



International Ski Academy · Académie Internationale de Ski

Apex2100

**SAFEGUARDING
CHILDREN AND CHILD
PROTECTION POLICIES AND
PROCEDURES**

For the academic year of 2019-20, Apex2100 relies on the relationship it has with host schools. All safeguarding concerns will be highlighted and discussed with school liaisons and their local authority. As a result, not one local authority can be listed.

KEY EXTERNAL CONTACT DETAILS

Support and Advice about Extremism	Department for Education NON EMERGENCY NUMBER: 020 7340 7264 EMAIL: counter.extremism@education.gsi.gov.uk
NSPCC whistleblowing advice line	ADDRESS: Weston House, 42 Curtain Road London EC2A 3NH TEL: 0800 028 0285 EMAIL: help@nspcc.org.uk
Disclosure and Barring Service	ADDRESS: PO Box 181, Darlington, DL1 9FA TEL: 01325 953795 EMAIL: dbdispatch@db.ssi.gov.uk
Teaching Regulation Agency	ADDRESS: 53-55 Butts Road, Earlsdon Park, Coventry, CV1 3BH TEL: 0207 593 5393 EMAIL: misconduct.teacher@education.gov.uk
OFSTED Safeguarding Children	TEL: 0300 123 4666 (Monday to Friday from 8am to 6pm) EMAIL: Whistleblowing@ofsted.gov.uk

KEY SCHOOL CONTACT DETAILS

APEX2100	Chair of Apex2100 Education Board Ian Young Email: Ian.Young@unitedlearning.org.uk Mobile: 07585 301090
Designated Safeguarding Lead (DSL) and Deputy Designed Safeguarding Leads DDSL	Dr Florence Potter TEL: +44 7861 232391 EMAIL: Florence.potter@apex2100.org Deputy DSL Chris Thomson TEL: +44 7733 331193 EMAIL: Chris@apex2100.org
Academy Director	Chris Thomson TEL: +44 7733 331193 EMAIL: Chris@apex2100.org

POLICY STATEMENT

This policy applies to Apex 2100 (“the School”). Apex 2100 requires the Educational Board to review and update this policy annually (as a minimum). This policy is ratified annually by the Educational Board of Governors.

This policy has regard to the following guidance and advice:

- Keeping Children Safe In Education (September 2018) (*'KCSIE'*)
 - Disqualification under the Childcare Act 2006 (July 2018)
 - What to do if you're worried a child is being abused: advice for practitioners (March 2015)
 - Sexual violence and sexual harassment between children in schools and colleges (May 2018)
- Working Together to Safeguard Children (July 2018)
 - Information sharing: advice for practitioners providing safeguarding services (July 2018)
- Revised Prevent Duty Guidance for England and Wales (July 2015)
 - The Prevent Duty: Departmental advice for schools and childminders (June 2015)
 - The use of social media for on-line radicalisation (July 2015)

This policy also takes into account the procedures and practice of host school's local authority and the published safeguarding arrangements set out by the host schools

CONCERNS ABOUT A CHILD

The School has a duty to consider at all times the best interests of the student and take action to enable all students to achieve the best outcomes. Safeguarding and promoting the welfare of children is **everyone's** responsibility. Everyone has a role to play in identifying concerns, sharing information and taking prompt action in accordance with this policy.

The School has arrangements for listening to children and providing early help and processes for children to raise concerns about themselves or their peers.

Staff should expect to support social workers and other agencies following any referral.

Definitions of Safeguarding and Types and Signs of Abuse

Safeguarding and promoting the welfare of children is defined as protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

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. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children. Abuse can be:

- physical abuse
- emotional abuse
- sexual abuse; and/or
- neglect.

Staff are referred to Appendix 1 of this policy for further detail of the types of abuse and possible signs of abuse.

PROCEDURES FOR DEALING WITH CONCERNS ABOUT A CHILD

If staff suspect or hear an allegation or concern of abuse or neglect from a child or any third party, they must follow the relevant procedure below. All staff should:

- listen carefully
- avoid asking leading questions
- reassure the individual that the allegation/complaint will be taken seriously
- not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child) and explain to the child that staff will only share the information with those who need to know to help the child. All staff should explain next steps and who the information will be passed to.

All concerns, discussions and decisions (together with reasons) made under these procedures should be recorded in writing. The record should include the date, time and place of the conversation and detail of what was said and done by whom and in whose presence and signed by the person making it. Where a report includes online elements, staff are reminded not to view or forward any illegal images of a child but note what has been reported.

Where there is a safeguarding concern, the School will ensure the student's wishes and feelings are taken into account wherever possible and will work with them (and their families where appropriate) when determining what action to take and what services to provide. This is particularly important in the context of harmful sexual behaviours, such as sexual harassment and violence. Safeguarding information will often be special category personal data and the School will have due regard to its data protection obligations when sharing such data.

Whilst the School aims to get consent to share information, relevant personal information may be shared without consent if there is a lawful basis to do so such as where a child's safety may be at risk. This is because the Data Protection Act 2018 includes 'safeguarding children and individuals at risk' as a condition that allows information to be shared without consent. Any decision to share or withhold information will be recorded together with the reasons for it and who the information has been given to. The School operates its processes with the best interests of the student at their heart.

What staff should do if they have concerns about a child

If staff (including governors, agency staff and volunteers) have any concerns about a child's welfare they should act immediately and should speak with the School's DSL or DDSL. If, in exceptional circumstances, the DSL or DDSL is not available, this should not delay appropriate action being taken and staff should consider speaking to a member of the senior leadership team and/or take advice from local children's social care of the host school. In these circumstances, any action taken should be shared with the DSL or DDSL as soon as is practically possible.

The DSL will consider the appropriate action to take in accordance with the threshold document published by the host school and its local authority. Options will include:

- managing any support for the child internally via the School's own pastoral support processes;
- discussing the situation with the DSL of the host school
- making an early help assessment; or
- making a referral for statutory services.

If a child's situation does not appear to be improving, the DSL (or the person that made the referral) should consider following local escalation procedures to ensure their concerns have been addressed and to ensure that the child's situation improves.

Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

Early Help

Any child may benefit from early help but all staff should be particularly alert to the potential need for early help for a child who:

- Is disabled and has specific additional needs;
- Has special educational needs (whether or not they have a statutory education, health and care plan);
- Is a young carer;
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- Is frequently missing/goes missing from care or from home;
- Is misusing drugs or alcohol themselves;
- Is at risk of modern slavery, trafficking or exploitation;
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- Has returned home to their family from care;
- Is showing early signs of abuse and/or neglect;
- Is at risk of being radicalised or exploited;
- Is a privately fostered child.

Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

In the first instance, staff who consider that a student may benefit from early help should discuss this with the School's DSL or DDSL. If early help is appropriate, the DSL will generally lead on liaising with relevant agencies and setting up inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead professional. The DSL will support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate. If early help is appropriate, the matter will be kept under constant review and consideration given to a referral to children's social care if the student's situation does not appear to be improving or is getting worse.

What staff should do if a child is suffering, or is likely to suffer from harm

If staff (including governors, agency staff and volunteers) believe that a child is suffering, or is likely to suffer from harm, or is in immediate danger it is important that

an **immediate** referral to children's social care (and/or the Police if appropriate) is made in accordance with the host school local authority referral process. Anyone can make a referral. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made to the host school and ensure that this is passed on to the locally agreed safeguarding arrangements.

What staff should do if a child is seen as at risk of radicalisation

Staff should follow the School's normal referral processes when there are concerns about children who may be at risk of being drawn into terrorism, as set out above. This may include a referral to Channel or children's social care depending on the level of risk. However, if staff have concerns that there is an immediate/significant risk of a child being drawn into terrorism they must call UK police and submit a referral form to MASH or call them directly. Advice and support can also be sought from children's social care.

The School, in recognition that students may be at risk of being drawn into terrorism or other forms of extremism, carries out appropriate risk assessments (following consultation with local partners, such as the Police) of the potential risk in the local area. Such risk assessments are discussed with the Head, DSL and DDSL to ensure the School's safeguarding arrangements are sufficiently robust to help prevent and protect children from being drawn into terrorism and are regularly revised.

What staff should do if they discover an act of Female Genital Mutilation ('FGM')

All staff should speak to the DSL or DDSL about any concerns about FGM. Teaching staff have a separate duty to report to the Police cases where they discover that an act of FGM appears to have been carried out on a girl under the age of 18. All staff are referred to Appendix 1 of this policy for the procedure to be followed where they suspect or discover that a student may be at risk of FGM.

Upskirting

'Upskirting' typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is not confined to victims wearing skirts or dresses and equally applies when men or women are wearing kilts, cassocks, shorts or trousers.

Upskirting is not tolerated at Apex and should an incident of upskirting involving students take place, it must be reported to the DSL immediately. Incidents involving adults must be reported to the Academy Director.

Child Criminal Exploitation & Serious Violence

Child Criminal Exploitation is a geographically widespread form of harm that is increasingly a feature of criminal activity: drug networks or gangs groom and exploit children and young people to carry weapons, drugs and money from urban areas to suburban and rural areas, market and seaside towns.

All staff should be aware of indicators, which may signal that pupils are at risk from or involved in criminal activity and serious violent crime or groups associated with serious violent crimes including the following of or glorification of behaviour of such groups online.

Indicators may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs

of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that pupils have been approached by or are involved with criminal networks. Any suspicions relating to pupil's behaviour in this regard should be reported to the DSL without delay.

Drugs and Alcohol

As part of school's duty to promote pupils' wellbeing, we have a role to play in preventing drug and alcohol misuse as part of our pastoral responsibilities. These responsibilities include to support and advise pupils via the curriculum in PSHE. The school also reserves the right to involve parents in conversation where concerns are raised about a pupil's involvement with drug or alcohol use/ misuse outside of school as a part of contextual safeguarding.

What staff should do if a child goes missing from education

Children who go missing from education, particularly on repeat occasions, is a potential indicator of a range of safeguarding possibilities. The School's procedures for unauthorised absence and for dealing with children who go missing from education, the Missing Student Policy to be used for searching for, and if necessary, reporting, any student missing from education. Further detail can also be found at Appendix 1 of this policy.

The School will report to the host school's Local Authority a student who fails to attend school regularly or has been absent from school without the School's permission for a continuous period of 10 school days or more.

What staff should do if they have concerns about another staff member (including volunteers)

If staff have safeguarding concerns, or an allegation is made about another staff member posing a risk of harm to children, then this should be referred to the Academy Director. Where there are concerns/allegations about the Academy Director, this should be referred to the Chair of the LGB, Head of Safeguarding and Head of Independent Schools. In the event of concerns/allegations of abuse being made, staff are referred to the procedures below regarding managing allegations of abuse against staff (including volunteers) and United Learning Guidance on Dealing with Allegations of Abuse against Teachers and Other Staff (available on the United Learning Hub).

What staff should do if they have concerns about safeguarding practices in the school

Where staff have concerns about poor or unsafe practices and potential failures in the School's safeguarding regimes, these should be raised in accordance with the School's whistleblowing procedures. There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

If staff and volunteers feel unable to raise an issue with the School, feel that their genuine concerns are not being (or have not been) addressed or are concerned about the way a concern is being handled, they may use other whistleblowing channels, such as the NSPCC whistleblowing advice line. Contact details for the NSPCC helpline can be found on the Key Contacts page at the start of this policy.

ARRANGEMENTS FOR DEALING WITH PEER-ON-PEER ALLEGATIONS

Safeguarding issues can manifest themselves via peer-on-peer abuse. Peer-on-peer abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between children and within children's relationships (both intimate and non-intimate). The School recognises the gendered nature of peer-on-peer abuse (i.e. that it is

more likely that girls will be “victims” and boys “perpetrators”) and that it can manifest itself in many ways and can include (but is not limited to) sexting, sexual assault, gender-based issues and harmful sexual behaviours including sexual violence and sexual harassment.

Peer-on-peer abuse can be associated with factors outside the School and can occur online and offline and between children of any age or gender. The School therefore takes a contextual safeguarding approach to managing peer-on-peer abuse.

Peer-on-peer abuse is abuse and is never acceptable. It should never be passed off or dismissed as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”.

The School recognises that children can be particularly vulnerable in residential settings and are alert to the potential for peer-on-peer abuse.

The School takes steps to minimise the risk of peer-on-peer abuse. Please refer to the Anti-Bullying and Behaviour policies

The School’s takes a serious approach to sexting and pupils can expect to be asked to leave the school and host school’s local authority and police be contacted. Staff are also referred to United Learning E-Safety Policy.

Where an issue of student behaviour or bullying gives ‘reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm’, staff should follow the procedures below rather than the School’s Anti-Bullying and Behaviour policies:

What to do if staff suspect that a child may be at risk or hears a report of peer-on-peer abuse

The procedures set out below have been developed following consultation with staff and will be reviewed, at least annually, in light of an assessment of the impact and effectiveness of the policy.

In the event of disclosures about peer-on-peer abuse, all children involved will be treated as being at risk and the safeguarding procedures in accordance with this policy will be followed (see ‘*Procedures for dealing with concerns about a child*’). This means that if a member of staff thinks for whatever reason that a child may be at risk of or experiencing abuse by their peer(s), or that a child may be at risk of abusing or may be abusing their peer(s), they should discuss their concern with the DSL without delay so that a course of action can be agreed.

The School recognises that a child is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure the pupil is likely to feel that the member of staff is in a position of trust.

All concerns/allegations of peer-on-peer abuse will be handled sensitively, appropriately and promptly and will be investigated including consideration of the wider context in which it may have occurred (as appropriate). The School treats all children involved as being at potential risk and ensures a safeguarding response is in place for both the child who has allegedly experienced the abuse, and the child who has allegedly been responsible for it. **Immediate** consideration will therefore be given as to how best to support and protect all children involved/impacted.

The School will take into account the views of the child/children affected. Unless it is considered unsafe to do so, the DSL should discuss the proposed action with the child/children and their parents following appropriate liaison with children's social care. The School should manage the child/children's expectations about information sharing, and keep them and their parents informed of developments, where appropriate and safe to do so.

All children affected by peer-on-peer abuse will be supported by the host school and Apex 2100 and support from external agencies will be sought, as appropriate. "Victims" will be reassured that they are being taken seriously and that they will be supported and kept safe. The School recognises that children with special educational needs and disabilities can be more prone to peer on peer group isolation than other children and will consider extra pastoral support for those children. Apex 2100 will work closely with host school to develop a strategy on how to best support individuals.

A student against whom an allegation of abuse has been made may be suspended from the School during the investigation. The School will take advice from the host school and it's local authority on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all students involved including the alleged "victim" and "perpetrator". If it is necessary for a student to be interviewed by the Police in relation to allegations of abuse, the School will ensure that, subject to the advice of the host school and its local authority, parents are informed as soon as possible and that the students involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the School and advice will be sought as necessary from the host school and its local authority and/or the Police as appropriate.

Reports concerning harmful sexual behaviour

Where a report concerns an allegation of sexual violence and/or sexual harassment, if possible two members of staff should be present when managing a report preferably one of them being the DSL or DDSL. The DSL or DDSL should be informed as soon as practically possible if they were not involved in the initial report.

Consideration of safeguarding all those children involved in the safeguarding report will be immediate. Following a report of sexual violence and/or sexual harassment the DSL will therefore consider the appropriate response. This will include:

- The wishes of the victim,
- The nature of the alleged incident,
- 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 sustained pattern,
- Any ongoing risks,
- Other related issues and context.

Any response and action will, as always, have at the centre the best interests of the child. The DSL will reassure any victim that they are being taken seriously and that

they will be supported and kept safe. The victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report.

When there has been a report of sexual violence, the DSL or DDSL should make an immediate risk and needs assessment in respect of each child affected by the abuse. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

- the “victim”;
- the alleged “perpetrator”; and
- the other children (and, if appropriate, staff) at the School.

The DSL will consider as part of the School’s response, the context within which such incidents and/or behaviours occur and the importance of anonymity. Risk assessments will be recorded (either written or electronic) and kept under review. The DSL will consider the risks posed to all students and put adequate measures in place to protect them and keep them safe. This may include consideration of the proximity of the “victim” and alleged “perpetrator” and considerations regarding shared classes, sharing school premises and school transport. Any professional risk assessment will inform the School’s approach.

The police may be informed of any harmful sexual behaviours including sexual violence and sexual harassment which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will be passed to the police. A report to the police will generally be made in parallel with a referral to children’s social care.

If the DSL decides to make a referral to children’s social care and/or a report to the police against a “victim’s” wishes, the reasons should be explained to the student and appropriate specialist support offered. The DSL or DDSL will also work closely with children’s social care and other agencies are required to ensure any action taken under this policy does not jeopardise any statutory investigation and to discuss how the alleged “perpetrator”, staff, parents and others will be informed of the allegations and what information can be disclosed bearing in mind the need to protect those involved and their anonymity.

Regardless of the outcome of any criminal process, including where a child is subject to bail, the DSL will liaise with the police and children’s social care to ensure the welfare and safety of all children and update the risk assessment and ensure relevant protections and measures are in place for all children.

The School will consider whether disciplinary action may be appropriate for any child/children involved. Before deciding on appropriate action the School will always consider its duty to safeguard all children from harm; the underlying reasons for a child's behaviour; any unmet needs, or harm or abuse suffered by the child; the risk that the child may pose to other children; and the severity of the peer-on-peer abuse and the causes of it. Exclusion will only be considered as a last resort and only where necessary to ensure the safety and wellbeing of the other children in the School.

The DSL will ensure that where children move to another educational institution following an incident of peer-on-peer abuse, the new institution is made aware of any ongoing support needs and, where appropriate, any potential risks to other children and staff.

ARRANGEMENTS FOR DEALING WITH CONCERNS/ALLEGATIONS OF ABUSE AGAINST TEACHERS AND OTHER STAFF (INCLUDING THE HEAD, GOVERNORS AND VOLUNTEERS)

The School's procedures for managing concerns/ allegations against staff who are currently working in the School follows Department for Education statutory guidance and the host school arrangements and applies when staff (including volunteers) have (or are alleged to have):

- Behaved in a way that has harmed a student, or may have harmed a student;
- Possibly committed a criminal offence against or related to a student; or
- Behaved towards a student in a way that indicated that they may pose a risk of harm if they were to work regularly or closely with children.

Allegations against a teacher who is no longer teaching should be referred to the Police. Historical (non-recent) allegations of abuse should be referred to the Police and also the LADO.

If an allegation is made against anyone working with children in the School, the School should not undertake their own investigation of allegations without prior consultation with the Local Authority 'designated officer' or, in the most serious cases, the Police, so as not to jeopardise statutory investigations. In borderline cases, the School may discuss informally with the 'designated officer' on a no-names basis.

All allegations should be investigated as a priority to avoid any delay.

1. All allegations which appear to meet the above reporting criteria are to be reported straight away to the 'case manager' who is the Academy. Where the Academy Director is absent or is the subject of the allegation or concern, reports should be made to the Chair of the LGB, Head of Safeguarding and Head of Independent Schools. Where the Academy Director is the subject of the allegation or concern, the Academy Director must not be informed of the allegation prior to contact with the Chair of the LGB, Head of Safeguarding and Head of Independent Schools and designated officer.
2. The case manager should immediately discuss the allegation with the designated officer and consider the nature, content and context of the allegation and agree a course of action including any involvement of the Police. (Where the case manager deems there to be an immediate risk to children or there is evidence of a possible criminal offence, the case manager may involve the Police immediately.) All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed. The designated officer should

be informed within one working day of all allegations that come to the School's attention and appear to meet the criteria or that are made directly to the Police and/or children's social care.

3. The case manager will ensure that the individual who is subject of the allegation is informed as soon as possible and given an explanation of the likely course or action, unless there is an objection by children's social care or the Police. The case manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.
4. The case manager should give careful consideration as to whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place until the allegation is resolved. The case manager will give due weight to the views of the designated officer and *KCS/E* when making a decision about suspension. Where the individual is suspended, the case manager will ensure they know who their point of contact is in the School and shall provide them with their contact details.
5. Where a member of boarding staff is suspended pending an investigation, the case manager will consider whether arrangements for alternative accommodation away from children should be made
6. The case manager will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from children's social care or the Police.
7. The case manager will discuss with the designated officer whether a referral to the Disclosure and Barring Service or Teaching Regulation Agency should be made where an allegation is substantiated and the person is dismissed or the School ceases to use their services, or the person resigns or otherwise ceases to provide their services. The School has a legal obligation to report promptly to the Disclosure and Barring Service any person (whether employed, contracted, a volunteer or a student) who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. Further, or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the School must consider making a referral to the Teaching Regulation Agency and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).
8. On conclusion of the case, the case manager should review the circumstances of the case with the designated officer to determine whether there are any improvements to be made to the School's safeguarding procedures or practices to help prevent similar events in the future.

The School will make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered.

Allegations found to be malicious will be removed from the individual's personnel records. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with *KCS/E* and a copy will only be provided to the individual concerned.

Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. If an allegation is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against a student who made it; or whether the Police should be asked to consider if action might be appropriate against the person responsible even if they are not a student.

STAFF BEHAVIOUR POLICY / CODE OF CONDUCT

The aim of the code of conduct is to provide clear guidance about behaviour and actions so as to not place students or staff at risk of harm or of allegation of harm to a student.

SAFER RECRUITMENT

The School is committed to safer recruitment processes and ongoing safer working practices. Members of the teaching and non-teaching staff at the School including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches are subject to the necessary statutory child protection checks before starting work, for example, right to work checks, additional overseas checks (if necessary), verifying identity, taking up references, checking work history and confirming medical fitness for the role.

For most appointments, an enhanced DBS check with 'barred list' information will be appropriate. Under no circumstances will an individual commence work unsupervised in sole charge of, or in unaccompanied contact with, children without a cleared DBS check. In this case, the individual will have a separate Barred List check and the School will undertake a written Risk Assessment exercise in relation to the proposed work. All other safeguarding checks will be completed and the individual will be appropriately supervised. Please refer to Section C and Appendix 5 of the 'Safeguarding Children – HR Procedural Guidance' available on the United Learning Hub for further guidance.

Full details of the School's safer recruitment procedures for checking the suitability of staff, and volunteers to work with children and young people is set out in

- the School's Recruitment and Selection Policy;
- Safeguarding Children – HR Procedural Guidance;

These documents are available upon request, please contact the Academy Director.

The School's protocols for ensuring that any visiting speakers, whether invited by staff or students themselves, are suitable and appropriate supervised is set out in the School's Recruitment and Selection Policy.

MANAGEMENT OF SAFEGUARDING

The School's DSL is Florence Potter who is a member of the leadership team.

Chris Thomson is the DDSL and the person to whom reports should be made in the absence of the DSL. This ensures there is the required cover for the role at all times.

The DSL or DDSL's contact details can be found on the Key Contacts page at the start of this policy.

The DSL's role is to take lead responsibility for safeguarding and child protection matters in the School. The DSL's responsibility is to maintain an overview of safeguarding within the School, to open channels of communication with local statutory agencies, to liaise closely with host schools and safeguarding partners such as] children's social care and the police), support staff in carrying out their safeguarding duties and to monitor the effectiveness of the School's policies and procedures in practice. The DSL or DDSL are most likely to have a complete safeguarding picture and be the most appropriate person to advise on a response to a safeguarding concern.

The DSL works with the Academy Director, and United Learning to review and update the School's safeguarding policy. Where a student leaves the School, the DSL will also ensure their child protection file is transferred to the new school (separately from the main student file) as soon as possible. The DSL will ensure secure transit and obtain confirmation of receipt. The DSL will also consider if it would be appropriate to share any information with the new school in advance of a child leaving. For example, information that would allow the new school to continue supporting victims of abuse and have that support in place for when the child arrives. The School will ensure that key staff, such as the SENCO, are also aware of these arrangements, as required.

The DSL will inform the host school of any incident which they think should be considered for a child safeguarding practice review.

The DSL regularly reviews the School's and their own practices and concerns about welfare and safeguarding matters. This includes the personal and professional duty of all staff to report welfare and safeguarding concerns to the DSL, or in their absence, to a member of the senior management team or directly to local children's services.

The DSL or Deputy DSL will always be available to discuss safeguarding concerns. During term time, the DSL or DDSL will always be available (during school hours) for staff in the School to discuss any safeguarding concerns. For out of hours/out of term activities, the School's arrangements to contact the Academy Director, Chris Thomson, or the Performance Director, Jeremy Mather.

Full details of the DSL's role can be found at Annex B of *KCSI/E*.

Ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility should not be delegated.

TRAINING

Induction and training (including online safety) are in line with advice from ISI.

All Staff

All new staff will be provided with induction training that includes:

- the child protection policy, including information about the identity and role of the DSL(s) and DDSL
- the behaviour policy
- the safeguarding response to children who go missing from education
- the staff code of conduct including the School's whistleblowing procedure and the acceptable use of technologies policy, staff/student relationships and communications including the use of social media
- a copy of Part 1 of *KCSIE*
- School leaders and staff who work directly with children will also be required to read Annex A of *KCSIE*

Induction training usually takes place within seven (14) working days of staff commencing work. Copies of the above documents are provided to all 'staff' during induction. On appointment and as part of United Learning Annual Declaration, all staff will receive and sign the up to date versions of the Staff Student Relationship Letter and Acceptable Use Declaration. The staff code of conduct is available on request from the Academy Director.

All staff are also required to:

- Read Part One of *KCSIE* and confirm that they have done so via a signed form]. Each time Part One of *KCSIE* is updated by the Department for Education, staff will be updated on the changes via email.
- Understand key information contained in Part One of *KCSIE*. The School will ensure staff understanding by training.
- Receive training in safeguarding and child protection regularly, in line with advice from the host schools. Training will include online safety and harmful sexual behaviours including sexual violence and sexual harassment between children. It will also include Prevent awareness training to equip staff to raise concerns appropriately by ensuring all staff have the knowledge and confidence to identify children at risk of being drawn into terrorism; are able to challenge extremist ideas; and know how to refer children and young people for further help. All staff will also be made aware of the local early help process and understand their role in it.
- Undertake regular informal updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. The School provides these via, for example, emails, e-bulletins and staff meetings.

DSL(s)

The DSL receives updated child protection training at least every two years to provide them with the knowledge and skills required to carry out the role. This includes local inter-agency working protocols, participation in child protection case conferences, supporting children in need, identifying children at risk of

radicalisation, supporting SEND children particularly when online, overseeing online safety in school, record keeping and promoting a culture of listening to children, training in the approach to *Prevent* duties and harmful sexual behaviours. Further details of the required training content for the DSL are set out in Annex B of *KCSIE*.

In addition to their formal training, the DSL's knowledge and skills are updated at least annually to keep up with any developments relevant to their role.

OVERSIGHT OF SAFEGUARDING, INCLUDING ARRANGEMENTS FOR REVIEWING POLICIES AND PROCEDURES

Ian Young is the board-level lead designated to take a lead in relation to responsibility for the Trust's safeguarding arrangements. Ian Young is lead designated to take a lead in relation to responsibility for the safeguarding arrangements in the School.

A review of the School's child protection policies takes place at least annually, including an update and review of the effectiveness of procedures and their implementation. This will be done via a Governors meeting. The School draws on the expertise of staff, including the DSL(s), in shaping the School's safeguarding arrangements and policies.

If there has been a substantiated allegation against a member of staff, the School will work with the Local Authority designated officer to determine whether there are any improvements to be made to the School's procedures or practice to help prevent similar events in the future.

THE SCHOOL'S ARRANGEMENTS TO FULFIL OTHER SAFEGUARDING RESPONSIBILITIES

Teaching children how to keep safe

The School ensures that all students are taught about safeguarding, including online, through the curriculum, Relationships and Sex Education and PREPARE to help children to adjust their behaviours in order to reduce risks and build resilience, including to radicalisation. This includes teaching students about the safe use of electronic equipment and the internet, and the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults. It will also include teaching students, for example about healthy relationships, consent and that sexual violence and sexual harassment is always wrong.

The School recognises the additional risks that children with SEND face online. The Academy Director will ensure that additional support and measures are in place to support these children. Online safety is an integral part of the School's ICT curriculum and also embedded in the PREPARE programme.

The School has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online. The School's is developing relationships with companies like SAFEToNET. Also, there will be filters, firewalls, in line with United Learnings advice from Sept 2019. Such systems aim to reduce the risk of children being exposed to illegal, inappropriate and harmful materials online; reduce the risk of children being subjected to harmful online interaction with others; and help manage online behaviour that can increase a child's likelihood of, or causes, harm. Further detail of the School's approach to online safety can be found in United Learning E-Safety Policy.

Use of 'reasonable force'

The School recognises the additional vulnerability when using reasonable force in response to risks presented by incidents involving children with SEND or with medical conditions. The School will consider its duties under the Equality Act 2010. Positive and proactive behaviour support, for instance through drawing up individual behaviour plans for more vulnerable children, and agreeing them with parents and carers can reduce the occurrence of challenging behaviour and the need to use reasonable force.

The School has a use of reasonable force policy which can be found in the Behaviour Policy

Arrangements for Visiting Speakers

The School has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. The School's responsibility to students is to ensure that they can critically assess the information they receive as to its value to themselves, and that the information is aligned to the ethos and values of the School and British values.

The School is required to undertake a risk assessment before agreeing to a Visiting Speaker being allowed to attend the School. This will take into account any vetting requirements considered appropriate in the circumstances, and may include a DBS check if relevant.

Visiting speakers will be expected to understand that, where appropriate, their session should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. In some cases, the School may request a copy of the Visiting Speaker's presentation and/or footage in advance of the session being provided.

Visiting Speakers, whilst on the School site, will be supervised by a school employee. On attending the School, Visiting Speakers will be required to show original current identification documents including a photograph such as a passport or photo card driving licence. The School shall also keep a formal register of visiting speakers retained in line with its Data Protection Policy.

BOARDING ARRANGEMENTS

The School has had regard to the National Minimum Standards for Boarding Schools (NMS) when drawing up its safeguarding arrangements to safeguard and promote the welfare of students and ensures that its safer recruitment procedures are adopted in line with regulatory requirements. This includes drawing up a written risk assessment policy and taking appropriate action in light of any identified risks to the welfare of students.

All staff are also referred to the United Learning Risk Assessment Policy (available on the United Learning Hub).]

APPENDIX 1 –SIGNS AND TYPES OF ABUSE

All school staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. They can occur from within or outside families, in or out of school, from within peer groups or the wider community and/or online. In most cases, multiple issues will overlap with one another and children can therefore be vulnerable to multiple threats.

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

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. Staff are referred to DfE guidance Sexual Violence and Sexual Harassment for further information.

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

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

Specific safeguarding issues: behaviours linked to drug taking, alcohol abuse, truanting and sexting put children in danger. Safeguarding issues can also manifest themselves via peer-on-peer abuse, such as bullying (including cyberbullying), gender-based violence/sexual assaults and sexting. Safeguarding issues can also

be linked to, for example, children missing education; child sexual exploitation; domestic violence; fabricated or induced illness; faith abuse; female genital mutilation; forced marriage; gangs and youth violence; gender-based violence / violence against women and girls; hate; mental health; preventing radicalisation; relationship abuse; sexting; and trafficking.

Child Sexual Exploitation (CSE): CSE is a form of sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact: it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex; can still be abuse even if the sexual activity appears consensual; can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity; can take place in person or via technology, or a combination of both; can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence; may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media); can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and is typified by some form of power imbalance in favour of those perpetrating the abuse. 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. 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; and
- Children who regularly miss school or education or do not take part in education.

CSE is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of drugs trafficking. The DSL or DDSL will consider a referral to the National Referral Mechanism as soon as possible if there are county line concerns, such as a child being a potential victim of modern slavery or human trafficking.

So Called 'Honour Based' Violence: encompasses 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. It can include multiple perpetrators.

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can also be found on pages 38-41 of the Multi-agency statutory guidance on FGM.

If staff have a concern that a student may be at risk of HBV or has suffered HBV, they should speak to the DSL (or DDSL). As appropriate they will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with Police and Children's Social Care.

There is a statutory duty on teachers to personally report to the Police where they **discover** (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate. If the teacher is unsure whether this reporting duty applies, they should discuss their concerns with the DSL in accordance with this policy. Where a teacher suspects that a student is at risk (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or it involves a student over 18, teachers should follow the School's local safeguarding procedures.

Forced Marriage: Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage. There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found on pages 13-14 of the Multi-agency guidelines: Handling cases of forced marriage. School staff can also contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fm@fco.gov.uk.

Radicalisation: Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. It can also call for the death of members of the armed forces.

There is no single way of identifying a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through different methods such as online. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include the DSL or DDSL making a referral to the Channel programme.

Special Educational Needs and/or Disabilities: Students with SEND may not outwardly shown signs of abuse and/or may have difficulties in communication about abuse or neglect. Students with SEND are more likely to be abused by their peers. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- being more prone to peer group isolation than other children
- the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

Staff will support such students in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL as appropriate. Any reports of abuse involving children with SEND will entail close liaison with the DSL or DDSL and named person with oversight for SEN.

Lesbian, Gay, Bi or Trans (LGBT): Children who are LGBT can be targeted by their peers. In some cases, a student who is perceived by their peers to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

Children and the court system: Children are sometime required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed, and this will be stressful for them. Making child arrangements following separation can also be stressful and entrench conflict in families. Staff should be alert to the needs of such students and report any concerns to the DSL or DDSL in accordance with this policy.

Children who go missing from education or school: A child going missing is a potential indicator of a range of safeguarding possibilities, such as abuse or neglect. The School holds more than one emergency contact number for each student so additional options are available to make contact with a responsible adult when a child goes missing is also identified as a welfare and/or safety concern.

Staff must follow the School's procedures for dealing with children who go missing, particularly on repeat occasions. The School's procedure for dealing with children who go missing can be found in the School's Missing Children Policy. All unexplained or unauthorised absences will be followed up in accordance with this Missing Children Policy.

The School shall inform the local authority of any student who is going to be added to or deleted from the School's admission register at non-standard transition points in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2006 (as amended). This will assist the local authority to:

- a) fulfil its duty to identify children of compulsory school age who are missing from education; and
- b) follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect or radicalisation.

School attendance registers are carefully monitored to identify any trends. The School will inform the host school and its local authority of any student who fails to attend school regularly or has been absent without the School's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the School and the local authority.

Action should be taken in accordance with this policy if any absence of a student from the School gives rise to a concern about their welfare.

Children with family members in prison: Children who have a parent in prison are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. Staff should be alert to the needs of such students and report any concerns to the DSL or DDSL in accordance with this policy.

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

Homelessness: Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. The DSL or DDSL will raise/progress any concerns about homelessness with the Local Housing Authority although this does not replace a referral into children's social care where a child has been harmed or is at risk of harm.

Peer on peer abuse: peer on peer abuse can take many forms and can include (but is not limited to) bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals. Girls students with SEND and LGBT children are more at risk of peer-on-peer abuse.

Signs that a child may be suffering from peer-on-peer abuse can also overlap with those indicating

other types of abuse and can include:

- failing to attend school, disengaging from classes or struggling to carry out school related tasks to
- the standard ordinarily expected;
- physical injuries;
- experiencing difficulties with mental health and/or emotional wellbeing;
- becoming withdrawn and/or shy; experiencing headaches, stomach aches, anxiety and/or panic
- attacks; suffering from nightmares or lack of sleep or sleeping too much;
- broader changes in behaviour including alcohol or substance misuse;
- changes in appearance and/or starting to act in a way that is not appropriate for the child's age;
- abusive behaviour towards others.

Sexual violence and sexual harassment, as a type of peer on peer abuse, may overlap and can occur online and offline (both physical and verbal). Sexual violence are sexual offences of rape, assault by penetration and sexual assault. Sexual harassment is unwanted conduct of a sexual nature and is likely to violate a child's dignity and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Examples of sexual harassment include sexual comments sexual "jokes" or taunting; physical behaviour such as deliberately brushing against someone; non-consensual sharing of sexual images and sexualised online bullying.

If staff have a concern about a child or a child make a report to the, staff should follow the referral process in this policy. If staff are in any doubt about what to do they should speak to the DSL or DDSL.

Date of last central office review:	SEPTEMBER 2019	Review Period:	1 year (minimum)
Date of next central office review:	September 2020	Owner:	Florence Mather
Date of next school level review:	September 2020		
Type of policy:	Central- website published	Local Governing Body	Policy requires Educational Board approval

REVIEW TIMETABLE

The Policy will be reviewed annually, as set out below:	
Policy reviewed centrally	September 2019
Policy approved by the Educational Board of Governors	September 2019
Implementation of Policy	September 2019

APPENDIX 2 – Meet the Safeguarding Team

The Designated Safeguarding Lead is:



Dr Florence Potter

The Deputy Designated Safeguarding Leads is:

