



**7A. Child Protection Handbook**  
**&**  
**Safeguarding Policy**

1.Statutory Policies	<b>7A. Safeguarding</b>
ISI	Part 3
NMS	11
Author Led	DSL
Date of Review	June 2022
Next Review	May 2023
Comment	Annual Review
Website	Yes

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# 1.Key contacts:

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## 2.Introduction and Context

### 2.1. Our responsibilities

British International School Casablanca (BISC) is committed to safeguarding children and young people and we expect everyone who works in our school to share this commitment. This policy sets out how BISC will deliver these responsibilities.

2.1.1. This policy **must** be read in conjunction with 'Keeping children safe in education' (September 2021), which is statutory guidance to be read and followed and alongside 'Working together to safeguard children' (July 2018), a guide to inter-agency working to safeguard and promote the welfare of children.

2.1.2. In addition, the advice in Department for Education Sexual violence and sexual harassment between children in schools and colleges must also be followed.

2.1.3. These documents are available via the following links:

- [Working Together to Safeguard Children 2018 \(publishing.service.gov.uk\)](https://www.gov.uk/government/publications/working-together-to-safeguard-children-2018)
- [Keeping children safe in education 2022 \(publishing.service.gov.uk\)](https://www.gov.uk/government/publications/keeping-children-safe-in-education-2022)
- [Sexual violence and sexual harassment between children in schools and colleges \(publishing.service.gov.uk\)](https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges)

### 2.2. Our Principles

2.2.1. We believe that our school should provide a child-centred, caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual child.

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

2.2.3. We recognise the importance of enabling children to talk openly about anything that worries them and to feel confident that they will be listened to, kept safe and never be made to feel that they are creating a problem for reporting abuse, sexual violence or sexual harassment.

2.2.4. We ensure that pupils are taught about safeguarding, including online safety, through various teaching and learning opportunities, as part of providing a broad and balanced curriculum.

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

2.2.6. Safeguarding arrangements in our school are underpinned by two key principles:

- safeguarding is everyone's responsibility: all staff, Board members and volunteers should play their full part in keeping children safe; and maintain an attitude of 'it could happen here' and
- a child-centred and coordinated approach: a clear understanding of the needs and views of children.

## 2.3. Scope

2.3.1. In line with the law, this policy defines a child as anyone under the age of 18 years or any child on roll at this school.

2.3.2. This policy applies to all members of staff in our school, including all permanent, temporary and support staff, supply staff, Board members, volunteers, contractors and external service or activity providers.

## 2.4. Our Policy

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

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

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

2.4.3. The school will ensure that we facilitate a whole school approach to safeguarding which means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.

# 3. Safeguarding Roles and Responsibilities

## 3.1. All staff, volunteers and Board members have responsibility for the following:

3.1.1. to provide a safe environment in which children can learn

3.1.2. identify children who may be in need of extra help or who are suffering, or are likely to suffer, significant harm.

- 3.1.3. to take appropriate action, working with other services as needed.
- 3.1.4. to keep themselves updated with the systems within the school which support safeguarding that were explained to them as part of their induction (including the Staff Code of Conduct). This includes knowing the role, and working with, the school's Designated Safeguarding Lead.
- 3.1.5. to ensure they receive appropriate child protection training which is regularly updated.

### **3.2. All school staff are responsible for:**

- 3.2.1. Knowing who the school's Designated Safeguarding Lead (DSL) and Deputy are.
- 3.2.2. Raising any concerns with the Designated Safeguarding Lead and Deputy. Anyone can make a referral.
- 3.2.3. Completing a written safeguarding concern when making a referral. Staff should be clear that this should be done immediately, always on the same day.
- 3.2.4. Ensuring that their child protection training is up to date.
- 3.2.5. Being alert to the signs of abuse, including peer on peer abuse and their need to refer any concerns to the designated staff member.
- 3.2.6. Maintaining an attitude of 'it could happen here'. When concerned about the welfare of a child, staff members should always act in the interests of the child.
- 3.2.7. Knowing the school's procedures for dealing with children who go missing from education, particularly on repeat occasions, and reporting any such concerns to the designated lead.
- 3.2.8. Listening to, and seeking out, the views, wishes and feelings of children and young people.
- 3.2.9. Sharing information and working together to provide children and young people with the help they need.
- 3.2.10. Referring to the DSL any concerns about another member of staff, or if the concerns are about the DSL, referring them to the Headmaster or School Board.
- 3.2.11. Raising concerns about poor or unsafe practice and potential failures in the school's safeguarding regime through the school's Whistle Blowing Policy.
- 3.2.12. Knowing the school's procedures for dealing with peer-on-peer abuse, including sexual harassment and sexual violence between children.

### **3.3. Board members and school leadership are responsible for:**

- 3.3.1. Ensuring that there is an effective Child Protection and Safeguarding Policy in place together with a Staff Code of Conduct, which are provided to all staff, and ensuring all staff are given a mandatory induction, which includes familiarisation with child protection responsibilities and procedures to be followed if anyone has any concerns about a child's safety or welfare.
- 3.3.2. Ensuring that policies and procedures adopted by The Board, particularly concerning referrals of cases of suspected abuse and neglect, are followed by all staff.

3.3.3. Ensuring that the school has an appropriate senior member of staff from the school leadership team, with appropriate status and authority, funding, resources and support to take the lead in responsibility for safeguarding and child protection; (DSL) and that they receive DSL Level 3 training which is updated every two years.

3.3.4. Ensuring that they are aware of and follow local procedures related to safeguarding.

#### **3.4. The Designated Safeguarding Lead is responsible for:**

3.4.1. Managing referrals from school staff or any others from outside the school.

3.4.2. Working with external agencies and professionals on matters of safety and safeguarding.

3.4.3. Undertaking relevant training and attending update sessions.

3.4.4. Raising awareness of safeguarding and child protection amongst the staff and parents; and ensuring that, where possible, child protection information is transferred to the pupil's new school/school.

3.4.5. Ensuring that the school has a nominated Board member to liaise with the Designated Lead in the event of allegations of abuse made against the overall Head of School

3.4.6. Ensuring all staff receive the appropriate training, and keep it up to date, in line with advice from the UK.

3.4.7. Managing security within the school and reviewing it annually.

3.4.8. Ensuring that important policies, such as those for behaviour and bullying, are kept up to date.

3.4.9. Keeping all child records up to date.

3.4.10. Have an overview of the numbers of safeguarding and child protection referrals and report to The Board termly about the school safeguarding activity over the previous term.

3.4.11. Ensuring that the curriculum makes best use of Citizenship and PSHCE opportunities to cover safeguarding issues with children.

3.4.12. Ensuring at least one person on any appointment panel has undertaken Safer Recruitment training.

3.4.13. Ensuring the adherence to statutory responsibilities to check staff working with children, taking proportionate decisions on whether to ask for checks beyond what is required; and ensuring volunteers are appropriately supervised.

3.4.14. Ensuring procedures are in place to handle allegations against members of staff and volunteers.

3.4.15. Ensuring there are procedures in place to handle allegations against other children.

3.4.16. Ensuring that there is support available for staff involved in difficult child protection cases/incidents both at the school and externally through counselling and/or other services.

- 3.4.17. Creating a culture of listening to children and taking account of their wishes and feelings, both in individual decisions and in the school's development.
- 3.4.18. Ensuring through the safeguarding curriculum that students know the process of raising a concern (about themselves or a friend/other), that they know the school's Designated Safeguarding Lead (and Deputy) and are aware of other support mechanisms.
- 3.4.19. Making this policy available to parents and carers as appropriate.
- 3.4.20. Ensuring that staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children and creating an environment where staff feel able to raise concerns and feel supported in their safeguarding role.
- 3.4.21. Ensuring all staff have regular reviews of their own practice to ensure they improve over time.
- 3.4.22. Ensuring all records are kept up to date and secure and kept separately from the main student file in a locked location.
- 3.4.23. Fulfilling their duties in line with KCSIE 2021 Appendix B.

## 4. Safeguarding Processes and Procedures

### 4.1. How to report any concerns

- 4.1.1. Clear procedures on reporting any concerns are given to all staff/volunteers in the school. This is done as part of the staff induction training and staff are given a reminder of this annually in refresher training.
- 4.1.2. All concerns should be reported in writing, using the school's safeguarding concern process (whether online or paper based). Concerns should always be completed as soon as possible.
- 4.1.3. All child protection and/or safeguarding concerns should be reported to Designated Safeguarding Lead or the Deputy Designated Safeguarding Lead immediately.
- 4.1.4. The school takes its responsibility to safeguard young people seriously. Failure to follow these reporting procedures may result in disciplinary action.

### 4.2. Taking Action

- 4.2.1. If at any time it is considered that a child has suffered significant harm or a child needs immediate protection, a referral will be made to the local police.
- 4.2.2. If the child has an injury that requires medical attention, the child protection process will not delay the administration of first aid or emergency medical assistance.

### 4.3. Student disclosure of abuse, peer-on-peer abuse, neglect or radicalisation

- 4.3.1. At BISC we have a clear procedure for reporting concerns. If a student talks to a member of staff about any risks to their safety or wellbeing, the staff member will let the student know that the staff member must pass the information on to the safeguarding team (DSL) in order to

offer the proper support that the pupil requires. Staff members will allow them to speak freely and will not ask investigative questions.

- 4.3.2. The staff member will tell the student what will happen next. It is the duty of the member of staff to inform the Designated Safeguarding Lead of what has been discussed. The staff member will write up details of the conversation with the student as soon as possible on the record of concern form (template can be found at the end of this policy) and deliver it to the Designated Safeguarding Lead.
- 4.3.3. All concerns should be recorded promptly and passed via hand to the DSL or Deputy DSL.
- 4.3.4. Staff should not wait until the following school day to report a concern. Information will be shared on a need-to-know basis only.
- 4.3.5. Issues or concerns will not be discussed with colleagues, friends or family unless necessary for the welfare of the child.

#### **4.4. Suspecting that a student is at risk of harm**

- 4.4.1. There will be occasions when staff may suspect that a student may be at risk but have no 'real' evidence. In these circumstances, staff will try to give the student the opportunity to talk. All staff should be aware that children can abuse other children (often referred to as peer-on-peer abuse) and that it can happen both inside and outside of school and online.
- 4.4.2. Staff should use the concern form referral to record these early concerns. Following an initial conversation with the student, if the member of staff remains concerned, they should discuss their concerns with the Designated Safeguarding Lead or Deputy. Children may be harmed by other children or young people. Staff will be aware of the harm caused by peer-on-peer abuse including sexual violence or harassment and recognize that even if there are no reported cases of peer-on-peer abuse, such abuse may still be taking place and is simply not being reported. Staff will use the school's Anti-Bullying Policy where necessary. However, there will be occasions when a student's behaviour warrants a response under child protection rather than anti-bullying procedures. The school acknowledges that some children can be particularly vulnerable or may have an increased risk of abuse and we accept the responsibility to take reasonable and appropriate steps to ensure their welfare. To ensure that all of our students receive equal protection, we will give special consideration to children that are considered to be vulnerable.

#### **4.5. Notifying parents**

- 4.5.1. The school will normally seek to discuss any concerns about a student with their parents. The Designated Safeguarding Lead will make contact with the parent in the event of a concern, suspicion or disclosure.
- 4.5.2. However, if the school believes that notifying parents could increase the risk to the child, exacerbate the problem or compromise the safety of a staff member, advice will first be sought, and a decision may be made not to inform parents.

#### **4.6. Private Fostering**

- 4.6.1. A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by

someone other than a parent, person with parental responsibility or close relative, in their own home, with the intention that it should last for 28 days or more.

- 4.6.2. Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored, particularly when the child has come from another country. In some cases, privately fostered children are affected by abuse and neglect, or are involved in trafficking, child sexual exploitation or modern-day slavery.
- 4.6.3. School staff should notify the Designated Safeguarding Lead or Deputy when they become aware of private fostering arrangements. The Designated Safeguarding Lead will speak to the family of the child involved to check that appropriate care is in place for the child and the school is aware who has parental responsibility.

## 5. Types of Abuse

### 5.1. Child abuse and types of abuse

- 5.1.1. Abuse is 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.
- 5.1.2. Further information and resources can be found in part 5 of KCSIE 2021 and in the Safeguarding folder in the school's Virtual Library
- 5.1.3. All staff must maintain an attitude of 'it could happen here' and ensure any concern, no matter how small is reported. It could be the vital missing piece of the jigsaw that indicates a child is at risk of harm
- 5.1.4. All staff will receive ongoing training regarding types of abuse including local and national context.
- 5.1.5. The DSL and/or Deputy will respond to all concerns, following procedures and where there is an immediate risk of serious harm to a child will inform the police.
- 5.1.6. There are four types of child abuse as defined in 'Keeping Children Safe in Education' September 2021 paras 26-30 and Annex A:
  - physical abuse
  - emotional abuse
  - sexual abuse
  - neglect.
- 5.1.7. All staff must know what these are and be alert to the signs.

### 5.2. Safeguarding Issues

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

**5.2.2. Staff must be particularly alert to the following**

**5.3. Child Sexual Exploitation and Child Criminal Exploitation – CSE and CCE  
(see KCSIE 2021 para 32-39)**

- 5.3.1. Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation
- 5.3.2. Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.
- 5.3.3. Children can become trapped by this type of exploitation as perpetrators can threaten victims and their families. Staff must recognise that children involved in CCE are vulnerable and are victims themselves and that they may still have been criminally exploited even if the activity appears to have been something they have agreed or consented to.
- 5.3.4. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.
- 5.3.5. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. It can take place as a one off or over a period of time and may occur online.
- 5.3.6. It is important that staff recognise that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however staff should be aware that girls are at risk of criminal exploitation too.
- 5.3.7. Staff must also be aware that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.
- 5.3.8. Staff should be aware that 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 believe they are in a genuine romantic relationship.
- 5.3.9. As a result, many children and young people who are victims of sexual exploitation do not recognise themselves as such which can be an additional barrier to disclosure.
- 5.3.10. Staff will receive training and updates on CSE and CCE to ensure awareness of and mitigate these additional difficulties to ensure children receiving appropriate intervention and support at the earliest opportunity.
- 5.3.11. CSE is a form of child sexual abuse and 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.

## **5.4. Serious Violence**

- 5.4.1. All staff should be aware of the indicators which may signal children are at risk from or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, as significant decline in performance, signs of self-harm or significant changes in well-being, signs of assault or unexplained injuries.
- 5.4.2. Unexplained gifts or new possessions are also potential indicators that children have been approached by or are involved with criminal networks or gangs and may be at risk of CCE.
- 5.4.3. All staff should be aware of the range of risk factors which increases the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced maltreatment and having been involved in offending such as theft or robbery.
- 5.4.4. Staff will receive training and updates on serious violence and have access to information and resources to support development of their knowledge, skills and understanding.
- 5.4.5. Any concerns, no matter how small must be reported using the school's usual procedures. The DSL or Deputy will follow the safeguarding procedures. Where there is a risk of imminent harm an immediate referral to the police should be made.

## **5.5. Honour-Based Abuse (HBA)**

- 5.5.1. So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing.
- 5.5.2. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the Designated Safeguarding Lead (or Deputy).
- 5.5.3. Where staff are concerned that a child might be at risk of HBA, they must contact the Designated Safeguarding Lead as a matter of urgency. Where FGM has taken place please refer to section 5.6 of this policy. (See below)

## **5.6. Female Genital Mutilation**

- 5.6.1. Female Genital Mutilation (FGM) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK but there are no laws specifically prohibiting it in Morocco. It is not usually considered part of Moroccan culture but may be practiced by other cultures.
- 5.6.2. All staff should speak to the DSL or Deputy with regard to any concerns about FGM.

5.6.3. Teachers must report cases where they discover that an act of FGM appears to have been carried out or suspect it will be and discuss any such cases with the Designated Safeguarding Lead.

## 5.7. Forced Marriage

5.7.1. A forced marriage is where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. A marriage must be entered into with the free and full consent of both parties, there must be a choice.

5.7.2. Forced marriage is recognised as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights.

5.7.3. An arranged marriage is not the same as a forced marriage. In an arranged marriage, the families take a leading role in choosing the marriage partner, but both parties are free to choose whether to enter into the marriage or not.

5.7.4. Where staff or volunteers have any reason to suspect that someone is experiencing pressure or being forced in marriage, they must report this to the DSL through the school process.

5.7.5. For more information on forced marriage see Annex B in KCSIE 2021.

## 5.8. Breast Ironing/Flattening

5.8.1. Breast ironing or flattening is the process during which young pubescent girls' breasts are ironed, massaged, flattened and/or pounded down over a period of time (sometimes years) in order for the breasts to disappear or delay the development of the breasts entirely.

5.8.2. Breast ironing is a form of physical abuse that has been condemned by the United Nations and identified as Gender-based Violence. Although, countries where breast ironing is prevalent have ratified the African Charter on Human Rights to prevent harmful traditional practices, it is not against the law.

5.8.3. *Keeping Children Safe in Education*, Annex B (2021) mentions breast ironing as part of the section on so-called 'Honour Violence'.

5.8.4. Staff or volunteers worried about the risk of breast ironing in the school should refer through the appropriate channels to the Designated Safeguarding Lead as soon as possible.

5.8.5. For more information on breast ironing or flattening see KCSIE 2021 Annex B.

## 5.9. Preventing Radicalisation

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

5.9.2. The Designated Safeguarding Lead has received training about the Prevent Duty and tackling extremism and is able to support staff with any concerns they may have.

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

5.9.4. We are committed to ensuring that our pupils are offered a broad and balanced curriculum that aims to prepare them for life. Teaching the school's core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

## 5.10. Peer on Peer (child-on child) Abuse

5.10.1. All staff should be aware that children can abuse other children and that it can happen both inside and outside of school and online.

5.10.2. All staff must know the indicators and signs of peer-on-peer abuse, know how to identify it and respond to reports of it.

5.10.3. Staff should be aware of the advice in the DfE advice Sexual violence and sexual harassment between children in schools and colleges [Sexual violence and sexual harassment between children in schools and colleges \(publishing.service.gov.uk\)](https://publishing.service.gov.uk) and will receive regular training and updates from the DSL.

5.10.4. All staff must be aware that even if there are no reports it does not mean peer on peer abuse is not happening. It may be the case that it is just not being reported.

5.10.5. Staff must be vigilant and if they have any concerns they should speak to the DSL or Deputy.

5.10.6. Abuse is abuse and should never be tolerated or passed off as "banter" or "part of growing up".

5.10.7. All staff must challenge inappropriate behaviours between peers including, but not limited to:

- Bullying (including cyberbullying, prejudiced 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 which may also include an online element
- Sexual harassment such as sexual comments, remarks, jokes and online harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent
- Consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as sexting or youth produced sexual imagery)
- Upskirting – 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
- Initiation/hazing type violence and rituals

5.10.8. All staff, but especially the Designated Safeguarding Lead (and Deputy) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

## **5.11. Child on child sexual violence and sexual harassment**

- 5.11.1. This section of the policy must be read in conjunction with KCSIE 2021 Part 5 and the DfE Advice Sexual violence and sexual harassment between children in schools and colleges 2021.
- 5.11.2. Sexual violence and sexual harassment can happen anywhere, Staff should be aware that it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely that it will be perpetrated by boys.
- 5.11.3. All staff should be aware of and respond appropriately to all reports and concerns.
- 5.11.4. This school has zero tolerance approach to sexual violence and sexual assault. It is never acceptable, will not be tolerated and will never be passed off as 'banter' 'just having a laugh' 'part of growing up' or 'boys being boys'.
- 5.11.5. We recognise that sexual violence and sexual harassment exists on a continuum, may overlap and can occur between two children of any age and sex. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children.
- 5.11.6. We also recognise that sexual violence and sexual harassment can occur online and face to face (both physically and verbally) and is never acceptable. All staff and volunteers will maintain an attitude of 'it could happen here'.
- 5.11.7. At BISC we believe that all children have a right to learn in a safe environment. Children should be free from harm by adults in the school and other students/pupils.
- 5.11.8. We recognise that some students/pupils will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school's Behaviour Policy.

## **5.12. Responding to reports of sexual violence and sexual harassment**

- 5.12.1. Allegations may be made against children by other children in the school, which are of a safeguarding nature.
- 5.12.2. Safeguarding issues raised in this way may include sexual violence, sexual harassment, sexual exploitation, physical abuse, emotional abuse.
- 5.12.3. We will support and reassure the victims that they are being taken seriously and that they will be supported and kept safe. We will ensure that victims are never given the impression that they are creating a problem or made to feel ashamed by reporting sexual violence or sexual harassment.
- 5.12.4. Abuse that occurs online or outside of the school will not be downplayed and will be treated equally seriously.
- 5.12.5. All staff will be trained in how to manage a report.
- 5.12.6. The school recognises that certain children may face additional barriers to disclosure because of their vulnerability, disability, sex, ethnicity and/or sexual orientation and that procedures will ensure that all children are able to report easily.

## **5.13. Risk Assessment**

- 5.13.1. Where there has been a report of sexual violence the DSL or Deputy will make an immediate written risk and needs assessment which will be kept under review and will work/engage with others as required.
- 5.13.2. Action will be taken immediately to protect the victim, alleged perpetrator(s) and other children in the school. The school will not wait for the outcome or even the start of any police investigation before taking action to protect the children involved.
- 5.13.3. Any relevant action under the school behaviour policy will be considered.
- 5.13.4. Where there has been a report of sexual harassment the need for a risk assessment will be considered on a case-by-case basis.
- 5.13.5. The risk and needs assessment will consider:
  - The victim, especially their protection and support
  - Whether there may have been other victims
  - The alleged perpetrator(s)
  - All the other children (and, if appropriate adults and staff) at the school, especially any actions that are appropriate to protect them from the alleged perpetrator(s) or from future harms

## **5.14. Action following a report of sexual violence and/or sexual harassment**

- 5.14.1. When a report has been received the DSL or Deputy will consider the following:
  - The wishes of the victim
  - The nature of the alleged incident(s) including whether a crime may have been committed and/or whether harmful sexual behaviour (HSB) has been displayed
  - The ages of the children involved
  - The developmental stages of the children involved
  - Any power imbalance between the children
  - If the alleged incident is a one off or a sustained pattern of abuse
  - That sexual violence and sexual harassment can take place within intimate personal relationships between peers
  - Are there any ongoing risks to the victim, other children, or staff
  - Other related issues and the wider context including links to CSE and CCE
- 5.14.2. Immediate consideration will be given as to how best to support and protect the victim and the alleged perpetrator(s) and any other children involved or impacted.

- 5.14.3. The DSL will consider 3 options when managing a report:

- Manage the report internally
- Provide support through the local services process
- Report to the police

- 5.14.4. All concerns, discussions, decisions and reasons for decisions will be recorded.

- 5.14.5. The school will ensure that if a child is convicted or receives a caution for a sexual offence the risk assessment will be updated to ensure relevant protections are in place and needs are being met.
- 5.14.6. If a report is assessed as being unsubstantiated, unfounded, false or malicious the DSL will consider whether the child and/or the person who has made the allegation is in need of help or protecting or worried about someone else and that this is a cry for help.
- 5.14.7. If a report is deliberately invented or malicious the school will consider what disciplinary action is appropriate as outlined in the behaviour policy.

## 5.15. Ongoing response – safeguarding and supporting the victim

- 5.15.1. The following principles will help shape and decisions regarding safeguarding and supporting the victim:
  - The needs and wishes of the victim will be paramount
  - Consideration of the age and development stage of the victim, nature of the allegations and the potential risk of further abuse
  - The victim will never be made to feel they are the problem or made to feel ashamed
  - Proportionality of response. Support will be tailored on a case-by -case basis
  - A holistic approach with an awareness of health needs associated with sexual assault including physical, mental and sexual health problems and unwanted pregnancy

## 5.16. Domestic Abuse and young people

- 5.16.1. This form of abuse can encompass but is not limited to psychological; physical; sexual; financial; and emotional. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.
- 5.16.2. We understand that domestic abuse does not only affect adults and is not only perpetrated by adults; the changes to the definition of domestic abuse raise awareness that young people in the 16 to 17 age group can also be victims of domestic violence and abuse.
- 5.16.3. We encourage students to come forward by raising awareness of the issue and teaching the students about healthy relationships through SRE, the wider curriculum and modelling behaviour in the school.

### 5.16.4. Adolescent to Parent Violent Abuse

- 5.16.5. APVA is a hidden form of domestic violence and abuse that is often not spoken about. By raising awareness around this issue, we can provide better protection to victims and apply an appropriate safeguarding approach.
- 5.16.6. What to look out for when a child is witnessing domestic abuse:

- The emotional responses of children who witness domestic violence may include fear, guilt, shame, sleep disturbances, sadness, depression, and anger (at both the abuser for the abuse and at the victim for being unable to prevent the abuse).
- Physical responses may include stomach aches and/or headaches, bedwetting, and loss of ability to concentrate. Some children may also experience physical or sexual abuse or neglect. Others may be injured while trying to intervene on behalf of the victim or a sibling.
- The behavioural responses of children who witness domestic violence may include acting out, withdrawal, or anxiousness to please. The children may exhibit signs of anxiety and have a short attention span which may result in poor academic performance and attendance. They may experience developmental delays in speech, motor or cognitive skills. They may also use violence to express themselves displaying increased aggression with peers or family. They can become self-injuring.
- If a child discloses that they have witnessed domestic abuse, or an adult linked to a child in your school discloses that they are being abused, follow the school safeguarding procedures and report your concern to the Designated Safeguarding Lead/Deputy.

## 5.17. Digital Safeguarding (online safety/E-safety)

- 5.17.1. It is essential that children are safeguarded from potentially harmful and inappropriate online material. The breadth of issues classified within online safety is considerable but can be categorised into four areas of risk. These are content, contact, conduct, commerce. (Cf KCSIE para 124).
- 5.17.2. We will ensure online safety is a running and interrelated theme when devising and implementing policies and procedures. This will include considering how online safety is reflected, as required, in all relevant polices. In addition, we will consider online safety whilst planning the curriculum, any staff training, the role of the DSL and any parental engagement.
- 5.17.3. Whilst the DSL has lead responsibility for digital safeguarding, we will ensure there is support, if required, for operational digital safeguarding and the appropriate technical and safeguarding knowledge, skills and understanding to be able to quality assure systems, policies and processes, train staff and contribute to the safeguarding curriculum is available.
- 5.17.4. We will keep our digital safeguarding processes and procedures under review through using an independent tool such as the SWgFL 360 safe process 360 Degree Safe - Online Safety Review Tool | SWGfL [\\_](#)
- 5.17.5. We are thoroughly committed to improving student's online safety awareness at BISC Our Technology Acceptable Use policy is signed up to by all students and staff.
- 5.17.6. If a student, parent/carer or member of staff has a concern relating to online safety students are encouraged to report it. They can report it directly to any staff member at the school.

## 5.18. Photography and images

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

- Seek their consent for photographs to be taken or published (for example, on our website or in newspapers or publications)
  - Seek parental consent
  - Use only the student's first name with an image
  - Ensure students are appropriately dressed
  - Encourage students to tell us if they are worried about any photographs that are taken of them
- 5.18.3. Parents, carers or relatives may only take still or video photographic images of pupils in the school or on school-organised activities with the prior consent of the school and then only in designated areas. If parents do not wish their children to be photographed or filmed and express this view in writing, their rights will be respected.

## 5.19. Filtering and monitoring

- 5.19.1. The school will limit children's exposure to risks from the school's IT system.
- 5.19.2. Ofsted concluded in 2013 that "Pupils in the schools that had 'managed' systems had better knowledge and understanding of how to stay safe than those in schools with 'locked down' systems. Pupils were more vulnerable overall when schools used locked down systems because they were not given enough opportunities to learn how to assess and manage risk for themselves." The school will take this approach.
- 5.19.3. The school has in place appropriate filtering and monitoring systems that are in line with the recommendations in the UK Internet Centre document Appropriate Filtering for Education Settings [Appropriate Filtering for Education settings 2021\\_2.pdf](https://www.gov.uk/government/publications/appropriate-filtering-for-education-settings-2021-2) ([d1afx9quaogywf.cloudfront.net](https://d1afx9quaogywf.cloudfront.net/)).

## 5.20. Sharing of nudes and semi-nudes

[Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people)

- 5.20.1. This section of the policy must be read in conjunction with KCSIE Annex D Online Safety and the UKIS advice Sharing nudes and semi-nudes advice for education settings working with children.
- 5.20.2. All staff will be trained in digital safeguarding and will have a role in educating and protecting children about online harms.
- 5.20.3. All staff will be available and approachable for students to make disclosures about which will then be referred to the DSL for further investigation.
- 5.20.4. We will seek to prevent young people from online harms through educating them about the laws and potential consequences of activity online.
- 5.20.5. The digital safeguarding may be addressed through, for example e-safety sessions during lessons, specialised e-safety sessions, PHSCE, and Assemblies.
- 5.20.6. Many professionals may refer to 'nudes and semi-nudes' as:
- youth produced sexual imagery or 'youth involved' sexual imagery

- indecent imagery. This is the legal term used to define nude or semi-nude images and videos of children and young people under the age of 18.
- ‘sexting’. Many adults may use this term, however some young people interpret sexting as ‘writing and sharing explicit messages with people they know’ rather than sharing images • image-based sexual abuse. This term may be used when referring to the non-consensual sharing of nudes and semi-nudes

5.20.7. Terms such as ‘revenge porn’ and ‘upskirting’ are also used to refer to specific incidents of nudes and semi-nudes being shared. However, these terms are more often used in the context of adult-to-adult non-consensual image sharing offences.

5.20.8. In dealing with cases of sending of nudes, semi-nudes etc the response to these incidents will be guided by the principle of proportionality and the primary concern at all times will be the welfare and protection of any children and young people involved.

#### **5.20.9. We will:**

- Outline our expectations and explain the rules of having a mobile, tablet or smartphone.
- Ask students what they feel is acceptable to send to other people then discuss appropriate image and the dangers of inappropriate images (listed above).
- Make sure students are comfortable saying no, that they know their body is private and being asked to share explicit images is inappropriate and illegal.
- Explain to students about the importance of trust and consent in a healthy relationship (\*see Sex and Relationships policy).
- Tell students that it’s not ok for someone to make them feel uncomfortable, to pressure them into doing things that they don’t want to do, or to show them things that they’re unhappy about.
- Tell students what can happen if things go wrong through real life examples such as television programs or news stories as far as possible.
- Talk about whether a person who asks for an image from you might also be asking other people for images.
- Discuss revenge sending of images after relationships have broken down or a friend has done something as a joke and lost control of the image etc.
- Let students know that they can speak to us if this ever happens and that disclosures will be treated confidentially and without embarrassment and support will be given. Staff will react calmly and listen to the concerns of the child and explain that they must share the information confidentially with the DSL.
- Provide details of sources of support and coping strategies if the young person finds themselves in an uncomfortable position.

#### **5.20.10. When a child has been affected by the sending of an explicit image staff will:**

- Recognise that if the child has been sending explicit images or videos of themselves, the child may feel anxious talking about this.
- Recognise that they themselves may feel shocked, upset, angry, confused or disappointed while listening to the child.
- Give themselves time to process the information, remembering that the child will be watching their reactions.
- Reassure the child that they aren’t alone.

- Listen and offer support – they're probably upset and need help and advice, not criticism.
- Not shout or make them feel like it's their fault.
- Will not ask questions like "why have you done it" as this may stop them from opening up.
- Discuss the problem and the wider pressures that they may face, to help them to understand what's happened and understand any wider safeguarding concerns.
- Assure the child that they'll do all they can to help and explain that they will seek the support of the DSL.

#### **5.20.11. If a child has shared an explicit image staff will:**

- Ask them who they initially sent it to, their age, and if they know whether it's been shared with anyone else.
- Ask the social media site to remove the image.
- Discuss the situation with the DSL for wider safeguarding concerns and agree who will be contacted and when, then contact parents/police/CEOP/ as appropriate to the case. The DSL can make a report direct to the [Internet Watch Foundation](#) (IWF). Staff need to provide IWF with a link to the image. However, after the link is sent staff will not keep a copy of the image for evidence as it's illegal to share or store child abuse images.
- Contact the DSL at the relevant school *if the image was requested by a school aged student not from this school*, to raise awareness of potential wider safeguarding issues or circulation of the image in their school.
- Encourage the child to:
  - Delete images from their social media accounts if they've have uploaded the image themselves.
  - If they're sharing an image which somebody else uploaded, consider asking that person to delete it.
  - If the image or video was shared over the web, don't comment on it or share it as this may mean the image is seen more widely.

#### **5.20.12. If a child has been sent a sexually explicit image:**

- Staff should ask them if they know the person who sent it and their age.
- If the image was sent by another young person, staff may want to help the child to speak to the sender in order to stop future messages. If the child agrees, staff can also help them to block the sender on social media.
- If the image was sent by an adult, staff should contact the police as this may be part of the [grooming](#) process.

#### **5.20.13. A young person is breaking the law if they:**

- Take an explicit photo or video of themselves or a friend.
- Share an explicit image or video of a child, even if it's shared between children of the same age.
- Possess, download or store an explicit image or video of a child, even if the child gave their permission for it to be created.

## **5.21. Upskirting**

- 5.21.1. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any gender, can be a victim.
- 5.21.2. Victims are often unaware that the abuse has taken place, until the video or picture is drawn to their attention. When this is the case the victim or observer should report their concern through the school's safeguarding referral system.
- 5.21.3. Any concerns related to upskirting must be reported to the DSL in line with the reporting process outlined within this policy and where appropriate staff will also consult the behaviour policy.

## **5.22. Children with Special Educational Needs (SEN) and disabilities**

- 5.22.1. Children and young people with SEN and disabilities can be more susceptible to safeguarding risks as:
  - Staff may not be able to spot the signs of abuse in children with SEND or assume that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration.
  - Pupils with SEND may be prone to peer group isolation and more vulnerable to bullying, coercion and 'grooming' without outwardly showing any signs.
  - Pupils with SEND may experience increased feelings of anxiety which prevent them from 'speaking out'.
  - Some pupils with SEND rely on adults for personal care, and this vulnerability puts them at greater risk of being harmed or abused.
  - Pupils with SEND are more likely to work alone with a single adult, putting them at greater risk of being harmed or abused.
  - Pupils with SEND may not be able to recognise that they are being abused.
- 5.22.2. In addition to these increased risk factors, disabled children and young people may have communication difficulties which make it difficult to tell others what is happening to them. Adults, including professionals assessing their needs and caring for them, may concentrate on the child's special needs and overlook signs and symptoms that they are being maltreated.
- 5.22.3. All staff must therefore be aware of and extra vigilant to the possible indicators of abuse and/or neglect for disabled children and young people. The Designated Safeguarding Lead should liaise regularly with the Head of Achievement Centre, the behaviour lead and the attendance lead, maintaining a culture of vigilance and being alert to any relevant new information or concerns.
- 5.22.4. If staff have a concern for a disabled child or young person, they must consider:
  - The child/young person's communication needs and how they can communicate effectively with them.
  - What information in relation to the child/young person's disability and special needs staff need to be aware of in order to assess risk of abuse.

- What resources staff require in order to undertake an informed assessment of safeguarding risk.
  - Where child protection issues are considered regarding a child with disabilities, there must be involvement by key professionals who know the child well, including those who have a comprehensive understanding of the child's disability, method of communication, and any associated medical condition.
- 5.22.5. Schools should consider what specialist advice, guidance and training may be required in order for staff to understand why children with SEND can be more vulnerable to abuse and how to recognise signs of abuse and/or neglect of disabled children and young people.

## 5.23. Mental Health

- 5.23.1. All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- 5.23.2. Only appropriately trained professionals should attempt 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.
- 5.23.3. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences (ACEs), this can have a lasting impact throughout childhood, adolescence and into adulthood. We will ensure that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.
- 5.23.4. We will ensure that we have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.
- 5.23.5. We seek to embed positive mental health and mental health awareness through our school to create a culture where pupils can self-identify, signpost peers and seek support themselves. We undertake staff training and promote mental health awareness through the PHSE schemes.
- 5.23.6. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the referral mechanisms listed within this policy and speaking to the Designated Safeguarding Lead or a Deputy.

## 6. Recruitment of staff and volunteers

- 6.1. The school will ensure that Safer Recruitment practices always follow KCSIE (2021) and will be adhered to by staff.
- 6.2. Every interview panel will have at least one member who has a current certificate in Safer Recruitment. These certificates will be updated every two years. We will check on the identity of candidates, follow up references with referees and scrutinise applications for gaps in employment. We will record the answers to safeguarding questions asked during the interview process on staff personnel files. We will ensure that safeguarding considerations are at the centre of each stage of the recruitment process.

- 6.3. Every job description and person specification will have a clear statement about the safeguarding responsibilities of the post holder.
- 6.4. We will ensure that all staff involved in recruitment are aware of government guidance on safer recruitment and that its recommendations are followed.
- 6.5. The Disclosure and Barring Service (DBS) helps employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups, including children. The school will ensure the correct level of DBS certificate is sought and ensure a prohibition check is undertaken.
- 6.6. The types of checks undertaken will be in accordance with the guidance given in the *Keeping Children Safe in Education* (September 2021) document.
- 6.7. Any offer of appointment made to a successful candidate (including one who has lived or worked abroad) will be conditional on satisfactory completion of the necessary pre-employment checks as required in the guidance given in the *Keeping Children Safe in Education* (September 2021) document.
- 6.8. Where an enhanced DBS Certificate is required, it will be obtained from the candidate before or as soon as is practicable after the person is appointed.
- 6.9. The school will always ask for written information about previous employment history and check that information is not contradictory or incomplete. References will be sought on all shortlisted candidates, before interview (unless the candidate has expressly denied permission for the employer to approach their referees). Where references have been sought, any issues or concerns they raise can be explored further with the referee and taken up with the candidate at interview.
- 6.10. The school will keep a single central record in accordance with the regulations given in the *Keeping Children Safe in Education* (September 2021) document.
- 6.11. Recruitment and/or deployment checks will be undertaken as stated in the *Keeping Children safe in Education* (September 2021) document.
- 6.12. The school will carry out all relevant checks if there are concerns about an existing member of staff and refer to the DBS anyone who has harmed or poses a risk of harm to a child or vulnerable adult.

## 7. Dealing with allegations against existing staff and volunteers who work with children

- 7.1. We will prevent people who pose risks to children from working in our school by ensuring that all individuals working in any capacity at our school have been subjected to safeguarding checks in line with the statutory guidance *Keeping Children Safe in Education* (September 2021).
- 7.2. At BISC we recognise the possibility that adults working in the school may harm children. Any concerns about the conduct of other adults in the school should be taken to the DSL without delay (or where that is not possible, to the overall Head of School); any concerns about the overall Head of School should go to the DSL who will then refer to the Board. Any concerns about the DSL should be taken to the overall Head of the School.

- 7.3. Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. Suspension is not mandatory, nor is it automatic but, in some cases, staff may be suspended where this is deemed to be the best way to ensure that children are protected.
- 7.4. Where a pupil makes an allegation against a staff member, supply teacher or volunteer, the allegation will be taken seriously and acted upon immediately and assessed to determine if they meet the harms threshold or can be dealt with under the 'low level concerns' advice in KCSIE 2021. Parents will be contacted as soon as reasonably possible. The pupil will be offered support and their wishes will be carefully considered before any actions related to said pupil begin.
- 7.5. Under its duty of care for its employees, the school will ensure they provide effective support for anyone facing an allegation and provide the employee with a named contact if they are suspended. The school will ensure its obligations for confidentiality when an allegation has been made.

## 8. Managing situations and exit arrangements

- 8.1. For the following issues:

- Resignation and settlement agreements.
- Record keeping
- References
- Timescales
- Oversight and Monitoring
- Suspension
- Following a criminal investigation or prosecution
- On conclusion of a case
- In respect of malicious or unsubstantiated allegations

- 8.2. The school will ensure compliance with the guidance and regulations contained in the appropriate sections of the *Keeping Children Safe in Education* (September 2021) document.

## 9. Attendance

- 9.1. Lack of, or erratic attendance or persistent absence is a safeguarding issue and must act as a warning sign to a range of concerns including neglect, sexual abuse, child sexual or child criminal exploitation. It may also be an indication of peer-on-peer abuse including bullying and sexual harassment or significant mental ill health concerns. It must not be seen as an isolated concern.
- 9.2. The school will have a separate attendance policy which includes protocols for first day absence, leave of absence, attendance monitoring and dealing with persistent absenteeism.
- 9.3. School leaders and Board members ensure that attendance data, particularly for identified vulnerable groups is closely and regularly monitored identifying trends or patterns which may indicate safeguarding concerns.

## 10. Training for all staff and students

- 10.1. Every year all staff (including non-teaching and volunteers) must undertake the Child Protection and Safeguarding training. This is recorded and logged. All staff are informed clearly on how to report anything of concern to the DSL or DSSL immediately. In addition, all staff must read KCSIE part 1.
- 10.2. All new members of staff, including newly-qualified teachers and teaching assistants, will be given induction that includes basic child protection training on how to recognise signs of abuse, how to respond to any concerns, e-safety and familiarisation with the safeguarding and child protection policy, behaviour policy, staff code of conduct, systems and processes for CME and *Keeping Children Safe in Education: Statutory Guidance for Academies and Colleges*, Part One and Annex A (September 2021), and other related policies.
- 10.3. The Designated Safeguarding Lead and Deputy will undergo updated child protection training every two years and in addition to formal training, their knowledge and skills will be refreshed at least annually.
- 10.4. All staff members of the school will undergo safeguarding and child protection training (whole-school training) which is regularly updated.
- 10.5. All Board members must undergo governor specific online awareness training at least every two years.
- 10.6. Staff members who miss the whole-school training will be required to undertake other relevant training to make up for it,
- 10.7. The school will maintain accurate records of staff induction and training.

## 11. Establishing a safe environment in which children can learn and develop

- 11.1. We recognise that because of the day-to-day contact with students, school staff are well placed to observe the outward signs of abuse. We therefore establish a safe environment where students feel secure and are encouraged to talk and are listened to.
- 11.2. We are thoroughly committed to teaching all our students about risks and place emphasis on them learning about how to minimise risk. This is done through our PHSCE programme and through the school engaging in national and local initiatives such as; anti-bullying awareness days, e-safety programmes, and other programmes which raise their awareness and increase their understanding.
- 11.3. At this school we ensure to raise awareness of bullying and what to do about it through PHSCE and assembly programmes.
- 11.4. If any student / member of staff / parent / carer has a concern about bullying, they should report it to any member of staff.

# 12. Confidentiality and sharing information

## 12.1. Storage and handling of records

- 12.1.1. Child protection information will be stored and handled in line with the principles set out in the Data Protection Act 1998 and the GDPR (2018) and the school's Data Protection Policy (Stored in the school Policies Folder).
- 12.1.2. The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information will not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.
- 12.1.3. Paper record of concern forms and other written information will be stored in a locked facility accessed only by the Designated Safeguarding Lead and Deputy. Any electronic information will be password protected and only made available to relevant individuals. Every effort will be made to prevent unauthorised access. Sensitive information will not be stored on laptop computers, which, by the nature of their portability, could be lost or stolen. If it is necessary to store child protection information on portable media, such as a CD or flash drive; these items will also be password protected and kept in locked storage.
- 12.1.4. Child protection information will be stored separately from the student's school file and the school file will be 'tagged' to indicate that separate information is held. If such records need to be sent to a new school, they will be sent separately from the student's file and under a confidential cover or in an encrypted electronic file.
- 12.1.5. Child protection records are normally exempt from the disclosure provisions of the Data Protection Act, which means that children and parents do not have an automatic right to see them. If any member of staff receives a request from a student or parent to see child protection records, they will refer the request to the Designated Safeguarding Lead. The Data Protection Act does not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child.
- 12.1.6. We will ensure that relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR. This includes:
  - 12.1.6.1. being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal, and should be treated as 'special category personal data'.
  - 12.1.6.2. 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.
  - 12.1.6.3. for schools, not providing pupils' personal data where the serious harm test under the legislation is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harms test is met,

they must withhold providing the data in compliance with schools' obligations under the Data Protection Act 2018 and the GDPR.

12.1.7. Further details on information sharing can be found:

- In Chapter One of Working Together to Safeguard Children, which includes a myth-busting guide to information sharing.
- At Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers. The seven golden rules for sharing information will be especially useful
- The Information Commissioner's Office (ICO), which includes ICO GDPR FAQs and guidance from the department in Data protection: toolkit for schools - Guidance to support schools with data protection activity, including compliance with the GDPR.

## 12.2. Confidentiality

12.2.1. Staff should only discuss concerns with the Designated Safeguarding Lead and Deputy. That person will then decide who else needs to have the information and they will disseminate it on a need-to-know basis.

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

# 13. Management of the Policy

13.1. The Board will oversee the policy, ensure its implementation and review its content on an annual basis.

13.2. The DSL will report on safeguarding activity and progress within the school to the Board termly.

# Appendix 1.

## Safeguarding Children

### Child Protection Record – Report of a Concern



<b>Name of referrer:</b>		<b>Role of referrer:</b>	
<b>Student Name:</b>			Male or Female:
<b>Date of birth:</b>		<b>Year Group / class:</b>	
<b>Details of concern:</b> <b>Include:</b> Time and place of incident The actual words said (as accurately as you recall) Was anyone else present? What action did you take? Attach a body map if relevant			
<b>Reported to:</b>		<b>Role of person reported to:</b>	
<b>Signed:</b>			
<b>Date:</b>			