

SAFEGUARDING POLICY

POLICY ESSENTIAL INFORMATION

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INTRODUCTION AND RATIONALE FOR POLICY

In line with GEMS vision for all services for children and young people, the Local Advisory Board (LAB) and all GEMS World Academy (GWA) staff recognise that children have a fundamental right to learn in a safe environment and to be protected from harm. Young people are less likely to learn effectively and go on to lead positive and independent lives if they are not kept healthy and safe. GWA is therefore committed to providing an environment which is safe, and where the welfare of each child is of paramount importance. This will include a commitment to ensuring that all students feel confident that any concerns they may have will be listened to and acted upon.

To this end, the LAB and the Academy staff will be committed to ensuring that all members of the Academy community are aware of the responsibilities and procedures in this area. This will include communicating policies and procedures effectively with parents/carers, ensuring all staff and relevant members of the LAB attend appropriate training and work effectively with other professionals on behalf of children in need, or when enquiring into allegations of child abuse. Safeguarding the children in our care is paramount in operating successful schools. Our employees are critical in the provision of an effective safeguarding system, however, safeguarding children is a responsibility that extends beyond the Academy and there are occasions where the expertise of other agencies will need to be sought.

THE AIMS OF THIS POLICY

- To ensure that all adults within GWA who have access to students have been checked as to their suitability to be in contact with young people
- To raise awareness of all Academy staff of the importance of safeguarding and child protection, and in particular to make clear responsibilities for identifying and reporting actual or suspected abuse
- To ensure that all staff are aware of their statutory responsibilities in respect of safeguarding
- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- Staff are properly trained in recognising and reporting safeguarding issues
- To develop a structured procedure within the Academy to be followed by all members of its community in cases of safeguarding
- To promote effective liaison with other agencies in order to work together for the protection and welfare of all students
- To provide a systematic means of monitoring students known or thought to be at risk of harm
- To emphasise the need for good levels of communication between all members of staff
- To support students' development in ways which will foster security, confidence and independence
- To integrate a child protection curriculum within the existing curriculum, allowing for continuity and progress through each Phase of the school
- To make appropriate links and reference to policies in related areas such as behaviour and bullying
- To ensure students and parents are aware that GWA takes safeguarding seriously and will follow the appropriate procedures for identifying and reporting abuse, and for dealing with allegations against staff

LEGISLATIVE FRAMEWORK

This policy is based on the following legislation, guidance and referencing:

- [UAE Federal Law 3, 2016](#) (Child Rights - Wadeema's Law)
- [Keeping Children Safe in Education 2020](#)
- [Working Together to Safeguard Children](#)
- [GEMS Safeguarding Code of Conduct](#)

- [Cabinet Resolution No. \(52\) of 2018 Governing the Executive Regulations of Federal Law No. \(3\) of 2016 on Child Rights Law \(Wadeema\)](#)
- [Department for Health, School Health Guidelines for Private Schools 2011](#)
- [The UAE School Inspection Framework 2016.](#)
- [Executive Council Resolution No. \(2\) of 2017](#)
- [Regulating Private Schools in the Emirate of Dubai Abu Dhabi Education Council Private Schools Policy and Guidance Manual 2014](#)
- [Abu Dhabi Education Council Organising Regulations of Private Schools in the Emirate of Abu Dhabi](#)
- [The Chairman of the Executive Council Resolution No. \(26\) of 2013 Law No. \(26\) of 2015 on the Organisation of Dubai Data Publication](#)

This policy is also based on the following legislation:

- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies to safeguard and promote the welfare of students at the Academy
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B (11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children

DEFINITIONS

Safeguarding and promoting the welfare of children means:

- Protecting children from maltreatment
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Key definitions explain the different types of abuse.

Neglect is a form of abuse and is 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. Key definitions define neglect in more detail.

Sexting (also known as youth produced sexual imagery) is the sharing of sexual imagery (photos or videos) by children.

Children, includes everyone under the age of 18 (Federal Law 3, 2016).

Designated Safeguarding Lead (DSL), the designated senior employee within the Academy who has specific responsibility for evoking and leading on safeguarding incidents.

Child protection specialist (CPS), the person licenced and assigned by the competent authority or the concerned bodies, as the case may be, to preserve the child's rights and protect him within his respective competence, as mentioned in this law. (Federal Law 3, 2016).

Crisis Management Team (CMT), an appointed group of senior employees from GEMS schools support centre, who can provide support during serious incidents.

PHOENIX Terminology

Minor - Internal student welfare and safeguarding concerns dealt with in school. Principal / DSL and GEMS safeguarding department receives these concerns.

Major - External agency involvement as a child is at risk of significant harm now or in the predictable future. The Principal/ DSL/ GEMS safeguarding department receives these alerts.

Serious - Child / staff fatality or hospitalisation as result of abuse. Principal/ DSL/ GEMS safeguarding department and CEO of GEMS.

EQUALITY STATEMENT

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities
- Are young carers
- May experience discrimination due to their race, ethnicity or religion
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs

ABUSE OF POSITION OF TRUST

It is an offence for a person over 18 (e.g. a teacher) to have a sexual relationship with a young person under 18 where that person is in a 'position of trust' in respect of the young person, even if the relationship is consensual.

APPOINTMENT OF STAFF

The Academy and LAB are committed to adhering to the principle of Safer Recruitment when appointing staff taking account of the Department of Education Statutory Guidance 'Keeping Children Safe in Education (September 2020)' and will observe the following safeguards:

- That documentation sent out to potential candidates will make it clear that safeguarding and child protection is a high priority for the Academy, and that rigorous checks will be made of any candidate before appointments are confirmed
- That all references will be taken up and verified by telephoning referees
- That a reference will always be obtained from the last employer
- That at interview candidates will be asked to account for any gaps in their career/employment history
- That evidence of relevant checks will be recorded and stored in a single, central location, easily accessible when appropriate and necessary

GUIDING PRINCIPLES FOR INTERVENTION TO PROTECT CHILDREN

The Academy will ensure that the principles identified below are followed by all staff

- All students have a right to be kept safe and protected from abuse
- Child abuse can occur in all cultures, religions and social classes
- Staff must be sensitive to the families cultural and social background
- Students must have the opportunity to express their views and be heard
- If there is a conflict of interests between the child and parent, the interests of the child must be paramount
- The responsibility to initiate agreed procedures rests with the individual who identifies the concern
- All staff must endeavour to work in partnership with those who hold parental responsibility for a student
- Information in the context of a child protection enquiry must be treated as confidential and only shared with those who need to know.
- All staff should have access to appropriate and regular training
- The Academy management must allow staff sufficient time to carry out their duties in relation to child protection and safeguarding
- The Academy will recommend and disseminate the GEMS ['Code of Conduct'](#) for staff and Governors working with young people

ROLES AND RESPONSIBILITIES

Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers and Governors in the Academy. Our policy and procedures also apply to extended Academy and off-site activities. All Academy staff have a responsibility to identify and report suspected abuse and to ensure the safety and well-being of the students in their Academy. In doing so they should seek advice and support as necessary from the Designated Safeguarding Lead or other appropriate senior staff members. Staff are expected to provide a safe and caring environment in which students can develop the confidence to voice ideas, feelings and opinions. Students should be treated with respect within a framework of agreed and understood behaviour.

ALL STAFF

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff Code of Conduct, the role and identity of the Designated Safeguarding Lead (DSL) and deputies and the Behaviour Policy
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation
- Appendix D of this policy outlines in more detail how staff are supported to do this
- The need to mark their registers promptly to flag up any absent students, failure to do so may invoke the disciplinary procedure
- Report concerns (including concerns about other staff/professionals) to the Designated Safeguarding Lead, or other senior staff members (the Principal) as appropriate
- Monitor and report as required on the welfare, attendance and progress of all students
- Keep clear, dated, factual and confidential records of child protection concerns
- Respond appropriately to disclosures from children and young people (stay calm, reassure without making unrealistic promises, listen, avoid leading questions, avoid being judgemental and keep records)
- Be aware of the importance of E-Safety (please see [GWA E-Safety Policy](#))

RESPONSIBILITIES OF DESIGNATED SAFEGUARDING LEAD

The LAB will ensure that the Academy has identified a Designated Safeguarding Lead who will be a Senior Leader(s), for safeguarding and child protection, and that the Principal and Designated Senior Leaders undertake the following responsibilities:

- To ensure all staff are familiar with Academy and GEMS Education procedures and guidelines for identifying and reporting abuse, including allegations of abuse against staff
- To ensure all staff receive training in the above, including staff who are volunteers, temporary or start mid-year. This training should be provided on an annual basis
- To be responsible for coordinating action and liaising with the Academy staff and Support Services over safeguarding and child protection issues
- To follow GEMS Education guidance informing the GEMS designated Child Protection Officer (CPO)
- To be aware of new legislation, guidance, policy and procedures in the area of safeguarding and child protection
- To support and advise staff on child protection issues generally
- To disseminate relevant information between agencies to the appropriate staff e.g. relevant teachers, personal tutors, counsellors etc.
- To maintain accurate and secure child protection records and send on to new schools (where relevant)

RESPONSIBILITIES OF THE LAB

The LAB will approve this policy at each review, ensure it complies with the law and hold the CEO / Principal to account for its implementation.

The LAB will appoint a senior board level (or equivalent) Link Governor to monitor the effectiveness of this policy in conjunction with the LAB. This is always a different person from the DSL.

GEMS Corporate will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate (see Appendix G).

All governors will read [Keeping Children Safe in Education](#).

RESPONSIBILITIES OF THE CEO / PRINCIPAL

The CEO / Principal is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction
- Communicating this policy to parents when their child joins the Academy and via the Academy website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see Appendix G)
- Ensuring the relevant staffing ratios are met, where applicable

CONFIDENTIALITY

Our processes and principles for sharing information within the Academy and GEMS Education are outlined below:

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if 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
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- The UK Government have a useful document: [information sharing advice for safeguarding practitioners](#) which includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy)

- Confidentiality is also addressed in this policy with respect to record-keeping in section 14, and allegations of abuse against staff in Appendix G

RECOGNISING ABUSE AND TAKING ACTION

Staff, volunteers and Governors must follow the procedures set out below in the event of a safeguarding issue.

Please note – in this and subsequent sections, you should take any references to the DSL to mean ‘the DSL (or deputy DSL)’.

If a child is suffering or likely to suffer harm, or in immediate danger

Tell the DSL as soon as possible. The DSL is responsible for reporting any safeguarding concerns to the GEMS Safeguarding department and other relevant head office stakeholders. The GEMS Safeguarding department and Crisis Management Team are responsible for identifying and reporting significant incidents to the relevant external authorities.

If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Immediately inform the DSL or Deputy DSL work with them to add your case to PHOENIX as soon as possible in the child’s own words. Stick to the facts, and do not put your own judgement on it
- If a DSL or Deputy DSL is not available then inform a member of SLT
- Do not discuss with other members of staff who are not on the SG team
- If another relevant authority and/or the police needs to be involved, tell the DSL as soon as possible and contact Sara Hedge sara.hedger@gemseducation.com from GEMS Safeguarding to seek advice.

If you discover that FGM has taken place or a student is at risk of FGM

The Department for Education’s Keeping Children Safe in Education explains that FGM comprises ‘all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs’.

Possible indicators that a student has already been subjected to FGM, and factors that suggest a student may be at risk, are set out in Appendix C.

Any member of staff who discovers that an act of FGM appears to have been carried out on a student under 18 must speak to the DSL and follow our safeguarding procedures.

Any member of staff who suspects a student is *at risk* of FGM or suspects that FGM has been carried out must speak to the DSL and follow our safeguarding procedures. Staff should not examine students.

If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from the GEMS Safeguarding department.

Share details of any actions you take with the DSL as soon as practically possible.

Referral

If it is appropriate to refer the case to the GEMS Safeguarding department or the police, the DSL will make the referral or support you to do so.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from the relevant external agency.

If you have a mental health concern

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

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps above.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree on a course of action.

WORK EXPERIENCE PLACEMENTS

Students on work experience/placements: the Academy will have policies and procedures in place to protect students from harm when they are on work placements.

ALLEGATIONS AGAINST STAFF

If you have concerns about a member of staff (including a supply teacher or volunteer), or an allegation is made about a member of staff (including a supply teacher or volunteer) posing a risk of harm to children, speak to the CEO / Principal. If the concerns/allegations are about the CEO / Principal, contact Sara Hedger sara.hedger@gemseducation.com from GEMS Corporate (more detail is outlined in Appendix G).

GEMS has a separate policy for ['Procedures for Managing Allegations of Abuse against Members of Staff'](#), however:

- The LAB recognise that because of their daily contact with children in a variety of situations, including the caring role, teachers and other Academy staff are vulnerable to accusations of abuse
- The LAB further recognises that, regrettably, in some cases such accusations may be true. The LAB, therefore, expect all staff to follow the agreed procedures for dealing with allegations against staff
- Allegations of abuse against a member of staff must be referred to the CEO / Principal or Designated Safeguarding Lead as soon as possible and in any case within 2 hours of the initial concern arising. If the CEO / Principal and Designated Safeguarding Lead are not available the most senior member of staff must be informed
- The Principal will inform the GEMS Safeguarding department of any allegations that might indicate a person would pose a risk of harm to children
- If the allegations are against the CEO / Principal, the Chair of the LAB or the named Safeguarding Link Governor must be notified and the procedures above will be followed
- All allegations and investigations against members of staff will be conducted in line with legislation, good practice and the guidance '[Keeping Children Safe in Education](#)'
- When conducting an investigation involving a safeguarding issue (where the alleged victim is under 18) the Investigating Officer must take guidance from the Designated Safeguarding Lead in relation to the interviewing procedure to be followed, and where there is significant risk, student interviews could be conducted by the Designated Safeguarding Lead
- In some circumstances after informing the GEMS Safeguarding department, the instruction may be to stop any internal investigation to allow the police to investigate. At any stage the CEO / Principal or the Designated Safeguarding Lead may decide to stop proceedings and refer the case to the police for further investigation where this is deemed necessary
- If a member of staff is dismissed or removed from 'regulated activity' (or would have been had they not already left) because they harmed or posed a risk of harm to children, the Academy will be under a legal obligation to forward information about that person to the Disclosure & Barring Service
- The Chair of the LAB or the named Safeguarding Link Governor will be responsible for overseeing this policy and related procedures, and to liaise with partner agencies in the event of allegations of abuse being made against the CEO / Principal

STAFF CONTACT WITH STUDENTS

As adults in positions of trust and in order to minimise the risk of accusations being made against staff as a result of their daily contact with students, all Academy staff will adhere to the Academy's expectations regarding professional conduct and should familiarise themselves with the Academy's [Use of reasonable force in schools](#) guidance regarding reasonable force.

All staff will be issued with a Staff Code of Conduct which clearly outlines the expectations of staff in relation to contact, over familiarisation, social networking and using student information.

ALLEGATIONS OF ABUSE MADE AGAINST OTHER STUDENTS

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as 'banter', 'just having a laugh' or 'part of growing up'.

We also recognise the gendered nature of peer-on-peer abuse. However, all peer-on-peer abuse is unacceptable and will be taken seriously.

Most cases of students hurting other students will be dealt with under our Academy's Behaviour Policy, but this Safeguarding Policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put students in the Academy at risk
- Is violent
- Involves students being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including sexting)

If a student makes an allegation of abuse against another student:

- You must record the allegation and tell the DSL, but do not investigate it further
- The DSL will contact the GEMS Safeguarding Team (if necessary) and follow their advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed

We will minimise the risk of peer-on-peer abuse by:

- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to boys
- Ensuring our curriculum helps to educate students about appropriate behaviour and consent
- Ensuring students know they can talk to staff confidentially by reiterating this during tutor time, pastoral support and other appropriate means of communication
- Ensuring staff are trained to understand that a student harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

(Sexting) Inappropriate Texting

This is a suggested approach based on guidance from the UK Council for Child Internet Safety for [all staff](#) and for [DSLs and senior leaders](#).

Your responsibilities when responding to an incident

If you are made aware of an incident involving sexting (also known as 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

- View, download or share the imagery yourself, or ask a student to share or download it. If you have already viewed the imagery by accident, you must report this to the DSL
- Delete the imagery or ask the student to delete it
- Ask the student(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the student(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident, and reassure the student(s) that they will receive support and help from the DSL.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate Academy staff. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to student(s)
- If a referral needs to be made to the police and/or other appropriate agencies
- If it is necessary to view the imagery in order to safeguard the young person (in most cases, imagery should not be viewed)
- What further information is required to decide on the best response
- Whether the imagery has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images from devices or online services
- Any relevant facts about the students involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the students involved (in most cases parents should be involved)

The DSL will make an immediate referral the GEMS Safeguarding Department and to the police and/or other appropriate agency:

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, ming these barriers
- We offer extra pastoral support for students with SEN and disabilities. or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts
- The DSL has reason to believe a student is at immediate risk of harm owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the CEO / Principal and other members of staff as appropriate, may decide to respond to the incident without involving the police or other appropriate agency.

Further review by the DSL

If at the initial review stage a decision has been made not to refer to police and/or any other agency, the DSL will conduct a further review.

They will hold interviews with the students involved (if appropriate) to establish the facts and assess the risks.

If at any point in the process there is a concern that a student has been harmed or is at risk of harm, a referral will be made to the GEMS Safeguarding sara.hedger@gemseducation.com department and the police immediately - seek advice from Sara Hedge before doing so.

Informing parents

The DSL will inform parents at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the student at risk of harm.

Recording incidents

All sexting incidents and the decisions made in responding to them will be recorded. The record-keeping arrangements set out in this policy also apply to recording incidents of sexting.

Curriculum coverage

Students are taught about the issues surrounding sexting as part of our education and computing programmes. Teaching covers the following in relation to sexting:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive
- Issues of legality
- The risk of damage to people's feelings and reputation

Students also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

This policy on sexting is also shared with students so they are aware of the processes the Academy will follow in the event of an incident.

Notifying parents

Where appropriate, we will discuss any concerns about a child with the child's parents. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents about any such concerns following consultation with the DSL. If we believe that notifying the parents would increase the risk to the child, we will discuss this with the GEMS safeguarding team / appropriate agency before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved.

Students with special educational needs and disabilities

We recognise that students with special educational needs (SEND) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- Students being more prone to peer group isolation than other students

- The potential for students with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers

MOBILE PHONES AND CAMERAS

Staff are allowed to bring their personal phones to the Academy for their own use, but will limit such use to non-contact time when students are not present. Staff members' personal phones will remain in their bags or cupboards during contact time with students.

Staff will not take pictures or recordings of students on their personal phones or cameras.

We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the Academy.

COMPLAINTS AND CONCERNS ABOUT THE SAFEGUARDING POLICY

Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see Appendix G).

Other complaints

The Academy has a formal Complaints Policy which is available via our website.

WHISTLEBLOWING

The Academy has a [Whistleblowing Policy](#).

All staff should be aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues, and that these should be reported to the Principal or the Designated Safeguarding Lead in the Principal's absence

PHYSICAL INTERVENTION

Our policy on physical intervention by staff is set out in a separate policy (please see Physical Restraint Policy) and acknowledges that staff must only ever use physical intervention as a last resort, and that at all times it must be the minimal force necessary to prevent injury to another person. We understand that physical intervention of any nature which causes injury or distress to a student may be considered under safeguarding or disciplinary procedures.

All incidents requiring use of restraint should be reported to the CEO / Principal or the Designated Safeguarding Lead in the CEO / Principal's absence.

ANTI-BULLYING

Our Anti-Bullying Policy is set out separately (please see [Anti-Bullying Policy](#)) and acknowledges that to allow or condone bullying may lead to consideration under safeguarding or disciplinary procedures.

Racist incidents: repeated racist incidents or a single serious incident may lead to consideration under safeguarding or disciplinary procedures.

PARENTS

We recognise that sometimes a concern arises about a parent when they are in the Academy. In these cases, the member of staff concerned will advise the parents that the Academy has a duty to refer the matter, under Safeguarding guidelines, to the Designated Safeguarding Lead.

PREVENTION

We recognise that the Academy plays a significant part in the prevention of harm to our students by providing children with good lines of communication with trusted adults, a supportive environment and an ethos of protection.

The Academy community will therefore:

- Establish and maintain an ethos where students feel secure, are encouraged to talk and are always listened to
- Ensure that all students know there are adults in the Academy whom they can approach if they are worried or in difficulty
- Ensure that students are provided with opportunities to develop their understanding and adopt safe practices through our promotion of Healthy Lifestyles
- Work on community cohesion, respect, anti-bullying and anti-violence
- Reward positive behaviour
- Work on safety, risk and crime prevention
- Provide opportunities for channelling positive engagement e.g. community work /charity events
- Provide parenting programmes covering topics such as e-Safety

HEALTH AND SAFETY

The Academy's Health & Safety policy, set out in a separate document, outlines the protection given to students both in the Academy environment and on external visits and trips.

E-SAFETY

Issues pertaining to E-Safety in connection with child protection are available in the policy for the Acceptable Use of ICT and the [E-Safety Policy](#). The Academy is committed to working with families to make them aware of how they can ensure that their children are using the internet safely.

STAFF TRAINING AND SUPPORT

- The LAB recognises the importance of child protection training for the Designated Safeguarding Lead, and for all other staff who have contact with students. The designated Link Governor for Safeguarding and Child Protection, and the Designated Safeguarding Lead will have specific training in their role
- The LAB expect the CEO / Principal and the Senior Leadership Team to ensure that all Academy staff, including support and ancillary staff, receive training in safeguarding and that new staff are made aware of Academy policy, procedures and guidelines when they join the Academy, and receive annual training thereafter in line with best practice
- Safeguarding training is mandatory for all members of staff and will be covered during induction for new members of staff. This will include information on radicalisation and extremism
- The CEO / Principal is also expected to ensure that all staff receive regular support in respect of child protection work and know which senior member of staff to refer to for advice in the absence of the Designated Safeguarding Lead
- The LAB recognises its own responsibilities to ensure the Academy has sufficient resources to effectively deliver its safeguarding responsibilities to the highest standard and to request information as part of the CEO / Principal's report regarding the safeguarding practice of the Academy so any identified gaps are remedied in a timely way

All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures, to ensure they understand the Academy's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with current external advice.

All staff will have training on Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates (for example, through emails, e-bulletins and staff meetings) as required, but at least annually.

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

The DSL and Deputy DSLs

The DSL and Deputy DSLs will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

Recruitment – interview panels

At least one person conducting any interview for a post at the Academy will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with safeguarding procedures.

Staff who have contact with students and families

All staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

The Academy will hold a central training register to confirm training has been provided.

CURRICULUM

The LAB believes that the Academy curriculum is important in the protection of children. They will aim to ensure that curriculum development meets the following objectives (these are often met through the Citizenship curriculum):

- Developing student self-esteem
- Developing communication skills
- Informing about all aspects of risk
- Developing strategies for self-protection
- Developing a sense of the boundaries between appropriate and inappropriate behaviour in adults
- Developing non-abusive behaviour between students

RECORD KEEPING

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the Academy.

If a child for whom the Academy has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main student file. In addition, if the concerns are significant or complex, and/or external agencies are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

MONITORING STUDENTS ON THE CHILD PROTECTION REGISTER

The LAB expects the CEO / Principal and Senior Leadership team to ensure that teachers monitor closely the welfare, progress and attendance of all students.

COMMUNICATING POLICY TO PARENTS AND STUDENTS

The LAB expects parents and students to be informed that the Academy has a Safeguarding policy and is required to follow national guidance and best practice at all times.

Students and parents should know how the Academy's child protection system works and with whom they can discuss any concerns. They should also be made aware of local or national telephone helplines.

EMERGENCY CONTACTS FOR STUDENTS

The Academy will strive to acquire more than one available emergency contact for every student. There will be at least two emergency contacts for every child at the Academy in the case of emergencies, and in case there are welfare concerns at home.

MONITORING AND EVALUATING THE EFFECTIVENESS OF THE ACADEMY'S POLICY

The LAB requires the CEO / Principal to report to them annually on the effectiveness of the Academy's Safeguarding policy and on any associated issues in the Academy over the preceding year.

SAFEGUARDING IN RELATION TO OTHER ACADEMY POLICIES

This Safeguarding policy should be read in conjunction with other relevant Academy policies such as;

- [Behaviour Policy](#)
- [Anti-Bullying Policy](#)
- [Whistleblowing Policy](#)
- [E-Safety Policy](#)
- [Physical Restraint Policy](#)

This policy will be reviewed on an annual basis in line with current legislation.

KEY DEFINITIONS

Children - Children includes everyone under the age of 18

Definitions of Abuse and Neglect of Children (taken from 'Working Together to Safeguard Children' 2020)

Physical Abuse - This may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocation or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer feigns the symptoms of or deliberately causes ill health to a child whom they are looking after.

Emotional Abuse - This is the persistent emotional ill-treatment of a child such that it causes severe and persistent adverse effects on a child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children.

It may involve causing children to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of ill-treatment of a child, although it may occur alone. Types of emotional abuse include:

Bullying - Bullying is the oppression or persecution of a weaker person by a stronger person. It is sometimes included as a type of child abuse. The difference is that bullying is often inflicted by a peer rather than by an adult. However adults and older children are capable of bullying behaviour and it is frequently an element of all types of child abuse.

Cyberbullying - Cyberbullying is the use of Information Communications Technology, particularly mobile phones and the internet, deliberately to upset someone. It is different from other forms of bullying because it can take place at any time, and can intrude into spaces that have previously been regarded as safe or personal. The audience can be very large, and can be reached rapidly. For some applications there can also be very little audit trail thus making this form of bullying far more effective. Cyberbullying can take place between peers and across generations and some instances of cyberbullying are known to be unintentional. See Appendix D for more detail.

Sexting - Sexting is when someone sends or receives a sexually explicit text, image or video on their mobile phone, usually in a text message.

Sexual Abuse - Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is fully aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. This may include non-contact activities such as; involving children in looking at or in the production of pornographic material, or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

Grooming - Is the term used to describe how an adult gets to know a child gradually and in quite natural ways, with the intention of sexually abusing and / or exploiting them. With increased internet usage more children are being targeted for this form of abuse.

Neglect - Neglect is 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. It may involve a parent/carer failing to provide adequate food or shelter and clothing, failing to protect a child from physical harm or danger, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to basic emotional needs.

In addition to the categories of abuse listed above see Appendix A for additional information and guidance on specific safeguarding concerns. See Appendix C for possible indicators of abuse.

Appendix A

This list has been taken from '[Keeping Children Safe in Education](#)'

Specific Safeguarding Issues ('Keeping children safe in education' – Statutory guidance for schools and colleges – September 2020).

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. School and college staff can access government guidance as required on the issues listed below appropriate professional websites:

- bullying including cyberbullying
- children missing education
- child missing from home or care
- child sexual exploitation (CSE)
- domestic violence
- drugs
- fabricated or induced illness
- faith abuse
- female genital mutilation (FGM)
- forced marriage- and Annex A
- gangs and youth violence
- gender-based violence / violence against women and girls (VAWG)
- hate
- mental health
- missing children and adults strategy
- private fostering
- preventing radicalisation
- relationship abuse
- sexting
- trafficking

Key Definitions

Domestic violence - *Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are family members. The abuse can encompass, but is not limited to:*

- psychological
- physical
- sexual
- financial
- emotional

The involvement of dependent, developmentally immature children and adolescents in sexual activities they do not truly comprehend, to which they are unable to give informed consent or that violate the social taboos of family roles.

Controlling behaviour - controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

Coercive behaviour - Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.

Domestic abuse and young people - the changes to the definition of domestic violence raises awareness that young people in the 16 to 17 age group can also be victims of domestic violence and abuse. By including this age group the government hopes to encourage young people to come forward and get the support they need, through a helpline or specialist service.

Child abuse linked to faith or belief - abuse linked to belief, including belief in possession, is a horrific crime which is condemned by people of all cultures, communities and faiths. Standard child safeguarding procedures apply in all cases where abuse or neglect is suspected, including those that may be related to particular belief systems.

Mental health difficulties - At least one in four people will experience a mental health difficulty at some point in their life and one in six adults has a mental health problem at any one time.

One in ten children aged between 5 and 16 years has a mental health difficulty, and many continue to have mental health difficulties into adulthood. Half of those with lifetime mental health difficulties first experience symptoms by the age of 14, and three quarters before their mid-20's.

Self-harming in young people is not uncommon (10 - 13% of 15 - 16 year-olds have self-harmed) Almost half of all adults will experience at least one episode of depression during their lifetime. One in ten new mothers experience postnatal depression.

About one in 100 people has a severe mental health difficulty. Some 60% of adults living in hostels have a personality disorder.

Some 90% of all prisoners are estimated to have a diagnosable mental health difficulty (including personality disorder) and / or a substance misuse problem.

Child sexual exploitation (CSE) - involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities.

Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation, or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

Some of the following signs may be indicators of sexual exploitation:

- Children who appear with unexplained gifts or new possessions
- Children who associate with other young people involved in exploitation
- Children who have older boyfriends or girlfriends
- Children who suffer from sexually transmitted infections or become pregnant
- Children who suffer from changes in emotional well-being
- Children who misuse drugs and alcohol
- Children who go missing for periods of time or regularly come home late
- Children who regularly miss school or education or don't take part in education

So-called 'honour-based' abuse (including FGM and forced marriage)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

This policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a student is at risk of FGM.

Indicators that FGM has already occurred include:

- A student confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/student already being known to social services in relation to other safeguarding issues
- A girl:
 - Having difficulty walking, sitting or standing, or looking uncomfortable
 - Finding it hard to sit still for long periods of time (where this was not a problem previously)
 - Spending longer than normal in the bathroom or toilet due to difficulties urinating
 - Having frequent urinary, menstrual or stomach problems
 - Avoiding physical exercise or missing PE
 - Being repeatedly absent from school, or absent for a prolonged period
 - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
 - Being reluctant to undergo any medical examinations
 - Asking for help, but not being explicit about the problem
 - Talking about pain or discomfort between her legs

Potential signs that a student may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
 - Having a mother, older sibling or cousin who has undergone FGM
 - Having limited level of integration within the community
 - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
 - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period
 - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
 - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
 - Being unexpectedly absent from the Academy
 - Having sections missing from her (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

APPENDIX B

PEER-ON-PEER ABUSE

At GWA we are committed to ensure that any form of peer on peer abuse or harmful behaviour is dealt with immediately and consistently. This will reduce the extent of harm to the young person and minimise the potential impact on that individual child's emotional and mental health and well-being. If one child or young person causes harm to another, this should not necessarily be dealt with as abuse: bullying, fighting and harassment between children are not generally seen as child protection issues. However, it may be appropriate to regard a young person's behaviour as abusive if:

- There is a large difference in power (for example age, size, ability, development) between the young people concerned; or
- The perpetrator has repeatedly tried to harm one or more other children; or
- There are concerns about the intention of the alleged young person
- If the evidence suggests that there was an intention to cause severe harm to the victim, this should be regarded as abusive whether or not severe harm was actually caused.

Prevention

At the Academy we will minimise the risk of allegations against other students by,

- Providing a rich and comprehensive curriculum through personal tutoring during TTB, year group assemblies and workshops. This will develop students' understanding of acceptable behaviours and keeping themselves safe
- Delivering a robust online and mobile technology safety programme through IT lessons which develop student knowledge, understanding and skills, to ensure personal safety and self protection when using the internet and social networking

- Work with our parents via the Parent Council to equip and empower all parents to support their children in using the internet safely at home and outside the Academy
- Having robust monitoring and filtering systems in place to ensure students are safe and act appropriately when using IT at the Academy
- Having systems in place for any student to raise concerns with staff, knowing that they will be listened to, believed and valued

Allegations

Occasionally, allegations may be made against students by other young people in the Academy which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse, teenage relationship abuse and sexual exploitation, bullying, cyberbullying and sexting. It should be considered as a safeguarding allegation against a student if some of the following features are present.

The allegation,

- Is made against an older student and refers to their behaviour towards a younger student or a more vulnerable student
- Is of a serious nature, possibly including a criminal offence
- Raises risk factors for other students in the Academy
- Indicates that other students may have been affected by this student
- Indicates that young people outside the Academy may be affected by this student

Examples of safeguarding issues against a student could include:

Physical Abuse, including hitting, kicking, nipping, shaking, biting, hair pulling, or otherwise causing physical harm to another person. There may be many reasons why a child harms another and it is important to understand why a young person has engaged in such behaviour, including accidentally, before considering the action or sanctions to be undertaken.

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

- An Imbalance of Power: Young people who bully use their power - such as physical strength, access to embarrassing information, or popularity - to control or harm others. Power imbalances can change over time and in different situations, even if they involve the same people
- Repetition: Bullying behaviours happen more than once or have the potential to happen more than once
- Bullying includes actions such as making threats, spreading rumours, attacking someone physically or verbally or for a particular reason e. g. size, hair colour, race, gender, and excluding someone from a group on purpose

Cyber bullying is the use of phones, instant messaging, email, chat rooms or social networking sites to harass, threaten or intimidate someone for the same reasons as stated above. It is important to state that cyberbullying can very easily fall into criminal behaviour. Outside of the immediate support our students may require in these instances, the Academy will have no choice but to involve the CPO and Police to investigate these situations.

Sexting is when someone sends or receives a sexually explicit text, image or video. This includes sending 'nude pics', 'rude pics' or 'nude selfies'. Pressuring someone into sending a nude picture can happen in any relationship and to anyone, regardless of their age or gender. However, once the image is taken and sent, the sender has lost control of the image and these images could end up anywhere. By having in their possession, or distributing, indecent images of a person under 18 on to someone else, young people are not even aware that they could be breaking the law.

Emotional Abuse can include blackmail or extortion and may also include threats and intimidation. This harmful behaviour can have a significant impact on the mental health and emotional well-being of the victim and can lead to self harm.

Sexual Abuse - sexually harmful behaviour from young people is not always contrived or with the intent to harm others.

There may be many reasons why a young person engages in sexually harmful behaviour and it may be just as distressing to the young person who instigates it as well as the young person it is intended towards. Sexually harmful behaviour may range from inappropriate sexual language, inappropriate role play, to sexually touching another or sexual assault/abuse.

It can also include indecent exposure, indecent touching/serious sexual assaults or forcing others to watch pornography or take part in sexting.

Teenage relationship abuse is defined as a pattern of actual or threatened acts of physical, sexual, and/or emotional abuse, perpetrated by an adolescent (between the ages of 13 and 18) against a current or former partner. Abuse may include insults, coercion, social sabotage, sexual harassment, threats and/or acts of physical or sexual abuse. The abusive teen uses this pattern of violent and coercive behaviour, in relationships, in order to gain power and maintain control over the partner.

Sexual Exploitation can include encouraging other young people to engage in inappropriate sexual behaviour or grooming and recruiting members of the peer group into being sexually exploited by other young people or adults. It can also include photographing or videoing other children performing indecent acts.

Initiation/Hazing is a form of initiation ceremony which is used to induct newcomers into an organisation such as schools, sports teams, etc. There are a number of different forms, from relatively mild rituals to severe and sometimes violent ceremonies. The idea behind this practice is that it welcomes newcomers by subjecting them to a series of trials which promote a bond between them. After the hazing is over, the newcomers also have something in common with older members of the organisation, because they all experienced it as part of a rite of passage. Many rituals involve humiliation, embarrassment, abuse, and harassment.

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

Procedure for Dealing with Allegations of Peer on Peer Abuse

When an allegation is made by a student against another student, members of staff should consider whether the complaint raises a safeguarding concern. If there is a safeguarding concern,

the Designated Safeguarding Lead should be informed immediately. A factual record should be made of the allegation, but no attempt at this stage should be made to investigate the circumstances. If the allegation indicates that a potential criminal offence has taken place, the CPO or police must be informed. Parents of the student/s being complained about and the alleged victim/s, should be informed and kept updated on the progress of the investigation. The Designated Safeguarding Lead will make a record of the concern, the discussion and any outcome.

If the allegation highlights a potential risk to the Academy and the student, the Academy will follow its behaviour policy and procedures and take appropriate action. In situations where the Academy considers a safeguarding risk is present, a risk assessment should be prepared along with a preventative, supervision plan. The plan should be monitored and a date set for a follow-up evaluation with everyone concerned.

APPENDIX C

Possible indicators of abuse of teenagers

It can be harder to spot signs of abuse in teenagers than in younger children as teenagers are more capable of covering up injuries, however, it is important that staff are aware of changes in a learner's behaviour, attendance, or attitude to their work as the changes could be indicators of abuse.

Possible indicators of abuse in teenagers:

- Poor self-esteem
- Depression and anxiety
- Tiredness due to sleep disturbance
- Not eating, weight loss or weight gain
- Marked changes in attendance at the academy, unexplained absences from the academy, lengthy absences from academy
- Marked changes in behaviour, students becoming withdrawn or aggressive
- Pregnancy
- STD

Possible indicators of physical abuse:

- unexplained skin bruising
- unexplained cuts or abrasions
- unexplained burns
- unexplained fractures etc.

Note of caution - some physiological processes / medical conditions can cause changes which are hard to distinguish from some aspects of physical abuse.

Possible indicators of neglect:

- poor hygiene
- malnutrition
- inappropriate clothing
- broken skin

Possible psychological and emotional indicators:

- withdrawal
- depression
- cowering and fearfulness
- sudden changes in behaviour
- deliberate self-harm

Possible indicators of sexual abuse:

- unexplained marked fluctuation of mood changes
- pain, bruising or bleeding in genital or anal areas
- a detailed sexual knowledge inappropriate to the age of the child behaviour that is excessively affectionate or sexual towards other children or adults
- attempts to inform by making a disclosure about the sexual abuse often begin by the initial sharing of limited information with an adult. It is also very characteristic of such children that they have an excessive preoccupation with secrecy and try to bind the adults to secrecy or confidentiality
- a fear of medical examinations
- a fear of being alone — this applies to friends/family/neighbours/baby-sitters, etc.
- a sudden loss of appetite, compulsive eating, anorexia nervosa or bulimia nervosa
- promiscuity
- sexual approaches or assaults - on other children or adults
- urinary tract infections (UTI), sexually transmitted disease (STD) are all cause for immediate concern in young children
- bruising to the buttocks, lower abdomen, thighs and genital/rectal areas. Bruises may be confined to grip marks where a child has been held so that sexual abuse can take place
- discomfort or pain particularly in the genital or anal areas
- the drawing of pornographic or sexually explicit images

Possible general indicators of abuse:

- Seeking shelter or protection
- unexplained reactions towards particular settings
- frequent or regular visits to the GP, or hospital casualty department, or hospital admissions
- frequent or irrational refusal to accept investigations or treatments for routine difficulties
- inconsistency of explanation

The following 'trigger' behaviours may be additional indicators that abuse is occurring:

- destruction of physical environment
- turning night into day/sleep disturbance
- chronic incontinence
- extreme physical and/or emotional dependence
- verbal abuse and aggression towards the carer
- changes in personality - caused by illness and/or medication
- non compliance with carer's wishes
- obsessive behaviour
- wandering / absconding
- self-harm

APPENDIX D

Additional information on Cyberbullying

Technology	Example of misuse
Mobile phones	Making inappropriate calls or sending inappropriate text messages, including threats. Intimidation or harassment. Taking and sharing humiliating images. Videoing other people being harassed and sending these to other phones or internet sites
Whatsapp/ Snapchat / other similar apps.	Sending inappropriate messages or content
Email	Sending inappropriate, nasty or threatening messages. Forwarding unsuitable content including images and video clips, or sending computer viruses. Accessing someone else's account, e.g. to forward personal emails or delete emails
Webcams	Making and sending inappropriate content. Persuading or threatening young people to act in inappropriate ways. Using inappropriate recordings to manipulate young people
Social network sites e.g. Facebook, Twitter, Instagram and internet dating sites such as Tinder	Posting nasty comments, humiliating images / video. Accessing another person's account details and sending unpleasant messages, deleting information or making private information public. Groups of people picking on individuals by excluding them. Creating fake profiles to pretend to be someone else, e.g. to bully, harass or get the person into trouble Trolling (posting inflammatory, extraneous, or off-topic messages in an online community with the deliberate intent of provoking the account holder) Vulnerable people may be exploited through relationships established on internet-dating sites
YouTube	Posting embarrassing, humiliating film of someone
Virtual Learning Environments	Posting inappropriate messages or images. Hacking into someone else's account to post inappropriate comments or delete schoolwork
Gaming sites, consoles and virtual worlds	Name-calling, making abusive / derogatory remarks. Players may pick on weaker or less experienced users, repeatedly killing their characters. Forwarding unwanted messages to other devices in the immediate vicinity
Identity theft	Bank details and other personal information being stolen and used inappropriately

APPENDIX E

Guidance for Supply Staff and visitors to the Academy

All staff have a professional duty to promote the safety and welfare of students and to seek to protect them from actual or likely harm. In all circumstances, the welfare of the student is paramount.

What should I be concerned about?

- A student who tells you something
- Out of character behaviour
- A student who displays unusual behaviour (flinches at sudden movements, makes adult sexual comments or gestures)
- Gossip you overhear or are told by a student
- Signs and or symptoms of drug abuse, alcohol abuse, smoking
- A student who has a lot of unexplained absences or lates, or appears dirty, hungry or uncared for
- Unexplained bruises or marks
- Anything else that makes you feel that 'something isn't right' about a student
- What should I do if I have a concern?

TELL THE DESIGNATED SAFEGUARDING LEAD IMMEDIATELY

If the DSL is not available, speak to the Deputy DSL or the CEO / Principal, or any other member of the Senior Leadership Team. They will speak with the DSL as soon as possible and a decision will be made as to the next steps. If you are not sure whether there is a problem, still pass it on.

But what if the young person tells me something in confidence?

You must not make promises of confidentiality that you cannot keep. You will need to explain to the student that if they tell you something that makes you think that they are at risk you are duty bound to pass on these concerns. If they do disclose to you, follow these guidelines:

- stay calm and be available to listen
- listen with the utmost care to what the student is saying
- do not 'interview' the student as this may interfere with a police investigation
- do not ask leading questions;
- reassure the student and let them know they were right to inform us
- inform the student that this information will now have to be passed on for their safety
- immediately inform the Designated Safeguarding Lead

Should I write anything down?

The written report should be done regardless of whether or not the concern results in a referral. The written report should be immediately passed to the DSL.

Should I tell the parents?

No – do not contact parents. If your concern arises when a parent is present, inform them that you have a duty to refer the concerns, under Child Protection Guidelines, to the Designated Safeguarding Lead

APPENDIX F

Allegations of abuse made against staff

This section of this policy applies to all cases in which it is alleged that a current member of staff or volunteer has:

- Behaved in a way that has harmed a child, or may have harmed a child, or
- Possibly committed a criminal offence against or related to a child, or
- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children

It applies regardless of whether the alleged abuse took place in the Academy. Allegations against a member of staff who no longer works at the Academy and historical allegations of abuse will be referred to the police.

We will deal with any allegation of abuse against a member of staff or volunteer very quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation. Our procedures for dealing with allegations will be applied with common sense and judgement.

Suspension

Suspension will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative. It is only the Principal that can make the decision to suspend a member of staff.

Based on an assessment of risk, we will consider alternatives such as:

- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the Academy so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the CEO / Principal (or chair of the LAB where the Principal is the subject of the allegation) – the ‘Investigating Officer’ – will take the following steps:

- Immediately discuss the allegation with the CPO. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children’s social care services. (The Investigating Officer may, on occasion, consider it necessary to involve the police *before* consulting the CPO – for example, if the accused individual is deemed to be an immediate risk to children

- or there is evidence of a possible criminal offence. In such cases, the case manager will notify the CPO as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the CPO (and the police or other external agencies, where necessary). Where the police and/or or other external agencies are involved, the case manager will only share such information with the individual as has been agreed with those agencies
 - Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the Academy is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the CPO, police and/or or other external agencies, as appropriate
 - **If immediate suspension is considered necessary**, agree and record the rationale for this with the CPO. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the Academy and their contact details as a person to be contacted throughout
 - **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the CPO what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
 - **If it is decided that further action is needed**, take steps as agreed with the CPO to initiate the appropriate action in the Academy and/or liaise with the police and/or or other external agencies as appropriate
 - Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and consider what other support is appropriate
 - Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with or other external agencies and/or the police, if applicable). The Principal or Investigating Officer will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
 - Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)

Where the police are involved, wherever possible the CEO / Principal will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the Academy's disciplinary process, should this be required at a later point.

Additional considerations for supply staff

If there are concerns or an allegation is made against someone not directly employed by the school, such as supply staff provided by an agency, we will take the actions below in addition to our standard procedures.

We will not decide to stop using a supply teacher due to safeguarding concerns without finding out the facts and liaising with our CPO to determine a suitable outcome.

The LAB will discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the Academy, while the Academy carries out the investigation.

We will involve the agency fully, but the Academy will take the lead in collecting the necessary information and providing it to the CPO as required.

We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary).

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, we will invoke appropriate action within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, we will aim to hold this within the timeframes outlined in the Disciplinary Policy.

Specific actions

Action following a criminal investigation or prosecution

The Investigating Officer will discuss with the CPO whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the Academy ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the CEO / Principal, Investigating Officer and the Designated Safeguarding Lead will discuss with the CPO whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required. If the individual concerned is a member of teaching staff, the CEO / Principal, Investigating Officer and the Designated Safeguarding Lead will discuss with the CPO whether to refer the matter to the relevant authority to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the Investigating Officer will consider how best to facilitate this.

The Investigating Officer will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the Academy.

Unsubstantiated or malicious allegations

If an allegation is shown to be deliberately invented, or malicious, the CEO / Principal, or other appropriate person in the case of an allegation against the CEO / Principal, will consider whether any disciplinary sanction is appropriate against the student(s) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a student.

Confidentiality

The Academy will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The Investigating Officer will take advice from the CPO, police and or other external agencies, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

Record-keeping

The Investigating Officer will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. Such records will include:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken and decisions reached (and justification for these, as stated above)

If an allegation or concern is not found to have been malicious, the Academy will retain the records of the case on the individual's confidential personnel file, and provide a copy to the individual. We will retain these records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer. The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

References

When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

Learning lessons

After any cases where the allegations are *substantiated*, we will review the circumstances of the case with the CPO to determine whether there are any improvements that we can make to the Academy's procedures or practice to help prevent similar events in the future. This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual