Safeguarding and Child Protection Policy
September 2025

based on DfE statutory guidance
Keeping Children Safe in Education, 2025

ITALIA CONTI

Approved by:	Policy Steering Group	01.09.2025
Management Leads:	Hayley Newton (CEO / Co-Principal) Bradley Hawkins (Co-Principal)	
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Checked by:	Designated Safeguarding Lead	31.08.2025
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This policy will be reviewed and approved by the Policy Steering Group following any updates to national and local guidance and procedures.

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

Key Safeguarding Contacts: Italia Conti			
Designated Safeguarding Lead (DSL)	Ms Catherine Cooper	01483 322220	Catherine.Cooper@italiaconti.co.uk Safeguarding@Italiaconti.co.uk
Deputy Safeguarding Leads:	Mrs. Sue Shackleton	01483 322220	Sue.Shackleton@italiaconti.co.uk
Safeguarding & Wellbeing Officer	Ms Ellie Chapman	01483 322220	Ellie.Chapman@italiaconti.co.uk
CEO (Proprietor)	Mrs. Hayley Newton	01483 322220	Contact via: HR@italiaconti.co.uk
Designated Governor for Safeguarding and Child Protection:	Keith Bailey	01483 322220	Keith.Bailey@italiaconti.co.uk
Designated Managers for allegations against staff and volunteers:	Mrs. Hayley Newton and Bradley Hawkins	01483 322220	Contact via: HR@italiaconti.co.uk
The Senior Mental Health Lead is:	Ms Catherine Cooper	01483 322220	Catherine.Cooper@italiaconti.co.uk
Local Authority Designated Officer (LADO)	LADO@surreycc.gov.uk 0300 123 1650		

2. Italia Conti 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

Italia Conti recognise our moral and statutory responsibility to safeguard and promote the welfare of all children.

Italia Conti 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 make every effort to provide an environment in which children and adults feel safe, secure, valued, and respected, and feel confident to talk if they are worried, believing they will be effectively 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.

Children and young people are at the centre of everything we do at Italia Conti. We are committed to providing our students with a sense of belonging and an environment that is welcoming, safe, valuable and respectful. Keeping children and young people safe is everybody's responsibility and that all children, regardless of age, gender, culture, language, race, ability, sexual identity, religion or lack of religion have equal rights to protection and opportunities.

We recognise 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's core safeguarding principles are:

- that schools and colleges are an important part of the wider safeguarding system for children;
- it is a whole institution responsibility to safeguard and promote the welfare of children;

[1] Keeping Children Safe in Education (DfE, 2025)

- all children (defined as those up to the age of 18) have equal rights to protection regardless of age, gender, culture, language, race, ability, sexual identity, religion or lack of religion;
- 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 our *Staff Code of Conduct* and other associated policies;
- all staff have a responsibility to recognise vulnerability in children and act on any concern in accordance with this guidance.

The purpose of this policy is to provide staff, volunteers Senior Leaders with the framework they need in order to keep children safe and secure in our setting. The policy also informs parents and carers how we will safeguard their children whilst they are in our care.

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

4. Definitions

KCSIE defines **Safeguarding** as *the process for protecting children from harm and abuse, whether that is within or outside the home, as well as online*. This includes:

- 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.

Early help means providing support as soon as any needs emerge or are identified at any point in a child's life.

Child(ren) includes everyone under the age of 18. On the whole, this will apply to pupils of our setting; however, the policy will extend to visiting children and students from other establishments.

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

Social Care refers to Children's Services in the area in which the child is resident, unless a child is a Child Looked After then this will be the Children's Services in their home authority.

MAP refers to the Surrey Multi-Agency Partnership.

C-SPA refers to the Children's Single Point of Access.

DSL where appropriate also refers to Deputy Designated Safeguarding Lead (DDSL)

The local safeguarding partnership has three partners:

1. Chief Executive of Surrey County Council (Children's Services)
2. Chief Executives of Surrey Heartlands and Frimley Integrated Care Boards, and
3. The Chief Constable of Surrey Police

Staff refers to all those working for or on behalf of the school, full or part time, temporary or permanent, in either a paid or voluntary capacity. This includes, but is not limited to, employed staff, contractors, volunteers, Directors/trustees, supply staff and freelance and self-employed staff.

Statutory means what has been decided or is controlled by the law. **Statutory guidance** tells us what schools and local authorities must do to follow the law.

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.

For the purposes of this policy, we, in places use the terms 'victim' and 'perpetrator'[2]:

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.

5. Context

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004; the Education Act 2002 (as amended), the Education (Independent School

[2] KCSIE 2023

Standards) Regulations 2014, the Non-Maintained Special Schools (England) Regulations 2015 and the Apprenticeships, Skills, Children and Learning Act 2009 (as amended).
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.

All action taken by Italia Conti will be in accordance with statutory, national, and local guidance. This includes:

- Working Together to Safeguard Children 2023 which sets out the multi-agency working arrangements to safeguard and promote the welfare of children and young people and protect them from harm; in addition, it sets out the statutory roles and responsibilities of settings.

- 'What to do if you are Worried a Child is Being Abused' 2015 - Advice for Practitioners
- Keeping Children Safe in Education (KCSIE, 2025) is statutory guidance issued by the Department for Education (DfE) which all schools and colleges must have regard to when carrying out their duties to safeguard and promote the welfare of children.

- Local Guidance from the Local Safeguarding Partnership: Surrey Safeguarding Children Partnership (SSCP) including Procedures. This policy applies to all members of staff and Directors/Proprietors/Management Committee in the setting.

- Education Act 2002, section 175/The Education (Independent School Standards) Regulations 2014/Part 1 of the schedule to the Non-Maintained Special Schools (England) Regulations 2015 places a duty on maintained/independent schools (including academies)/non-maintained special schools and local authorities to keep children safe and promote their welfare.

Guidance and documents referred to in this policy:

- Surrey Safeguarding Children Partnership protocols, guidance and procedures
- Working Together to Safeguard Children 2023
- Keeping Children Safe in Education 2025
- Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018
- Childcare Act 2006
- FGM Act 2003 Mandatory Reporting Guidance 2015 (updated January 2020)
- 'What to do if you are worried a child is being abused' 2015
- Teachers' standards
- Information sharing: advice for practitioners providing safeguarding services
- The Equality Act 2010
- Early years foundation stage (EYFS) statutory framework
- The Children Act 1989
- Surrey County Council Safeguarding Children Missing Education (CME) and Educated Other Than at School (EOTaS)

- Surrey County Council Touch and The Use of Physical Intervention When Working with Children and Young People
- SCC Touch and The Use of Physical Intervention When Working with Children and Young People – available on Surrey Education Services (Education Safeguarding Team Resources Hub)

This policy should be read in conjunction with the following policies:

- *Appropriate Physical Contact and Safe Touch Policy*
- *Health & Safety Policy*
- *Prevent and Anti Radicalisation Policy*
- *Safer Recruitment Policy*
- *Staff Code of Conduct*
- *Emergency Actions Plan Policy and Procedure*
- *Fire Alarm and Emergency Evacuations Procedure*
- *First Aid Policy*
- *Disciplinary Policy (Non-academic Misconduct)*
- *Harassment, Sexual Misconduct and Sexual Violence Policy*
- *Personal Relationships Policy*
- *Attendance Policy*
- *Student Code of Conduct*
- *Social Media Policy*

6. Equalities Statement

With regards to safeguarding we will consider our duties under the Equality Act 2010 and our general and specific duties under the Public Sector Equality Duty. General duties include:

- Eliminate discrimination, harassment, victimisation, and other conduct that is prohibited by the Equality Act 2010.

- Advance equality of opportunity between people who share a protected characteristic and people who do not share it.

- Foster good relations across all protected characteristics between people who share a protected characteristic and people who do not share it.

Staff are aware of the additional barriers to recognising abuse and neglect in children with Special Educational Needs and Disabilities (SEND). This will be in line with our Special Educational Needs and Disability Policies.

Italia Conti also adheres to the principals of and promotes anti-oppressive practice in line of the United Nations Convention of the Rights of the Child and the Human Rights Act 1998.

7. Policy Aims

The aims of these procedures are:

- To provide staff with the framework to promote and safeguard the wellbeing of children and in doing so ensure they meet their statutory responsibilities.
- To ensure consistent good practice across the setting and ensure that safeguarding follows a whole setting approach.
- Clarifying safeguarding expectations for members of the setting's community, staff, Board of Directors/Proprietor/Management Committee, children, and their families.
- Contributing to the establishment of a safe, resilient, and robust safeguarding culture in the setting built on shared values; that children are treated with respect and dignity, taught to treat each other and staff with respect, feel safe, have a voice and are listened to.
- Supporting contextual safeguarding practice recognising that the setting's site can be a location where harm can occur.
- Setting expectations for developing knowledge and skills within the setting's community (staff, children, parents/carers) to the signs and indicators of safeguarding issues and how to respond to them.
- Early identification of need for vulnerable learners and provision of proportionate interventions to promote their welfare and safety.
- Working in partnership with children, parents/carers, and other agencies in the Surrey Safeguarding Children's Partnership.

Policy Principles and Values

- The welfare of the child is paramount.
- Maintain an attitude of "It could happen here".
- Maintain a "zero-tolerance" approach to sexual violence and sexual harassment.
- Children have a right to feel safe and secure, they cannot learn effectively unless they do so.
- All children have a right to be protected from harm and abuse.
- All staff have a role in the prevention of harm and abuse and an equal responsibility to act immediately on any suspicion or disclosure that may indicate a child is at risk of harm, either in the setting or in the community, taking into account contextual safeguarding, in accordance with statutory guidance.
- Italia Conti has a clear process in place, that is shared with and followed by all members of the school community, when there is a safeguarding concern.
- We acknowledge that working in partnership with other agencies protects children and reduces risk and so we will engage in partnership working to protect and safeguard children.
- Whilst the setting will work openly with parents/carers as far as possible, it reserves the right to contact social care or the police, without notifying parents/carers if this is believed to be in the child's best interests.
- We will always act in the best interests of the child and ensure that our decisions around safeguarding take a child-centred and coordinated approach.

Supporting Children

Italia Conti will:

- Establish and maintain an ethos where students feel safe and secure, are encouraged to talk and are always listened to.

- Include regular consultations with students e.g., through questionnaires, participation in anti-bullying activity, asking students to report whether they feel safe in the setting.

- Ensure that all students know they can access a trained adult in the setting whom they can approach if they are worried or in difficulty.

- Include safeguarding across the curriculum, including opportunities which equip students with the skills they need to keep themselves and other safe, including online and to know to whom they should turn to for help. It is also recognised that effective education will be tailored to the specific needs and vulnerabilities of individual students, including children who are victims of abuse, and children with special education needs or disabilities.

- Provide preventative education by creating a culture of zero tolerance for sexism, misogyny/ Misandry, homophobia, biphobia and sexual violence and sexual harassment.

Italia Conti will support all children by:

- Providing a safe place and stability in the lives of children who have been abused or who are at risk of harm. The setting recognises that a child who is abused or witnesses abuse and/or violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth. Research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.
- Promoting a caring, safe and positive environment within the setting.

- Encouraging self-esteem and self-assertiveness, through the curriculum and through positive relationships within the setting community.

- Ensuring children are taught to understand and manage risk through Personal, Social, Health and Economic (PSHE) education and Relationship and Sex Education (RSE) and Health Education through all aspects of setting life, including staying safe online.

- Responding sympathetically to any requests for time out to deal with distress and/or anxiety.

- Ensuring children are made aware of and have access to details of helplines, counselling, or other avenues of external support.

- Liaising and working in partnership with support services and agencies involved in early help and the safeguarding of children. [Include details of the setting's early help offer]

- Notifying children's social care without delay if there is an immediate risk of significant harm.

- Providing continued support to children about whom they have concerns and those who leave the setting by ensuring that information is shared confidentially with the child's new setting. The setting will ensure records are forwarded as a matter of priority and within statutory timescale.

The Designated Safeguarding Lead will consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

Italia Conti recognises it plays a significant part in the prevention of harm to our children by providing children with good lines of communication with trusted adults, supportive friends and an ethos of protection.

8. Responsibilities of Italia Conti and the Staff Team

Italia Conti will ensure that:

- details of the DSL and DDSL are available on the Italia Conti website and that new staff, volunteers or are informed of the safeguarding arrangements in place, the name of the DSL and how to share concerns with them.

- the name of the designated members of staff for safeguarding and child protection, the DSL and DDSL(s), are clearly advertised across Italia Conti.

- the Safeguarding and Child Protection Policy is made available via the setting website, and a paper copy is available upon request for parents/carers.

- Italia Conti operates safer recruitment procedures in line with KCSIE 2025 which includes statutory checks on the suitability of staff to work with children.

- community users organising activities for children are aware of the setting's Safeguarding and Child Protection Policy, guidelines and procedures.

- Italia Conti will ensure that all staff
  - receive information about Italia Conti's safeguarding arrangements, including the Staff Code of Conduct, the Safeguarding and Child Protection policy, the role and names of the Designated Safeguarding Lead (DSL) and their deputy Designated

Safeguarding Lead (DDSL), and Keeping Children Safe in Education 2025, part 1 or the condensed version of it in annex A (dependent on their role). . This applies to the Board of Directors/Proprietor/ Principal/Senior Leadership Team in relation to part 2 of the same guidance.

- receive regular safeguarding and child protection training, to maintain their understanding of the signs and indicators of abuse. Training is regularly updated as required, and at least annually to continue to provide them with relevant skills and knowledge to safeguard children and young people effectively.

- are trained in and receive regular updates in online safety and reporting concerns.

- maintain a zero-tolerance approach to sexual violence and sexual harassment.

- provide a coordinated offer of early help when additional needs of children are identified and contribute to early help arrangements and inter-agency working and plans.

Where services or activities are provided separately by another body using the Italia Conti premises, the Principal 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.

All Staff will:

- Maintain an attitude of “It could happen here” with regards to safeguarding.
- Understand that safeguarding is “everyone’s responsibility”.
- Maintain a “zero-tolerance” approach to sexual violence and sexual harassment.
- Read and understand Part 1 of statutory guidance KCSIE (2025). Those working directly with children will also read Annex B.
- Be aware of the systems in place which support safeguarding including reading this Safeguarding and Child Protection Policy; the Student Code of Conduct and the Disciplinary Policy; the Staff Code of Conduct; safeguarding response to children who go missing from education; and the role of the DSL.
- Know who and how to contact the DSL and DDSL or Wellbeing team, the Chair of Governors/ CEO / Senior Leadership Team / Duty Manager, and the Director responsible for safeguarding.

- Be aware of indicators of abuse and neglect understanding that children can be at risk of harm inside and outside of the setting, inside and outside of home and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.

- Be able to identify vulnerable learners and take action to keep them safe. Information or concerns about learners will be shared with the DSL where it includes those:

    - who may need a social worker and may be experiencing abuse or neglect.
    - requiring mental health support
    - may benefit from early help.
    - where there is a radicalisation concern
    - where a crime may have been committed.

    - Provide a safe environment in which children can learn.

    - Establish and maintain an environment where children feel secure, are encouraged to talk and are listened to.

    - Ensure children and young people know that there are adults in the setting who they can approach if they are worried or have concerns.

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

    - Ensure only appropriately trained professionals attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

    - Take immediate action if they have a mental health concern about a child that is also a safeguarding concern, following our Safeguarding and Child Protection Policy and procedures.

    - Plan opportunities within the curriculum for students to develop the skills they need to assess and manage risk appropriately and keep themselves safe.

    - Attend training in order to be aware of and alert to the signs of abuse and neglect.

    - Know how to respond to a child who discloses harm or abuse following training of ‘Working Together to Safeguard Children’ (2023), and ‘What to do if you are worried a child is being abused’ (2015).

    - Record their concerns if they are worried that a child is being abused and report these to the DSL immediately that day. If the DSL is not contactable immediately a DDSL should be informed.

- Be prepared to refer directly to the Children's Single Point of Access (C-SPA), and the Police if appropriate, if there is a risk of significant harm and the DSL or their DDSL is not available.

- Follow the allegations procedures, as set out in this policy and KCSIE 2025, if the disclosure is an allegation against a member of staff, supply staff, volunteer or contactor.

- Report low-level concerns (as defined in KCSIE 2025) about any member of staff/supply staff/volunteer or contractor in line with Italia Conti internal procedures and Surrey LADO guidance].

- Provide support for children subject to early help, child in need or child protection and be involved where appropriate, in the implementation of individual plans to further safeguard vulnerable learners and understand their academic progress and attainment and maintain a culture of high aspirations for this cohort.

A member of staff who is approached by a student should

- Listen positively and try to reassure them. They cannot promise complete confidentiality and should explain that they need to pass information to other professionals to help keep the student and/or other students safe. The degree of confidentiality should always be governed by the need to protect the student.

- Notify the DSL or their DDSL of any child on a child protection plan or child in need plan who has unexplained absence.

- Understand early help and be prepared to identify and support children who may benefit from early help. Liaise with other agencies that support children and provide early help.

- Be aware that children may not feel ready or know how to tell someone they are being abused, exploited, or neglected, and/or they may not recognise these experiences as harmful. This could be due to their vulnerability, disability and/or sexual orientation or language barriers.

- Be mindful that the Teacher Standards states that teachers should safeguard student's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

The Principal

In addition to the role and responsibilities of all staff the Principal will ensure that:

- Italia Conti fully contributes to inter-agency working in line with Working Together to Safeguard Children (2023) guidance.

- The Safeguarding and Child Protection Policy and procedures are shared at induction, understood by all staff, including temporary staff and volunteers, implemented and followed by all staff.

- Staff receive safeguarding training that is updated regularly.

- Visitors are appropriately supervised or escorted, where necessary.

- Italia Conti has appropriate policies in place that make it clear that sexual harassment, online sexual abuse and sexual violence (including sexualised language) is unacceptable, with appropriate sanctions and support in place.

- All children are supported to report concerns about harmful sexual behaviour freely. That concerns are taken seriously and dealt with swiftly and appropriately, and children are confident that this is the case. Comprehensive records of all allegations are kept.

- All staff are aware of the role of the DSL, including the identity of the DSL and any DDSL's.

- Sufficient time, training, support, funding, resources, including cover arrangements where necessary, is allocated to the DSL to carry out their role effectively, including the provision of advice and support to setting staff on safeguarding and child protection matters, to take part in strategy discussions/meetings and other inter-agency meetings and/or support other staff to do so; and to contribute to the assessment of children / students.

- Opportunities are provided for a co-ordinated offer of early help when additional needs of students are identified.

- That DDSLs are trained to the same standard as the DSL, and the role is explicit in their job description.

- Adequate and appropriate DSL cover arrangements are in place for any out of hours/out of term activities, including cover for the DSL's planned and unplanned absences from the institution.

- Where there is a safeguarding concern that the student's wishes and feelings are taken into account when determining what action to take and what services to provide.

- Student - centred systems and processes are in place for students to express their views and give feedback.

- 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.

- Students are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online.

- That allegations or concerns against staff and other adults are dealt with in accordance with guidance from the DfE, SSCP and Surrey County Council (SCC).

- That statutory requirements are met to make a referral to the Disclosure and Barring Service and additionally in the case of teaching staff the Teacher Regulation Agency where they think an individual has engaged in conduct that harmed (or is likely to harm) a child; or if the person otherwise poses a risk of harm to a child / student.

- Record low-level concerns in cases which concern a member of staff/supply staff/contractor or a volunteer. 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 will be respected as far as reasonably possible.

- They become the 'case manager' when an allegation is raised about a member of staff and make the final decision regarding all low-level concerns.

The Designated Safeguarding Lead:

In addition to the role and responsibilities of all staff the DSL will:

- Hold the lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems in place) in the setting, this responsibility is not able to be delegated.

- Work together with all staff to understand the whole picture when there are safeguarding concerns, providing them with advice, support and expertise.

- Liaise with the Surrey Country Council and with other agencies in line with Working Together to Safeguard Children (2023).

- Where necessary, contact Surrey's Child Protection Consultation Line for advice and support (0300 470 9100 option 3).

- Manage and submit a Request for Support Form for a child if there are concerns about suspected harm or abuse, to the C-SPA, and act as a point of contact and support for setting staff. Requests for support should be sent securely by email to cspa@surreycc.gov.uk using the Request for Support Form urgent referrals should be made by telephone 0300 470 9100 or 03311 435554.

- Report concerns that a child may be at risk of radicalisation or involvement in terrorism, use the Prevent referral form to refer cases by e-mail to preventreferrals@surrey.pnn.police.uk . If the matter is urgent then Police must be contacted by dialling 999. In cases where further advice from the Police is sought dial 101 or 07795 043842 or 01865 555618 and ask to speak to the Prevent Supervisor for

Surrey. The DfE has also set up a dedicated telephone helpline for staff and Governors/Proprietors/management committees to raise concerns around Prevent (020 7340 7264).

- Refer cases where a crime may have been committed to the Police as required. NB: NPCC- When to call the police should help DSLs understand when they should consider calling the Police and what to expect when they do.

- Liaise with the "case manager" and Local Authority Designated Officer (LADO) for child protection concerns in cases which concern a member of staff/supply staff/contractor or a volunteer.

- Follow relevant DfE guidance and KCSIE 2025 on 'Child on Child abuse' when a concern is raised that there is an allegation of a child abusing another child within the setting.

- When there has been a report of sexual violence, make an immediate risk and needs assessment. Additionally, where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis and will be put in place as required.

- Be available during term time (during setting hours) for staff at Italia Conti to discuss any safeguarding concerns. Appropriate and adequate cover arrangements will be arranged by the DSL and the setting leadership for any out of hours/term activities.

- Act as a source of support and expertise in carrying out safeguarding duties for the whole settings community.

- Ensure that the names of the DSL and DDSL are clearly advertised, with a statement explaining the setting's role in referring and monitoring cases of suspected abuse.

- Encourage and promote a culture of listening to children and taking account of their wishes and feelings, amongst all staff.

- Access training and support to ensure they have the knowledge and skills required to carry out the role.

- Have a secure working knowledge of SSCP procedures and understand the assessment process for providing early help and statutory intervention, in line with Surrey's Continuum of Need Indicators.

- Have a clear understanding of access and referral to the local early help offer and will support and advise members of staff where early help intervention is appropriate.

- Have a working knowledge of how Surrey Country Council conduct an initial child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.

- Understand the lasting impact that adversity and trauma can have, including on the children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes.

- Understand and support the institution's delivery with regards to the requirements of the Prevent duty and provide advice and guidance to staff on protecting children from radicalisation.

- Be alert to the specific needs of children in need, those with Special Educational Needs and Disability (SEND) and young carers.
- Understand the risks associated with online activity and be confident that they have the up-to-date knowledge and capability to keep children safe whilst they are online at the setting; in particular understand the additional risks that children with SEND face online and the associated and appropriate support they require.

- DSL training should be updated at least every two years, and their knowledge and skills refreshed at regular intervals but at least annually.

- Work with the Principal and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at Italia Conti.

- Keep up to date, detailed, accurate records (either written or using appropriate secure online software), that include all concerns about a child even if there is no need to make an immediate referral and record the rationale for decisions made and action taken. 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 child 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.

- Ensure that an indication of the existence of the additional safeguarding/child protection file is marked on the student's main file record.

- Ensure that when a child transfers setting (including in-year), their safeguarding/child protection file is passed to the new setting as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main student file, ensuring secure transit, and confirmation of receipt should be obtained. If the transit method requires that a copy of the safeguarding/child protection file is retained until such a time that the new setting acknowledges receipt of the original file, the copy should be securely destroyed on confirmation of receipt.

- Ensure that where a child transfers to a setting and is on a child protection plan, child in need plan or is a child looked after, their information is passed to the new setting immediately and that the child's social worker is informed. In addition, consideration should be given to a multi-agency settings transition meeting if the case is complex or on-going.

- Ensure that all appropriate staff members have a working knowledge and understanding of their role in case conferences, core groups and other multi-agency planning meetings, to ensure that they attend and are able to effectively contribute when required to do so; where a report is required, this should be shared with the parents prior to the meeting.
- Report to the Principal any significant issues for example, use of Surrey's FaST Resolution Process enquiries under section 47 of the Children Act 1989 and Police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - PACE Code C 2019.

- Ensure that the case holding social worker is informed of any child currently with a child protection plan who is absent without explanation.

- Organise safeguarding and child protection induction, regularly updated training and a minimum of annual updates (including online safety) for all setting staff, keep a record of attendance and address any absences.

- Ensure each member of staff has access to, and understands, the settings Safeguarding and Child Protection policy procedures, especially new and part-time staff.

- Ensure that in collaboration with the Italia Conti's Board of Directors, Senior Leadership Team, Designated Safeguarding Lead, Policy Steering Group and Quality Assurance team, the Safeguarding and Child Protection Policy is reviewed annually, and the procedures and implementation are updated and reviewed regularly.

- Ensure that the Safeguarding and Child Protection Policy is available publicly and that stakeholders know that referrals about suspected abuse or neglect may be made and the role of the setting in this.

- Promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of students, including where families may be facing challenging circumstances.

- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and leadership staff.

- Establish and maintain links with the SSCP to make sure staff are aware of training opportunities and the latest policies on local safeguarding arrangements.

- Contribute to and provide, with the CEO / Principal and Chair of Board of Directors and Senior Management Team, the biennial (s157 s175) Statutory Audit for Safeguarding

Arrangements and Termly Safeguarding Data Collections via PHEW to Surrey County Council.

Duties are further outlined in KCSIE (2025, Annex C).
DSL training should be updated at least every two years, and their knowledge and skills refreshed at regular intervals but at least annually.

The Deputy Designated Safeguarding Lead(s):

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

In addition to the role and responsibilities of all staff the DDSL will:

- Provide support and capacity to the DSL in carrying out delegated activities of the DSL; however, the lead responsibility of the DSL cannot be delegated.

- In the absence of the DSL, carry out the activities necessary to ensure the ongoing safety and protection of children. In the event of the long-term absence of the DSL the DDSL will assume all of the functions of the DSL.

The Board of Directors / Principal / Senior Leadership Team

All members of Board of Directors / Principal / Senior Leadership Team understand and fulfil their responsibilities to ensure that:

- There is a whole setting approach to safeguarding, involving everyone in the setting and ensuring that safeguarding, and child protection are at the forefront and underpin all relevant aspects of process and policy development.

- A nominated Consultant to The Board for safeguarding is identified.

- Senior Leaders should ensure that all members receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the setting are effective and support the delivery of a robust whole setting approach to safeguarding. Training should be regularly updated.

- The student's wishes and feelings are considered when determining what action to take and what services to provide.

- The setting has effective safeguarding policies and procedures including a Safeguarding and Child Protection Policy, a Staff Code of Conduct, a Student Code of Conduct and Disciplinary Policy and a response to children who go missing from education.

- Policies are consistent with SSCP and statutory requirements, including Italia Conti's duties under the Human Rights Act 1998, Data Protection Act 2018 and Equality Act 2010, are reviewed annually (as a minimum) and updated if needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt and that the Safeguarding and Child Protection policy is available on the setting website.
- The SSCP is informed in line with local requirements about the discharge of duties via the Biennial (s 157 s 175) Statutory Audit for Safeguarding Arrangements and Termly Safeguarding Data Collections via PHEW to Surrey County Council.

- Safeguarding is a standing item on the agenda for SLT / Board and Director's Committee meetings.

- Ensure recruitment, selection and induction follow safer recruitment practice including all appropriate checks.

- All members of the governing board/board of trustees will receive safeguarding training at induction, which is regularly updated.

- Staff have been trained appropriately, and this is updated in line with guidance, and all staff have read KCSIE (2025) part 1 or Annex B (depending on their role in the setting) Additionally, there are mechanisms are in place to assist staff in understanding and discharging their roles and responsibilities as set out in the guidance.

- Ensure that, as part of the requirement for staff to undergo regular updated safeguarding training, including online safety and the requirement to ensure children are taught about safeguarding, is integrated, aligned, and considered as part of the whole setting safeguarding approach and wider staff training and curriculum planning.

- Considering the above training requirements, Board members / Senior Leaders should have regard to the Teachers' Standards which set out the expectation that all teachers manage behaviour effectively to ensure a good and safe educational environment and requires teachers to have a clear understanding of the needs of all children.

- All staff including temporary staff/supply staff, volunteers and contractors are provided with the setting's Safeguarding and Child Protection policy and if appropriate, the Staff Code of Conduct.

- Take a proportionate risk-based approach to the level of information that is provided to temporary staff, volunteers and contractors.

- The setting has procedures in place for dealing with allegations against all staff (including the CEO and Principal), volunteers and contractors and that a referral is made to the DBS and/or the Teaching Regulation Agency (as applicable) if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have, had they not resigned.

- Policies and processes are in place to deal with concerns (including allegations) which do not meet the harm threshold or low-level concerns as defined in KCSIE 2025.

- A member of the Senior Management Team has been appointed by the Board members / Senior Leaders as the DSL who will take lead responsibility for safeguarding and child protection and that the role is explicit in the role holder's job description.

- That on appointment, the DSL and DDSL initially undertake DSL 'New to Role' with 'Refresher' training at least every two years as well as attending DSL network events, to refresh knowledge and skills.

- Students are taught about safeguarding (including online safety and Prevent) as part of a broad and balanced curriculum.

- Alongside the setting Board members / Senior Leaders will regularly review the effectiveness of filtering and monitoring systems in place to safeguard children online.

- Ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.

- Italia Conti will comply with DfE and the Surrey County Council Policy Guidance for Safeguarding Children Missing Education and Education Other Than at School.

- Clear systems and processes are in place for identifying possible mental health concerns, including routes to escalate and clear referral and accountability systems.

- Ensure that safeguarding and child protection files are maintained as set out in KCSIE 2025 Annex C.

- Enhanced DBS checks (without barred list checks unless the Director is also a volunteer at the setting) are in place for all Directors /Senior Leadership Team members.

- Ensure section 128 checks are undertaken as defined in KCSIE 2025.

- Ensure where Directors / Senior Leaders hire or rent out Italia Conti facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) they should ensure that appropriate arrangements are in place to keep children safe.

The Safeguarding Consultant to the Board of Directors

The Safeguarding Consultant to the Board of Directors will:

- meet with the DSL periodically, asking questions that allow them to monitor how the Italia Conti's safeguarding policies and procedures are being put into practice;
- review the report and provide advice as required to the Board
- keep up to date with appropriate safeguarding arrangements and guidance.

9. Security

All members of staff have a responsibility for maintaining awareness of the premise's security and for reporting concerns that may come to light. We operate within a whole-institution community ethos and welcome comments from students, staff 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 Italia Conti 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 Italia Conti 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 who threatens Italia Conti security or causes others 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 site.

10. Confidentiality, Sharing and Withholding Information

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 Data protection: toolkit for schools to support setting with data protection activity, including compliance with General Data Protection Regulation (GDPR).

Information will be shared with staff within the setting who 'need to know'.

Relevant staff have due regard to GDPR principles which allow them to share (and withhold) information. 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.

All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and that the Data Protection Act 1998 and GDPR are not a barrier to sharing information where a failure to do so would place a child at risk of harm. There is a lawful basis for child protection concerns to be shared with agencies who have a statutory duty for child protection.

All staff will always endeavour to gain parent/carers consent to refer a child to social care unless to do so could put the child at greater risk of harm or impede a criminal investigation.

11. Records and information sharing

- Staff will record any welfare concern that they have about a student using the Safeguarding concern (level 5) process on ProMonitor. This ensures the DSL is notified 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. 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, 2023. These will be given to the new DSL, and a receipt of delivery will be obtained.

- Where a student transfers from Italia Conti 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.

- Where a student joins Italia Conti, we will routinely check with the previous school or college whether there are current or historical safeguarding / child protection records.

12. Safeguarding Procedures

These procedures apply to all staff working / volunteering in Italia Conti and will be covered in training to enable everyone understands their role and responsibility.

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 harmed or abused or is at risk of harm or abuse.
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.

All staff are aware that very young children and those with disabilities, special needs or with language delay may be more likely to communicate concerns with behaviours rather than words. Additionally, staff will question the cause of knocks and bumps in children who have limited mobility.

Any member of staff, volunteer or visitor to Italia Conti who receives a disclosure or allegation of abuse, or suspects that abuse may have occurred **must report it immediately to the DSL** (or, in their absence, the deputy DSL). See flowchart **'What to do if you are worried about a child/ young person'** (Appendix 1).

Staff members should make an initial record of the information related to the concern as soon as possible, including details of:

- Student's name and date of birth
- Date
- Time
- Place

- Who was present
- Context
- Details of disclosure/concern (using the student's words)
- Demeanour/non-verbal behaviours of the student
- Student's voice
- Any injuries (using a body map to record these)
- Reason for the referral (rationale)
- Actions taken

They should ensure that they sign and date the referral form (or equivalent on electronic based records), including the time of day that the referral is made.

a) The DSL will consider if there is a requirement for immediate medical intervention, however urgent medical attention should not be delayed if the DSL is not immediately available.

b) In the absence of the DSL or DDSL, all staff must be prepared to and know how to refer directly to C-SPA (and the Police if appropriate) if there is the potential for immediate significant harm or contact the consultation line at the C-SPA for support and advice.

c) Following a report of concerns the DSL must use the Continuum of Support for Children and Families in Surrey and Continuum of Support Matrix to decide whether or not there are sufficient grounds for suspecting harm, in which case a request for support must be made to the C-SPA and the Police if it is appropriate.

d) The setting should try to discuss any concerns about a student's welfare with the parent/carer and where possible obtain their agreement before making a referral to the C-SPA. However, this should only be done when:
   - it will not place the student at increased risk
   - sexual/organised abuse is suspected
   - the fabrication of an illness is suspected
   - where the discussion could impede a Police investigation or Social Work enquiry

e) Where there are doubts or reservations about involving the student's family, the DSL should clarify with the C-SPA or the Police whether the parents/carers should be told about the referral and, if so, when and by whom. This is important in cases where the Police may need to conduct a criminal investigation. The student's views should also be considered.

f) If it is suspected that a student is suffering, or is likely to suffer, harm or abuse the DSL must contact the C-SPA. If the DSL feels unsure about whether a referral is necessary, they can phone the C-SPA consultation line to discuss concerns.

g) When a student needs urgent medical attention and there is suspicion of abuse the DSL should take the child to the accident and emergency unit at the nearest hospital, having first notified the C-SPA. The DSL should seek advice about what action the C-SPA will take and about informing the parents/carers, remembering that parents/carers should normally be informed that a child requires urgent hospital attention.

The exception to this process will be in those cases of known FGM where there is a mandatory reporting duty for the teacher to report directly to the Police where they either:

- Are informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for the purposes connected with labour or birth.
- The DSL should also be made aware.

Dealing with safeguarding concerns

A member of staff who is approached by a child or student should listen positively and try to reassure them. They cannot promise complete confidentiality and should explain that they need to pass information to other professionals to help keep the child and/or other children safe. The degree of confidentiality should always be governed by the need to protect the child.

Additional consideration needs to be given to children with communication difficulties and for those whose preferred language is not English. It is important to communicate with them in a way that is appropriate to their age, understanding and preference.

All staff should know who the DSL is and who to approach if the DSL is unavailable. All staff have the right to make a referral to the C-SPA or Police directly and should do this if, for whatever reason, there are difficulties following the agreed protocol, for example, they are the only adult on the setting premises at the time and have concerns about sending a child home.

Guiding principles:

- Receive
- Reassure
- Respond
- Report
- Record
- Remember
- Review (by the DSL)

What happens next?

It is important that concerns are followed up and it is everyone's responsibility to ensure that they are. The member of staff should be informed by the DSL what has happened following a report being made. If they do not receive this information, they should seek it out.
If they believe that the concern has not been acted upon appropriately, they should inform the Principal or Advisory Board member responsible for Safeguarding or contact the C-SPA for advice.

13. Safeguarding Concerns and Allegations made about Staff, including supply teachers, volunteer and contractors and LADO Procedure

Every local authority has a legal responsibility to appoint a LADO who is responsible for organising the response to concerns/allegations that an adult who works with children may have caused them or could cause them harm. They will be informed within one working day of any allegations that come to our attention. The LADO will give advice and guidance to employers, such as the headteacher and the chair of governors/chair of trustees, to make sure that any allegation is dealt with fairly and quickly, ensuring that the child is protected effectively.

Surrey's LADO procedure will be followed where it is alleged that anyone working in the setting that provides education for children under 18 years of age, including supply staff, volunteers and contractors or another adult who works with children has:

- behaved in a way that has harmed a child, or may have harmed a child
  and/or
- possibly committed a criminal offence against or related to a child
  and/or
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children
  and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

The last bullet point above includes behaviour that may have happened outside of Italia Conti, that might make an individual unsuitable to work with children, this is known as transferable risk.

Italia Conti may also receive an allegation relating to an incident that happened when an individual or organisation was using their premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities).

In dealing with allegations or concerns against an adult, staff must report any concerns to the Principal immediately.

If an allegation is made against the Principal or CEO, the concerns need to be raised with the Chair of Board of Directors of Italia Conti as soon as possible. If the Chair of the Board of Directors is not available, then the Chair of the Advisory Board should be contacted. If necessary, the LADO should be contacted directly.

There may be situations when the CEO / Principal / Chair of Board of Directors / Senior Leadership Team will want to involve the Police immediately if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence.

The LADO can be contacted by:

Email: LADO@surreycc.gov.uk
Telephone: 0300123 1650 option 3
Online: LADO Referral Form

Following consultation with the LADO inform the parents/carers of the allegation unless there is a good reason not to.

In liaison with the LADO, the setting will determine how to proceed and if necessary, the LADO will refer the matter to Social Care and/or the Police.

If the matter is investigated internally, the LADO will advise the setting to seek guidance in following procedures set out in part 4 of KCSIE (2025) and the SSCP procedures.

14. Low-level concerns

The term low-level concern does not mean that it is insignificant. 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 setting may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

The purpose of reporting low-level concerns is to create and embed a culture of openness, trust and transparency in which the setting's values and expected behaviour set out in the staff code of conduct are lived, monitored and reinforced constantly by all staff.

Italia Conti 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.

Low-level concerns about a member of staff should be reported to the DSL, who will inform the Principal. Where a low-level concern is raised about the DSL, it should be shared with the Principal. The Principal will be the ultimate decision maker in respect of all low-level concerns. If the DSL and / or Principal has any doubt as to whether the information which has been shared about the individual as a low-level concern in fact meets the harm threshold, they will consult with the LADO.

Where a low-level concern relates to a person employed by a supply agency or a contractor, that concern should be shared with the DSL and/or Principal and recorded in accordance Italia Conti's low-level concern / Staff Code of Conduct policy and their employer notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

15. What is child abuse?

The following definitions are taken from Working Together to Safeguard Children (2023). In addition to these definitions, it should be understood that children can also be abused by being

sexually exploited, honour-based violence, forced marriage or female genital mutilation. To support the local context, all staff have access to Surrey's Continuum of Need Matrix.

Forms of abuse and neglect

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. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from 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.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving 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.

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, for example, 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.

Further information on indicators of abuse can be accessed via NSPCC.

16. Early Help

a) Any child may benefit from early help, but all Italia Conti 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
- 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 college (including for part of the college day)

b) All staff are aware of the Early Help process and understand their role within it. This includes identifying emerging problems, liaising with the DSL, 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.

c) If Early Help is assessed to be appropriate, then the DSL will support staff members involved with the family to initiate an Early Help Assessment. The DSL 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.

d) The Board of Directors, CEO, Principal and Leadership Team will ensure that the DSL is properly supported in this role in relation to the availability of appropriate time, support and resources.

17. Sexual Violence and Sexual Harassment Between Children in the Setting

Italia Conti operates a separate Harassment, Sexual Misconduct and Sexual Violence Policy, and this section should be managed in conjunction with that policy. Further information is also available in Appendix 1, Paragraph 55 of this Policy.

Child-on-Child Abuse

Sexual violence and sexual harassment can occur between children of any age and sex. It can occur through a single child or a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will find the experience stressful and distressing. This will, in all likelihood, adversely affect their education 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 reassured that they are being taken seriously and that they will be supported and kept safe.

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, adults, and setting staff are supported and protected as appropriate.

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 children (sometimes known as 'teenage relationship abuse')

- 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)

- sexual 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 nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery) UKCIS guidance: Sharing nudes and semi-nudes advice for education settings working with children and young people

- upskirting, 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).

We recognise that children are capable of abusing other children and their peers and this will be dealt with under our child protection policy and in line with KCSiE (2025).

We are clear that sexual violence and sexual harassment is not acceptable.

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

- making clear that there is a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated. It will never be passed off as "banter", "just having a laugh", "a part of growing up" or "boys being boys". We believe that failure to do so can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it.

- recognising, acknowledging, and understanding the scale of harassment and abuse and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported.

- challenging physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. As we believe that dismissing or tolerating such behaviours risks normalising them.

Prevention

- Taking a whole setting approach to safeguarding and child protection
- Providing training to staff
- Providing a clear set of values and standards, underpinned by the setting's behaviour policy and pastoral support; and by a planned programme of evidence-based content delivered through the curriculum.
- Engaging with specialist support and interventions.

- Responding robustly to reports of sexual violence and sexual harassment

Children making any report of sexual violence or sexual harassment including "upskirting"[3]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 at school guidance.
The key consideration is for staff not to view or forward illegal images of a child. The guidance provides more details on what to do when viewing an image is unavoidable. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection

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 sanctions.
- All other children at the setting.
- The victim and the alleged perpetrator sharing classes and space at setting.
- 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 setting's approach to supporting and protecting children.

Action:
It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the setting should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

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.
- Ages of the children involved.
- Developmental stages of the children.
- Any power imbalance between the children.

[3] The Voyeurism Offences Act 2019

- Any previous incidents.
- That sexual violence and sexual harassment can take place within intimate personal relationships between children.
- Importance of understanding intra familiar harms and any necessary support for siblings following incidents
- Ongoing risks to victim, other children, adult students, or staff.
- Other related issues or wider context.

Confidentiality:
The victim may ask the setting not to tell anyone about the sexual violence or sexual harassment. If the victim does not give consent to share information, staff may still lawfully share it, if there is another legal basis under the UK GDPR that applies. The DSL should consider:

- parents or carers should normally be informed (unless this would put the victim at greater risk)
- the basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care, and
- rape, assault by penetration and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of referring to the police remains. The police will take a welfare, rather than a criminal justice approach, in these cases.

The DSL will have to balance the victim's wishes against their duty to protect the victim and other children.

Options:
- Manage internally
- Early help intervention
- Request for support to the C-SPA
- Report to the Police (generally in parallel with a request for support to the C-SPA)

All concerns, discussions, decisions and reasons for decision will be recorded [insert written or electronic].

Ongoing Response:
- The DSL will manage each case individually and will ensure the risk assessment is reviewed regularly with relevant partner agencies, for example the Police and social care.

- Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, settings should be aware of anonymity, witness support, and the criminal process in general so they can offer support and act appropriately.

- 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 the setting premises and on transport where appropriate.

- Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, the setting 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 may lead to the view that allowing the perpetrator to remain in the same setting would seriously harm the education or welfare of the victim (and potentially themselves and other children).

- Where a criminal investigation into sexual assault leads to a conviction or caution, the setting will, if it has not already, consider any suitable sanctions in light of their behaviour policy, which may include consideration of permanent exclusion. Where the perpetrator is going to remain at the setting, the Headteacher/Principal should continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on setting 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 any other children and adults affected will receive appropriate support and safeguards on a case-by-case basis.

- Italia Conti will take any disciplinary action against the alleged perpetrator in accordance with the setting behaviour policy.

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

- Italia Conti will consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.

- Italia Conti recognises that children who have experienced sexual violence display a wide range of responses to their experiences including clear signs of trauma, physical and emotional responses, or no overt signs at all.

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 children to children 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.

18. Online Safety and Child-on Child Abuse

Italia Conti staff are aware that technology is a significant component in many safeguarding and wellbeing issues. Students 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 the Italia Conti premises and/or online.
-

19. Harmful Sexual Behaviour (HSB)

Students' sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. HSB can occur online and/or face-to-face and can also occur simultaneously between the two. HSB will be considered in a child protection context.

Italia Conti operates a separate Harassment, Sexual Misconduct and Sexual Violence Policy, and this section should be managed in conjunction with that policy.

Italia Conti recognises that it is vital that professionals agree on how behaviours should be categorised regardless of culture, faith, beliefs, and their own experiences or values.

20. Anti-Bullying/Cyberbullying

Italia Conti's 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, prejudice – based and discriminatory bullying, including racist, homophobic, transphobic, religious and gender related bullying.

We keep a record of known bullying incidents which is shared with and analysed by the Senior Leadership Team and Principal. All staff are aware that children or individuals at risk with SEND and / or differences/perceived differences including those who identify (or who are perceived to identify) as Lesbian, Gay, Bisexual, Transgender, Queer or Questioning (LGBTQ+) are more susceptible to being bullied / victims of child abuse.

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

Risks can be compounded where students who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.

When there is 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm' a bullying incident should be addressed as a child protection concern. If the bullying is particularly serious, or the anti-bullying procedures are seen to be ineffective, the Principal and the DSL will consider implementing safeguarding and child protection procedures.

The subject of bullying is addressed at regular intervals through curriculum topics and discussion in both FE and HE courses.

Italia Conti has e-safety and social media policies which explain how we work to keep students and students safe at Italia Conti and how we respond to online safety incidents. The Italia Conti online safety coordinators are Andrew Dickinson and Preston Cole. The Data Protection Officer is Will Flanagan.

Please also refer to the *Anti Bullying*, Disciplinary policies and *Student Code of Conduct*.

21. Safety/Cybercrime

The following section should be read in conjunction with the *Digital Safety Agreement* and Staff guidance to online teaching and learning, and the *Student* and *Staff Codes of Conduct*.

Italia Conti identifies that the issues classified within online safety are considerable and ever-evolving, but can be categorised into four areas of risk, content, contact, conduct and commerce.

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

Italia Conti recognises that online safety is part of the whole institution 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's 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 will ensure a comprehensive college wide strategy is in place to enable all students to learn about and manage online risks effectively and will support the wider school community (including all members of staff) to become aware and alert to the need to keep children and students safe online.

Italia Conti will follow the guidance around harmful online challenges and online hoaxes when supporting students and sharing information with stakeholders.

Italia Conti has e-safety and social media policies which explain how we work to keep students and students safe at Italia Conti and how we respond to online safety incidents. The Italia Conti

online safety coordinator is the IT Manager (IT@italiaconti.co.uk). The Data Protection Officer is contactable via: DPO@italiaconti.co.uk

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

22. 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 Italia Conti 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 *Staff Code of Conduct* including:

- avoiding the use of private accounts
- ensuring that any issues and concerns are logged on ProMonitor
- considering students with SEND
- avoiding private chats with students

23. Racist Incidents

Our policy on racist incidents is set out separately and acknowledges that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures. We keep a record of racist incidents.

24. Radicalisation, Extremism and Terrorism

Prevent duty guidance: England and Wales (2023) 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 becoming terrorists or supporting terrorism.

Extremism is defined as 'the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and 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 with 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.'

Some students are at risk of being radicalised; adopting beliefs and engaging in activities which are harmful, criminal or dangerous. This can happen both online and offline.

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

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

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.

The DSL should report concerns that a student may be at risk of radicalisation or involvement in terrorism, use the Prevent referral form to refer cases by e-mail to preventreferrals@surrey.pnn.police.uk .
If the matter is urgent then Police must be contacted by dialling 999. In cases where further advice from the Police is sought dial 101.

To speak to the Prevent Supervisor for Surrey call 07795043842

There is a dedicated telephone helpline 0800 0113764 for staff and Senior Leaders to raise concerns around Prevent.

There is a dedicated telephone helpline 0800 0113764 for staff and Directors / CEO / Principal / SLT to raise concerns around Prevent.

Italia Conti staff receive training to help identify early signs of radicalisation and extremism.
All staff at Italia Conti will complete an approved training package which includes guidance on how to identify people who may be vulnerable to being drawn into radicalisation, extremism and 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 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. Opportunities are provided in the curriculum to enable

students to discuss issues of religion, ethnicity and culture and Italia Conti has a Promoting British Values Policy in place.

Italia Conti's Senior Leadership Team and the DSL will assess the level of risk within the organisation and put actions in place to reduce that risk. Risk assessment may include due diligence checks for external speakers and private hire of facilities, anti-bullying policy and other issues specific to Italia Conti's profile, community and philosophy.

Although not a cause for concern on their own, possible indicators when taken into consideration alongside other factors or context may be a sign of being radicalised.

Further information and a list of such indicators can be found at Managing Risk of Radicalisation in your Education Setting.

25. Curriculum and Staying Safe

Italia Conti 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 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.

Systems have been established to support the empowerment of students to talk to a range of staff so that students at Italia Conti will be listened to, heard and their concerns taken seriously and acted upon as appropriate. Specific systems outside of expected day to day classroom interaction and support include:

- Pastoral tutorial system
- Student Rep system
- Drop-in Welfare
- Buddy and peer-mentoring and "family" systems
- Bullying and Anti-Harassment Policy
- Ethics and Consent Committee
- EDI committees

26. Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. It occurs regardless of race, ethnicity, gender, class, sexuality, age, religion, mental or physical ability. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Domestic Abuse Act received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

27. Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL is aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

28. Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

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 affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Child Sexual Exploitation
CSE is a form of child sexual abuse. CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge for example 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. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Any concerns that a child is being or is at risk of being sexually exploited should be passed immediately to the DSL.

The victim may have been sexually exploited even if the sexual activity appears consensual. Some children may not realise they are being exploited e.g.; they believe they are in a genuine romantic relationship.

Any concerns that a child is being or is at risk of being sexually exploited should be passed immediately to the DSL.

Italia Conti is aware there is a clear link between regular non-attendance and CSE. Staff will consider a student to be at potential CSE risk in the case of regular non-attendance at and make reasonable enquiries with the student and parents/carers to assess this risk.

All staff are aware that safeguarding incidents and/or behaviours can be associated with factors outside Italia Conti and/or can occur between students outside of these environments. All staff, but especially the DSL will consider whether students are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

In all cases if the DSL identifies any level of concern the DSL should contact the C-SPA and if a child is in immediate danger the Police should be called on 999.

Italia Conti is aware that often a child is not able to recognise the coercive nature of the abuse and does not see themselves as a victim. Therefore, the child may resent what they perceive as interference by staff. However, staff must act on their concerns as they would for any other type of abuse. Children also rarely self-report CSE so staff must be particularly vigilant to potential indicators of risk.

Child Criminal Exploitation
Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. Children are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt.

Any concerns that a student is being or is at risk of being criminally exploited will be passed without delay to the DSL. The DSL will then contact the C-SPA and if there is concern about a student’s immediate safety, the Police will be contacted on 999.

The setting is aware there is a clear link between regular non-attendance at setting and exploitation. Staff will consider a student to be at potential risk in the case of regular non-attendance at setting and make reasonable enquiries with the student and parents/carers to assess this risk.

29. Serious Violence

There are a number of indicators, which may signal students are at risk from, or are involved with, serious violent crime. These may include:

- increased absence from the setting
- a change in friendships or relationships with older individuals or groups
- a significant decline in performance
- signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries
- Unexplained gifts or new possessions could also indicate that students have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

Staff are aware that violence can often peak in the house just before and after the children attend the setting which includes travelling to and from the setting.

30. Modern Slavery

Modern slavery encompasses 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.

31. Female Genital Mutilation (FGM)

FGM is illegal in England and Wales under the FGM Act (2003). It is a form of child abuse and violence against women. A mandatory reporting duty, requires teachers to report directly and immediately to the Police 101 where they either:

- Are informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for the purposes connected with labour or birth.

The duty applies to all persons who are employed or engaged to carry out 'teaching work' whether or not they have qualified teacher status.

The duty applies to the individual who becomes aware of the case to make a report. It should not be transferred to the DSL; however, the DSL should be informed.

Setting staff are trained to be aware of risk indicators of FGM.

Concerns about FGM outside of the mandatory reporting duty should be reported using the setting's Safeguarding and Child protection procedures. Staff should be particularly alert to suspicions or concerns expressed by female students about going on a long holiday during the summer holiday.

There should also be consideration of potential risk to other girls in the family and the wider community. Where there is a risk to life or likelihood of serious immediate harm the teacher should report the case immediately to the Police by calling 999.

There are no circumstances in which a member of staff should examine a girl.

32. Forced Marriage

A forced marriage is a marriage in which one or both people do not (or in cases of people with learning disabilities cannot) consent to the marriage but are coerced into it. Coercion may include physical, psychological, financial, sexual, and emotional pressure. It may also involve physical or sexual violence and abuse.

Forced marriage is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights. Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014. In addition, since February 2023, it is also a crime to cause a child to marry before their eighteenth birthday, even if violence, threats, or another form of coercion are not used. This applies to non-binding, unofficial 'marriages' as well as legal marriages.

A forced marriage is not the same as an arranged marriage which is common in many cultures. The families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.

Setting staff should never attempt to intervene directly as a setting or through a third party. Contact should be made with the C-SPA and/or the Forced Marriage Unit 020 7008 0151.

33. So-called 'Honour'-based abuse (HBA)

HBA 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 abuse can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.

HBA 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; 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 particular culture

It is considered a violation of human rights and may be a form of domestic and/or sexual abuse.

One Chance Rule

All staff are aware of the 'One Chance' Rule' in relation to forced marriage, FGM and HBA. Staff recognise they may only have one chance' to speak to a child who is a potential victim and have just one chance to save a life.

The setting is aware that if the victim is not offered support following disclosure that the 'One Chance' opportunity may be lost. Therefore, all staff are aware of their responsibilities and obligations when they become aware of potential forced marriage, FGM and HBA cases.

34. Private Fostering Arrangements

A private fostering arrangement 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 students under the age of 16 years old or 18 years old if the student is disabled.

Looked After Children by the local authority or those who are placed in residential settings, children's homes or hospitals are not considered to be privately fostered.

Private fostering occurs in all cultures and children may be privately fostered at any age.

Italia Conti recognises that most privately fostered young people 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 young person 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 Social Care immediately. 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 C-SPA immediately.

35. Looked After Children and Previously Looked After Children

The most common reason for children becoming looked after is because of abuse and/or neglect.

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.

A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these students, who are a particularly vulnerable group.

The designated member of staff for looked after children will have the appropriate level of training to equip them with the knowledge and skills to undertake their role.

The designated member of staff will work with Surrey's Head of Virtual School for both looked after children and previously looked after children.

36. Children with Special Educational Needs and Disabilities or Health Issues

Children with SEND or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children, the potential for children with SEND or certain medical conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs, and
- communication barriers and difficulties in managing or reporting these challenges.
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in settings or the consequences of doing so

Any reports of abuse will require close liaison with the DSL. The setting will consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place.

37. Mental Health

Italia Conti has an important role to play in supporting the mental health and wellbeing of its students. 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 students' 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.

If staff have a mental health concern about a student that is also a safeguarding concern, immediate action should be taken, by following the Italia Conti safeguarding policy and speaking to the DSL or a deputy. Italia Conti take into account the government's Mental health and behaviour in schools guidance.

38. Children and Young People in Specific Circumstances

39. 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 student with a social worker is communicated to Italia Conti, 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 student's safety, welfare and educational outcomes.

- Where students 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).

40. Children and Young People absent from education

All children are entitled to an efficient, full-time education which is suitable to their age, ability, aptitude, and any SEND they may have.

Italia Conti recognises that when children and young people are absent from education, or persistently absent, without explanation and/or for prolonged periods, this can be a vital warning sign of a range of safeguarding possibilities. They are also at significant risk of underachieving, being victims of abuse and harm, exploitation, radicalisation, and not being in education, employment or training (NEET) later in life.

Italia Conti has a procedure in place for responding to unauthorised absence and responding to children who go missing from education, particularly on repeat occasions, to help identify the

risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future:

- Parents/ carers and students should always inform us of the reason for any absence.
- Italia Conti will hold at least 2 emergency contact numbers for each student.
- Italia Conti will ensure that there is a record of joiners and leavers as defined in The Education (Pupil Registration) (England) 2006 (amended 2016).

For students under 18:
When removing a child's name, Italia Conti will notify the Surrey County Council of: (a) the full name of the child, (b) the full name and address of any parent with whom the child normally resides, (c) at least one telephone number of the parent, (d) the child's future address and destination setting, if applicable, and (e) the ground in regulation 8 under which the child's name is to be removed from the setting register.

The setting will make reasonable enquiries to establish the whereabouts of a child jointly with the Local Authority, before deleting the child's name from the setting register if the deletion is under regulation 8(1), sub-paragraphs (f) (iii) and (h) (iii)of The Education (Pupil Registration) (England) 2006 (amended 2016).

Italia Conti will

- maintain an accurate and up to date registration of learners enrolled on courses.
- Monitor each child's attendance through their daily register and follow Surrey County Council procedure in cases of unauthorised absence.
- Remove a child's name from the admissions register on the date that the child leaves the setting.
- The setting will notify Surrey County Council when they are about to remove a child's name from the setting register under any of the fifteen grounds listed in the regulations, no later than the date that the child's name is due to be removed.

41. Pupils Missing Out on Education (PMOOE)

Most students engage positively with setting and attend regularly. However, to flourish, some students require an alternative education provision or may require a modified timetable to support a return to full time education provision. It is recognised that students accessing alternative provision, or a reduced/modified timetable may have additional vulnerabilities. Ofsted refer to these as PMOOE because they are not accessing their education in a setting in the 'usual way'.

Italia Conti will gain consent (if required in statute) from parents/carers to put in place alternative provision and/or a reduced or modified timetable.

The setting will ensure that parents/carers (and the Local Authority where the student has an Education Health Care Plan (EHCP)) are given clear information about alternative provision placements and reduced/modified timetables: why, when, where, and how they will be reviewed.

The setting will keep the placement and timetable under review and involve parents/carers in the review. Reviews will be frequent enough to provide assurance that the off-site education and/or modified timetable is achieving its objectives and that the student is benefitting from it.

Italia Conti will monitor and track students attending alternative provision to ensure that the provision meets the needs of the student. The setting continues to be responsible for the safeguarding of that student. The setting will obtain written confirmation from the alternative provision provider that appropriate safeguarding checks have been carried out on individuals working at the establishment,

Italia Conti will comply with regular data returns requested by Surrey County Council, regarding all students, of statutory setting age, attending alternative provision and/or on a reduced/modified timetable.

Italia Conti leadership will report to Senior Leaders information regarding the use and effectiveness of alternative provision and modified/reduced timetables. The setting will also report to Senior Leaders any formal direction of a student to alternative provision to improve behaviour.

42. Attendance and Behaviour

Additional policies and procedures are in place relating to attendance, behaviour (Student Code of Conduct) and non-academic misconduct (disciplinary).

Italia Conti recognises that students being absent, particularly repeatedly and/or for prolonged periods and exclusion from may be indicators of abuse and neglect, including the exploitation of children. The DSL will regularly liaise with members of staff with responsibility for behaviour and attendance to ensure risk is identified and appropriate intervention is in place to protect students from harm.

43. Restrictive Physical Intervention

Italia Conti recognise that sometimes touch is appropriate in the context or working with young people in a performing arts setting, and we have an Appropriate Physical Contact and Safe Touch Policy in place to ensure staff are clear about their professional boundaries.

We acknowledge that staff must only ever use physical intervention as a last resort, when a student is at immediate risk of harming themselves or others, and that at all times it must be the minimal force necessary to prevent injury to another person. Such events should be fully recorded and signed by a witness.

Staff understand that physical intervention of a nature which causes injury or distress to a child may be considered under child protection and/or disciplinary procedures.

When applying disciplinary measures such as physical intervention or isolation for children with SEND the setting will consider the risks, given the additional vulnerabilities of these children.

44. Whistleblowing

We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.

All staff, including temporary staff/supply staff and volunteers, should be aware of their duty to raise concerns, where they exist, about the management of safeguarding and child protection, which may include the attitude or actions of colleagues, poor or unsafe practice and potential failures in the setting's safeguarding arrangements.

If it becomes necessary to consult outside the setting, they should speak in the first instance, to the LADO in accordance with the Whistleblowing Policy.

Staff are encouraged to use an external, independent and confidential service provided by Navex Global, who can be contacted on their freephone helpline number 0800 069 8180 and through the Navex Global web pages

The NSPCC whistleblowing helpline is also available for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about a way a concern is being handled by their setting. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk.

For areas of particular concern, we have a Whistleblowing Policy, and an e-mail address: speakup@italiaconti.co.uk is monitored by the Senior Leadership Team. The Whistleblowing Policy, along with our other salient policies, is available on our website: https://www.italiaconti.com/about-us/policies/.

Whistleblowing regarding the CEO / Principal should be made to the Chair of the Board of Directors whose contact details should be available to staff.

45. Links with other policies:

- Anti-bullying Statement
- Anti Radicalisation and Extremism Policy
- Appropriate Physical Contact and Safe Touch
- Attendance Policy
- Disciplinary Policy
- Complaints Policy and Procedures
- Equal Opportunities Policy

- E-Safety Policy
- Harassment, Sexual Misconduct and Sexual Violence Policy
- Health & Safety Policy
- Intimate Care (Associate Schools only)
- Personal Relationships Policy
- Safer Recruitment Procedures
- SEND Policy
- Social Media Policy
- Whistleblowing Policy

Policies are available on the Italia Conti website Policies page.

46. Complaints

- Italia Conti 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 specific Procedures for Managing Allegations against Staff policy. This can be found in the Staff Handbook.

47. Staff Induction, Awareness and Training

All members of staff have been provided with a copy of part one of KCSIE, 2025 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 Child Protection and Safeguarding Policy
- the Student Code of Conduct
- the Staff Code of Conduct
- the safeguarding response to children who go missing from education; and
- 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 Italia Conti policies
- refer concerns to the DSL and be able to seek support external to the school if required
- understand what cyber security Italia Conti has in place to keep children and staff safe when online at school and how to report any issues.
- understand what ineffective filtering and monitoring systems look like and how to report any concerns or issues.

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.
- receive safeguarding and child protection updates annually, or when required, via training sessions, staff meetings or email.
- receive Prevent training, which will prepare them for identifying children at risk of being radicalised into terrorism and how to challenge extremist ideas.

The DSL and Director of HR 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 Board of Directors as part of the Annual Safeguarding Report.

48. 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 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.

49. Safer Recruitment

As part of the Italia Conti's safeguarding culture, the institution 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 2025 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 and that training will be repeated every three years.

Italia Conti will ensure that the safer recruitment process covers relevant paragraphs of KCSIE 2025 in relation to advertisement, application form, shortlisting, employment history and references, selection, ID, DBS checks etc.

- The Board of Directors will ensure that the Senior Leadership Team and at least one member of the Board of Directors complete accredited Safer Recruitment Training in line with statutory requirements.

- Italia Conti is responsible for ensuring that the college maintains an accurate Single Central Record (SCR). The SCR is a list of all staff (including supply staff), volunteers and governors 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.

50. Appendix 1: Further Information on Sexual Misconduct and Sexual Violence

This section should be read in conjunction with Italia Conti's Harassment, Sexual Misconduct and Sexual Violence Policy.

It is important that settings are aware of sexual violence and the fact children can, and sometimes do, abuse other children in this way and that it can happen both inside and outside of setting. When referring to sexual violence in this advice, we do so in the context of child-on-child sexual violence.

When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (NOTE- Settings should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)

Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (NOTE – this could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party).

What is consent?

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g.to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity, and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

- a child under the age of 13 can never consent to any sexual activity
- the age of consent is 16
- sexual intercourse without consent is rape.

Further information about consent can be found here: Rape Crisis England & Wales - Sexual consent.

Sexual harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of the setting. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
- sexual "jokes" or taunting
- physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes. Settings should be considering when any of this crosses a line into sexual violence – it is important to talk to and consider the experience of the victim.
- displaying pictures, photos or drawings of a sexual nature
- upskirting (this is a criminal offence), and
- online sexual harassment.

This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:

- consensual and non-consensual sharing of nude and semi-nude images and/or videos. Taking and sharing nude photographs of under-18s is a criminal offence. Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK (www.gov.uk)
- sharing of unwanted explicit content
- sexualised online bullying
- unwanted sexual comments and messages, including, on social media
- sexual exploitation; coercion and threats, and
- coercing others into sharing images of themselves or performing acts they're not comfortable with online.

It is important that settings consider sexual harassment in broad terms. Sexual harassment (as set out above) creates a culture that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

Staff should also be aware of and abide by the details of Italia Conti's Personal Relationships Policy.

51. Appendix 2: 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
   - Get some support for yourself, dealing with disclosures can be traumatic for professional.

52. Appendix 3: Further Guidance and Links

Children's Single Point of Access (C-SPA)
Anyone can contact the C-SPA about a child, young person or parent/carer who needs support in Surrey. This could be a concern about how the child is developing, issues that the parent or carer is experiencing, or you suspect a child is being neglected or subjected to physical, sexual, or emotional abuse.

Surrey's Child Protection Consultation Line for advice and support (0300 470 9100 option 3).

- If a child or young person is in **immediate danger,** the police should be contacted on 999.
- If it is not an emergency, but there is a concern that a child is at risk, C-SPA should be contacted by phone on 0300 470 9100 or 03311 435554.
- Requests for support should be sent securely by email to cspa@surreycc.gov.uk using the Request for Support Form.

If you have children attending your school from other local authorities, you may wish to also include their contact details here - this government website will help identify which local council to report child abuse to and their contact details: Report child abuse to a local council - GOV.UK.

Emergency Duty Team (EDT)
The Emergency Duty Team (EDT) provides an emergency social care service for urgent situations which are out of normal office hours. If your call is not answered, please do leave a message and your contact details for someone to get back to you.
EDT is available **5pm-9am, Monday – Friday, Weekends 24 hours a day.**
Phone: 01483 517898
Email: edt.ssd@surreycc.gov.uk

Additional Resources

Keeping Children Safe in Education (2025)
Department for Education statutory guidance part 1 and appendix A (all staff):
Working Together to Safeguard Children (2023)
Surrey Safeguarding Children Partnership webpages
Continuum of Support for children and families living in Surrey
Surrey Education Services (surreycc.gov.uk) – Education Safeguarding Resources Hub
Graded Care Profile 2
NSPCC | The UK children's charity | NSPCC
CEOP Education
Anti Bullying Alliance webpages
Beat Bullying: http://www.beatbullying.org/
Childnet International
Safer Internet Centre webpages
Contextual Safeguarding Network webpages
Lucy Faithfull Foundation webpages
CEOPSThinkuknow: **https://www.thinkuknow.co.uk/**
Childline: **http://www.childline.org.uk/pages/home.aspx**

53. Appendix 4 What to do if you are worried about a child/young person

Why are you concerned?

For example
Disclosure

- Child's appearance – unexplained marks and bruises, clothes, hygiene.
- Change in behaviour, presentation, attendance, progress and attainment.
- Behaviour which causes concern, indicates risk/vulnerability.