child—regardless of age, ability, or special educational needs—is entitled to full-time education.
- Parents/carers must notify the school of any absence. If a pupil is absent without notification by 10:00 AM, the main office will call home.
- If contact cannot be established, the school may escalate concerns to external agencies, including the Newham Attendance Management Service (NAMS), Children's Social Care, or the Police.
- **Home Welfare Checks:** Where a pupil is absent and staff (or relevant professionals) cannot establish contact, a home visit welfare check will be conducted within a maximum of **three days**.

Local Authority Notifications & Elective Home Education (EHE)

- **Unauthorised Absence:** The school notifies the local authority of any pupil who attends irregularly or accrues 10 consecutive days of unauthorised absence.
- **De-registrations:** The local authority is informed immediately when a pupil transfers schools and is removed from roll.
- **EHE Requests:** If parents express an intent to provide EHE, school staff, the Local Authority, and key professionals (e.g., EHE link teacher) will coordinate a multi-agency meeting *prior* to a final decision. This ensures the choice reflects the child's best interests, particularly for vulnerable pupils, those with social workers, or children with SEND. If the pupil holds an EHC plan, the Local Authority retains the legal capacity to veto an unsuitable EHE arrangement.

Statutory Guidance & Resources

- Working Together to Improve School Attendance (DfE)
- Children Missing Education (DfE)
- Full-time Enrolment of 14 to 16-Year-Olds in Further Education and Sixth-Form Colleges (DfE)
- Missing Children and Adults Strategy (GOV.UK)

4.5 Contextual Safeguarding

All staff are aware that safeguarding incidents and/or behaviours can be associated with factors outside of the school and can occur between children outside of the school environment. The Designated Safeguarding Lead (DSL) and all staff will consider whether children are at risk of abuse or exploitation in situations outside their families, and children who are at risk are regularly discussed by our school's contextual safeguarding panel.

Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm and risk beyond their families. It recognises that the relationships that young people form in their neighbourhoods, schools, and online can feature violence and abuse. Parents and carers may have little influence over these extra-familial contexts, which can undermine parent-child relationships.

Our school staff actively engage with individuals, community groups, and multi-agency partners who hold influence within these extra-familial spaces. We recognise that conducting robust risk assessments of, and delivering targeted interventions for, these external sources of influence are critical components of our safeguarding practice. Contextual Safeguarding expands the traditional objectives of our child protection systems by addressing vulnerabilities across the diverse social contexts our students navigate.

Contextual abuse takes different forms, placing children at risk of multiple overlapping harms, including:

- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation (CCE), including County Lines
- Serious youth violence and gang-associated harm
- Online harassment, digital abuse, and AI-generated harms

If school staff suspect or identify that a child is experiencing exploitation or harm in an extra-familial context, we will follow our established safeguarding procedures and submit an immediate referral to the Newham Multi-Agency Safeguarding Hub (MASH). Where appropriate, cases will be escalated to the Pan-London Complex Safeguarding / PCEHH pathways to access specialist inter-agency support.

4.5.1 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) including County Lines

Both Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) are forms of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate, or deceive a child into sexual or criminal activity. This power imbalance can stem from a range of factors, including age, gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. CSE and CCE can affect children and young people from any background or community.

In some cases, the abuse occurs in exchange for something the child needs or wants, or for the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. Abuse can be perpetrated by individuals or groups, males or females, and children or adults. It ranges from opportunistic to complex organised abuse and can manifest as a one-off occurrence or a series of incidents over time. Methods of compliance may involve enforcement or enticement, and may or may not include violence or threats of violence. Crucially, children can be exploited even when the activity appears consensual.

Criminal exploitation of children is a geographically widespread form of harm and a typical feature of County Lines activity, where drug networks or gangs groom and exploit children and young people to carry drugs, weapons, and money. A key indicator of potential involvement is 'missing episodes', where a child may have been trafficked for the purpose of transporting these illicit items. Our school will consider a referral using the Newham pathways or a direct referral via the National Referral Mechanism for human trafficking.

4.5.2 Serious Violence

There are a range of contextual indicators that may signal a child is at risk from, or actively involved in, serious violent crime, extra-familial harm, or criminal exploitation. These indicators may include:

- Unexplained, persistent, or increasing absence from school
- A sudden shift in friendship dynamics, or association with older individuals and groups
- A sharp, unexplained decline in academic engagement or performance
- Signs of self-harm, emotional withdrawal, severe distress, or significant changes in attitude, behavior, or well-being
- Physical signs of assault or unexplained injuries
- Possession of unexplained gifts, luxury items, excess cash, or new belongings (which may indicate recruitment or grooming by criminal networks or gangs)

Staff must maintain professional curiosity and report any combination of these indicators to the DSL immediately. The school's Contextual Safeguarding Panel will regularly review pupils identified at risk of serious youth violence to coordinate multi-agency protection plans.

4.6 Honour-Based Abuse (HBA)

So-called 'Honour-Based Abuse' (HBA) encompasses physical, emotional, or coercive harm committed to protect or restore perceived family or community "honour". HBA typically involves a wider network of family or community pressure and often features multiple perpetrators. Practices falling under HBA include Female Genital Mutilation (FGM), forced marriage, breast ironing, forced isolation, and threats of violence. Staff must recognize that HBA is a severe form of child abuse and domestic abuse, requiring immediate safeguarding action.

4.6.1 Female Genital Mutilation (FGM)

Female Genital Mutilation (FGM) comprises all procedures involving the partial or total removal of external female genitalia or other injury to female genital organs for non-medical reasons. FGM is illegal in the UK, constitutes severe physical child abuse, and carries a mandatory reporting duty for education staff.

- **Mandatory Reporting Duty:** Under UK statutory duty, if a teacher, in the course of their work, discovers that an act of FGM appears to have been carried out on a girl under the age of 18 (either through direct disclosure or visual observation), they **must** report it directly to the Police immediately.
- **DSL Support & Multi-Agency Liaison:** The DSL will guide, support, and advise staff fulfilling this statutory reporting duty, liaising with local authority children's social care, medical professionals, and the family as appropriate to keep the girl safe.
- **Preventative Guidance & Travel:** Staff must follow guidance produced by the Newham Attendance Management Service (NAMS) when dealing with families who announce intent to travel abroad, especially during extended holiday periods.

4.6.2 Forced Marriage

A forced marriage is a marriage entered into without the full and free consent of one or both parties, where violence, threats, or any form of coercion (emotional, psychological, or financial) is used. It is a criminal offense.

- **Extensive Child Protections:** It is a criminal offense to carry out any conduct intended to cause a child (under 18) to marry—**even if violence, threats, or coercion are not used**.
- **Scope of Law:** This statutory protection applies to all non-binding, religious, or unofficial "marriages" as well as legally registered marriages.
- **Reporting & Action:** Staff who suspect a child is at risk of, or has been subjected to, a forced marriage must immediately consult the DSL. Staff must never attempt to mediate between the family and the child, as this significantly increases risk. Guidance and referral resources are accessible via the statutory GOV.UK Forced Marriage Resource Pack.

4.7 Prevention of Radicalisation

Children can be vulnerable to extremist ideology and radicalisation. Protecting them from this risk is an essential element of our overarching safeguarding duties. Under Section 26 of the Counter-Terrorism and Security Act 2015, schools are subject to the PREVENT duty, which mandates having "due regard to the need to prevent people from being drawn into terrorism".

Key Requirements for Schools

- **Promote a Balanced Curriculum:** Deliver a broad, balanced curriculum that fosters pupils' spiritual, moral, cultural, mental, and physical development, promotes community cohesion, and prepares them for the opportunities and responsibilities of life.
- **Provide Safe Spaces:** Create safe, open environments where young people can understand, discuss, and challenge sensitive topics, including terrorism and extremist ideologies.
- **Maintain Political Neutrality:** Uphold statutory duties to forbid political indoctrination and ensure a balanced presentation of political issues.

Support Mechanisms and Programmes

- **CHANNEL Programme:** We utilise CHANNEL—a national early-intervention programme providing tailored support to individuals vulnerable to radicalisation. All staff are trained to identify indicators of concern and understand the referral process via established Newham pathways.
- **Fundamental British Values:** Fundamental British Values are embedded across the curriculum, particularly within PSHE and humanities. Regular staff training and updates are delivered in close partnership with Newham's PREVENT leads.
- **External Workshops and Resources:** We integrate the National Crime Agency's CEOP Education Programme into our curriculum and deliver on-site BRAVE workshops to empower students.

4.8 Mental Health and Wellbeing

Mental health problems can, in some cases, act as a primary indicator that a child has suffered, or is at risk of suffering, abuse, neglect, or exploitation.

All staff are aware of this link and are positioned to observe children day-to-day to identify those whose behaviour, presentation, or emotional state suggests an emerging or escalating mental health concern. Where a mental health concern also constitutes a safeguarding issue, staff must take immediate action in line with our Child Protection Policy and notify the Designated Safeguarding Lead (DSL) and Mental Health Lead, **Hayley Reinprecht.**

School Support and Resilience Framework Newham PRUs works to protect and promote the emotional wellbeing and resilience of all pupils and staff, providing targeted and specialist support for those with additional needs. We recognise that:

- **Risk and Protective Factors:** Multiple risk factors increase a child's vulnerability, requiring a higher level of protective factors, nurture-based strategies, and coordinated multi-agency interventions to foster resilience and growth.
- **High-Achieving or Masking Pupils:** Children experiencing severe mental ill-health, self-harm, or suicidal ideation may mask their distress and present as making good academic progress. Vigilance and curiosity remain essential for every child regardless of academic attainment.
- **Partnership with Parents/Carers:** We actively work with parents and carers to monitor, share, and support child wellbeing. Parents are strongly encouraged to inform the school of any home-based concerns so joint support strategies can be implemented swiftly.

Self-Harm and Suicidal Ideation Protocols Concerns regarding self-harm or suicidal ideation are taken with immediate seriousness, as self-harming behaviours significantly correlate with an elevated risk of accidental or intentional suicide.

When a child discloses self-harm or is identified as self-harming:

- **Immediate Response:** The Designated Safeguarding Lead (DSL) or Senior Mental Health Lead will meet with the child to establish any immediate risk and uncover underlying safety or emotional concerns.
- **Relational Co-Regulation:** Staff will utilise trauma-informed emotion coaching (*"Validate to Navigate"* and *"Calm the State to Co-Regulate"*) to provide a supportive, non-judgmental environment.
- **Referral Pathways:** The child will be supported to access appropriate specialist care using local multi-agency referral pathways (including the Newham MASH, CAMHS, and local health provisions).
- **Recording:** All disclosures, observed indicators, baseline assessments, and safety plans must be recorded immediately on **CPOMS**.

4.9 Domestic Abuse

Domestic abuse is defined under the Domestic Abuse Act 2021 as:

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

The Domestic Abuse Act 2021 explicitly recognizes children as victims in their own right if they see, hear, or experience the effects of domestic abuse.

Impact on Children and Young People

- **Home Environment:** Children witnessing domestic abuse between family members can suffer severe, enduring emotional and psychological harm. They may experience displacement, trauma, or inappropriately blame themselves for the abuse.
- **Teenage Relationship Abuse:** Young people can also experience domestic abuse within their own intimate relationships. Where one or both individuals are under the age of 16, this is addressed under our child-on-child abuse and safeguarding procedures rather than the statutory age definition.
- **Long-Term Risk:** The longer domestic abuse continues, the greater the risk of significant and cumulative harm that young people may carry into adulthood.

School Response and Procedures

- **Monitoring & Support:** Staff will vigilantly monitor the welfare of children living in households affected by domestic abuse, providing targeted, trauma-informed support.
- **Multi-Agency Collaboration:** The school actively contributes to Multi-Agency Risk Assessment Conference (MARAC) safety plans and works closely with local safeguarding partners.
- **Operation Encompass:** Newham PRUs actively participates in Operation Encompass. Timely information shared by the police regarding domestic abuse incidents is used immediately to ensure children are supported and kept safe.

5. Procedures

5.1 Staff Responsibilities & Reporting Protocols All staff members, volunteers, and visitors have an absolute duty to identify and respond immediately to any suspected or actual abuse, harm, or disclosures. Any concern, allegation, or disclosure must be reported without delay to the Designated Safeguarding Lead (DSL) or, in their absence, a Deputy Designated Safeguarding Lead (DDSL). Concerns regarding a child at risk of radicalisation or extremism must be raised directly with the PREVENT Lead and the DSL team.

5.2 Statutory Framework and Guidance

All safeguarding actions and decision-making within Newham PRUs align strictly with current statutory guidance and local protocols:

- *Keeping Children Safe in Education* (DfE, 2026)
- *Working Together to Safeguard Children* (DfE, 2023/2026 updates)
- Newham Safeguarding Children Partnership (NSCP) guidelines and Pan-London Child Protection Procedures
- PREVENT Duty under the Counter-Terrorism and Security Act (HMG)

5.3 Referrals & Emergency Responses

- Immediate Harm / MASH Referrals: If a child is suffering or is likely to suffer significant harm, an immediate referral is made to the Newham Multi-Agency Safeguarding Hub via the Newham MASH Portal.
- Time-Sensitive Issues: Referrals involving immediate safety may be phoned through first to ensure the child remains safely in school pending a Section 47 Strategy meeting.
- Acute Risks: If an acute, immediate physical risk exists, emergency services (Police) will be contacted directly.
- Out-of-Borough Children: If a child resides outside Newham, the DSL will refer directly to their home local authority's MASH, or consult Newham MASH for immediate cross-border redirection.
- Early Help: Less urgent concerns or requests for targeted support will be submitted through the Newham MASH Portal for Early Help triage.

5.4 Police Involvement on School Premises Before calling the police to school premises, the DSL and Senior Leadership Team (SLT) must assess the proportionality of the response, taking into account the child's rights under the Equality Act 2010 and the Human Rights Act 1998, while actively safeguarding against biases such as adultification.

Action Stage	**Mandatory Practice & Safeguarding Protocol**
Pre-Intervention	Mandatory consultation with the DSL and Head Teacher prior to contacting police.
On-Site Searches	No child/student may be searched on school premises by police officers. Any required police search must be conducted offsite at a police station with an Appropriate Adult present.

Interviews On-Site	If interviewed on site, the DSL will act in loco parentis to provide emotional support and protect the child's wellbeing.
Escort & Offsite Transport	A child will not be removed to a police station without an Appropriate Adult (e.g., DSL) or parent/carer accompanying them.
Arrests & Station Support	If a child is arrested, a trained Appropriate Adult (AA) must be arranged before the child leaves the site. The DSL will record the reason for arrest and confirm AA details.
Parental Communication	Parents/carers must be informed immediately when police are involved, unless doing so places the child at heightened risk of harm or impedes a criminal investigation.

5.5 Professional Curiosity, Escalation & Unfettered Access

- **Internal Escalation:** If a staff member feels a reported concern is not being adequately addressed or that a child's situation is not improving, they must press for formal reconsideration with the DSL.
- **Unfettered Referral Rights:** The absence of a DSL or DDSL must never delay protective action. All staff have unfettered access to safeguarding contact details displayed across provisions and retain the right to refer concerns directly to the Newham MASH Portal independently.

Early Help

Early help means providing support as soon as a problem emerges, at any point in a child's life, to prevent concerns from escalating. At Newham PRUs, all staff receive appropriate induction training to ensure they understand their role in identifying emerging needs, taking proactive action, and working in partnership with external agencies and the local community.

Key Risk Indicators for Early Help Identification All staff must maintain a high level of professional curiosity and be particularly alert to the potential need for Early Help for any child who:

- **Special Educational Needs & Disabilities:** Is disabled and has specific additional needs, or has Special Educational Needs and Disabilities (SEND), speech, language, and communication needs (SLCN), whether or not they have a statutory Education, Health and Care Plan (EHCP).
- **Young Carers & Family Circumstances:** Is a young carer, has a parent/carer in custody, or is in a family circumstance presenting acute challenges (e.g., adult mental health issues, domestic abuse, or parental drug and alcohol misuse).
- **Exploitation & Serious Harm Risks:** Is showing signs of being drawn into antisocial or criminal behaviour (including gang involvement, county lines, and association with organised crime groups), or is at risk of modern slavery, trafficking, sexual exploitation, or radicalisation.
- **Absence & Mobility Concerns:** Is frequently absent or missing from home or care, is a privately fostered child, or has returned home to their family after being in local authority care.
- **Substance Misuse:** Is misusing drugs or alcohol themselves.
- **Mental Health & Emotional Distress:** Presents with mental health challenges, emotional distress, or self-harming behaviours. Staff must recognise that mental health problems can, in some cases, be a key indicator that a child has suffered or is at risk of suffering abuse, neglect, or exploitation.

Staff Induction and Operational Pathways When new staff, agency personnel, volunteers, or regular visitors join Newham PRUs, they are immediately inducted into our safeguarding arrangements. They are briefed on the names and contact details of the Designated Safeguarding Lead (DSL) and Deputy DSLs, and are trained on how to record and escalate concerns through CPOMS or hard-copy reporting pathways.

Where early help needs are identified, staff will liaise directly with the Safeguarding Team to initiate multi-disciplinary interventions, utilize localized Newham Early Help pathways, or refer via the Newham MASH Portal in line with the **Newham Early Help Strategy** (see **Appendix 2**).

5.6 Intimate Care

At times, staff may be required to carry out intimate care work for students. Intimate care refers to any care involving toileting, washing, changing, touching, or performing invasive procedures on a child's intimate personal areas.

- **Compliance & Safety Guidelines:** Staff carry out intimate care strictly within the guidelines set out in our dedicated Intimate Care Policy and its associated procedures—including health and safety, manual handling, and safeguarding protocols—to protect both themselves and the pupils.
- **Equalities & Non-Discrimination:** In line with the Equality Act 2010, pupils with intimate care needs are protected from discrimination, ensuring their rights, dignity, and personal safety are maintained at all times.

5.7 Drugs, Alcohol, and Substance Misuse

Newham PRUs is committed to prioritizing the health, safety, and emotional well-being of all pupils by maintaining a proactive approach to preventing drug, alcohol, and substance misuse. We recognise that substance misuse can be both a primary vulnerability and a secondary indicator of extra-familial harm, adverse childhood experiences (ACEs), child criminal exploitation (CCE), or mental health distress.

Preventative Education and Curriculum Integration Through our evidence-based Relationships, Sex, and Health Education (RSHE) and *Life Lessons* programmes, we educate pupils on the physical, emotional, and legal risks associated with drug, alcohol, and volatile substance misuse. We empower pupils to make safe, informed choices, build resilience, and develop strategies to withstand peer pressure and exploitation.

Identification, Escalation, and CPOMS Reporting

Any staff member who suspects, observes, or receives information that a pupil may be under the influence of, in possession of, or involved in the supply of illegal drugs, alcohol, or novel psychoactive substances must:

- **Prioritise Immediate Safety:** Assess the pupil for acute medical distress or immediate safety risks. If a pupil requires urgent medical attention, staff must initiate first aid protocols and contact Emergency Services (999) without delay.
- **Report via CPOMS:** Log full details of the observation, disclosure, or incident on the CPOMS platform immediately (or before the end of the working day). Reports must be routed directly to the Designated Safeguarding Lead (DSL) and relevant pastoral leads.
- **Adhere to School Policy:** Follow all operational procedures detailed in the school's Substance Misuse Policy and Search, Screening, and Confiscation Policy.

Contextual Safeguarding and Support Pathways Substance misuse concerns will be reviewed through a contextual safeguarding lens. Where appropriate, the DSL will coordinate targeted early help interventions, conduct an internal risk assessment, or refer the pupil to specialised local support services (including the Newham MASH, youth drug and alcohol services, or contextual safeguarding panels) to address underlying factors such as grooming or exploitation.

6. Training and Professional Development

The Designated Safeguarding Lead (DSL) and Deputy DSLs undertake specialised child protection and safeguarding training appropriate to their role at least every two years. The Headteacher, all staff members, and governors receive appropriate child protection training that is regularly updated. In addition, all staff members receive safeguarding and child protection updates as required, but at least annually, to ensure they have the relevant skills, up-to-date knowledge, and practical understanding required to safeguard children effectively. Comprehensive records of all child protection and safeguarding training completed by staff and governors are maintained.

The school ensures that the DSL and Deputy DSLs also undertake regular inter-agency working training and professional development on emerging safeguarding matters, as appropriate.

- **6.1 Positive Handling and De-escalation:** Positive Handling and proactive de-escalation practices keep children and staff safe in school. Refreshers are conducted annually where possible, and at least once every three years as a minimum. Training is delivered to all staff through a rolling programme designed to foster shared responsibility for the safety and well-being of the school community.
- **6.2 Agency Staff Induction & Safeguarding Requirements:** All agency staff must complete the school's safeguarding induction programme prior to starting work. This induction prioritises core safeguarding procedures and appropriate, child-centered language. Evidence of Positive Handling certificates and the date of the most recent refresher training are verified as part of the recruitment and vetting process.
- **6.3 Prevent & WRAP Training:** Prevent awareness training is completed annually by all staff members. Borough leads deliver annual Workshops to Raise Awareness of Prevent (WRAP) to ensure staff remain vigilant to radicalisation risks.
- **6.4 Safeguarding CPD Calendar:** Specific safeguarding themes—including online safety, digital harms, and contextual vulnerabilities—are addressed during designated INSET days and continuously throughout the academic year via the Safeguarding CPD calendar.

7. Professional Confidentiality

Staff members must never promise confidentiality or agree to keep secrets regarding a safeguarding concern with anyone, including children, parents, or carers. Under statutory requirements, any child protection concern must be reported immediately to the Designated Safeguarding Lead (DSL) or a Deputy DSL, who will determine if further referral and investigation by statutory authorities are required.

Information concerning individual child protection cases may be shared by the DSL or Deputy DSL with designated staff members solely on a strict ‘need-to-know’ basis and only when doing so serves the best interests of the child.

8. Record Keeping and Information Sharing

Data Protection and Information Sharing

Data protection legislation is not a barrier to sharing safeguarding information. When concerns exist regarding a child's safety, prompt and effective information sharing between organisations reduces the risk of harm. All staff must act in accordance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR). The school operates under lawful processing conditions that permit the storage and sharing of personal data for safeguarding purposes without consent, including situations where obtaining consent is not possible or would place the child at increased risk.

Recording Safeguarding Concerns

Accurate, timely, and detailed record-keeping is essential to effective child protection practice. Any staff member who receives a disclosure of abuse, or observes signs or indicators of abuse, must log the concern as soon as possible on the CPOMS reporting platform. Reports must include:

- Factual details of what was seen or said.
- Date, time, and location of the incident or disclosure.
- An attached body map indicating the site and scale of any visible injuries, where applicable (see Appendix 4).
- Any immediate actions taken and the rationale for those actions.

The report is automatically submitted to the DSL or Deputy DSL, who will determine, execute, and record the appropriate follow-up action.

Storage and Retention of Records

Child protection records are maintained separately from general pupil files in secure, confidential individual child protection files. These records are stored securely and retained until the individual reaches 25 years from their date of birth, or until they transfer to another educational setting.

Transfer of Safeguarding Records

When a pupil transfers to another school, college, or educational setting, their child protection file must be transferred promptly to the receiving setting:

- Electronic Transfer: Records are transferred securely via CPOMS, with formal notification sent to the receiving DSL.
- Alternative Systems / Email Transfer: Where the receiving setting uses a different system, files are transmitted via secure, encrypted email marked ‘Confidential’ for the direct attention of the receiving DSL. The receiving DSL must provide written confirmation of receipt (preferably via email).
- Paper Transfer: Paper files must be securely sealed and delivered directly. Arrangements must be in place for immediate return if direct hand delivery to the receiving DSL or Headteacher is not possible. Written receipt confirmation is required.
- Additional Contextual Information: In accordance with *Keeping Children Safe in Education*, the DSL will consider sharing additional context prior to transfer (e.g., historical involvement of social care or targeted support needs) to enable the receiving setting to establish appropriate support systems in advance.
- Retention by Transferring Setting: Transferring settings are not required to keep copies of transferred child protection files. If copies are retained, they must be held strictly in line with data

retention policies for the shortest practical time. Where ongoing involvement remains—such as siblings staying at the PRU—the DSL may retain copies of key chronologies.
- Untraced Destinations: If a child subject to a Child Protection Plan leaves the setting and the receiving destination is unknown, the DSL must contact the allocated key worker from Early Help or Children's Social Care immediately to determine the secure transfer process.

Incoming Pupils

When a child joins Newham PRUs, the safeguarding team will request all historical child protection records from the previous educational setting. If records are not received within statutory timeframes, the request will be re-issued and reported to the Safeguarding Officer.

9. Inter-agency Working

9.1 Commitment to Multi-Agency Collaboration Our school will be proactive and prioritise inter-agency working in accordance with *Working Together to Safeguard Children* and local *Newham Safeguarding Children Partnership (NSCP)* procedures to promote child welfare and safety.

9.2 Conference Representation and Reporting It is the responsibility of the Designated Safeguarding Lead (DSL) to ensure that the school is represented at, and submits a comprehensive written report to, any child protection conference or core group meeting for children on the school roll or previously known to the school.

- **Parental Engagement:** Where safe, possible, and appropriate, written reports will be shared in advance with parent(s) and/or carer(s) to maintain transparent, child-centred communication.
- **Staff Preparation:** Anyone representing the school at multi-agency meetings will be fully briefed on all current academic, pastoral, and safety concerns, and will be prepared to actively contribute to multi-agency discussions, safety planning, and risk assessments.

9.3 Monitoring Children on Child Protection (CP) or Child in Need (CIN) Plans

Where a pupil is subject to a Child Protection or Child in Need plan, the Designated Safeguarding Lead (DSL) will ensure robust internal monitoring regarding the child's:

- School attendance and punctuality
- Mental health and emotional well-being
- Academic progress and engagement
- General welfare, physical presentation, and behavioural indicators

The DSL will ensure the school prioritises attendance at all core group meetings and provides timely, up-to-date data to shape the multi-agency plan.

9.4 Escalation and Urgent Concerns Any concerns regarding the effectiveness of a child protection plan, or any emerging welfare issues, will be formally recorded and raised during core group meetings.

> **Urgent Safeguarding Protocol:** If waiting for the next scheduled meeting would place the child at further risk of significant harm, the DSL will bypass routine schedules, contact the child's social worker or key worker **immediately**, and document the conversation, rationale, and agreed actions on CPOMS.

9.5 Private Fostering Notifications When staff become aware that a pupil is being, or is going to be, privately fostered (a private arrangement made for a child under 16, or under 18 if disabled, to live with

someone who is not a close relative for 28 days or more), the school has a statutory duty under Section 10 of the Children Act 2004 to notify the Local Authority.

- The DSL will promptly submit an appropriate referral using the Newham MASH referral pathway to ensure all required statutory safeguards and welfare checks are put in place.

10. Allegations about members of the workforce

Our school is committed to providing a safe and supportive environment that secures the well-being and best learning outcomes for children. All staff members are made aware of appropriate professional boundaries during induction and through our Staff Code of Conduct. However, we recognize that allegations of abuse may occur—some genuine, and others unfounded—which are distressing for all parties involved. We take all necessary steps to maintain a robust safeguarding culture and ensure that all adults working in our school are safe to work with children.

Managing Allegations Against Staff, Volunteers, and Contractors

If an allegation is made, or information is received, indicating that any member of staff, volunteer, or contractor working with children has:

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

Reporting and Escalation Procedures

- **Immediate Reporting:** The recipient of the information must inform the Headteacher immediately. This includes concerns regarding agency and supply staff.
- **Allegations Against the Headteacher:** Concerns must be reported immediately to the Chair of the Governing Body. If the Chair is unavailable that day, the information must be passed to the Vice-Chair.
- **LADO Consultation:** The Headteacher, Chair, or Trustees will seek advice from the Local Authority Designated Officer (LADO) within one working day. **No internal investigation shall be carried out prior to seeking LADO advice.**
- **Threshold Assessment:** All concerns are shared with the LADO to determine whether they meet the harm threshold. Concerns falling below this threshold will be managed under our Low-Level Concerns Policy once approved by the LADO.
- **Direct Staff Contact:** Any staff member or volunteer who does not feel confident raising a concern internally can contact the LADO directly.

Agency and Supply Staff Supply staff remain under the supervision, direction, and control of the Governing Body while working at the school. If an allegation involves a supply staff member, we will lead on collecting factual statements from children and staff. We will work in partnership with the employment agency and the LADO to manage the process, determining whether redeployment or suspension is appropriate during the investigation.

Referrals to the Disclosure and Barring Service (DBS) The school has a legal duty to refer to the DBS any individual who has harmed, or poses a risk of harm to, a child, or who has been removed from regulated activity (or would have been removed had they not left). Referrals will be made as soon as possible following an individual's removal or resignation, in consultation with the LADO and HR department.

Regulatory Alignment & Statutory Contact All procedures strictly adhere to Chapter 7 of the London Child Protection Procedures and Part 4 of *Keeping Children Safe in Education*.

- **Local Authority Designated Officer (LADO) Contact:**
    - **Telephone:** 020 3373 8003 *(Updated standard formatting)*
    - **Email:** cprt.lado@nwham.gov.uk

11. Low-Level Concerns

11.1 Definition In accordance with *Keeping Children Safe in Education (KCSIE 2026)*, a low-level concern is any concern—no matter how small, and even if no more than a sense of unease or a 'nagging doubt'—that an adult working in or on behalf of the school may have acted in a way that is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work. A low-level concern does not meet the harm threshold and does not warrant a referral to the Local Authority Designated Officer (LADO) on its own.

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

- Being overly personal or friendly with pupils
- Excessive or unmonitored one-to-one communication with a child
- Favoritism or boundary-blurring behavior
- Inappropriate language or social media interaction

11.2 Reporting All staff, volunteers, and agency workers must share any low-level concerns regarding staff conduct without delay. Concerns should be reported directly to the Headteacher (or the Designated Safeguarding Lead if delegated). Concerns regarding the Headteacher must be reported directly to the Chair of Governors.

11.3 Recording and Oversight

- All low-level concerns will be recorded confidentially on the school's central monitoring platform (CPOMS).
- Records will include full details of the concern, the context, the rationale for decisions taken, and any follow-up actions or management advice given.
- The Headteacher and DSL will regularly review the central low-level concerns log to identify patterns, themes, or cumulative behaviors.

11.4 Escalation Where a series of low-level concerns indicates a pattern of behavior, or where a single concern is re-evaluated, it may meet the harm threshold. In such instances, the school will immediately follow the *Managing Allegations Against Staff* procedure (Section 10) and consult the LADO without delay.

12. Whistleblowing

12.1 Definition & Duty to Report Whistleblowing is defined as 'making a disclosure in the public interest' and occurs when a worker (or member of the wider school community) raises a genuine concern regarding illegal activity, danger, misconduct, or poor practice that impacts pupils, staff, or the public. All staff members are informed of their duty to raise concerns about the attitudes, actions, or practice of colleagues in alignment with our **Staff Code of Conduct** and standalone **Whistleblowing Policy**.

12.2 Escalation Pathways and External Contacts While staff are strongly encouraged to raise child protection or safeguarding concerns internally through CPOMS, the Headteacher, or the DSL, external pathways are available where a staff member feels unable to report internally:

- **NSPCC Whistleblowing Helpline (for Staff):** 0800 028 0285 | Email: help@nspcc.org.uk
- **Local Authority Designated Officer (LADO):** Tel: 020 3373 8003 | Email: cprt.lado@newham.gov.uk
- **NSPCC General Helpline (Parents & Wider Community):** 0808 800 5000 (24-hour) | Email: help@nspcc.org.uk

12.3 Support Following Unsubstantiated or False Allegations

If an allegation made against a staff member is determined to be unsubstantiated, unfounded, false, or malicious:

- **Child / Reporting Individual Support:** The LADO and the school case manager will consider whether the child or person who made the allegation requires Early Help, therapeutic support, or Children's Social Care intervention (e.g., assessing if the allegation represents a 'cry for help' or indicates abuse elsewhere).
- **Staff Support:** In accordance with paragraphs 419–421 of *KCSIE 2026* and our Recruitment Policy, the school will provide tailored support, pastoral care, and occupational health assistance to protect the wellbeing and professional reputation of staff subject to unfounded or false allegations.

Child Protection Online Monitoring System (CPOMS)

It is mandatory for any staff member who becomes aware of a safeguarding concern to submit a report immediately through CPOMS, Newham PRUs' dedicated safeguarding platform. Timely logging—as soon as possible following a disclosure or receipt of information—is essential to maintaining an accurate, contemporaneous record.

Using CPOMS directly supports Newham PRUs' mission to protect and enhance student well-being. The platform provides a comprehensive suite of tools that enables staff to effectively monitor, manage, and track safeguarding concerns, ensuring a safe and secure environment for our entire educational community.

Appendix 1 — Statutory Framework and Location of Embedded Safeguarding

1. Statutory Framework and National Guidance

The school operates in full compliance with national legislation, statutory guidance, and local multi-agency safeguarding arrangements.

- Education Act 2002 (Section 175): Places a duty on local authorities and governing bodies to make arrangements to ensure functions are exercised with a view to safeguarding and promoting the welfare of children.
- Keeping Children Safe in Education (KCSIE): Statutory guidance for schools and colleges on safeguarding staff duties, safer recruitment, child-on-child abuse, filtering and monitoring, and contextual risks.
- Working Together to Safeguard Children: Statutory multi-agency guidance setting out expectations for inter-agency working, Early Help, and child protection procedures.
- Counter-Terrorism and Security Act 2015 (Section 26 - Prevent Duty): Places a statutory duty on schools to have due regard to the need to prevent people from being drawn into terrorism.
- Children Act 1989 & 2004: Establishes the core welfare principles, local authority duties, and inter-agency co-operation requirements for children in need and those at risk of significant harm.
- Voyeurism (Offences) Act 2019: Criminalises upskirting and informs school responses to image-based sexual harassment.
- Domestic Abuse Act 2021: Recognises children as victims of domestic abuse in their own right when witnessing or experiencing abuse within the home.
- Data Protection Act 2018 and UK GDPR: Governs lawful, proportionate, and timely information sharing for safeguarding purposes.

2. Embedded Safeguarding Across School Policy and Curriculum

Safeguarding is embedded across all operational areas, policies, and curriculum delivery within Newham PRUs:

Safeguarding Dimension	Location in School Policy / Framework	Core Operational & Curricular Content
Preventative Education & RSHE	RSHE / RSE Secondary Policy; Character Education Policy	Explicit teaching on healthy relationships, consent, online safety, respectful communication, and zero tolerance for harassment, misogyny, and discriminatory language.
Child-on-Child Harm & Behaviour	Behaviour Policy; Low Level Concerns Policy; Anti-Bullying Policy	Frameworks for managing peer-on-peer risks, conducting AIMs/Brook Traffic Light risk assessments, implementing safety plans, and using neutral terminology (reporting/reported child).

Digital Safety & Filtering/Monitoring	Online Safety Policy; Acceptable Use of IT (and AI) Policy; Mobile Phone Policy	Compliance with filtering and monitoring standards, management of digital harms/AI-generated explicit content, and strict boundaries for staff-student electronic contact (Google Classroom only).
Staff Conduct & Professional Boundaries	Staff Code of Conduct; Whistleblowing Policy; Recruitment and Selection Policy	Standards for professional conduct, protocol for work mobile phone usage off-duty, safer recruitment checks (including online searches), and procedures for reporting allegations or low-level concerns.
Vulnerable Groups & Attendance	Attendance Policy; Intimate Care Policy; Students with Medical Needs Policy	Protocols for tracking Children Missing Education (CME) / Children Missing Out on Education (CMOE), welfare home visits, intimate care protocols, and tailored support for pupils with SEND.

Appendix 2 – Early Help Newham

Early help provides support to children, young people, and families as soon as needs emerge. The primary goal is to address emerging issues early, build family resilience, and prevent concerns from escalating into statutory child protection interventions.

At Newham PRUs, all staff are trained to identify early indicators of need, maintain professional curiosity, and utilise multi-agency support networks.

1. Early Help Thresholds & Risk Indicators

Staff must remain alert to indicators that suggest a child, young person, or family requires additional or coordinated support:

Special Educational Needs & Communication Needs: Children with SEND, speech, language, and communication needs (SLCN), or disabilities requiring adapted pastoral support.

Family Circumstances & Vulnerabilities: Young carers, children with a parent/carer in custody, or families experiencing domestic abuse, adult mental health difficulties, or parental substance misuse.

Contextual & Extra-Familial Harms: Pupils showing early signs of antisocial behavior, gang association, criminal exploitation (CCE/County Lines), sexual exploitation (CSE), radicalisation, or extra-familial threats.

Attendance & Mobility: Frequent unexplained absence, persistent absenteeism, risk of becoming a Child Missing Education (CME) or Child Missing Out on Education (CMOE), or moving between placements.

Emotional Well-being & Substance Misuse: Pupils experiencing emotional distress, low self-esteem, self-harming behaviours, or personal drug/alcohol misuse.

2. The Newham Early Help Referral Process

When a staff member identifies an emerging early help need:

Identify & Record: The staff member logs full details of the emerging concern or observation on CPOMS.

Consultation: The concern is routed directly to the Designated Safeguarding Lead (DSL) team and Safeguarding Keyworkers to evaluate baseline needs.

Family Engagement: Where safe and appropriate, the school communicates openly with parents/carers to discuss identified needs and seek consent for early help interventions.

Early Help Triage & Assessment: Concerns or requests for targeted support are submitted via the Newham MASH Portal for Early Help triage and multi-agency coordination.

Multi-Agency Action Plan: The school contributes to Team Around the Family (TAF) meetings, internal support interventions, or referrals to specialized local community services.

3. Key Local & Statutory Resources

For additional operational guidance and referral pathways across Newham, staff should access:

Newham Multi-Agency Safeguarding Hub (MASH) Portal: For submitting Early Help requests and statutory referrals.

Newham Early Help Strategy & Framework: Guidance on local threshold levels, family hubs, and community offer pathways.

Internal Support Team: Contact Laura O'Donnell (Safeguarding, Welfare and Attendance Manager) or Yasmine Dhillon (Deputy Headteacher/SENCO/DSL) for guidance on internal Early Help provision

Appendix 4

Staff should use this form to Record Safeguarding Concerns in the **absence of online access**

Full Name of Child	Date of Birth	Tutor Group/Class

Nature of worry, concern or disclosure
Please include where you were when the child made a disclosure, what you saw, who else was there and what the child said or did and what you said. Time and date of incident:
Was there an injury? Yes/ No Did you see it Yes / No
Describe the injury
Have you filled in the body plan to show where the injury is and its approximate size? Yes /No
Was anyone else with you? If 'Yes' who?
Has this happened before? Is 'Yes' did you report the previous incident?
Who are you passing this information to? **Name:** **Position:**
Your signature: **Printed Name:** **Role in School:** **Time form completed:**

Recording Safeguarding Concerns

Time form received by Designated Safeguarding Lead:

Action taken by Designated Safeguarding Lead:

Rationale for actions taken:

Referred to:

Date: Time:

Have Parents been informed? Yes / No (If No, state reason)

Feedback given to:

☐ Pastoral team ☐ Early Help Lead ☐ Child ☐ Person who recorded disclosure

Further Action Agreed:

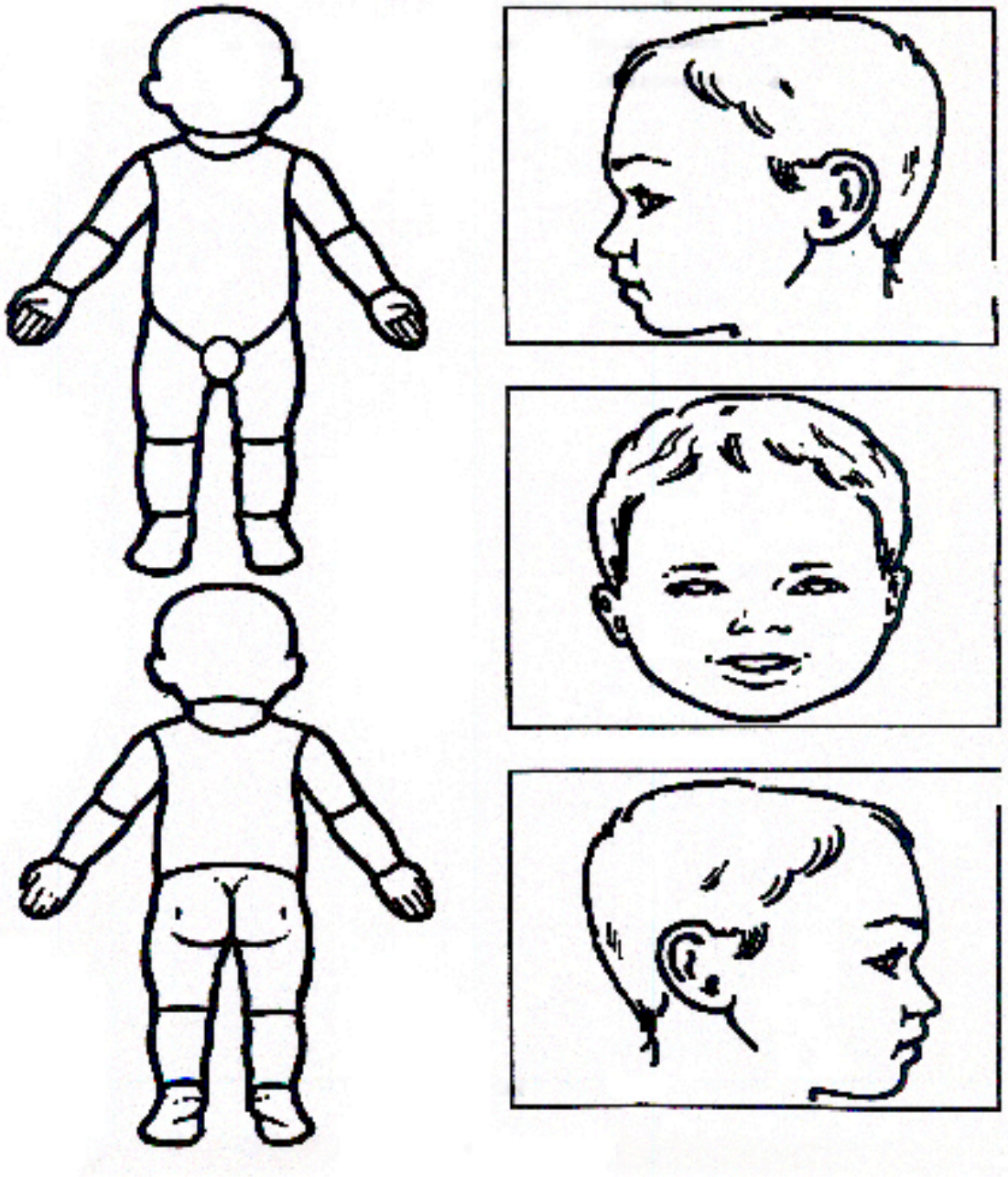
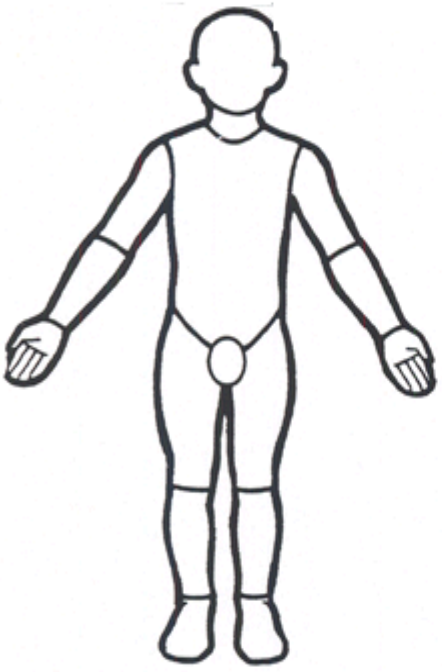
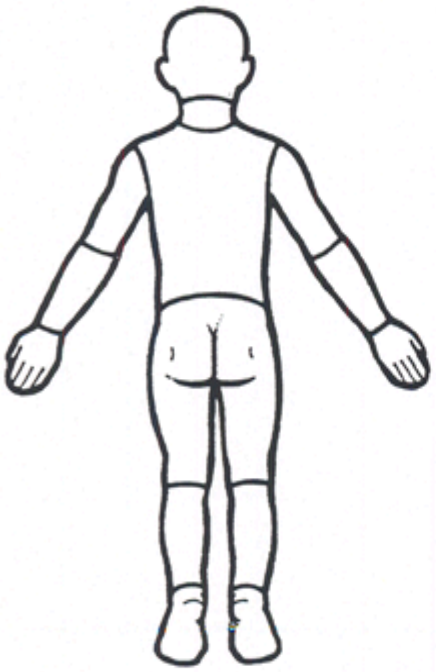
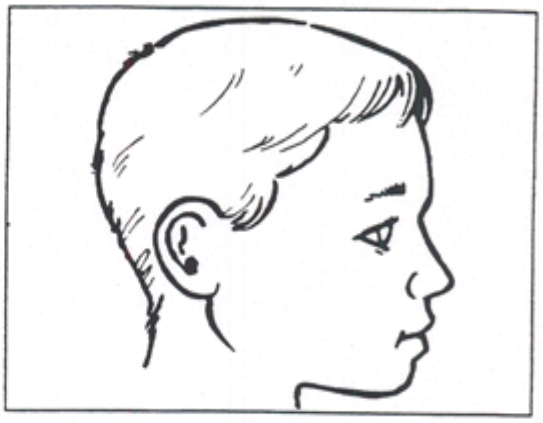
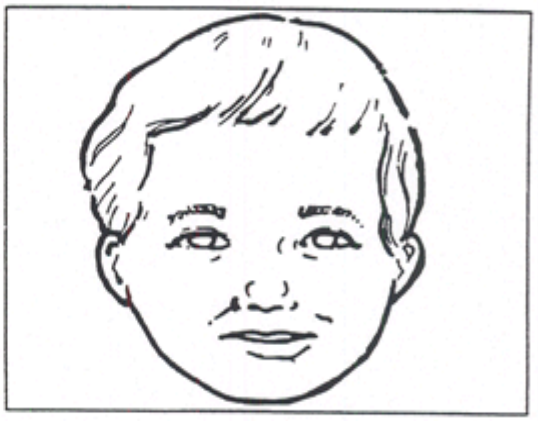
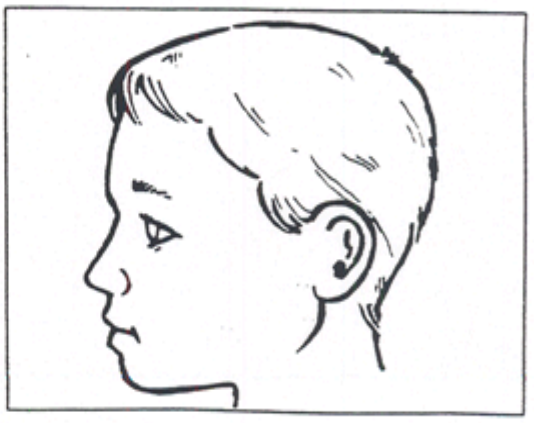
DSL Signature:

Printed Name:

Date

Appendix 4 –Body Plans

Young Child



Older Child