Creative Ed International

Safeguarding and Child Protection Policy

UPDATES

12/10/2021	Written
01/07/2022	Reviewed and Published

INDEX

Statement – This is a core policy that forms part of the induction for all staff. It is a requirement that all members of staff have access to this policy and sign to say they have read and understood its contents.

"Safeguarding and promoting the welfare of children and young people is everyone's responsibility. Everyone who comes into contact with children, young people and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child centred. This means that they should consider, at all times, what is in the best interests of the child."

1. Policy Aims

- To demonstrate Creative Ed International's commitment to safeguarding and child protection to students, parents, and other stakeholders.

- To support learners' development in ways that will foster security, confidence, and independence.

- To provide an environment in which children and young people feel safe, secure, valued, and respected, and feel confident to, and know how to approach adults if they are in difficulties, believing they will be effectively listened to.

- To ensure awareness of all staff and stakeholders of the need to safeguard children, and of their responsibilities in identifying and reporting possible cases of abuse appropriately according to regional procedural nuances.

- To provide a systematic means of monitoring children and young people known or thought to be at risk of harm.

- To emphasise the need for good levels of communication between all members of staff.

- To develop and promote effective working relationships with other agencies depending on the region.

- To ensure that all staff working within Creative Ed International who have substantial access to children have been checked as to their suitability, including verification of their identity, qualifications/experience, and a satisfactory criminal record and safeguarding check (according to region), and a single central record is kept for audit.

- All safeguarding policies will be reviewed on an annual (minimum) basis by the Senior Management Team which has responsibility for oversight of safeguarding and child protection systems. The principal of each course/school/affiliated provider will ensure regular reporting on safeguarding activity and systems to Creative Ed Internatioanl's senior management team who will not receive details of individual student situations or identifying features of families as part of their oversight responsibility.

2.   Safeguarding Procedures

a) When new staff, volunteers or regular visitors join Creative Ed International, they are informed of the safeguarding arrangements in place, the name of the safeguarding lead in their workplace, and how to share concerns with them.

b) Any member of staff, volunteer or visitor to Creative Ed International who receives a disclosure or allegation of abuse, or suspects that abuse may have occurred must report it immediately to the nominated safeguarding lead (or, in their absence, the deputy).

c) The Safeguarding lead or the deputy will immediately refer cases of suspected abuse or allegations, by telephone, to: The regional contact or Creative Ed International's Senior Management Team.

d) Wherever possible, Creative Ed International staff will share any safeguarding concerns, or an intention to refer a child or individual at risk to with parents or carers. However, we will not do so where it is felt that to do so could place the child at greater risk of harm or impede a criminal investigation. On occasions, it may be necessary to seek advice from Police or regional authorities in making decisions about when it is appropriate to share information with parents/carers.

e) These procedures apply to all staff and will be covered in training to enable everyone to understand their role and responsibility. The prime concern at all stages must be the interests and safety of the child. Where there is a conflict of interest between the child and an adult, the interests of the child must be paramount.

f) When new staff, volunteers or regular visitors join Creative Ed International, they are informed of the safeguarding arrangements in place, the name of the Safeguarding Lead and how to share concerns with them.

g) The Principal or course leader of Creative Ed International schools/courses or examinations will ensure that the policies and procedures adopted by the organisation (particularly those concerning referrals of cases of suspected abuse and neglect), are understood, and followed by all staff.

3. Recognition of Types of Abuse / Specific Safeguarding Issues

'Keeping Children Safe in Education' **defines abuse as the maltreatment of a child.**

"Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children"

The four main types of abuse are:
1. Physical
2. Emotional
3. Sexual
4. Neglect

All staff are aware of the signs of abuse and neglect and are able to identify children or vulnerable adults who may need help or protection. Staff are also aware of environmental factors which may impact on a child/vulnerable adult's welfare and safety and understand safeguarding in the wider context (contextual safeguarding). Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, peer on peer abuse and serious youth violence.

Advice will be sought in different regions to comply with regional cultural acceptance and behaviours. Creative Ed International staff will be made aware of these differences and need to respect the beliefs and/or additional guidelines enforced in different regions. Official documentation and advice will be given according to country/local laws and authorities.

4. Online Safety

Members of staff with appropriate skills, interest and expertise regarding online safety are encouraged to help support the DSL, and deputy DSLs, when developing curriculum approaches or making technical decisions. However, the Designated Safeguarding Lead retains overall responsibility for online safeguarding within Creative Ed International.

Creative Ed International identifies that the issues classified within online safety are considerable, but can be broadly categorised into four areas of risk:

1. **Content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
2. **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.
3. **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.
4. **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (https://apwg.org/)

Creative Ed International will ensure a comprehensive wide strategy is in place to enable all full time learners to learn about and manage online risks effectively and will support the wider school community, including all members of staff, to become aware and alert to the need to keep children and students safe online.

5. Roles and responsibilities

All staff
All staff including teaching and non-teaching staff, temporary and supply staff, agencies and those working with children and families in the community, have a statutory responsibility to safeguard and promote the welfare of children and must be aware of and fully conversant with this policy. All staff must have access to this policy and always follow the procedures and guidance.

The Senior Management Team (SMT)
- The SMT will approve this policy at each review and hold the principal and/ or course leaders, examiners to account for its implementation whilst on site or online with learners.

- The SMT ensures that the policies, procedures and training are effective and comply with the law in different regions at all times. It ensures that all required policies relating to safeguarding are in place and that the Child Protection Policy reflects statutory and local guidance and is reviewed at least annually.

- The SMT are responsible for ensuring recruitment procedures that help to deter, reject or identify people who might abuse children or vulnerable adults. It adheres to statutory responsibilities to check adults working with children and vulnerable adults and has recruitment and selection procedures in place. It ensures that volunteers are appropriately supervised.

- The SMT ensures all other staff have safeguarding training updated as appropriate.

- Whilst the SMT holds overall responsibility for the child protection and safeguarding functions of the school, the day-to-day operational responsibility rests with the Principal Examiners and/or course leaders on site or online.

The Principal or Course Leaders (CL) of Creative Ed International's provision
- The Principal or Course Leader works in accordance with the requirements upon all staff involved with the delivery of the Global Arts Training provision in situ. In addition, they ensure that all safeguarding policies and procedures adopted by the SMT are followed by all staff.

- The Principal or Course Leader manages all concerns about the conduct of adults in the organisation/environment they are working in relation to safeguarding and child protection.

- The Principal or Course Leader agrees the nominated safeguarding lead and deputy with Creative Ed International's SMT. This may be themselves and will be added to their job description.

Designated Safeguarding Lead (DSL)
- Ensures that systems are in place for children or vulnerable adults to express their views and give feedback which operate with the best interest of the child/vulnerable adult at heart.

▪ Ensures that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle-blowing procedures.

▪ Ensures that students are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online.

▪ Ensures that they liaise with the Local Authority and SMT before taking any action and on an ongoing basis, where an allegation is made against a member of staff or volunteer.

▪ Ensures there are robust systems in place to cover for the Desginated Safeguarding Lead planned and unplanned absences from the school, including having Deputy Designated Safeguarding Leads who have the role added to their job descriptions.

▪ The Designated Safeguarding Lead and deputies at each relevant site take lead responsibility for managing child protection referrals, safeguarding training, and raising awareness of all child protection policies and procedures. They ensure that everyone at the relevant site (including temporary staff, volunteers, and contractors) is aware of these procedures and that they are always followed. They act as a source of advice and support for other staff (on child protection matters) and ensure timely referrals to SMT or relevant regional authorities.

▪ The Safeguarding Lead will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role.

▪ The Deputy Designated Safeguarding Leads are/are trained to the same standard as the Designated Safeguarding Lead and, in the absence of the DSL, carry out those functions necessary to ensure the ongoing safety and protection of students. In the event of the long-term absence of the DSL the deputy will assume all the functions above.

▪ In full time courses the DSL maintains a confidential recording system for all safeguarding and child protection concerns. The DSL will ensure that all such records are kept confidential, stored securely and are separate from student records, until the child or student's 25th birthday and that when a student leaves, their child protection file is passed to the new school/college (ensuring secure transit) and that confirmation of receipt is obtained. The DSL will ensure that a copy of the CP file is retained until such a time that the new school/college acknowledges receipt of the original file. The copy should then be disposed of securely.

▪ The DSL or a deputy should always be available to discuss safeguarding concerns. If for any reason the DSL is unavailable, one of the named deputy DSLs will act in their absence.

▪ The DSL or a deputy will ensure that all staff sign to say they have read, understood and agree to work within this policy.

▪ The DSL or a deputy will organise child protection and safeguarding induction, regularly updated training and a minimum of annual updates (including online safety) for all school staff, keep a record of attendance and address any absences.

▪ The DSL or a deputy will contribute to and provide, with the Principal/Course Leader, the Audit of Statutory Duties and Associated Responsibilities to be submitted annually to SMT.

Additional responsibilities for the DSL include:

- Responsibility for online safety as well as safeguarding and child protection.

- Working with mental health leads where safeguarding is linked to mental health.

- Promoting supportive engagement with parents and carers, where a student is under the age of 18.

- Promoting educational outcomes of children in need by knowing and helping to address issues they have/are experiencing by:

  o Supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have/had a social worker reach their potential
  o Recognising the lasting impact on educational outcomes.

- To work with the Principal/Course Leaders and 'relevant strategic leads' on information sharing:

  o Understanding the importance of sharing information with other schools/colleges on transfers.
  o Ensuring information in child protection files is kept confidential and stored securely.

- Training, knowledge and skills new expectations they have a good understanding of:

  o How to identify, understand and respond to specific needs that can increase the vulnerability of children.
  o Specific harms that could put children at risk.
  o The important role they play in providing information and support to safeguard and promote their student welfare.
  o The lasting impact of adversity and trauma on education, behaviour, mental health and wellbeing, and what is needed to respond to this.
  o The difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships that facilitate communication.
  o Children in need (disabled children, those with relevant health needs and young carers) who have specific need to be alert to.

DSL's ensure all staff are aware of safe working practices, including:

- avoiding engaging in personal email, text or telephone conversations with young people.
- not accepting personal or 'friends' requests on social networking sites.
- reporting to a senior member of staff if a young person or parent has become dependent on you.

Parents and Carers

Parents/Carers have a responsibility to:

- Discuss safeguarding issues with their children, support Creative Ed International in their safeguarding approaches, and reinforce appropriate safe behaviours at home.

- Identify changes in behaviour which could indicate that their child is at risk of harm online, or in the wider community.

- Seek help and support from Creative Ed International, or other appropriate agencies, if they or their child have any safeguarding concerns.

6. Mental Health

Everyone has an important role to play in supporting the mental health and wellbeing of children. Staff have an awareness that mental health problems can, in some cases, be an indicator that a student has suffered or is at risk of suffering abuse, neglect or exploitation. Staff are not expected to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one and work with external agencies.

Where students have suffered:

- abuse and neglect, or
- other potentially traumatic adverse childhood experiences

This can have a lasting impact throughout childhood, adolescence and into adulthood. Staff are aware of how these student's experiences can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child or student that is also a safeguarding concern, immediate action should be taken, by following the safeguarding policy and speaking to the DSL or a deputy.

7. Peer on peer abuse

Creative Ed International courses may be the only stable, secure and safe element in the lives of children and young people at risk of, or who have suffered harm. Nevertheless, whilst training their behaviour may be challenging and defiant, or they may instead be withdrawn, or display abusive behaviours towards other young people. Creative Ed International recognises that some children/young people may abuse their peers and any incidents of peer-on-peer abuse will be managed in the same way as any other child protection concern and will follow the same procedures. SMT will seek advice and support from other agencies as appropriate. (Please refer to Annex 4 below)

Peer-on peer-abuse can manifest itself in many ways. This may include bullying (including cyber bullying), on-line abuse, gender-based abuse, up skirting, 'sexting' or sexually harmful behaviour.

Creative Ed International will not tolerate any harmful behaviour in school and will take swift action to intervene where this occurs. Creative Ed International understands the different gender issues that can be prevalent when dealing with peer-on-peer abuse.

8. Online Safety and Peer-on-Peer Abuse

Staff are aware that technology is a significant component in many safeguarding and wellbeing issues including:

- Children and staff are at risk of online abuse as well as face to face.
- Peer-on-peer abuse can happen online through abusive, harassing and misogynistic messages.
- Non-consensual sharing of indecent nude and semi-nude images/videos especially in chat groups.
- Sharing of abusive images and pornography, to those who do not want to receive it.

Staff should:

- Recognise and respond to the indicators.
- Recognise it may be taking place, even if not reported.
- Understand their role in preventing and responding where a child is at risk.
- Understand the importance of challenging inappropriate behaviours to ensure a safe environment and not to normalise abuse.
- Recognise it can take place inside and outside of school and/or online.
- Report any staff abuse to their line manager or SMT.

9. Anti-Bullying/Cyberbullying

Creative Ed International does not allow or condone bullying and instances may lead to consideration under safeguarding and child protection procedures. This includes all forms e.g. cyber, racist, homophobic, transphobic, religious and gender related bullying. We keep a record of known bullying incidents which is shared with and analysed by the SMT. All staff are aware that children or individuals at risk with SEND and/or differences/perceived differences are more susceptible to being bullied/victims of child abuse.

If the bullying is particularly serious, or the anti-bullying procedures are seen to be ineffective, the SMT/Principal/Course Leader and the DSL will consider implementing safeguarding and child protection procedures.

10. Serious Violence

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

- Increased absence from school.

- A change in friendships.
- Relationships with older individuals or groups.
- A significant decline in performance
- Signs of self-harm
- A significant change in well-being
- Signs of assault
- Unexplained injuries
- Unexplained gifts or new possessions may indicate involvement with individuals associated with criminal networks or gangs.

These instances will be dealt with through this policy and referral to outside agencies such as the police.

11. Safeguarding Children or young people with special educational needs and disabilities

Creative Ed International understands that children with special educational needs and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of children. This can include:

- Being more prone to peer group isolation than other groups and being disproportionately impacted by things like bullying, without outwardly showing signs of being bullied.
- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability rather than abuse or neglect, without further exploration.
- Communication barriers and difficulties in overcoming these barriers in relation to disclosing abuse or neglect.

To address these additional challenges, staff will consider extra pastoral support and attention for these students, along with ensuring any appropriate support for communication is in place. Staff are encouraged to work and seek advice from parents/ carers to ensure the child receives the best possible experience manageable by the course staff in situ.

12. Child Criminal Exploitation (CCE)

Staff are aware that CCE can include the following:

- Vehicle crime and threatening/committing serious violence.
- Children may become trapped due to threats of violence to them and families.
- Children may be coerced or entrapped into debt/carrying weapons.
- Children may carry weapons for protection.
- Children involved in CCE need to be treated as victims themselves even though they may be committing crimes (particularly older children).
- Girls are at risk of CCE too, even though experiences may be different.

These instances will be dealt with through this policy and referral to outside agencies such as the police.

13. County Lines (UK and Europe)

Some indicators of county lines are:

- 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.

14. Child Sexual Exploitation (CSE)

- Child Sexual Exploitation (CSE) is a form of child abuse, which can happen to boys, girls or any young person from any background or community.

"Child Sexual Exploitation is a form of child sexual abuse. It occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator.

The victim may have been sexually exploited even if the sexual activity appears consensual.

Child sexual exploitation does not always involve physical contact; it can also occur using technology."
(Department of Education (DfE), 2017)

- Creative Ed International understands that a significant number of children who are victims of CSE go missing from home, care and education at some point and is alert to the signs and indicators of a child becoming at risk of, or subject to, CSE and will take appropriate action to respond to any concerns.

- Any concerns that a child is being or is at risk of being sexually exploited should be passed without delay to the DSL who will inform the relevant authorities and SMT.

- 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 non-penetrative 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.

On all occasions when there is a concern that a child is being or is at risk of being sexually exploited or where indicators have been observed that are consistent with a child who is being or who is at risk of being sexually exploited the DSL will make a referral to the appropriate regional agency.

15. Domestic Abuse

The following is the current definition of Domestic Abuse from the UK Domestic Abuse Act 2021 :

The behaviour of a person towards another person is "domestic abuse" if —
- *They are each aged 16 or over and are personally connected to each other ((ie a) they are, or have been, married to each other; (b)they are, or have been, civil partners of each other; (c)they have agreed to marry one another (whether or not the agreement has been terminated); (d)they have entered into a civil partnership agreement (whether or not the agreement has been terminated); (e)they are, or have been, in an intimate personal relationship with each other; (f)they each have, or there has been a time when they each have had, a parental relationship in relation to the same child; (g)they are relatives.*
- *The behaviour is abusive.*

Behaviour is "abusive" if it consists of any of the following —
- *physical or sexual abuse;*
- *violent or threatening behaviour;*
- *controlling or coercive behaviour;*
- *economic abuse;*
- *psychological, emotional or other abuse;*
  and it does not matter whether the behaviour consists of a single incident or a course of conduct.

"Economic abuse" means any behaviour that has a substantial adverse effect on one party's ability to—
- *acquire, use or maintain money or other property, or*
- *obtain goods or services.*

These instances will be dealt with through this policy and referral to outside agencies such as the police.

16. Prevent and Radicalisation (UK)

- Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs.

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

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

- Creative Ed International recognises that exposure of children (and adults) to extremist ideology can hinder their social development and educational attainment alongside posing a very real risk that they could support or partake in an act of violence. Radicalisation of young people can be compared to grooming for sexual exploitation.

- All staff recognise that children exposed to radicalisation and extremism should be protected and safeguarded in the same way as protecting children from other risks and will report concerns regarding radicalisation and extremism to the DSL who will follow local and national guidance.

- All staff will complete an approved training package which includes guidance on how to identify people who may be vulnerable to being drawn into terrorism, and how to refer them.

- When any member of staff has concerns that a student may be at risk of radicalisation or involvement in terrorism, they should speak with the DSL. They should then follow normal safeguarding procedures.

17. Records and information sharing

a. Staff will record any welfare concern that they have about a student in writing and sent by email to the DSL/SMT. This ensures the DSL is notified without delay. Where statements are taken, records will be completed as soon as possible after the disclosure/incident/event, using the student's words where appropriate, and will be signed and dated by the member of staff concerned.

b. All safeguarding concerns, discussions and decisions (and justifications for those decisions) will be recorded in writing. If members of staff are in any doubt about recording requirements, they should discuss their concerns with the DSL or the deputy DSL in the DSL's absence.

c. Safeguarding and child protection records are kept for individual students and are maintained separately from all other records relating to the student. Safeguarding records are kept in accordance with data protection legislation and are retained centrally and securely by the

DSL. Safeguarding and child protection records are shared with staff on a 'need to know' basis only.

18. Confidentiality and Information Sharing

- Creative Ed International recognises that all matters relating to safeguarding and child protection are confidential. The SMT/ Principal/Course Leader or DSL will only disclose information about a pupil to other members of staff on a 'need to know' basis.

- All members of staff are aware that whilst they have duties to keep any information about children, students, families and colleagues which they have access to as a result of their role confidential, they also have a professional responsibility to share information with other agencies in order to safeguard children.

- All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing. Further advice on responding to disclosures

Creative Ed International staff and management have due regard to the relevant data protection principles, which allow us to share (and withhold) personal information. This includes:

- Being confident of the processing conditions which allow us 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.

- Not providing pupils' personal data where the serious harm test under the legislation is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harms test is met, we will withhold providing the data.

Guidance on Information sharing can be found here:

Information sharing: advice for practitioners
publishing.service.gov.uk

Data Protection Toolkit for Schools:
https://www.gov.uk/government/publications/data-protection-toolkit-for-schools

19. Multi-Agency Working

Where a Creative Ed International provision or service is part of the core group, the DSL will ensure Creative Ed International is represented, provides appropriate information and contributes to the plan at these meetings. Any concerns about the Child Protection plan and/or the child or student's welfare will be discussed and recorded at the core group meeting, unless to do so would place the child/student at further risk of significant harm. In this case the DSL will inform the child/student's social worker immediately and then record that they have done so, and the actions agreed.

20. Allegations About Members of the Workforce

a. All staff members are made aware of the boundaries of appropriate behaviour and conduct. These matters form part of staff induction and are outlined in the Staff Handbook and Code of Conduct.

b. Creative Ed International has processes in place for reporting any concerns about a member of staff (or any adult working with children/individuals at risk). Any concerns about the conduct of a member of staff, including supply staff or freelancers, will be referred to the Principal/Course Leader or SMT Head Office Directors. This role is distinct from the DSL as the named person should have sufficient status and authority to manage employment procedures. Staffing matters are confidential and operate within statutory guidance around Data Protection.

c. Where the concern involves the Principal/Course Leader, it should be reported directly to the Directors, Yvette Curtin yvette@creative-ed.com / Niall Swords niall@creative-ed.com

d. An investigation, where appropriate, will be undertaken with referral to Creative Ed International internal staff procedure and policy in tandem with any full-time institutional policy.

21. Staff Induction, Awareness and Training

▪ The DSL will ensure that all new staff and volunteers (including temporary staff) are appropriately inducted in the school's internal safeguarding procedures and communication lines. As a minimum, this will include:

o The Child Protection Policy
o The Behaviour Policy
o The Staff Behaviour Policy (sometimes called a code of conduct)
o The role of the DSL (including the identity of the DSL and any deputies)

▪ All staff members (including temporary staff) will receive appropriate safeguarding and child protection training (organised by the DSL) which will enable them to:

o Recognise potential safeguarding and child protection concerns involving pupils and adults (colleagues, other professionals, and parents/carers).
o Respond appropriately to safeguarding issues and take action in line with this policy.
o Record concerns in line with the policies.

    o   Refer concerns to the DSL and be able to seek support external to the school if required.

- All staff members (including temporary staff) will receive appropriate training to ensure they are aware of a range of safeguarding issues and are aware that behaviours linked to drug taking, alcohol abuse, truanting and peer on peer abuse such as bullying, and sexting can put children in danger.

- All staff members (including temporary staff) will receive safeguarding and child protection updates annually, or when required, via training sessions, staff meetings or email.

- The DSL and SMT will maintain an up-to-date register of who has received safeguarding and child protection training, including Prevent and will provide an Annual Safeguarding Report.

22. Safe Working Practice

- All members of staff are required to work within clear guidelines on the Staff Code of Conduct.

- Students may make allegations against staff in situations where they feel vulnerable or where they perceive there to be a possible risk to their welfare. As such, staff will avoid placing themselves in a vulnerable position regarding potential allegations.

- There may be circumstances when it is appropriate for staff to use 'reasonable force' to safeguard children and young people, such as guiding a child to safety or breaking up a fight. The term 'reasonable force' covers a broad range of actions used by staff that involve a degree of physical contact to control or restrain children. 'Reasonable' means using no more force than is needed. Staff work in accordance with statutory and local guidance (on the use of reasonable force) and recognises that where intervention is required, it should always be considered in a safeguarding and regional context.

- Physical intervention should only be used when the child is endangering him/herself or others and such events should be recorded and signed by a witness. Staff should be aware of the Disciplinary and Appropriate Physical Contact and Safe Touch Policies, and any physical interventions must be in line with agreed policy and procedure in which appropriate training should be provided.

- Creative Ed International understands the additional vulnerability of children with special educational needs and disabilities and will ensure positive and proactive behaviour support to reduce the occurrence of risky behaviour and the need to use restraint.

- Staff should be particularly aware of the professional risks associated with the use of social media and electronic communication (email, mobile phones, texting, social network sites etc.).

23. Staff Supervision and Support

- The SMT aims to create a culture and environment where members of staff feel competent and confident to raise concerns and feel supported in their safeguarding role. Any member of

staff affected by issues arising from concerns for children or students' welfare or safety is encouraged to seek support from the DSL.

- The induction process will include familiarisation with child protection responsibilities and procedures as outlined above. All new staff including support staff will receive induction training. However, their induction should be clear that safeguarding concerns should be brought to the DSL's attention, as soon as possible.

- Creative Ed International will provide appropriate supervision/1:1 support for all members of staff to ensure that:
    o staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children
    o case holding staff have a space to discuss and reflect upon their work and progress with children.

- The DSL will also put staff in touch with outside agencies for professional support if they so wish. Staff can also approach organisations such as their Union or other similar organisations directly.

24. Safer Recruitment and allegations

As part of the Creative Ed International safeguarding culture, the college has robust recruitment procedures that deter and prevent people who are unsuitable to work with children from applying for or securing employment, or volunteering opportunities in our organisation. Creative Ed International is responsible for:

- Ensuring that we maintain an accurate Single Central Record (SCR). The SCR is a list of all staff (including supply/cover staff), volunteers, administration, management and governance.
- Recruiting through a fair and considered process.
- Ensuring appropriate paperwork and documentation is checked as authentic and compliant to work with young people.
- Ensuring interviews and references are upheld and where appropriate class observations.

We expect all staff and volunteers to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, cautions, reprimands and warnings.

Where a member of staff has acted in a way outside of school that may question their suitability to work with children (transferable risk), a risk assessment should be carried out when appropriate. If staff have safeguarding concerns, or an allegation is made about another member of staff (including supply staff and volunteers) posing a risk of harm to children, then:
- this should be immediately referred to the SMT
- where there are concerns/allegations about the Principal, this should be referred to the SMT

Low level concerns or allegations
Creative Ed International will keep a low-level concern central register if a member of staff or applicant is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of

work. Concerns may arise from suspicions, complaints, a disclosure made by a child, parent or other adult or member of the public or because of vetting checks undertaken.

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

- o   Being over friendly with children.
- o   Having favourites.
- o   Taking photographs of children on their mobile phone.
- o   Engaging with a child on a one-to-one basis in a secluded area or behind a closed door.
- o   Using inappropriate sexualised, intimidating, or offensive language.

It is crucial that any such concerns are shared responsibly and with the right person, and recorded and dealt with appropriately. This will also protect staff from potential false allegations or misunderstandings.

What to do if you have a low-level concern:
- Low-level concerns about a member of staff should be reported to the DSL. Where a low-level concern is raised about the DSL, it should be shared with the SMT.

- The organisation encourages staff to feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

All low-level concerns should be recorded in writing by the DSL. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

- Records will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR)

- Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school will either implement disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harm threshold, it will be referred to the SMT or regional authority.

- Consideration will also be given to whether there are wider cultural issues within the school that have enabled the behaviour to occur and where appropriate policies will be reviewed and updated, or extra training delivered to minimise the risk of it happening again. The records will be retained at least until the individual leaves the employment of the organisation, unless there is an ongoing investigation taking place.

25. Security

- All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light. We operate within a whole community ethos and welcome comments from pupils/students, parents and others about areas that may need improvement as well as what we are doing well.

- Appropriate checks will be undertaken in respect of visitors and volunteers coming into school as outlined within our Visitor procedures. Visitors will be expected to sign in and out via the office visitors log and to display a visitor's badge whilst on school site. Any individual who is not known or identifiable should be challenged for clarification and reassurance.

- Creative Ed International will not accept the behaviour of any individual (parent or professional) who threatens school security or causes others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the site.

26. Private Fostering Arrangements

- A private fostering occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 or 18 if the child is disabled. Children looked after by the local authority or who are placed in residential schools, children's homes or hospitals are not considered to be privately fostered.

- Creative Ed International recognise that most privately fostered children remain safe and well but are aware that safeguarding concerns have been raised in some cases. Therefore, all staff are alert to possible safeguarding issues, including the possibility that the child has been trafficked into the country.

- By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's services as soon as possible. However, where a member of staff becomes aware that a student may be in a private fostering arrangement, they will raise this will the DSL and the DSL will notify the local education authority social care of the circumstances as appropriate.

27. Looked After Children

The most common reason for children becoming looked after is as a result of abuse and neglect ensuring that staff have the necessary skills, knowledge and understanding to keep looked after children safe. Appropriate staff have information about a child's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child and contact arrangements with birth parents or those with parental responsibility, and care arrangements.

The designated teacher for looked after children and the DSL have details of the child's social worker and the name. As part of their role, they will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked–after and previously looked–after children are quickly and effectively responded to.

- Work with virtual school heads to promote the educational achievement of looked–after and previously looked–after children.

Annex 1:

Supporting Guidance (to be read and followed alongside this document- UK based guidance)

- Information Sharing: [Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents And Carers Information Sharing](#)
- If you are concerned about a child that may be abused: [What to do if you're worried a child is being abused](#) – Publications – GOV.UK
- Safer Working Practices: [Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings](#)
- Safer Recruitment Consortium, 2019 : https://saferrecruitmentconsortium.org/
- Mental Health & Behaviour in Schools 2018 : [Mental health and behaviour in schools – Publications](#) Publications – GOV.UK
- [Teachers' Standards 2012](#)
- Safeguarding Disabled Children – Practice Guidance – DOH, 2009 https://www.gov.uk/government/publications/safeguarding-disabled-children-practice-guidance
- [Preventing and Tackling Bullying](#)
- [Promoting Children and Young People's Emotional Health & Wellbeing:](#)
- Rise Above : links to lesson plans and materials https://campaignresources.phe.gov.uk/schools/topics/rise-above/overview

Annex 2

Categories of abuse

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

2. Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children. It should be noted that abuse can be carried out both on and offline and be perpetrated by men, women and children. All members of staff should read and understand part one of KCSIE, 2021 and staff who have direct contact with pupils should also read annex A.

3. Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline

abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children (also known as peer on peer abuse) is a specific safeguarding issue in education

Signs that may indicate Sexual Abuse

- Sudden changes in behaviour and school performance
- Displays of affection which are sexual and age inappropriate
- Self-harm, self-mutilation or attempts at suicide
- Alluding to secrets which they cannot reveal
- Tendency to cling or need constant reassurance
- Regression to younger behaviour for example thumb sucking, playing with discarded toys, acting like a baby
- Distrust of familiar adults e.g. anxiety of being left with relatives, a child minder or lodger
- Unexplained gifts or money
- Depression and withdrawal
- Fear of undressing for PE
- Sexually transmitted disease
- Fire setting

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

Signs that may indicate physical abuse

- Bruises and abrasions around the face
- Damage or injury around the mouth
- Bi-lateral injuries such as two bruised eyes
- Bruising to soft area of the face such as the cheeks
- Fingertip bruising to the front or back of torso
- Bite marks
- Burns or scalds (unusual patterns and spread of injuries)
- Deep contact burns such as cigarette burns
- Injuries suggesting beatings (strap marks, welts)
- Covering arms and legs even when hot
- Aggressive behaviour or severe temper outbursts.
- Injuries need to be accounted for – inadequate, inconsistent, or excessively plausible explanations or a delay in seeking treatment should signal concern.

5. Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.

It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another.

It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Annex 3

Peer-on-Peer Abuse (Allegations of abuse made against other children)

All members of staff recognise that children are capable of abusing their peers.

Peer-on-peer abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers.
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence and could take place inside school, outside school or online);
- sexual violence and harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nudes and semi-nudes images and or videos (also known as sexting or youth produced sexual imagery);
- up-skirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element.
- Abuse is abuse and it will never be tolerated, dismissed or minimised. Any incidents of peer-on-peer abuse will be managed in the same way as any other child protection concern and will follow the same procedures, as outlined in Section 6, above and in accordance with ISCB procedures.

Creative Ed International aims to minimise the risk of all forms of peer–on–peer abuse. We will ensure that appropriate curriculum time is dedicated to enable children and students to develop an awareness and understanding of abusive behaviour and to ensure that children and students recognise warning signs and have access to externally (such as the Police, ChildLine etc).

- ▪ 'Upskirting' is a criminal offence and will not be tolerated. It typically involves someone taking a photograph under a person's clothes (not necessarily a skirt) without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any gender, can be a victim.

- ▪ All staff need to maintain a culture of 'it could happen here' and that if inappropriate; behaviour is addressed early, this can help prevent abusive/violent behaviour.

- ▪ Victims of abuse will be distressed, which can affect progress in college If the alleged perpetrator is a fellow student, this can be made worse.

- ▪ Girls are *more likely* to be victims, boys *more likely* to be perpetrators.

- ▪ It could be a group of perpetrators or an individual.

- ▪ Staff should keep in mind that some students may have additional barriers to disclosing due to vulnerability, disability, gender, ethnicity and/or sexual orientation.

- ▪ Staff should reflect back, using the student's own language, when hearing a report.

- ▪ Staff should recognise it may only be the first incident reported, rather than representative of a singular incident and that trauma can impact upon memory, so students may not be able to recall all details or timeline of abuse.

(a) What to do if you have concerns

- ● Staff should not wait for a child to make a disclosure; they should act on concerns immediately.

- ● Staff may overhear a conversation that suggests a child may have been harmed or behaviour may be an indicator.

- ● If the report includes an online element, staff may confiscate devices for evidence to hand to the Police.

- ● Staff can ask children outright if they have been harmed and what the nature of the harm was.

(b) Support

Pupils who have been experienced peer on peer abuse will be supported by:

- Being offered an immediate opportunity to discuss the experience with a member of staff of their choice.

- Being advised to keep a record of concerns as evidence and discussions regarding how to respond to concerns and build resilience, if appropriate and will follow the relevant Local Authority procedures for supporting children who are at risk of harm as a result of their own behaviour. Students who are alleged to have abused other students will be helped by:

  - discussing what happened, establishing the specific concern and the need for behaviour to change;
  - informing parents/carers to help change the attitude and behaviour of the child;
  - providing appropriate education and support;
  - sanctioning them in line with the disciplinary policy. This may include official warnings, detentions, removal of privileges (including denial of online access), fixed-term and permanent exclusions.

- Speaking with police or other local services (such as early help or children's specialist services) as appropriate – see NCPP advice on when to call the Police, paragraph 26 Local Support.

(c) **Next Steps after Initial Report**

- The DSL's risk and needs assessment in response to a report of sexual harassment should also consider whether there have been any other victims. The DSL will regularly review the actions taken to respond to reports.

- Regularly review the risk and needs assessment and put active measures in place to safeguard students.

Staff should be aware of the following:

- Be aware of and respond appropriately to all reports and concerns about sexual violence and/or harassment both online and offline, including those happening outside of college.
- Balance the victim's wishes against their responsibility to protect other students.
- Remember that sexual violence and sexual harassment can take place within intimate personal relationships between peers.
- Think about other related issues and wider context, including any links to CSE and CCE and take the potential for sexual violence and harassment in intimate personal relationships into consideration.
- Keep victim and alleged perpetrator a reasonable distance apart on school premises including at before and after-school activities.
- Ensure recording practice is comprehensive and accurate.
- The DSL should know what the early help process is and how and where to access support.

- The previous restrictions on the use of Police bail have been removed – the Police will now consider what action to take to manage the assessed risk of harm, this could include the use of Police or court bail.

Annex 4

Sexting

- The term 'sexting' relates to the sending of indecent images, videos and/or written messages with sexually explicit content; these are created and sent electronically. They are often 'shared' via social networking sites and instant messaging services.

- Sexting; it is inappropriate and illegal amongst young people and can have extremely damaging and long-lasting consequences. Sexting is unacceptable behaviour. The misuse of electronic communication, such as sexting, inappropriate comments on Facebook for example, being the object of cyber-bullying and online grooming are all potential safeguarding concerns.

- Work with parents, carers and young people in ensuring that all students are fully aware of the dangers and possible repercussions of sexting.

- Not dismissing or tolerating such behaviours as this risks normalising them.

Annex 5

Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet:

- Cyber - enabled: crimes happen off-line and enabled at scale/speed online or
- Cyber-dependant: where there is:

  o Unauthorised access to computers and illegal hacking, eg accessing a school's computer network to look for test paper answers or change grades.

  o Denial of service attacks or 'booting' where attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources.

  o 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.

  o Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the DSL should consider referring to the Cyber Choices programme, a Police programme supported by the Home Officer and led by the National Crime Agency.

Cyber Choices aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Annex 6

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).
- By strangers.

Other community safety incidents in the vicinity of a school may 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.

Schools will give practical advice on how to keep themselves safe. We will provide outdoor-safety lessons run by teachers or by local Police. The lessons will focus on building children's confidence and abilities rather than simply warning them about all strangers.

Annex 7

Modern Slavery and the National Referral Mechanism (NRM)

Modern slavery is linked to human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims – Modern slavery – GOV.UK (www.gov.uk)

Annex 8

Sexual Violence and Sexual Harassment Between Children

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

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap. They can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

Staff should be aware of the importance of:

- o Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.
- o Not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys".
- o Challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts, or up skirting.

Peer–on–Peer Abuse

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

    b. 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 as well as their emotional well–being. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and offline (both physically and verbally) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support.

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

2. Policy
    a. We believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and other children.

    b. We recognise that children are capable of abusing their peers and this will be dealt with under our child protection policy

    c. We are clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
    d. We will minimise the risk of peer-on-peer abuse by: –

i. Prevention:
    o   Taking a whole organisational approach to safeguarding & child protection
    o   Providing training to staff
    o   Engaging with specialist support and interventions.
    o   Using a clear reporting system for staff and pupils, that is well promoted, easily understood and accessible
    o   Recognising that it may be taking place, even if not reported
    o   Publicising the school's zero-tolerance approach to abuse
    o   Online safety, including mobile phone usage during school hours

ii. Responding to reports of sexual violence and sexual harassment:
    o   Children making a report of sexual violence or sexual harassment will be taken seriously, kept safe and be well supported.
    o   Staff taking a report will never promise confidentiality.
    o   Parents or carers will normally be informed (unless this would put the child at greater risk).
    o   If a child is at risk of harm, is in immediate danger, or has been harmed, a referral will be made.

iii. Risk Assessment: –
    o   Following a report, the DSL will make an immediate risk and needs assessment on a case-by-case basis. The Risk assessment will consider;
        o   The victim, especially their protection and support.
        o   The alleged perpetrator, their support needs and any discipline action.
        o   All other children at the school.
        o   The victim and the alleged perpetrator sharing classes and space at school.
        o   The risk assessment will be recorded and kept under review.
        o   Where there has been other professional intervention and/or other specialist risk assessments, these professional assessments will be used to inform the school's approach to supporting and protecting pupils.

iv. DSL considerations and response
    o   The DSL will consider: –
        o   The wishes of the victim.
        o   The nature of the incident including whether a crime has been committed and the harm caused.
        o   The ages of the children involved.
        o   The developmental stages of the children.
        o   Whether there is a power imbalance between the children/young people.
        o   Any previous incidents.
        o   Ongoing risks.
        o   Other related issues or wider context.

Options: The DSL will then consider the following options: –
        o   Manage internally
        o   Early Help
        o   Refer
        o   Report to the police (generally in parallel with a referral to Social Care)

v. Ongoing Response:
- o The DSL will manage each report on a case by case basis and will keep the risk assessment under review.
- o Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator should be removed from any classes they share with the victim.
- o The DSL will consider how best to keep the victim and perpetrator a reasonable distance apart on school premises and on transport where appropriate.
- o Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, the school will take suitable action. In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and lead to the view that allowing the perpetrator to remain in the same school or college would seriously harm the education or welfare of the victim (and potentially other pupils or students).
- o Where a criminal investigation into sexual assault leads to a conviction or caution, the school or college will, if it has not already, consider any suitable sanctions in light of their behaviour policy, including consideration of permanent exclusion.

- o Where the perpetrator is going to remain at the school or college, the Principal would be to continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on school and college premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.
- o The victim, alleged perpetrator and other witnesses (children& adults) will receive appropriate support and safeguards on a case–by–case basis.
- o The school will take any disciplinary action against the alleged perpetrator in line with behaviour and discipline in schools.
- o The school recognises that taking disciplinary action and providing appropriate support are not mutually exclusive actions and will occur at the same time if necessary.

- ▪ **Annex 9**

- ▪ **Keeping Yourself Safe When Responding to Disclosures**

1. Receive
   - ▪ Keep calm
   - ▪ Listen to what is being said without displaying shock or disbelief
   - ▪ Take what is being said to you seriously

2. Respond
   - ▪ Reassure the pupil that they have done the right thing in talking to you
   - ▪ Be honest and do not make promises you cannot keep e.g. "It will be alright now"
   - ▪ Do not promise confidentiality; you have a duty to refer
   - ▪ Reassure and alleviate guilt if the pupil refers to it e.g. "you're not to blame"
   - ▪ Reassure the child that information will only be shared with those who need to know

3. React

- React to the pupil only as far as is necessary for you to establish whether or not you need to refer the matter, but do not interrogate for full details
- Do not ask leading questions; "Did he/she….?" Such questions can invalidate evidence.
- Do ask open "TED" questions; Tell, explain, describe
- Do not criticise the perpetrator; the pupil may have affection for him/her
- Do not ask the pupil to repeat it all for another member of staff
- Explain what you have to do next and who you have to talk to

4. Record
- Make some brief notes at the time on any paper which comes to hand and write them up as soon as possible
- Do not destroy your original notes
- Record the date, time, place, any non-verbal behaviour and the words used by the child. Always ensure that as far as possible you have recorded the actual words used by the child.
- Record statements and observable things rather than your interpretations or assumptions

5. Remember
- Contact the DSL
- The DSL may be required to make appropriate records available to other agencies

6. Relax
- Get some support for yourself, dealing with disclosures can be traumatic for professionals

3. Physical Abuse

o While a clear focus of peer-on-peer abuse is around sexual abuse and harassment, physical assaults and initiation violence and rituals from pupils to pupils can also be abusive.
o These are equally not tolerated and if it is believed that a crime has been committed, will be reported to the police.
o The principles from the anti-bullying policy will be applied in these cases, with recognition that any police investigation will need to take priority.

- **Annex 10**

- **Dealing with Disclosure Flow Chart**
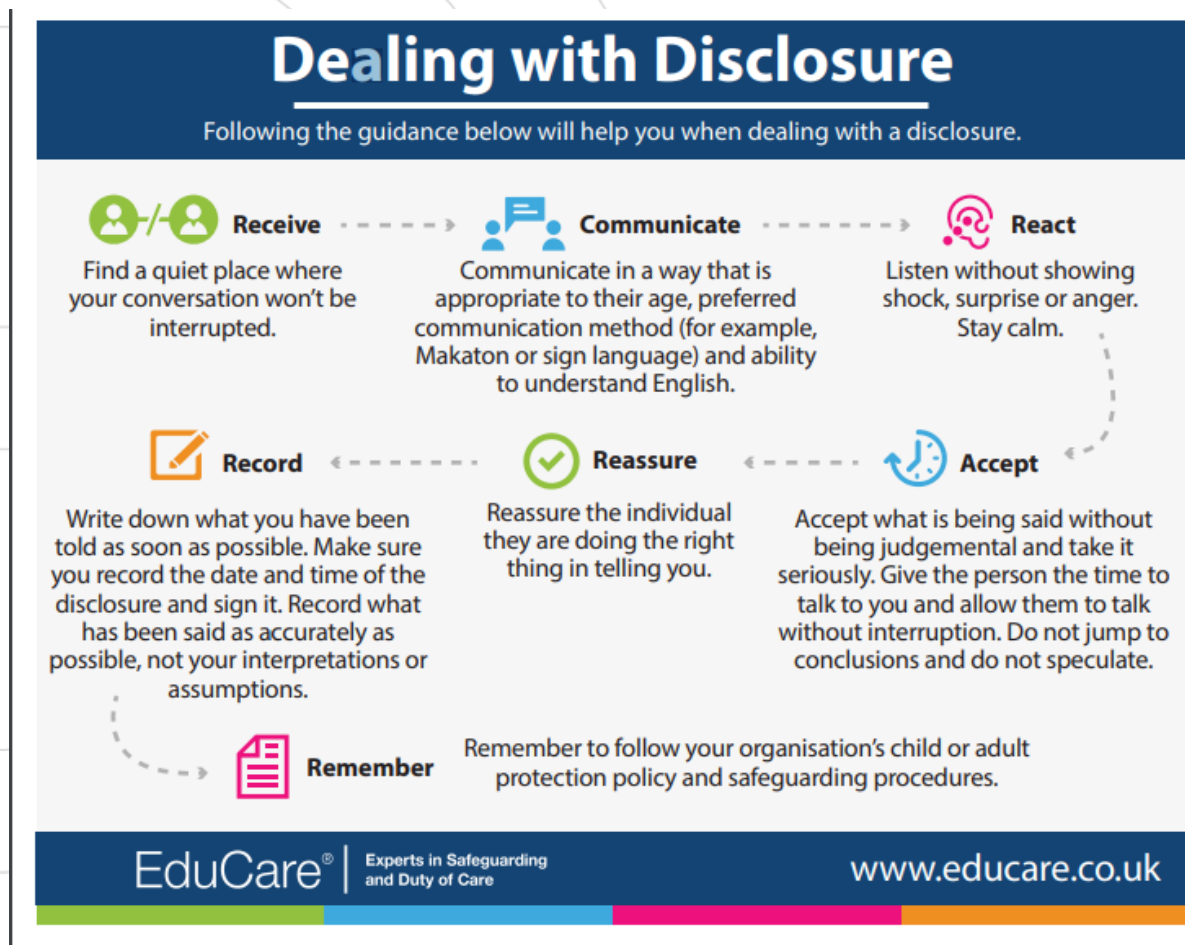
Source:
https://www.myeducare.com/pluginfile.php/480082/mod_resource/content/1/Dealing%20with%20Disclosure.pdf

- **Annex 11**

- **Points of reference**

- Childline: http://www.childline.org.uk/pages/home.aspx

- CEOPSThinkuknow: https://www.thinkuknow.co.uk/

- Anti-Bullying Alliance: http://anti-bullyingalliance.org.uk/

- Beat Bullying: http://www.beatbullying.org/

- Childnet International –making the internet a great and safe place for children. Includes resources for professionals and parents http://www.childnet.com/

- Thinkuknow (includes resources for professionals and parents) https://www.thinkuknow.co.uk/

- Safer Internet Centre http://www.saferinternet.org.uk/

- Youth Index: Princes Trust
https://www.princes-trust.org.uk/about-the-trust/research-policies-reports/youth-index-2017?utm_source=twitter&utm_campaign=youth_index&utm_medium=direct

- Government definition of Domestic Violence:
https://www.gov.uk/government/news/new-definition-of-domestic-violence

Signs that may indicate emotional abuse
- Over reaction to mistakes;
- Lack of self-confidence/esteem;
- Sudden speech disorders;
- Self-harming;
- Eating Disorders;
- Extremes of passivity and/or aggression;
- Compulsive stealing;
- Drug, alcohol, solvent abuse;
- Fear of parents being contacted;
- Unwillingness or inability to play;
- Excessive need for approval, attention and affection

- **Annex 12**

- **Neglect**

The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Signs that may indicate neglect:
- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Inadequate clothing
- Missing from home, nursery/school/college, medical appointments including frequent lateness
- Untreated medical problems
- Poor relationship with peers
- Compulsive stealing and scavenging
- Rocking, hair twisting and thumb sucking
- Running away
- Loss of weight or being constantly underweight
- Low self esteem

End of document