



Safeguarding and Child Protection Policy

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All Italia Conti safeguarding policies will be reviewed on an annual (minimum) basis by the Italia Conti Policy Steering Group and/or following any updates to national and local guidance and procedures. 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.

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.

ITALIA CONTI ASSOCIATES

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1. 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.

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, neglect and exploitation 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. 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.

2. The Purpose, Scope, and Aims of this Policy Statement

The purpose of this policy statement is:

- to protect children and young people who receive Italia Conti Associates’ services from harm.
- to provide staff and volunteers, as well as children and young people and their families, with the overarching principles that guide our approach to child protection.
- This policy applies to anyone working on behalf of Italia Conti Associates including senior managers, paid staff, volunteers, sessional workers, and students.

3. Italia Conti Associates’ 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.

4. Legal Framework

This policy is based on legislation, policy and guidance that seeks to protect children in the United Kingdom. It has been developed in accordance with the principles established by the Children Act(s) 1989 and 2004 and related guidance. A summary of the key legislation and guidance is available from [nspcc.org.uk/child protection](https://www.nspcc.org.uk/child-protection).

5. Supporting Documents

This policy statement should be read alongside our organisational policies, procedures, guidance, and other related documents:

- [Safeguarding Procedures and Further Information](#)
- [role description for the Designated Safeguarding Officer](#)
- [dealing with disclosures and concerns about a child or young person](#)
- [managing allegations against staff and volunteers](#)
- [recording concerns and information sharing](#)
- [child protection records retention and storage](#)
- code of conduct for staff and volunteers
- behaviour codes for children and young people
- photography and sharing images guidance.
- [safer recruitment](#)
- [online safety](#)

- Anti-bullying Procedure
- [Complaints Policy and Procedure](#)
- [Whistleblowing Policy](#)
- [Health and Safety Policy](#)
- [Appropriate Physical Contact and Safe Touch Policy](#)
- Induction and training

6. Core Safeguarding Principles

Italia Conti Associates' core safeguarding principles are:

- that Associate schools 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 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.

We believe that:

- children and young people should never experience abuse of any kind.
- we have a responsibility to promote the welfare of all children and young people, to keep them safe and to practise in a way that protects them.

We recognise that:

- the welfare of children is paramount in all the work we do and in all the decisions we take.
- working in partnership with children, young people, their parents, carers, and other agencies is essential in promoting young people's welfare.
- all children, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation have an equal right to protection from all types of harm or abuse.
- some children are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues.
- extra safeguards may be needed to keep children who are additionally vulnerable safe from abuse.

We will seek to keep children and young people safe by:

- valuing, listening to and respecting them.
- appointing a nominated child protection lead for children and young people, a deputy, and a lead trustee/board member for safeguarding.
- adopting child protection and safeguarding best practice through our policies, procedures, and code of conduct for staff and volunteers
- developing and implementing an effective online safety policy and related procedures
- providing effective management for staff and volunteers through monitoring, support, training, and quality assurance measures so that all staff and volunteers know about and follow our policies, procedures, and behaviour codes confidently and competently.
- recruiting and selecting staff and volunteers safely, ensuring all necessary checks are

made.

- recording and storing and using information professionally and securely, in line with data protection legislation and guidance
- making sure that children, young people, and their families know where to go for help if they have a concern.
- using our safeguarding and child protection procedures to share concerns and relevant information with agencies who need to know, and involving children, young people, parents, families, and carers appropriately.
- using our procedures to manage any allegations against staff and volunteers appropriately
- creating and maintaining an anti-bullying environment and ensuring that we have a policy and procedure to help us deal effectively with any bullying that does arise.
- ensuring that we have effective complaints and whistleblowing measures in place.
- ensuring that we provide a safe physical environment for our children, young people, staff, and volunteers, by applying health and safety measures in accordance with the law and regulatory guidance.
- building a safeguarding culture where staff and volunteers, children, young people, and their families, treat each other with respect and are comfortable about sharing concerns.

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 Associate School sites.

Find out more:

- [safeguarding children who come from Black, Asian and minoritised ethnic communities](#)
- [safeguarding d/Deaf and disabled children and young people](#)
- [safeguarding LGBTQ+ children and young people](#)
- [safeguarding children with special educational needs and disabilities \(SEND\)](#).
- [Italia Conti Safeguarding Procedures and Further Information](#)

7. Roles and Responsibilities

Everyone across the Italia Conti Associates Schools has a responsibility to provide a safe learning environment in which our students can learn. All staff including senior managers, paid staff, volunteers, sessional workers, and students have a responsibility to safeguard and promote the welfare of children and must be aware of and fully conversant with this policy.

All staff must follow the Italia Conti Associate School's procedures and guidance. This policy and procedure also apply to extended Italia Conti Associates and off-site activities.

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.

All staff and volunteers will

- be aware that students and children can be at risk of harm inside and outside of their home, at school and online.
- develop their understanding of the signs and indicators of abuse and of their responsibility for referring any concerns.
- take individual responsibility for knowing what to do if a child discloses, or they have concerns about abuse or neglect.
- 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.
- 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 safe working practices, including:
 - avoiding engaging in personal email, text, or telephone conversations with young people.
 - not accepting personal or 'friends' requests on social networking sites.
 - reporting to a senior member of staff if a young person or parent has become dependent on you.

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

Further information on dealing with disclosures is available in the [Appendix here](#).

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

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 children. In the event of the long-term absence of the DSL the deputy will assume all of the functions above.

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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 and stored securely. Files are kept for 10 years following the last record and then be disposed of securely.

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

The DSL or a deputy will ensure that all Franchisees/ Principals sign to say they have read, understood, and agree to work within the Associate School's *Safeguarding and Child Protection Policy*, and ensure that the policy is 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 Franchisees/ Principals, keep a record of attendance and address any absences. We ask the Franchisees/ Principals to ensure that their staff teams are appropriately trained in Safeguarding and Child Protection procedures; this may include Educare courses as well as this Policy.

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

The Chief Executive Officer (CEO) / Principal (Italia Conti)

The CEO / Principal of Italia Conti works in accordance with the requirements upon all Italia Conti and Italia Conti Associates' staff. In addition, they ensure that all safeguarding policies and procedures are followed by all staff. In conjunction with the Franchisee / Principal and the Designated Safeguarding Lead (DSL), the CEO / Principal has oversight of all concerns about the conduct of adults in Italia Conti and Italia Conti Associates in relation to safeguarding and child protection, including ensuring 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.
- 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.
- 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.
- there are robust systems in place to cover for the DSL's planned and unplanned absences, including having Deputy Designated Safeguarding Leads who have the role added to their job descriptions.

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8. Contact details.

Designated Safeguarding Lead for Italia Conti and for the Italia Conti Associates Schools	Catherine Cooper	Catherine.Cooper@italiaconti.c.uk
Deputy Designated Safeguarding Lead for Italia Conti and for the Italia Conti Associates Schools	Sue Shackleton	Sue.Shackleton@italiaconti.co.uk
Safeguarding Officer for Italia Conti and for the Italia Conti Associates Schools	Ellie Chapman	Ellie.Chapman@italiaconti.co.uk
Safeguarding email Italia Conti		Safeguarding@italiaconti.co.uk

Appendix: Safeguarding Procedures and Further Information

1. Safeguarding Procedures

These procedures apply to all staff working/volunteering in the Associate School. The aim of these procedures is to provide a robust framework which enables staff to take appropriate action when they are worried a child is being abused. 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.

- i) **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 overall DSL for Italia Conti, or their Deputy.**
- ii) The Designated Safeguarding Lead (DSL) will immediately refer cases of suspected abuse or allegations, by telephone, to the Local Authority Children's Services.
- iii) Referrals should be made in writing, following a telephone call and with reference to the specified Local Authority Procedure, which will be available on their website. See <https://www.gov.uk/report-child-abuse-to-local-council> for local authority child protection referral contact details.
- iv) If the Franchisee / Principal 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 in writing.
- v) All referrals will include the student's name, address, date of birth, 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.
- vi) 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 Local Authority Children's Services and/or Police in making decisions about when it is appropriate to share information with parents / carers.
- vii) 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.

- viii) If after a referral to the relevant Children's Services 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 situation has improved. Professional disagreements (escalation) will be responded to in line with the local authority safeguarding children partnership procedures.

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.

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 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.

2. Responding to disclosures

2.1 Receive

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

2.2 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.
- If unclear, ask the child outright if they have been harmed and what the nature of the harm was.

2.3 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/ they....?" 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

2.4 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, using the student's own language.

2.5 Remember

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

2.6 Relax

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

3. What to do if you have concerns but no disclosure has been made

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

4. Recording Concerns and Disclosures

Staff will record any wellbeing 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.

Statements will be signed and dated by the member of staff concerned.

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 in a secure central folder. 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.

Concerns will be shared with statutory services and the child's school, in line with GDPR regulations.

5. Definitions

Safeguarding and promoting the welfare of children is defined as:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment, whether that is within or outside the home, including online.
- Preventing impairment of children's mental and physical health or development.
- Making sure that children grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best outcomes.

Child protection: is a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or are 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(ren): includes everyone under the age of eighteen. On the whole, this will apply to students of Italia Conti Associates; 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, including where they see, hear, or experience its effects. 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.

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. Recognition of Types of Abuse

Keeping Children Safe / 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

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.

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.

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

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.

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

The warning signs and symptoms of child abuse and neglect can vary from student to student. By understanding the warning signs, Italia Conti Associates staff members 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 should be 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.

7. Early Help

The Early Help process includes identifying emerging problems and liaising with the Designated Safeguarding Lead at Italia Conti, who may share information with other professionals to support early identification and assessment and, in some cases, act as the lead professional in undertaking an early help assessment.

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 education, home, or care.
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit;
- is misusing drugs or alcohol themselves.
- is at risk of modern slavery, trafficking, or exploitation.
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse.
- has returned home to their family from care.
- is showing early signs of abuse and/or neglect.
- is at risk of being radicalised or exploited.
- is a privately fostered child.
- has a parent or carer in custody or 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 frequently missing/going missing from education, home, or care.
- has unexplainable and/or persistent absences from education.
- is at risk of self-harm.

8. Child-on Child Abuse

It is important that when staff have any concerns about child-on-child abuse they should speak to the DSL. Any incidents of child-on-child abuse will be managed in the same way as any other child protection concern and will follow standard Italia Conti safeguarding, and where appropriate, local authority procedures.

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.

9. Anti-Bullying/Cyberbullying

Italia Conti Associates' policies on behaviour and bullying 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 gender questioning (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

10. Child-on Child Abuse and Online Safety

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

11. Sexual harassment between children

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

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

Staff should be aware of the importance of:

- 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.

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.
- 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](#)
- 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.

Up-Skirting

- ‘Up skirting’ 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. It is a criminal offence and will not be tolerated.

12. Child Criminal Exploitation (CCE)

Child criminal exploitation (CCE) is a form of child abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate, or deceive a child into criminal activity. This can include activities such as drug trafficking, theft, or other illegal acts. The exploitation often involves grooming and can have severe physical and psychological impacts on the child.¹

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);

13. County Lines

Some indicators of county lines are:

- going missing and being subsequently found in areas away from home;
- being the perpetrator or alleged perpetrator of serious violence (e.g. knife crime), as well as the victim;
- 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.

14. Child Sexual Exploitation (CSE)

"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

¹ "Criminal Exploitation of Children and Vulnerable Adults: County Lines," Home Office, UK Government, accessed January 9, 2025, <https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines/criminal-exploitation-of-children-and-vulnerable-adults-county-lines>.

the use of technology".²

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.

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

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

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

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, and may involve an exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

15. 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 sixteen or over and are personally connected to each other ((i.e. a) they are, or have been, married to each other;

² Department of Education (DfE), 2017.

- they are, or have been, civil partners of each other;
- they have agreed to marry one another (whether or not the agreement has been terminated);
- they have entered into a civil partnership agreement (whether or not the agreement has been terminated);
- they are, or have been, in an intimate personal relationship with each other;
- they each have, or there has been a time when they each have had, a parental relationship in relation to the same child;
- 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;

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.

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.

16. Safeguarding Children or young people with SEN and disabilities

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

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

To address these additional challenges, Italia Conti Associates staff may 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).

17. 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.

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 procedures, and speaking to the DSL or a deputy.

18. 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.
- 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.

19. 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.

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, fmv@fcdo.gov.uk.

All staff should be 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.

20. 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.

21. Looked after children.

The most common reason for children becoming looked after is as a result of abuse, neglect and exploitation. Staff at Italia Conti Associates should 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.

22. 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](#).

23. 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 \(www.gov.uk\)](https://www.gov.uk/guidance/modern-slavery)

24. Online Safety

Italia Conti Associates recognise that the use of technology presents particular challenges and risks to children and adults. The Designated Safeguarding Lead retains overall responsibility for online safeguarding within Italia Conti and Italia Conti Associates.

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, misinformation, disinformation (including fake news) and conspiracy theories;
- **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' schools recognise the specific risks that can be posed by mobile phones and cameras and there are appropriate policies in place to support the Italia Conti community.

25. Cybercrime

Cybercrime is criminal activity committed using computers and/or the Internet. It can be categorised as:

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, e.g. 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.

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/>.

26. 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.

27. Prevent and Radicalisation

Under section 26 of the Counter Terrorism and Security Act 2015 places a duty on education and other children's services to have due regard to the need to prevent people from being drawn in terrorism.

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 of a person legitimising support for, or use of, terrorist violence.

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.

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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.

It is possible to protect people from extremist ideology and intervene to prevent those susceptible to radicalisation into terrorism. As with other safeguarding risks, staff should be alert to changes in pupils' behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying pupils who might be at risk of radicalisation and act proportionately which may include the DSL making a Prevent Referral.

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. Associate schools can refer to the DfE's guidance on <https://www.gov.uk/government/publications/the-prevent-duty-safeguarding-learners-vulnerable-to-radicalisation/managing-risk-of-radicalisation-in-your-education-setting>.

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 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 extremism³.

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 terrorism⁴.

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.

³

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

⁴ <https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty>

28. Confidentiality and Information Sharing

All matters relating to safeguarding and child protection will be treated as confidential and only shared as per the 'Information sharing: advice for practitioners providing safeguarding services' guidance. Italia Conti will refer to the guidance in the <https://www.gov.uk/guidance/data-protection-in-schools> to support setting with data protection activity, including compliance with General Data Protection Regulation (GDPR).

The CEO, Principal / Franchisee 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 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.

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. We will take seriously any allegation received and follow the relevant government guidance.

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). The Director of HR at Italia Conti Head Office and the DSL will provide relevant advice and guidance.

Procedures for raising a concern about a member of the workforce:

1. Inform the Associate School Principal / Franchisee directly. You can also contact the Italia Conti Head Office via the Speakup@italiaconti.co.uk mailbox, or contact the HR department directly via HR@italiaconti.co.uk
2. Use the Complaints Form (stage 1) to raise your concern.
3. The Principal / Franchisee should then inform Italia Conti Head Office.
4. Where the concern involves the Principal/Franchisee, it should be reported directly to the Chief Executive Officer at Italia Conti via HR@italiaconti.co.uk

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 must 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.

Referrals to the Local Authority Designated Officer (LADO)

Referrals to the LADO are made by the Franchisee in conjunction with Italia Conti Associates DSL.

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

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

The Franchisee / Principal of each Italia Conti Associates School will ensure that all new staff and volunteers (including temporary staff) are appropriately inducted in the Associates Schools' safeguarding procedures and communication lines. As a minimum, this will include:

- the *Safeguarding and Child Protection Policy*;
- the role of the DSL (including the identity of the DSL and any deputies
- how to report any concerns.

All staff members (including temporary staff) will receive appropriate safeguarding and child protection training 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.
- refer concerns to the DSL and be able to seek support external to the school if required.

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.

Staff should be aware of the Italia Conti Associates' *Behaviour* and *Appropriate Physical Contact and Safe Touch* Policies. 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. Any physical interventions must be in line with agreed policy and procedure in which appropriate training should be provided.

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.

33. 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.

Italia Conti Associates is responsible for ensuring that the Associate 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.

34. Dealing with 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.

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,

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- using inappropriate sexualised, intimidating, or offensive language.

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

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 maintain a record, and inform the Italia Conti Associates DSL.

Where a low-level concern is raised about the **Principal / Franchisee**, 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, who will inform the Italia Conti Associates DSL, and ensure that their employer is 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 and sent to the DSL.

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

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

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

END