



Safeguarding and Child Protection Policy September

based on DfE statutory guidance
Keeping Children Safe in Education

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Reviewed by:	Quality Assurance Team	31.08.2023
Checked by:	Designated Safeguarding Lead	31.08.2023
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This policy will be reviewed and approved by the Italia Conti CEO and/or following any updates to national and local guidance and procedures.

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

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1. Key Safeguarding Contacts for Italia Conti Associates

Overarching Key Safeguarding Contacts: Italia Conti			
CEO (Italia Conti)	Mrs. Hayley Newton	01483 322220	Hayley@italia-conti.com
Overarching Designated Safeguarding Lead (DSL) Italia Conti and Senior Mental Health Lead	Ms Catherine Cooper	01483 322220 07863 455991 (Emergencies)	Catherine.Cooper@italiaconti.co.uk
Italia Conti Associates Designated Safeguarding Lead	Lee Ellaway	01483 322220	Lee.Ellaway@italiaconti.co.uk
Designated Manager for allegations against staff and volunteers:	Miranda Tatton-Brown Chief Operating Officer	01483 322220	HR@italiaconti.co.uk
Local Authority Designated Officer for Head Office (LADO)	LADO@local authority cc.gov.uk 0300 123 1650		

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2. Italia Conti Associates Safeguarding Statement

“Safeguarding and promoting the welfare of children and young people is everyone’s responsibility. Everyone who comes into contact with children, young people and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child centred. This means that they should consider, at all times, what is in the best interests of the child ¹

3. Introduction and Aims

Italia Conti Associates recognises the importance of creating and maintaining a culture of safeguarding that will help all students to feel safe, secure, and respected; encourage them to talk openly; and enable them to feel confident that they will be listened to. We are committed to providing an environment where students can learn, develop, and achieve, and where they are safeguarded and are enabled to disclose if they are being harmed in some way. We are alert to the signs of abuse and neglect and follow our procedures to ensure that all students receive effective support, protection, and justice.

Italia Conti Associates recognises that some children or young people may be especially vulnerable to abuse. We understand that children or young people who are abused or neglected may find it difficult to develop a sense of self-worth and to view the world in a positive way. Whilst at college, their behaviour may be challenging, and they may exhibit behaviours which give rise to concern and, at times, this may impact on other students either directly or indirectly. We will always take a considered and sensitive approach in order that we can support all of our students.

Italia Conti Associates’ core safeguarding principles are:

- that schools and colleges are an important part of the wider safeguarding system for children;
- it is a whole school responsibility to safeguard and promote the welfare of children;
- all children (defined as those up to the age of 18) have equal rights to protection regardless of age, gender, ability, culture, race, language, religion or sexual identity;
- all children have a right to be heard and to have their wishes and feelings taken into account;
- all staff understand safe professional practice and adhere to the stated expectations within the Italia Conti Associates’ agreement and other associated policies;
- all staff have a responsibility to recognise vulnerability in children and act on any concern in accordance with this guidance.

¹ Keeping Children Safe in Education (DfE)

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The procedures contained in this policy apply to all staff (including teaching and non-teaching, temporary staff, and volunteers) and are consistent with KCSIE Child Protection Procedures.

4. Policy Aims

- To demonstrate Italia Conti Associates' commitment to safeguarding and child protection to students, parents and other stakeholders.
- To support a child's development in ways that will foster security, confidence, and independence.
- To provide an environment in which children and young people feel safe, secure, valued, and respected, and feel confident to, and know how to approach adults if they are in difficulties, having the belief that they will be effectively listened to.
- To ensure awareness in all teaching and non-teaching staff of the need to safeguard children, and of their responsibilities in identifying and reporting possible cases of abuse.
- To provide a systematic means of monitoring children and young people known or thought to be at risk of harm, and ensure that we, Italia Conti Associates, contribute effectively to assessments of need and support packages for those children and young people.
- To emphasise the need for good levels of communication between all members of staff.
- To ensure a structured procedure within Italia Conti Associate schools which will be followed by all members of the school's community in cases of suspected abuse.
- To develop and promote effective working relationships with other agencies, especially the Police and Social Care.
- To ensure that all staff working within Italia Conti Associates schools who have substantial access to children have been checked as to their suitability, including verification of their identity, qualifications, and a satisfactory DBS check (according to guidance), and that a single central record is kept for audit purposes.

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5. Definitions

“Safeguarding is not just about protecting children from deliberate harm. It includes a wide range of issues relating to students’ welfare, health and safety.”²

Safeguarding is defined as:

- protecting children from maltreatment;
- preventing impairment of children’s mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- taking action to enable all children to have the best life chances.

Child protection: an aspect of safeguarding that is focused on how we respond to children suffering, or being likely to suffer, significant harm.

Staff: refers to all those working for or on behalf of Italia Conti Associates schools, full or part time, temporary or permanent, in either a paid or voluntary capacity.

Child: includes everyone under the age of 18. On the whole, this will apply to students of Italia Conti; the policy will also extend to visiting children and students from other establishments.

Parent: refers to birth parents and other adults who are in a parenting role, for example stepparents, foster carers and adoptive parents.

Abuse: a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse. Explanations of these are given within the document and appendices 1 and 2.

Neglect: a form of abuse and is the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development.

² *Inspecting Safeguarding In Early Years, Education and Skills*, Ofsted, September 2019, available from: <https://www.gov.uk/government/publications/inspecting-safeguarding-in-early-years-education-and-skills> [Accessed 9/11/2022].

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For the purposes of this policy, we, in places use the terms 'victim' and 'perpetrator'³:

Victim is a widely understood and recognised term, but not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, in some cases, abusive behaviour can be harmful to the perpetrator too. The appropriate terms should be considered and used on a case-by-case basis.

6. Context

This policy has been developed in accordance with the principles established by the Children Act(s) 1989 and 2004 and related guidance. In addition, Section 175 (Section 157 for academies and independent schools) of the Education Act, 2002 requires governing bodies of maintained schools and further education colleges (including sixth form colleges) to ensure they safeguard and promote the welfare of students at Italia Conti who are students under 18 years of age attending the further education institution.

This includes:

- Working Together to Safeguard Children (DfE 2018) (WTSC) [Working Together to Safeguard Children 2018](#);
- DfE guidance Keeping Children Safe in Education 2022 (KCSIE) Part One - Safeguarding Information for all Staff and Annex A [Keeping Children Safe in Education 2022](#);
- [Teaching online safety in schools \(DfE, 2019\)](#);
- Ofsted guidance 'Inspecting safeguarding in early years, education and skills' (2019) [Ofsted Inspecting Safeguarding](#);
- [Sexual violence and sexual harassment between children in schools and colleges](#) ⁴;
- [Criminal Exploitation of children and vulnerable adult - county lines guidance \(Home Office, 2018\)](#);
- Children and Social Work Act, 2017;
- [The Children Act 1989 \(and 2004 amendment\)](#), which provides a framework for the care and protection of children;
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children;
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children.

³ KCSIE 2022

⁴ From 1 September 2021

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- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our Franchisee/Principal should carefully consider how they are supporting their students with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- Female Genital Mutilation Act 2003 (S. 74 - Serious Crime Act 2015)
FGM_Mandatory_Reporting_-_procedural_information_nov16_FINAL.pdf

All Italia Conti safeguarding policies will be reviewed on an annual (minimum) basis by the Italia Conti Senior Leadership Teams. The Italia Conti Associates Safeguarding policy will be reviewed by the Quality Assurance and Safeguarding Teams as part of this process. The Designated Safeguarding Lead and CEO will ensure regular reporting on safeguarding activity and systems in Italia Conti.

All staff and volunteers at Italia Conti Associates recognise that children and young people experiencing specific safeguarding issues identified above are no different to safeguarding against any other vulnerability or concern and will respond in the same way as they do to protect children from any other risks.

Supporting Guidance (to be read and followed alongside this document)

- Information Sharing: *Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents And Carers Information Sharing*
- If you are concerned about a child that may be abused: *What to do if you're worried a child is being abused* - Publications - GOV.UK
- Safer Working Practices: *Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings*
- Safer Recruitment Consortium, 2019: <https://saferrecruitmentconsortium.org/>

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- Mental Health & Behaviour in Schools 2018 : *Mental Health and Behaviour in Schools* - Publications – GOV.UK
- Teachers' Standards 2012
- Safeguarding Disabled Children – Practice Guidance - DOH, 2009 <https://www.gov.uk/government/publications/safeguarding-disabled-children-practice-guidance>
- Preventing and Tackling Bullying
- Promoting Children and Young People's Emotional Health & Wellbeing:
- Rise Above: links to lesson plans and materials <https://campaignresources.phe.gov.uk/schools/topics/rise-above/overview>

The following 3 safeguarding partners are identified in *Keeping Children Safe in Education* (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children and young people, including identifying and responding to their needs:

- the Local Authority (LA);
- a clinical commissioning group for an area within the LA;
- the chief officer of police for a police area in the LA area.

All staff and volunteers must work in accordance with the Local Authority Child Protection Procedures.

7. Safeguarding Procedures

When new staff, volunteers or regular visitors join Italia Conti Associate schools they are informed of the safeguarding arrangements in place, the name of the DSL and how to share concerns with them.

Any member of staff, volunteer or visitor to Italia Conti Associates who receives a disclosure or allegation of abuse, or suspects that abuse may have occurred **must report it immediately to** the Principal / Franchisee holder, who will then report this to the Safeguarding Lead for Associate Schools, and to the overall DSL for Italia Conti as required. See flowchart **'What to do if you are worried about a child/ young person'** (Appendix 1).

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The Designated Safeguarding or the Deputy DSL will immediately refer cases of suspected abuse or allegations, by telephone, to the Local Authority Safeguarding Officer. In an emergency out of hours, referrals can be made to the Emergency Duty Team.

Referrals should be made in writing, following a telephone call Local Authority Procedure, which will be available on their website.

If the Principal or Franchisee is making the referral (for example, if it is out of normal working hours), they should ensure that they also notify the overarching DSL at Italia Conti and the Deputy Safeguarding Lead for the Italia Conti Associates in writing.

All Associate Schools will complete the form in Appendix 5 and ensure that these details are readily available.

Referrals to other local authority statutory services will be followed up, within the same timescale. All referrals will be made using the local authority's referral process (*KCSIE, 2022*) See <https://www.gov.uk/report-child-abuse-to-local-council> for local authority child protection referral contact details.

All referrals will include the student's name, address, date of birth, family composition, the reason for the referral, whether the child's parents are aware of the referral plus any other relevant information, action taken, or advice given. Staff members should ensure that they sign and date the referral form, including the time of day that the referral is made.

Wherever possible, Italia Conti Associates will share any safeguarding concerns, or an intention to refer a child or individual at risk to Children's Social Care, with parents or carers. However, we will not do so where it is felt that to do so could place the child at greater risk of harm or impede a criminal investigation. On occasions, it may be necessary to seek advice from the Children's Services Contact Team (CSCT) and/or Police in making decisions about when it is appropriate to share information with parents / carers.

If a member of staff continues to have concerns about a child or young person and feels the situation is not being addressed or does not appear to be improving, they should press the Designated Safeguarding Lead for re-consideration of the case. If after following this process, the staff member remains concerned that appropriate action is not being taken, it is the responsibility of that person to seek further direct consultation from the Italia Conti Chief Operating Officer.

If after a referral to the relevant Children's Services Contact Team a child's situation does not appear to be improving, the Designated Safeguarding Lead will request reconsideration to ensure that the referral concerns have been addressed and, most importantly, that the child's

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situation has improved. Professional disagreements (escalation) will be responded to in line with the local authority safeguarding board procedures.

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

The aim of our procedures is to provide a robust framework which enables staff to take appropriate action when they are worried a child is being abused.

Safeguarding contact details are displayed in Italia Conti Associates schools across all sites to ensure that all staff members have unfettered access to safeguarding support.

When new staff, volunteers or regular visitors join an Italia Conti Associates School they will be informed of the safeguarding arrangements in place, the name of the Designated Safeguarding Lead and how to share concerns with them.

The Principal / Franchisee will ensure that the policies and procedures adopted (particularly those concerning referrals of cases of suspected abuse and neglect), are understood, and followed by all staff.

8. Early Help

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

- has health conditions including a mental health need;
- 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 and county lines;
- is at risk of child sexual exploitation and/or other extra familial harm;
- 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;

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- 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;
- a family member in prison;
- is affected by parental offending;
- is at risk of honour-based abuse;
- Is at risk of female genital mutilation;
- is at risk of forced marriage;
- is persistently absent from classes;
- is at risk of self-harm.

All staff are aware of the Early Help process and understand their role within it. This includes identifying emerging problems, liaising with the Designated Safeguarding Lead, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment.

If Early Help is assessed to be appropriate, then the Designated Safeguarding Lead will support staff members involved with the family to initiate an Early Help Assessment. The Designated Safeguarding Lead will keep all Early Help cases under constant review and will give consideration to making a child in need or child protection referral if the situation does not appear to be improving for the student.

The Italia Conti CEO and Senior Leadership Team will ensure that the Designated Safeguarding Lead is properly supported in this role in relation to the availability of appropriate time, support and resources.

9. Recognition of Types of Abuse / specific safeguarding issues

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

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

The four main types of abuse are:

- Physical
- Emotional
- Sexual
- Neglect

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The most up to date definitions and possible indicators and signs of abuse are found in Appendix 1. Staff should also refer to Part 1 and Annex A within *KCSIE*, 2022 and 'What to do if you are worried a child is being abused' (2015).⁵

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

The warning signs and symptoms of child abuse and neglect can vary from student to student. By understanding the warning signs, Italia Conti can respond to problems as early as possible and provide the right support and services for the student and their family. It is important to recognise that a warning sign does not automatically mean a student is being abused.

All staff are aware that some children may not feel ready or know how to talk about abuse, not recognise their experiences as harmful, or feel embarrassed, humiliated or threatened but that this should not stop staff from having a 'professional curiosity' and speaking to the DSL if they have concerns about a child.

10. Online Safety

Italia Conti Associates recognise that the use of technology presents particular challenges and risks to children and adults both inside and outside of college. The DSL and leadership team have read paragraphs 123-135 regarding Online Safety within *KCSIE* 2022.

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

⁵ See also Italia Conti Safeguarding Training

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

- **content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism;
- **contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes;
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your students, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

Italia Conti Associates recognises the specific risks that can be posed by mobile phones and cameras and in accordance with *KCSIE 2022* has appropriate policies in place that are shared and understood by all members of the Italia Conti community.

Italia Conti Associates' approach to online safety will consider the 4 'c's above. This approach is also reflected in our online safety/behaviour/anti-bullying policies.

Italia Conti Associates recognises that online safety is part of the whole school approach to safeguarding which includes:

- the student, and where appropriate, parental, engagement with online safety;
- an appropriate level of security to protect users and their data;
- an annual review of Italia Conti Associates' online safety procedures which include a risk assessment that reflects and considers the risks children and students face online
- curriculum planning;
- teacher training;
- the role and responsibilities of the DSL.

Italia Conti Associates will ensure a comprehensive school wide strategy is in place to enable all students to learn about and manage online risks effectively and will support the wider school

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community (including all members of staff) to become aware and alert to the need to keep children and students safe online.

Italia Conti Associates will ensure that a safe space is available for students, including those who are LGBTQ, ethnically diverse and / or live with SEND to speak out and share their concerns.

11. Learning at home

Italia Conti recognises that it is essential that all students are safeguarded from potentially harmful and inappropriate online material. Staff with access to Italia Conti devices are reminded about rules on the **misuse of school technology** – devices used at home should be used just like if they were in full view of a teacher or colleague. Italia Conti staff will operate within the parameters of the Italia Conti Associates' Consultant Agreement including:

- avoiding the use of private accounts;
- ensuring that any issues and concerns re recorded
- considering students with SEND;
- avoiding private chats with students.

12. Roles and responsibilities

a. **All staff**

All staff including teaching and non-teaching staff, temporary and supply staff, clerical and domestic staff, volunteers and staff working on site employed by other services and agencies and those working with children and families in the community, have a statutory responsibility to safeguard and promote the welfare of children and must be aware of and fully conversant with this policy. All staff must have access to this policy and follow the school's procedures and guidance at all times. This policy and procedure also apply to extended Italia Conti Associates and off-site activities.

All staff and volunteers will read *Keeping Children Safe in Education 2022*, part 1 and Annex A (see Appendix A). Senior Management will support all staff in understanding this key document and implementing it in their practice.

Italia Conti Associates plays a crucial role in preventative education. This is in the context of a whole-college approach to preparing students for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, transphobia, biphobia and sexual violence/harassment.

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b. The Chief Executive Officer (CEO)

The Italia Conti CEO will approve this policy at each review and hold Italia Conti Associates to account for its implementation.

The CEO ensures that the policies, procedures, and training in Italia Conti are effective and comply with the law at all times. It ensures that all required policies relating to safeguarding are in place and that the *Child Protection Policy* reflects statutory and local guidance and is reviewed at least annually. Related policies include a staff behaviour policy (*Code of Conduct*); child protection, safeguarding, recruitment and managing allegations policies and procedures and are consistent with the relevant local authority Safeguarding Children's Board and statutory requirements, are reviewed annually and that the *Child Protection Policy* is publicly available on the Italia Conti website and by other means.

The CEO ensures appropriate procedures are in place to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold, about staff members (including supply staff, volunteers, and contractors)

The CEO holds overall responsibility for the child protection and safeguarding functions of the Italia Conti Associate school and will ensure that the Italia Conti Associates' safeguarding arrangements take into account the procedures and practice of the relevant local authority as part of the inter-agency safeguarding procedures, including local protocols for assessment. They will ensure that the policies reflect the fact that additional barriers can exist when recognising abuse and neglect experience by students with SEN.

The CEO and Senior Management team are responsible for ensuring that the Italia Conti Associate school follows recruitment procedures that help to deter, reject or identify people who might abuse children or vulnerable adults. It adheres to statutory responsibilities to check adults working with children and vulnerable adults and has recruitment and selection procedures in place (see Italia Conti's *Safer Recruitment Policy* for further information). It ensures that volunteers are appropriately supervised Italia Conti.

For those staff engaged in management roles (in independent schools - including academies and free schools) an additional check is required to ensure they are not prohibited under section 128 provisions.⁶

⁶ Section 128 of the Education and Skills Act 2008 provides for the Secretary of State to direct that a person may be prohibited or restricted from participating in the management of an independent school (which includes academies and free schools).

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c. The Chief Executive Officer

The CEO works in accordance with the requirements upon all Italia Conti and Italia Conti Associates' staff (see below). In addition, they ensure that all safeguarding policies and procedures are followed by all staff.

The CEO, in conjunction with the Franchisee/ Principal manages all concerns about the conduct of adults in Italia Conti and Italia Conti Associates in relation to safeguarding and child protection.

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

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

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

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

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

d. The Designated Safeguarding Lead (DSL) (and Deputy DSL)

The DSL takes lead responsibility for managing child protection referrals, safeguarding training, and raising awareness of all child protection policies and procedures. In conjunction with the Safeguarding Lead for the Italia Conti Associates, they ensure that everyone at Italia Conti Associates (including temporary staff, volunteers, and contractors) is aware of these procedures and that they are followed at all times. They act as a source of advice and support for other staff (on child protection matters) and ensure that timely referrals are made to the relevant Local Authority Designated Officer. They work with statutory, targeted and universal agencies as required, in line with Working Together to Safeguard Children. **Referrals should be made in writing, following a telephone call.**

The DSL takes lead responsibility for coordinating early help assessments for children and individuals at risk within Italia Conti Associates, in conjunction with the principal/ Franchisee.

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The DSL will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. The DSL's training will be updated formally every two years, but their knowledge and skills will be updated through a variety of methods for example, the local authority Safeguarding Newsletter, conferences, local DSL Forum, etc.) at regular intervals, at least annually, to keep up with any developments relevant to their role.

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

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

The DSL or a deputy should always be available to discuss safeguarding concerns. If for any reason the DSL is unavailable, one of the named deputy DSLs will act in their absence. The DSL or a deputy will ensure that any student currently with a child protection plan who is absent in the educational setting without explanation for two days is referred to their key worker's Social Care Team.

The DSL or a deputy will ensure that all staff sign to say they have read, understood and agree to work within the School's *Safeguarding and Child Protection Policy*, staff behaviour policy (*Code of Conduct*) and *Keeping Children Safe in Education Part 1* and annex A and ensure that the policies are used appropriately.

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

The DSL or a deputy will contribute to and provide, with the CEO, the *Audit of Statutory Duties and Associated Responsibilities* to be submitted annually to the Education Safeguarding Team at the Local Authority/County Council.

The DSL will refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly.

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Additional responsibilities for the DSL include:

- responsibility for online safety as well as safeguarding and child protection;
- working with mental health leads where safeguarding is linked to mental health;
- promoting supportive engagement with parents and carers, where a student is under the age of 18;
- discussing the local response to sexual violence and sexual harassment with the police and local authority children's social care colleagues to prepare the school's policies;
- promoting educational outcomes of children in need by knowing and helping to address issues they have/are experiencing by:
 - ensuring that the Italia Conti Associate school knows which children need a social worker, understand their academic progress and attainment and maintaining a culture of high aspirations.
 - supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have/had a social worker reach their potential
 - recognising the lasting impact on educational outcomes.
 - having a good understanding of harmful sexual behaviour.
- to work with the CEO and 'relevant strategic leads' on information sharing:
 - understanding the importance of sharing information with other schools/colleges on transfers;
 - ensuring information in child protection files is kept confidential and stored securely;
 - ensuring that the child protection file is transferred to a new school/college within 5 days for an in-year transfer or within first 5 days of start of a new term.
- Training, knowledge and skills new expectations they have a good understanding of:
 - how to identify, understand and respond to specific needs that can increase the vulnerability of children;
 - specific harms that could put children at risk;
 - the important role they play in providing information and support to CSC to safeguard and promote their welfare;
 - the lasting impact of adversity and trauma on education, behaviour, mental health and wellbeing, and what is needed to respond to this;

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- the local specialist support available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and how to access this support;
- awareness that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search;
- the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships that facilitate communication;
- children in need (disabled children, those with relevant health needs and young carers) who have specific need to be alert to.

e. All Italia Conti staff and volunteers

Everyone in Italia Conti has a responsibility to provide a safe learning environment in which our students can learn. All staff members are prepared to identify students who may benefit from early help and understand their role within this process. This includes identifying any emerging problems so appropriate support may be provided and liaising with the relevant site DSL to report any concerns.

All staff and teachers will develop their understanding of the signs and indicators of abuse and of their responsibility for referring any concerns.

All staff will be aware that students and children can be at risk of harm inside and outside of their home, at school and online.

All staff members are aware of and follow Italia Conti processes (as set out in this policy) and are aware of how to make a referral to Social Care if there is a need to do so.

All staff and volunteers take individual responsibility for knowing what to do if a child discloses, or they have concerns about abuse or neglect. Members of staff know how to maintain an appropriate level of confidentiality whilst at the same time liaising with relevant professionals such as the DSL and other agencies as appropriate. Members of staff know they must never promise a child that they will not tell anyone about a concern or allegation as this may ultimately not be in the best interests of the child.

If, in exceptional circumstances, the relevant DSL (or deputy) is not available, staff should contact a member of the senior management team and/or take advice from local authority children's social care. In these circumstances, any action taken should be shared with the designated safeguarding lead (or deputy) as soon as is practically possible.

All staff are aware of Italia Conti Associates' *Whistleblowing Policy* and how to access it.

All staff are aware of safe working practices, including:

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

f) **Parents and Carers**

Parents/ carers have a responsibility to:

- discuss safeguarding issues with their children, support Italia Conti Associates in their safeguarding approaches, and reinforce appropriate safe behaviours at home;
- identify changes in behaviour which could indicate that their child is at risk of harm online, or in the wider community;
- seek help and support from Italia Conti, or other appropriate agencies, if they or their child have any safeguarding concerns.

13. Mental Health

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

Where students have suffered:

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

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

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

14. Children in Specific Circumstances

Children who need a social worker (Child in Need and Child Protection Plans)

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

Once information about a child with a social worker is communicated to the school, the DSL will, as a matter of routine, hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes.

Where children need a social worker, this will inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

Findings from the [Children in Need Review](#), 'Improving the educational outcomes of Children in Need of help and protection' contains further information; the conclusion of the review, '[Help, protection, education](#)' sets out action the Government is taking to support this.

15. Child on child abuse

Italia Conti Associates may be the only stable, secure and safe element in the lives of children and young people at risk of, or who have suffered harm. Nevertheless, whilst at Italia Conti Associates, their behaviour may be challenging and defiant, or they may instead be withdrawn, or display abusive behaviours towards other young people. Italia Conti Associates recognises that some children/young people may abuse their peers and any incidents of child-on-child abuse will be managed in the same way as any other child protection concern and will follow the same procedures. Italia Conti Associates will seek advice and support from other agencies as appropriate.

Child-on-child-abuse can manifest itself in many ways. This may include bullying (including cyber bullying), on-line abuse, gender-based abuse, up skirting, 'sexting' or sexually harmful behaviour. We do not tolerate any harmful behaviour at Italia Conti Associates and will take

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swift action to intervene where this occurs. We aim to help children and young people understand, in an age-appropriate way, what abuse is, and we encourage them to tell a trusted adult if someone is behaving in a way that makes them feel uncomfortable. Italia Conti Associates understands the different gender issues that can be prevalent when dealing with child-on-child abuse.

Where the Police are involved, the DSL will work closely with the investigating team, including when there are delays to the criminal process.

Italia Conti Associates will be alert to reports of sexual violence and/or harassment that may point to environmental/systematic problems or reflect wider issues.

Italia Conti Associates recognises that there is increased vulnerability of victims and perpetrators in certain environments, such as while using public transport.

Italia Conti Associates will support children who have witnessed sexual violence and that it will do all it can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed.

Disciplinary action taken against alleged perpetrators will follow Italia Conti Associates' Behaviour *Management Policy*.

16. Online Safety and Child-on Child Abuse

Italia Conti Associates staff are aware that technology is a significant component in many safeguarding and wellbeing issues including:

- children are at risk of online abuse as well as face to face;
- child-on-child abuse can happen online through:
- abusive, harassing and misogynistic messages;
- non-consensual sharing of indecent nude and semi-nude images/videos especially in chat groups;
- sharing of abusive images and pornography, to those who do not want to receive it.

Staff should:

- recognise and respond to the indicators;
- recognise it may be taking place, even if not reported;
- understand their role in preventing and responding where a child is at risk;
- understand the importance of challenging inappropriate behaviours to ensure a safe environment and not to normalise abuse;
- recognise it can take place inside and outside of college and/or online.

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17. Anti-Bullying/Cyberbullying

Italia Conti Associates' policies on anti-bullying and harassment are set out in separate documents and acknowledge that to allow or condone bullying may lead to consideration under safeguarding and child protection procedures. This includes all forms e.g. cyber, racist, homophobic, transphobic, religious and gender related bullying. We keep a record of known bullying incidents which is shared with and analysed by the Italia Conti Senior Leadership Team (SLT). All staff are aware that children or individuals at risk with SEND and/or differences/perceived differences are more susceptible to being bullied / victims of child abuse. Staff will be aware that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBT) can be targeted by other children.

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

Italia Conti Associates has a *Social Media Policy* which explains how we work to keep students and students safe at Italia Conti Associates schools, and how we respond to online safety incidents. Any Data Protection concerns should be notified to: DPO@italiaconti.co.uk

18. Serious violence

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

- increased absence from school;
- a change in friendships and/or
- relationships with older individuals or groups;
- a significant decline in performance.
- signs of self-harm and/or
- a significant change in well-being;
- signs of assault;
- unexplained injuries;
- unexplained gifts or new possessions may indicate involvement with individuals; associated with criminal networks or gangs.

19. Safeguarding Children or young people with SEN and disabilities

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

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

To address these additional challenges, Italia Conti Associates staff will consider extra support and attention for these students, along with ensuring any appropriate support for communication is in place. Abuse involving children with SEND will require close liaison with the DSL (or deputy) and the SENCO.

20. Child Criminal Exploitation (CCE)

Staff are aware that CCE can include the following:

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

21. County Lines

Some indicators of county lines are:

- going missing and being subsequently found in areas away from home;
- being the victim or perpetrator of serious violence (e.g. knife crime);
- being involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- being exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;
- being found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity;
- owing a 'debt bond' to their exploiters;
- having their bank accounts used to facilitate drug dealing.

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22. Child Sexual Exploitation (CSE)

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

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

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

Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology".⁷

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

Any concerns that a child is being or is at risk of being sexually exploited should be passed without delay to the DSL.

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the Internet.

CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g., through others sharing videos or images of them on social media. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited e.g., they believe they are in a genuine romantic relationship.

Further information about CSE including definitions and indicators is included in **Annex B** of *KCSIE 2022*.

⁷ Department of Education (DfE), 2017)

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On all occasions when there is a concern that a child is being or is at risk of being sexually exploited or where indicators have been observed that are consistent with a child who is being or who is at risk of being sexually exploited, the Principal / Franchisee DSL will make an immediate referral to the DSL and refer to their local authority procedures for reporting and referral.

23. Domestic Abuse

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

The behaviour of a person towards another person is “domestic abuse” if—

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

Behaviour is “abusive” if it consists of any of the following—

- physical or sexual abuse;
- violent or threatening behaviour;
- controlling or coercive behaviour;
- economic abuse;
- psychological, emotional or other abuse;

and it does not matter whether the behaviour consists of a single incident or a course of conduct.

“Economic abuse” means any behaviour that has a substantial adverse effect on one party’s ability to

- acquire, use or maintain money or other property, or
- obtain goods or services.

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For the purposes of this Act A's behaviour may be behaviour "towards" B despite the fact that it consists of conduct directed at another person (for example, B's child).⁸

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247.

24. Prevent and Radicalisation

Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

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

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

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

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

All staff will complete an approved training package which includes guidance on how to identify people who may be vulnerable to being drawn into terrorism, and how to refer them into the Channel process. This could include the NCALT e-Learning http://course.ncalt.com/Channel_General_Awareness/01/index.html or Home Office training on Prevent <https://www.elearning.prevent.homeoffice.gov.uk/>.

Italia Conti Associates seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far

⁸ <https://www.legislation.gov.uk/ukpga/2021/17/section/1/enacted>

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Right / Neo Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

Italia Conti Associates staff receive training to help identify early signs of radicalisation and extremism.⁹

The Italia Conti Associates Principal/Franchisee and the Designated Safeguarding Lead (DSL) will assess the level of risk within the school and put actions in place to reduce that risk. Risk assessment may include the use of Italia Conti Associates school premises by external agencies, anti-bullying policy and other issues specific to the Italia Conti's profile, community and philosophy.

Italia Conti Associates is clear that exploitation of vulnerable children and radicalisation should be viewed as a safeguarding concern and follows the Department for Education guidance for schools and childcare providers on preventing children and young people from being drawn into terrorism¹⁰.

When any member of staff has concerns that a student may be at risk of radicalisation or involvement in terrorism, they should speak with the DSL. They should then follow normal safeguarding procedures. If the matter is urgent contact the Police by dialling 999. In non-urgent cases where police advice is sought then dial 101. The Department of Education has also set up a dedicated telephone helpline for staff and governors to raise concerns around Prevent (020 7340 7264). You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

25. Curriculum and Staying Safe

Italia Conti Associates recognises our essential role in helping students to understand and identify the parameters of what is appropriate adult behaviour; what is 'safe'; to recognise when they and others close to them are not safe; and how to seek advice and support when they are concerned.

Italia Conti Associates will use opportunities across the curriculum to provide opportunities for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that students have a range of contacts and strategies to ensure their own protection and understand the importance of protecting others.

⁹https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/380595/SMSC_Guidance_Maintained_Schools.pdf

¹⁰ <https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty>

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26. Records and information sharing

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

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

Safeguarding and child protection records are kept for individual students and are maintained separately from all other records relating to the student at Italia Conti Associates. Safeguarding records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL. Safeguarding and child protection records are shared with staff on a 'need to know' basis only.

All safeguarding records will be transferred in accordance with data protection legislation to the child's subsequent school/setting, under confidential and separate cover in line with *KCSiE, 2022*. These will be given to the new DSL and a receipt of delivery will be obtained. Further information can be found in *ISCB Guidelines for Recording, Storing and Transferring Safeguarding and Child Protection Records in Education Settings, September 2018*. The DSL should also transfer any information relating to the Channel Programme.

Where a student transfers from Italia Conti Associates to another school/educational setting (including college), the DSL (or deputy DSL) will copy their safeguarding/ child protection file in its entirety and forward the original file to the new educational setting. This will be marked 'Strictly Confidential' and for the attention of the receiving school or college's DSL, with a return address on the envelope so it can be returned to us if it goes astray. We will obtain evidence that the paperwork has been received by the new educational establishment and place this on the copied file which will be archived in line with our retention policy.

27. Confidentiality and Information Sharing

Italia Conti Associates recognises that all matters relating to safeguarding and child protection are confidential. The CEO or DSL will only disclose information about a student to other members of staff on a 'need to know' basis.

All members of staff are aware that whilst they have duties to keep any information about children, students, families and colleagues which they have access to as a result of their role confidential, they also have a professional responsibility to share information with other agencies in order to safeguard children. The Data Protection Act 2018 and GDPR do not

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prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing. Further advice on responding to disclosures can be found in Appendix 3.

Italia Conti Associates has due regard to the relevant data protection principles, which allow us to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR.

This includes:

- being confident of the processing conditions which allow us to store and share information for safeguarding purposes, including information, which is sensitive and personal, and should be treated as 'special category personal data'.
- understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner, but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.
- not providing students' personal data where the serious harm test under the legislation is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harms test is met, we will withhold providing the data in compliance with our obligations under the Data Protection Act 2018 and the GDPR.
- If the school is made aware of any safeguarding concerns which they feel need to be shared with the wider community (including other local schools) then advice will be sought from the POSIE to ensure that the integrity of any subsequent investigations are maintained and that all members of the community are safeguarded.
- The DFE guidance on Information sharing can be found here: [Information sharing: advice for practitioners \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/671422/Information-sharing-advice-for-practitioners.pdf)
- Data Protection Toolkit for Schools: <https://www.gov.uk/government/publications/data-protection-toolkit-for-schools>

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28. Multi-Agency Working

It is the responsibility of the DSL to ensure that Italia Conti Associates is represented at any child protection conference called for children on the Italia Conti Associates' roll or previously known to them. In addition, we will ensure that a child protection conference report is submitted two working days in advance of an initial conference and five working days for a review conference, in line with Local Authority Child Protection Procedures, as relevant.

Where possible and appropriate, any report will be shared in advance with the parent(s)/carer(s). Whoever attends will be fully briefed on any issues or concerns Italia Conti has and be prepared to contribute to the discussions at the conference in line with Local Authority Child Protection Procedures, as relevant.

If a student is subject to a Child Protection Plan, Child in Need plan or Early Help Assessment and Plan, the DSL will ensure the child/student is monitored regarding their Italia Conti Associates attendance, emotional well-being, academic progress, welfare and presentation.

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

29. Allegations about members of the workforce

All staff members are made aware of the boundaries of appropriate behaviour and conduct. These matters form part of staff induction and are outlined in the Associates Schools' contract with Italia Conti.

Italia Conti Associates works in accordance with statutory guidance and the Allegations against Staff/Volunteers (ASV/LADO) procedures (LSCB, 2017) in respect of allegations against an adult working with children (in a paid or voluntary capacity).

Italia Conti Associates has processes in place for reporting any concerns about a member of staff (or any adult working with children / individuals at risk). Any concerns about the conduct of a member of staff, including supply staff or freelancers, will be referred to the CEO (or the Chief Operating Officer (COO) in their absence). This role is distinct from the DSL as the named person should have sufficient status and authority in Italia Conti to manage employment procedures. Staffing matters are confidential, and Italia Conti operates within statutory guidance around Data Protection.

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Where the concern involves the Principal/Franchisee, it should be reported directly to the Chief Executive Officer at Italia Conti.

ASV/LADO procedures (LSCB, 2017) require that, where an allegation against a member of staff is received, the CEO, senior named person or the Chair of Governors must inform the duty Local Authority Designated Officer (LADO) within one working day. However, wherever possible, contact with the LADO will be made immediately as they will then advise on how to proceed and whether the matter requires police involvement. This will include advice on speaking to students and parents and HR. Italia Conti Associates will not carry out any investigation before speaking to the LADO.

30. Complaints

Italia Conti Associates has a Complaints Procedure which is available to parents, students and members of staff who wish to report concerns. This can be found on the website: www.italiaconti.com/policies

All reported concerns will be taken seriously and considered within the relevant and appropriate process. Anything that constitutes an allegation against a member of staff or volunteer will be dealt with under the *Complaints Policy*.

31. Staff Induction, Awareness and Training

All members of staff have been provided with a copy of part one of *KCSIE, 2022* which provides an overview of safeguarding duties and responsibilities. School leaders will read the entire document. Staff are required to confirm by email that they have read part 1.

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

- the *Safeguarding Policy and Child Protection*;
- the role of the DSL (including the identity of the DSL and any deputies).

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

- recognise potential safeguarding and child protection concerns involving students and adults (colleagues, other professionals and parents/carers)
- respond appropriately to safeguarding issues and take action in line with this policy
- record concerns in line with the school policies

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- refer concerns to the DSL and be able to seek support external to the school if required

All staff members (including temporary staff) will receive appropriate training to ensure they are aware of a range of safeguarding issues (see definition of safeguarding) and are aware that behaviours linked to drug taking, alcohol abuse, truanting and peer on peer abuse such as bullying and sexting can put children in danger. The staff training will also include school responsibilities, the school child protection procedures, online safety, safe working practice and external reporting mechanisms.

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

The Principal / Franchisee of each Associate School will maintain an up-to-date register of who has received safeguarding and child protection training, including Prevent and will provide an annual update to the Italia Conti Development and Marketing Manager and the DSL as part of the *Annual Safeguarding Report*. This register will be available for inspection at monitoring visits.

32. Safe Working Practice

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

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

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

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Italia Conti Associates understands the additional vulnerability of children with special educational needs and disabilities and will ensure positive and proactive behaviour support to reduce the occurrence of risky behaviour and the need to use restraint.

Full advice and guidance can be found in *Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings* (2019) which can be found in the staff shared drive in the *Safeguarding Policy* folder.

Staff should be particularly aware of the professional risks associated with the use of social media and electronic communication (email, mobile phones, texting, social network sites etc.) and should familiarise themselves with advice and professional expectations outlined in the *Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings* <https://www.saferrecruitmentconsortium.org/GSWP%20Sept%202019.pdf> the Italia Conti *Social Media Policy* and the *Staff Code of Conduct*.

33. Staff Supervision and Support

The Senior Leadership Team (SLT) aim to create a culture and environment where members of staff feel competent and confident to raise concerns and feel supported in their safeguarding role. Any member of staff affected by issues arising from concerns for children or students' welfare or safety is encouraged to seek support from the DSL.

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

Italia Conti Associates will provide appropriate supervision/ 1:1 support for all members of staff to ensure that:

- staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children;
- case holding staff have a space to discuss and reflect upon their work and progress with particular children and young people.

The DSL will also put staff in touch with outside agencies for professional support if they so wish. Staff can also approach organisations such as their Union or other similar organisations directly. Further information about a range of supporting organisations can be found in **Appendix 4**.

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34. Safer Recruitment

As part of the Italia Conti Associates safeguarding culture, Italia Conti Associates has robust recruitment procedures that deter and prevent people who are unsuitable to work with children from applying for or securing employment, or volunteering opportunities in our organisation.

Any members of staff who are involved in the recruitment and selection process are appropriately trained in safer recruitment, covering the topics contained in Part 3 of *KCSIE 2022* at a minimum. In accordance with *The School Staffing (England) Regulations 2009* and the *Education (Student Referral Units) (Application of Enactments) (England) Regulations 2007* we will ensure that at least one of the persons who conducts an interview has completed safer recruitment training which should be repeated every three years.

Italia Conti will ensure that the safer recruitment process covers paragraphs 192 – 316 of *KCSIE 2022* in relation to advertisement, application form, shortlisting, employment history and references, selection, ID, DBS checks etc.

- Italia Conti Associates is responsible for ensuring that the school maintains an accurate Single Central Record (SCR). The SCR is a list of all staff (including supply staff), volunteers and meets statutory requirements.
- We expect all staff and volunteers to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, cautions, reprimands and warnings.

35. Allegations Against Members of Staff and Volunteers

Italia Conti Associates recognises that it is possible for staff, supply staff and volunteers to pose a risk of harm to children by behaving in a way that might cause them harm. We will take seriously any allegation received and follow the guidance in Part 4, Section 1 of *KCSIE 2022*.

a) Referrals to the Local Authority Designated Officer (LADO)

A referral to the Local Authority Designated Officer (LADO) should be made immediately if a member of staff, volunteer or supply staff has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (e.g., where they are involved in an incident outside of school which did

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not involve children but could have an impact on their suitability to work with children, one example being domestic abuse.)

In the event that there are concerns regarding any one or more of the above criteria the following will take place:

- basic enquiries to establish facts before contacting LADO;
- a case manager (usually the CEO) to lead investigation;
- the case manager to discuss any concerns about the welfare of other children in the community of member of staff's family with DSL and make risk assessment;
- DSL may then make a referral to children's social care.

Where a member of staff has acted in a way outside of school that may question their suitability to work with children (transferable risk), a risk assessment should be carried out when appropriate.

If staff have safeguarding concerns, or an allegation is made about another member of staff (including supply staff and volunteers) posing a risk of harm to children, then:

- this should be immediately referred to the Franchisee/Principal;
- where there are concerns/allegations about the Franchisee/Principal, this should be referred to the CEO of Italia Conti and
- in the event of concerns/allegations about the CEO this should be reported directly to the LADO.

(b) Low Level Concerns

Low level concerns (including allegations) are those that do not meet the harm threshold set out above. Concerns may arise from suspicions, complaints, a disclosure made by a child, parent or other adult or member of the public or as a result of vetting checks undertaken.

Italia Conti Associates will manage and record such concerns and take appropriate action to safeguard children.

Italia Conti Associates, as part of our whole school approach to safeguarding, promotes an open and transparent culture in which all concerns about all adults working in or on behalf of the school (including visiting teachers, volunteers and contractors) are dealt with promptly and appropriately. We believe it is critical to create a culture in which all concerns about adults (including allegations that do not meet the harms threshold (see Part Four - Section one *KCS/E 2022*) are shared responsibly and with the right person, recorded and dealt with appropriately.

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This is to ensure that problematic or inappropriate behaviour is identified early, the risk of abuse is minimised and that all adults working in the school are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the school.

A low-level concern means that the behaviour towards a child does not meet the threshold set out at Section 22(a) above (paragraph 338 of *KCSIE 2022*). A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ - that an adult working in or on behalf of the school may have acted in a way that is inconsistent with the Italia Conti Associates Contract Agreement, including inappropriate conduct outside of work, and b) does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

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

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating, or offensive language.

Italia Conti Associates believes it is crucial that any such concerns, including those which do not meet the allegation/harm threshold at 22(a) above, are shared responsibly and with the right person, and recorded and dealt with appropriately. This will also protect staff from potential false allegations or misunderstandings.

(c) What to do if you have a low-level concern

Low-level concerns about a member of staff should be reported to the Principal / Franchisee, who will inform the Italia Conti Associates DSL. Where a low-level concern is raised about the Principal, it should be shared with Italia Conti DSL and reported to the Italia Conti CEO. The CEO will be the ultimate decision maker in respect of all low-level concerns.

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

Where a low-level concern relates to a person employed by a supply agency or a contractor, that concern should be shared with the Principal / Franchisee and/or should be reported to the Principal / Franchisee, who will inform the Italia Conti Associates DSL, and their employer

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notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

(d) Recording low-level concerns

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

Records will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) (as per paragraph 109 *KCSIE 2022*).

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

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

36. The Use of Italia Conti Associates Premises by Other Organisations

Where services or activities are provided separately by another body using the school premises, the CEO and Senior Leadership Team (SLT) will seek written assurance that the organisation concerned has appropriate policies and procedures in place with regard to safeguarding children and child protection and that relevant safeguarding checks have been made in respect of staff and volunteers.

If this assurance is not achieved, then an application to use premises will be refused.

37. Security

All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light. We operate within a whole-school

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community ethos and welcome comments from students, parents and others about areas that may need improvement as well as what we are doing well.

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

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

38. Monitoring and Review

All Italia Conti Associates staff (including temporary staff and volunteers) will have access to a copy of this policy. The policy will also be available to parents/carers.

This policy has been updated to reflect the new guidance and legislation issued in relation to safeguarding children and promoting their welfare which comes into force on 1st September 2022.

All safeguarding policies will be reviewed on an annual (minimum) basis by the CEO, DSL and the Italia Conti Associates Quality Assurance Team who have responsibility for oversight of Italia Conti Safeguarding and Child Protection systems.

The DSL will ensure regular reporting on safeguarding activity and systems in Italia Conti to the CEO. The CEO **will not** receive details of individual student situations or identifying features of families as part of their oversight responsibility.

All staff should have access to this policy and confirm that they have read and understood its contents.

The DSL will review the policy following any child protection concerns (including following learning identified from serious case reviews) or allegations against staff to ensure that it reflects appropriate, accurate and up-to-date safeguarding practice.

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39. Linked Policies

Appropriate Physical Contact and Safe Touch Policy

Fire Evacuation Procedures

Fire Safety Policy

First Aid Policy

Health & Safety Policy

Extremism and Anti Radicalisation Policy

Safer Recruitment Policy

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Appendix 1: Categories of Abuse

1. All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.
2. **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children. It should be noted that abuse can be carried out both on and offline and be perpetrated by men, women and children. All members of staff should read and understand part one of *KCSIE, 2022* and staff who have direct contact with students should also read Annex A.
3. **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children (also known as child-on-child abuse) is a specific safeguarding issue in education (see *KCSIE 2022* paragraph 29).
4. **Signs that may indicate Sexual Abuse**
 - Sudden changes in behaviour and school performance
 - Displays of affection which are sexual and age inappropriate
 - Self-harm, self-mutilation or attempts at suicide
 - Alluding to secrets which they cannot reveal
 - Tendency to cling or need constant reassurance
 - Regression to younger behaviour for example thumb sucking, playing with discarded toys, acting like a baby
 - Distrust of familiar adults e.g. anxiety of being left with relatives, a child minder or lodger
 - Unexplained gifts or money
 - Depression and withdrawal
 - Fear of undressing for PE
 - Sexually transmitted disease
 - Fire setting

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

Signs that may indicate physical abuse

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

6. **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.

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7. Signs that may indicate emotional abuse

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

8. **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 caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

9. Signs that may indicate neglect.

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

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Appendix 2: Specific Safeguarding Issues

(Please also refer to Annex B of *KCSIE 2022*)

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

All members of staff at Italia Conti Associates recognise that children are capable of abusing their peers.

a) Child-on child abuse is most likely to include, but may not be limited to:

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

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Italia Conti Associates and externally (such as the Police, Child Line etc.). Further information can be found in the *Behaviour Policy*.

- Sharing nudes and semi-nudes or 'Sexting' or 'Youth Produced Sexual Images' will not be tolerated and Italia Conti will respond to such cases in line with the UKCCIS guidance Sharing nudes and semi-nudes: advice for education settings working with children and young people
- 'Up skirting' is a criminal offence and will not be tolerated. It typically involves someone taking a photograph under a person's clothes (not necessarily a skirt) without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any gender, can be a victim.
- All staff need to maintain a culture of 'it could happen here' and that if inappropriate; behaviour is addressed early, this can help prevent abusive/violent behaviour
- Victims of abuse will be distressed, which can affect progress in college If the alleged perpetrator is a fellow student, this can be made worse
- Girls are more likely to be victims, boys more likely to be perpetrators
- It could be a group of perpetrators or an individual
- Part 5 Should be read alongside DfE's sexual violence and harassment;
- Staff should keep in mind that some students may have additional barriers to disclosing due to vulnerability, disability, gender, ethnicity and/or sexual orientation
- Staff should reflect back, using the student's own language, when hearing a report
- Staff should recognise it may only be the first incident reported, rather than representative of a singular incident and that trauma can impact upon memory, so students may not be able to recall all details or timeline of abuse.

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b) What to do if you have concerns

- Staff should not wait for a child to make a disclosure; they should act on concerns immediately
- Staff may overhear a conversation that suggests a child may have been harmed or behaviour may be an indicator
- If the report includes an online element, staff may confiscate devices for evidence to hand to the Police
- Staff can ask children outright if they have been harmed and what the nature of the harm was.

c) Support

Students who have experienced child on child abuse will be supported by:

- an immediate opportunity to discuss the experience with a member of staff of their choice
- advised to keep a record of concerns as evidence and discussions regarding how to respond to concerns and build resilience, if appropriate.

Italia Conti Associates is aware of and will follow the relevant Local Authority procedures for supporting children who are at risk of harm as a result of their own behaviour. Students who are alleged to have abused other students will be helped by:

- discussing what happened, establishing the specific concern and the need for behaviour to change;
- informing parents/carers to help change the attitude and behaviour of the child;
- providing appropriate education and support
- sanctioning them in line with Italia Conti Associates' *Behaviour Policy*. This may include official warnings, detentions, removal of privileges (including denial of online access), fixed-term and permanent exclusions.
- speaking with police or other local services (such as early help or children's specialist services) as appropriate – see NCPP advice on when to call the Police, paragraph 26 Local Support.

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d) Next Steps after Initial Report

- The DSL's risk and needs assessment in response to a report of sexual harassment should also consider whether there have been any other victims. The DSL will regularly review the actions taken to respond to reports and
- regularly review the risk and needs assessment and put active measures in place to safeguard students.
- Any risk assessment should be informed by any CSC or multi-agency risk assessment.

Staff should be aware of the following:

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

e) Sexting:

- The term 'sexting' relates to the sending of indecent images, videos and/or written messages with sexually explicit content; these are created and sent electronically. They are often 'shared' via social networking sites and instant messaging services.
- Italia Conti Associates will not tolerate sexting; it is inappropriate and illegal amongst young people and can have extremely damaging and long-lasting consequences. Sexting is unacceptable behaviour. The misuse of electronic communication, such as sexting, inappropriate comments on Facebook for example, being the object of cyber-bullying and online grooming are all potential safeguarding concerns.

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- Italia Conti Associates will work with parents, carers and young people in ensuring that all students are fully aware of the dangers and possible repercussions of sexting.
- Not dismissing or tolerating such behaviours as these risks normalising them.

f) Female Genital Mutilation (FGM)

- FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to female genital organs. It is illegal in the UK under the FGM Act (2003) and a form of child abuse and violence against women.
- As of October 2015, the Serious Crime Act 2015 (Home Office, 2015) introduced a mandatory duty on **teachers** (and other professionals) to notify the police, on **101**, of **known** cases of female genital mutilation where it appears to have been carried out on a girl under the age of 18.
- Unless they have been specifically told not to disclose, by the Police, they should also discuss the case with the DSL and involve children's social care as appropriate.
- The duty for teachers mentioned above does not apply in cases where a student is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine students.
- **Any member of staff** who suspects a student is *at risk* of FGM or suspects that FGM has been carried out or discovers that a student **aged 18 or over** appears to have been a victim of FGM must speak to the DSL.
- Italia Conti Associates will operate in accordance with the statutory requirements relating to this issue, and in line with existing local safeguarding procedures.

g) Forced marriage

- A forced marriage is one entered into without the full consent of one or both parties. It is where violence, threats or other forms of coercion is used and is a crime. Our staff understand how to report concerns where this may be an issue.
- Italia Conti Associates staff should never attempt to intervene directly as a school or through a third party. Contact should be made with the contact centre or the Forced Marriage Unit +44 020 7008 0151, fm@fcd.gov.uk.

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- All staff are aware of the **‘One Chance’ Rule** in relation to forced marriage, FGM and HBV. Staff recognise they may only have one chance to speak to a student who is a potential victim and have just one chance to save a life.

h) Honour based violence

Honour based violence (HBV) can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such violence can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.

Honour-based violence might be committed against people who:

- Become involved with a boyfriend or girlfriend from a different culture or religion;
- Want to get out of an arranged marriage;
- Want to get out of a forced marriage;
- Wear clothes or take part in activities that might not be considered traditional within a culture;
- It is a violation of human rights and may be a form of domestic and/or sexual abuse. There is no, and cannot be, honour or justification for abusing the human rights of others.

i) Private Fostering Arrangements

- A private fostering occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child’s parents. It applies to children under the age of 16 or 18 if the child is disabled. Children looked after by the local authority or who are placed in residential schools, children’s homes or hospitals are not considered to be privately fostered.
- Italia Conti Associates recognise that most privately fostered children remain safe and well but are aware that safeguarding concerns have been raised in some cases. Therefore, all staff are alert to possible safeguarding issues, including the possibility that the child has been trafficked into the country.
- By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children’s services as soon as possible. However, where a member of staff becomes aware that a student may be in a private fostering arrangement, they will raise this with the DSL and the DSL will notify the local education authority social care of the circumstances as appropriate.

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j) Looked after children

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

The designated teacher for looked after children and the DSL have details of the child's social worker and the name and contact details of the Local Authority/County Council's virtual school head for children in care. As part of their role, they will:

- work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to;
- work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children.

k) Cybercrime

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

- Cyber-enabled – crimes happen off-line and enabled at scale/speed online or
- Cyber-dependant – where there is:
 - Unauthorised access to computers and illegal hacking, eg accessing a school's computer network to look for test paper answers or change grades;
 - Denial of service attacks or 'booting' where attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources;
 - Making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.
 - Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the DSL should consider referring to the Cyber Choices programme, a Police programme supported by the Home Officer and led by the National Crime Agency.

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

l) Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by:

- parents or other family members;
- by people known but not related to the victim (such as neighbours, friends and acquaintances); and
- by strangers.

Other community safety incidents in the vicinity of a school or college may raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. The lessons will focus on building children's confidence and abilities rather than simply warning them about all strangers.

Further information is available here: <http://www.actionagainstabduction.org/> and [Clever Never Goes](#).

m) Modern Slavery and the National Referral Mechanism (NRM)

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

n) Sexual violence and sexual harassment between children

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

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may

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overlap. They can occur online and offline (both physical and verbal) and are never acceptable. It is important that **all** victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

Staff should be aware of the importance of:

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

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Appendix 3: Keeping yourself safe when responding to disclosures

1. Receive

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

2. Respond

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

3. React

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

4. Record

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

5. Remember

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

6. Relax

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

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Appendix 4: Child-on-Child Abuse

1. Context

- a. Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.
- b. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment as well as their emotional well-being. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and offline (both physically and verbally) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support.
- c. Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. It is also important that other children, adult students and school and college staff are supported and protected as appropriate.

2. Policy

- a. We believe that all children have a right to attend college and learn in a safe environment. Children should be free from harm by adults in the school and other children.
- b. We recognise that children are capable of abusing their peers and this will be dealt with under our child protection policy and in line with *KCSIE 2022*
- c. We are clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- d. We will minimise the risk of child-on-child abuse by: -

i. Prevention:

- Taking a whole school approach to safeguarding & child protection
- Providing training to staff
- Providing a clear set of values and standards, underpinned by the school's behaviour policy and pastoral support system, and by a planned programme of evidence-based content delivered through the curriculum.
- Engaging with specialist support and interventions.
- Using a clear reporting system for staff and students, that is well promoted, easily understood and accessible
- Recognising that it may be taking place, even if not reported
- Publicising the school's zero-tolerance approach to abuse

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- Online safety, including mobile phone usage during school hours
- ii. Responding to reports of sexual violence and sexual harassment:**
 - Children making a report of sexual violence or sexual harassment will be taken seriously, kept safe and be well supported.
 - If the report includes an online element staff will be mindful of the Searching, screening and confiscation advice for schools Staff taking a report will inform the DSL or their Deputy as soon as practicably possible but at least within 24 hours.
 - Staff taking a report will never promise confidentiality.
 - Parents or carers will normally be informed (unless this would put the child at greater risk).
 - If a child is at risk of harm, is in immediate danger, or has been harmed, a referral will be made to Children's Social Care.
- iii. Risk Assessment: -**
 - Following a report, the DSL will make an immediate risk and needs assessment on a case-by-case basis. The Risk assessment will consider;
 - The victim, especially their protection and support.
 - The alleged perpetrator, their support needs and any discipline action.
 - All other children at the school.
 - The victim and the alleged perpetrator sharing classes and space at school.
 - The risk assessment will be recorded and kept under review.
 - Where there has been other professional intervention and/or other specialist risk assessments, these professional assessments will be used to inform the school's approach to supporting and protecting students.
- iv. DSL considerations and response**
 - The DSL will consider: -
 - The wishes of the victim.
 - The nature of the incident including whether a crime has been committed and the harm caused.
 - The ages of the children involved.
 - The developmental stages of the children.
 - Whether there is a power imbalance between the children/young people.
 - Any previous incidents.
 - Ongoing risks.
 - Other related issues or wider context.
 - Options: The DSL will then consider the following options: -
 - Manage internally
 - Early Help
 - Refer to Children's Social Care
 - Report to the police (generally in parallel with a referral to Social Care)

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v. Ongoing Response:

- The DSL will manage each report on a case-by-case basis and will keep the risk assessment under review.

- Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator should be removed from any classes they share with the victim.

- The DSL will consider how best to keep the victim and perpetrator a reasonable distance apart on school premises and on transport where appropriate.
- Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, the school will take suitable action. In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and lead to the view that allowing the perpetrator to remain in the same school or college would seriously harm the education or welfare of the victim (and potentially other students or students).

- Where a criminal investigation into sexual assault leads to a conviction or caution, the school or college will, if it has not already, consider any suitable sanctions in light of their behaviour policy, including consideration of permanent exclusion.

- Where the perpetrator is going to remain at the school or college, the CEO would be to continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on school and college premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.

- The victim, alleged perpetrator, and other witnesses (children & adults) will receive appropriate support and safeguards on a case-by-case basis.

- The school will take any disciplinary action against the alleged perpetrator in line with behaviour and discipline in schools.

- Italia Conti Associates recognises that taking disciplinary action and providing appropriate support are not mutually exclusive actions and will occur at the same time if necessary.

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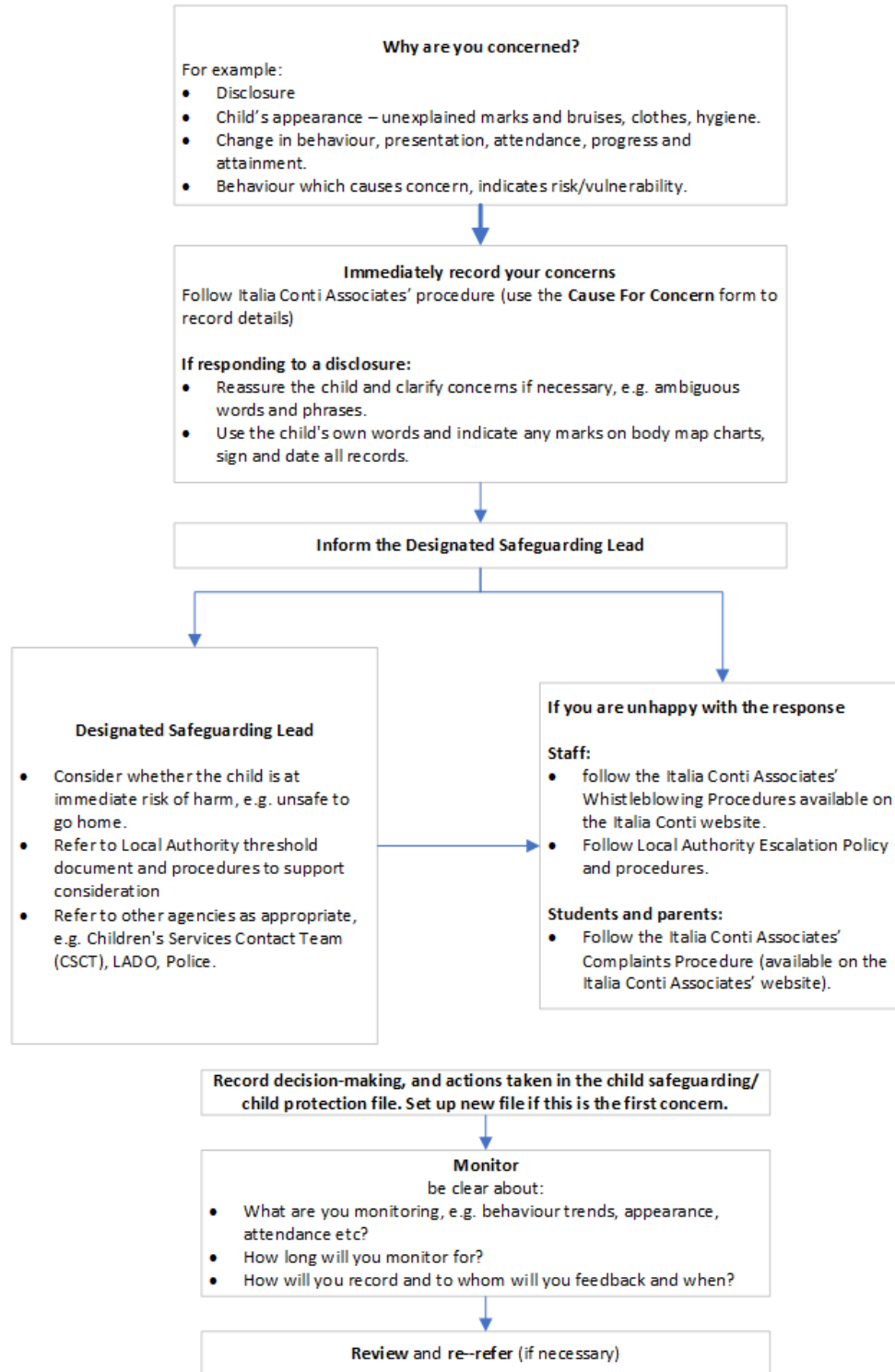
3. Physical Abuse

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

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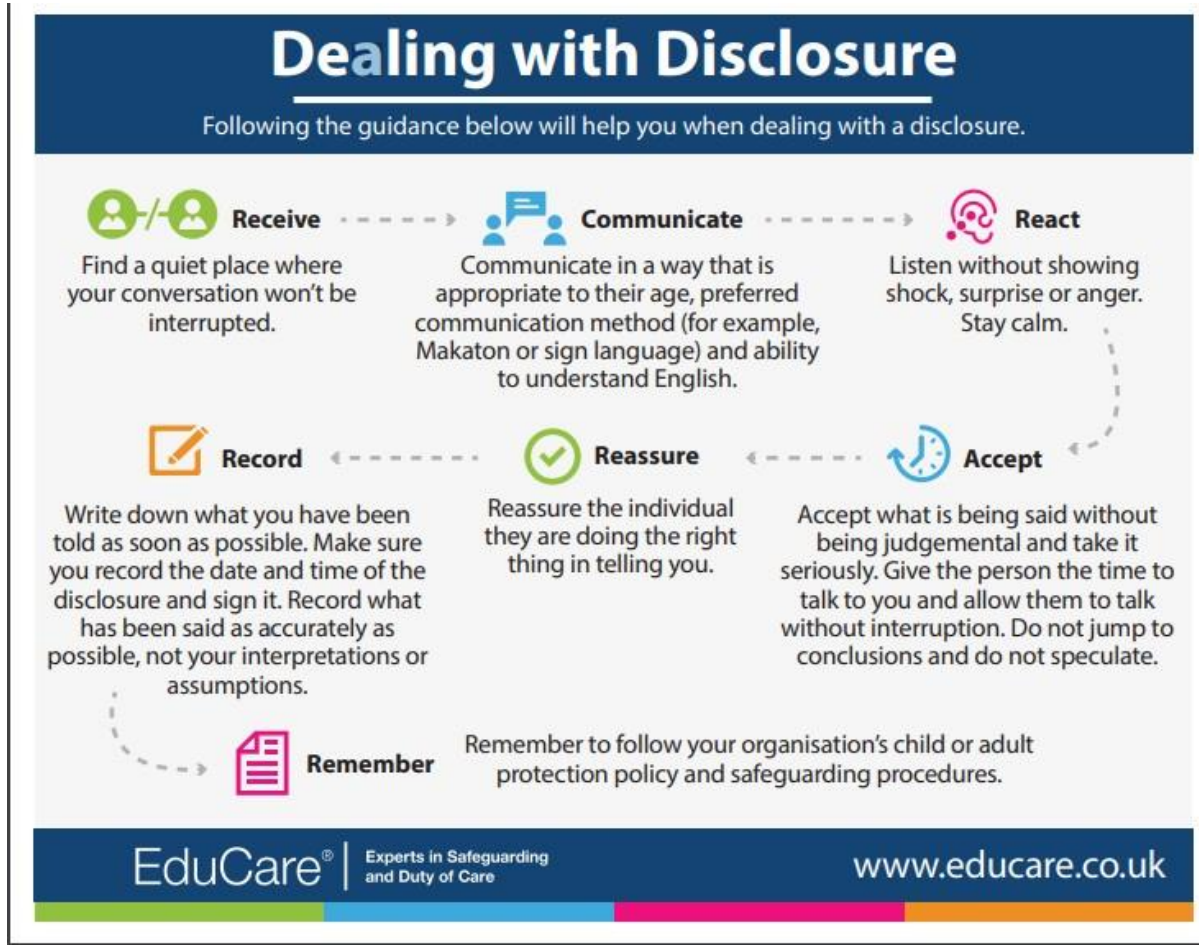
Safeguarding and Child Protection Policy 2022

Appendix 5 What to do if you are worried about a child/young person



At all stages, the child's circumstances will be kept under review. The DSL/staff will re--refer if required to ensure the child/young person's ongoing safeguarding and welfare needs are addressed.

Appendix 6: Dealing with Disclosure Flow Chart

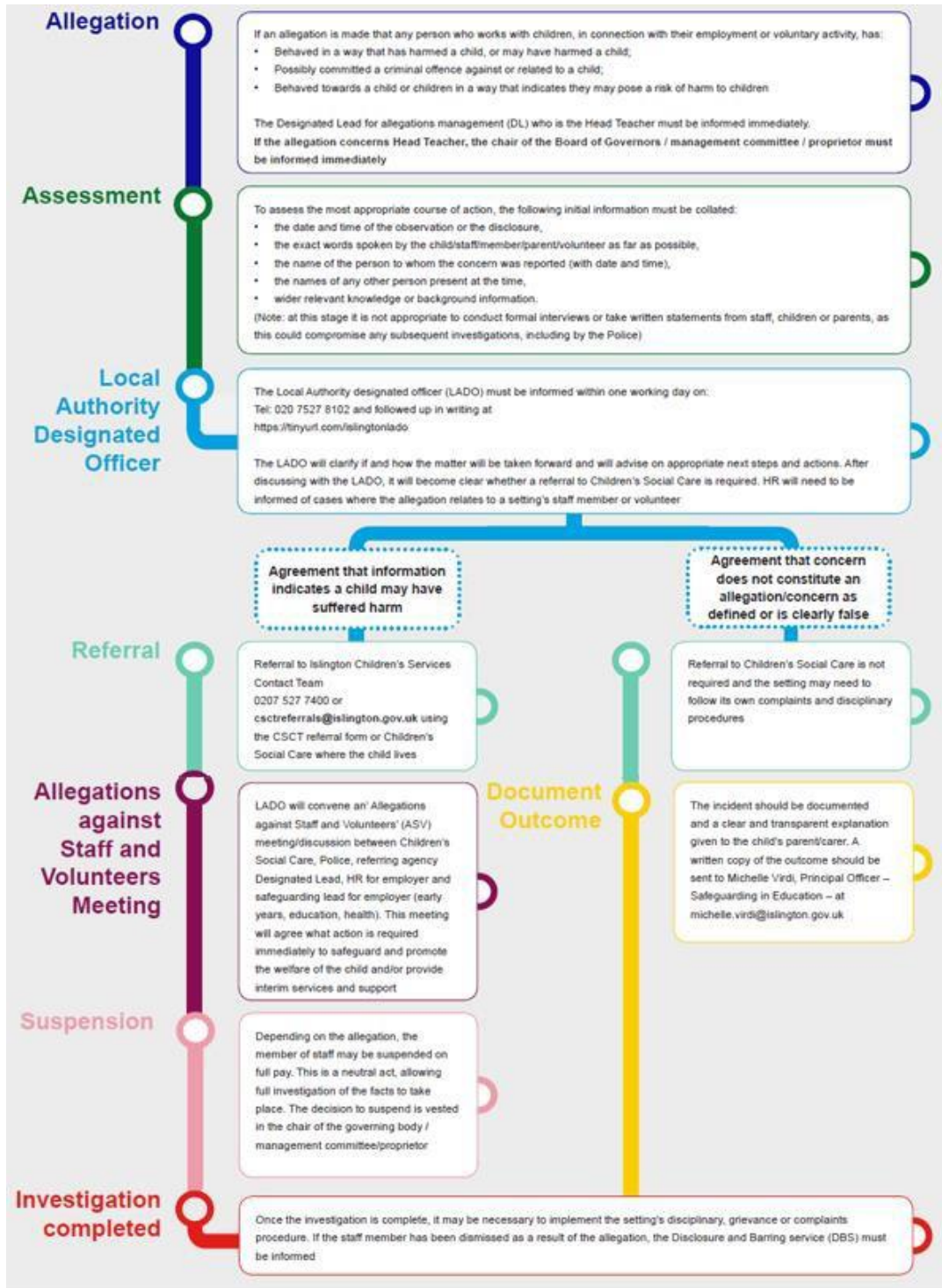


Source:

https://www.myeducare.com/pluginfile.php/480082/mod_resource/content/1/Dealing%20with%20Disclosure.pdf

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Appendix 7: Managing Allegations Against Staff/Volunteers



(Note: this relates to an educational setting)

Appendix 8: Required Reading Links and Further Advice on Child Protection

Keeping Children Safe in Education (2022)

Department for Education statutory guidance part 1 and appendix A (all staff):

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

Working Together to Safeguard Children (2018)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779401/Working_Together_to_Safeguard-Children.pdf

Link to Local Authority Schools Child Protection procedures information

<http://localauthorityscb.procedures.org.uk/>

Further advice on child protection is available from:

- NSPCC: <http://www.nspcc.org.uk/>
- Childline: <http://www.childline.org.uk/pages/home.aspx>
- CEOPS Thinkuknow: <https://www.thinkuknow.co.uk/>

Appendix 9: Useful Websites

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

Beat Bullying: <http://www.beatbullying.org/>

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

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

Safer Internet Centre <http://www.saferinternet.org.uk/>

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

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

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