ITALIA CONTI

Safeguarding and Child Protection Policy

Version:	v2627-2.1
Policy Owner:	Principal
Reviewed by:	Designated Safeguarding Lead
Approved by:	Policy Steering Group
Approval date:	06.10.2026
Next review:	31.08.2027

This policy will be reviewed and approved annually, or earlier if required by statute or updates to national and local guidance and procedures by the Policy Steering Group.

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 Italia Conti safeguarding statement

1.1 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]

1.2 Further information about Italia Conti's approach to equality, diversity and inclusion can be found in the Equality, Diversity and Inclusion (EDI) and Equal Opportunities Policy.

2 Introduction and policy aims

2.1 Italia Conti recognises its moral and statutory responsibility to safeguard and promote the welfare of all children. We are committed to a strong safeguarding culture in which children, and adults, feel safe, secure valued and respected, and where children are encouraged to speak openly, being confident they will be heard.

2.2 Italia Conti recognises that:

- Schools and colleges form part of the wider safeguarding system for children.
- Safeguarding and promoting children's welfare is the responsibility of the whole organisation.
- All children have equal rights to protection and to have their wishes and feelings heard and considered.
- All staff must understand and follow safe professional practice, the Staff Code of Conduct and relevant policies.
- All staff must recognise vulnerability and act promptly on concerns in accordance with statutory guidance.
- We maintain an attitude of '*it could happen here*' and a *'zero-tolerance*' approach to sexual violence and sexual harassment.
- Children have the right to feel safe, secure, respected and able to learn effectively.
- All safeguarding decisions will be child-centred, coordinated and made in the best interests of the child.
- Partnership working with parents/carers, social care, the police and other agencies is essential to protecting children and reducing risk.
- Where necessary, Italia Conti may contact social care and/or the police without notifying parents/carers where this is considered in the child's best interest.

[1] Keeping Children Safe in Education (DfE 2026)

2.3 This policy provides a framework for all staff to meet their statutory safeguarding responsibilities and establishes a consistent, whole-setting practice by defining the safeguarding expectations for staff, the Board of Directors, children and their families. It promotes a safe, resilient and robust safeguarding culture based on respect, dignity, voice and participation, and supports contextual safeguarding, recognising that harm may occur within Italia Conti or beyond.

2.4 The policy develops the knowledge and skills of staff, children and parents/carers to recognise safeguarding concerns and respond appropriately, promoting the early identification of vulnerable learners with proportionate intervention.

2.5 We are committed to supporting the effective partnership working with children, parents/carers and the Surrey Safeguarding Children's Partnership (SSCP).

2.6 In supporting children, Italia Conti will:

- Maintain an environment where students feel safe, encouraged to speak and confident they will be listened to.
- Ensure children know how to access help when they are worried or in need.
- Embed safeguarding and personal safety across the curriculum, including online safety.
- Provide preventative education, promoting respect, with zero-tolerance of sexism, misogyny, misandry, homophobia, biphobia, sexual violence and sexual harassment.
- Provide appropriate support for children affected by abuse, neglect, distress or anxiety, recognising that their behaviour may vary.
- Promote self-esteem, self-assertiveness and positive relationships.
- Ensure staff and children are familiar with Early Help and the safeguarding services available.
- Notify children's social care without delay where there is an immediate risk of significant harm.
- Share safeguarding information appropriately and confidentially when a child transfers to another institution, in accordance with statutory requirements.

2.7 Italia Conti recognises its important role in preventing harm by providing children with trusted adults, supportive relationships, effective communication and a culture of protection.

3 Definitions

3.1 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 problem 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.

3.2 **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.

3.3 **Child(ren)** includes everyone under the age of 18.

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

3.5 **Early Help** is support for children that improves a family's resilience and outcomes or reduces the chance of a problem getting worse.

3.6 **MAP** refers to the Surrey Multi-Agency Partnership, which as 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

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

3.8 **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.

3.9 **Staff** refers to all those working for or on behalf of Italia Conti, 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, freelance and self-employed staff.

3.10 **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.

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

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(s) too.

The appropriate terms will be considered and used on a case-by-case basis.

4 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

5 Children's Services contacts

Children's Single Point of Access (C-SPA)

5.1 Anyone can contact the C-SPA about a child, young person or parent who needs support in Surrey.

5.2 If a child in in **immediate danger,** the police should be contacted on **999**.

5.3 If it is not an emergency, but here is a concern that a child is at risk, C-SPA should be contacted by phone on **0300 470 9100**.

Emergency Duty Team (EDT)

5.4 EDT provides an emergency social care service for urgent situations which are out of normal office hours. If the call is not answered, leave a message and contact details for someone to return the call.

5.5 EDT is available: 5:00pm-9:00am Monday – Friday, Weekends 24 hours a day

Phone: 01483 517898
Email: edt.ssd@surreycc.gov.uk
Local Authority Designated Officer (LADO)

5.6 The LADO 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. The LADO will give advice and guidance to employers to ensure that any allegation is dealt with fairly and quickly, ensuring that the child is protected effectively.

5.7 The LADO can be contacted by:

Phone: 0300123 1650 (option 3)
Email: LADO@surreycc.gov.uk
Online: LADO Referral Form

6 The Law (legislation and statutory guidance)

6.1 In addition to Surrey Safeguarding Children Partnership's (SSCP) arrangements, Italia Conti also follows the laws and statutory guidance of:

- Working Together to Safeguard Children 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, 2026) 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.
- Relationships and sex education (RSE) and health education - GOV.UK This is statutory guidance from the Department for Education issued under Section 80A of the Education Act 2002 and section 403 of the Education Act 1996.
- 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.
- The Children Act 1989 is the main source of child safety law for England and Wales. The Act gives the basis for most of children's services' duties and responsibilities towards children and their families. It provides the legal framework for the child protection system. The 2004 amendment is used alongside the Act.
- The Children Act 1989 Planning, Placement and Case Review sets out what responsibilities education settings have for children looked after by the local authority.
- The Human Rights Act 1998 sets out the core rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (the Convention) that apply in the UK. Experiencing harassment, violence, and/or abuse, including that of a sexual nature, may breach any or all of these rights.
- The Equality Act 2010 states that schools and colleges must not unlawfully discriminate against children because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (called protected characteristics). Therefore, we can take positive action to deal with disadvantages affecting our children with protected characteristics to make sure their needs are met. The Equality Act 2010: advice for schools advises us further.

6.2 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 2026
- 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)

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

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

7 Oversight

7.1 The Principal, or their nominated representative, will have oversight of the implementation and operation of this Policy. The Designated Safeguarding Lead will provide professional expertise and guidance in relation to its implementation, with any further concerns or matters requiring escalation being referred to the Principal, or their nominated representative and/or the Board of Directors. The Board of Directors will have ultimate responsibility for ensuring that this Policy remains compliant with relevant legislation and aligned with any subsequent statutory guidance or recommendations.

8 Security

8.1 All members of staff have a responsibility of maintaining awareness of the premise's security and for reporting concerns. 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.

8.2 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 site. Any individual who is not known or identifiable should be challenged for clarification and reassurance.

8.3 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.

9 Responsibilities of Italia Conti and the staff

9.1 Safeguarding and promoting the welfare of children is everyone's responsibility. Italia Conti will maintain a child-centred, whole-setting approach to safeguarding, recognising that children may experience harm inside or outside Italia Conti, at home or elsewhere, online or offline. The best interests, wishes and feelings of children will be considered when determining safeguarding responses.

Italia Conti

9.2 Italia Conti will:

- Maintain effective safeguarding and child protection policies, procedures and systems which are consistent with statutory guidance, local safeguarding arrangements and relevant legislation. The Safeguarding and Child Protection Policy will be reviewed at least annually and made publicly available.
- Ensure that the identity and contact details of the Designated Safeguarding Lead (DSL and Deputy Designated Safeguarding Lead (DDSL) are clearly communicated to staff, children and relevant stakeholders, with appropriate arrangements in place for safeguarding cover whenever the DSL is unavailable.
- Operate safer recruitment and selection procedures, including all required pre-employment and suitability checks, and maintain appropriate procedures for managing safeguarding concerns and allegations relating to staff, volunteers, contractors and other adults.
- Ensure that all staff, including temporary staff, volunteers and contractors, receive safeguarding information appropriate to their role and are aware of the procedures for reporting concerns. A proportionate, risk-based approach will be taken to information provided to temporary staff, volunteers and contractors.
- Ensure all staff receive safeguarding and child protection training, including online safety, at induction and regular updates at least annually, with additional training provided as required.

- Ensure appropriate systems are in place for children to report concerns safely and confidently, and that concerns are taken seriously, acted upon promptly and handled in accordance with this policy and relevant procedures.
- Maintain effective arrangements for responding to child-on-child abuse, sexual harassment and sexual violence, including appropriate support, risk assessment and action.
- Maintain appropriate filtering and monitoring arrangements to safeguard children online, with their effectiveness reviewed at least annually and concerns escalated appropriately.
- Work collaboratively with parents, children's social care, the police, health services and other relevant agencies, including through Early Help and child protection arrangements, and participate appropriate in multi-agency safeguarding processes.
- Ensure safeguarding information is shared lawfully, appropriate and without unnecessary delay, recognising that data protection legislation is not a barrier to appropriate safeguarding information-sharing.
- Ensure safeguarding records are maintained securely, accurately and confidentially, including records of concerns, decisions, actions and outcomes, and that child protection information is transferred securely and promptly when a child moves institutions.
- Ensure that appropriate arrangements are in place where third parties use Italia Conti premises or provide activities or services involving children, including appropriate safeguarding policies, procedures, risk management and suitability checks.
- Promote a culture in which staff can raise concerns about unsafe practice, including through whistleblowing procedures, and ensure that low-level concerns and allegations about adults are appropriately recorded, considered and managed.

Board of Directors (Board), Senior Leadership Team (SLT) and Principal

9.3 The Board, SLT and Principal are responsible for ensuring that safeguarding is embedded throughout Italia Conti and that effective oversight, challenge and accountability are maintained.

9.4 They will:

- Ensure that safeguarding and child protection remain a strategic priority and that Italia Conti operates a whole-setting approach in which safeguarding is embedded across policies, practice, curriculum, culture and online provision.
- Ensure the DSL has appropriate seniority, authority, skills, experience, time, funding, training, resources and support to fulfil the role effectively.
- Ensure the DSL and DDSL receive appropriate training and that robust arrangements are in place to maintain safeguarding oversight during planned or unplanned absence.
- Ensure that safer recruitment, staff conduct, allegations, low-level concerns, whistleblowing and safeguarding training arrangements are effective and regularly reviewed.

- Ensure that children are taught about safeguarding, including online safety and relevant risks, through appropriate curriculum and pastoral provision.
- Ensure that safeguarding concerns and allegations involving adults are managed in accordance with KCSIE, local safeguarding arrangements and Italia Conti's procedures, including referral to the appropriate external agencies where required.
- Provide appropriate challenge and oversight of safeguarding arrangements, including reviewing safeguarding data, incidents, emerging risks, training, referrals, safer recruitment, filtering and monitoring, and the effectiveness of safeguarding policies and procedures.

Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Lead (DDSL)

9.5 The DSL has lead responsibility for safeguarding and child protection, including online safety and oversight of filtering and monitoring arrangements. The DSL's lead responsibility cannot be delegated, although activities may be delegated to appropriately trained DDSL.

9.6 The DSL will:

- Act as the principal point of contact for safeguarding and provide advice, support and expertise to staff.
- Ensure that safeguarding concerns are appropriately assessed, recorded, referred and followed up, including referrals to children's social care, the police, Prevent and other agencies where appropriate.
- Work effectively with children, parents, staff and relevant external agencies, including contributing to Early Help, child protection plans, strategy discussion, conferences and other multi-agency arrangements.
- Ensure children's wishes and feelings are considered and that safeguarding responses remain child-centred.
- Maintain effective, secure and confidential safeguarding records, including the rationale for decisions and actions taken, and ensure appropriate information-sharing and transfer of safeguarding records.
- Ensure staff understand this policy, safeguarding procedures, local safeguarding arrangements and the reporting routes for concerns.
- Promote a culture in which staff recognise safeguarding concerns, exercise professional curiosity and act promptly.
- Maintain appropriate knowledge and skills through DSL training at least every two years and regular updates at least annually, including Prevent and relevant local safeguarding developments.
- Maintain an up-to-date understanding of safeguarding risks, including abuse, neglect and exploitation, child-on-child abuse, harmful sexual behaviour, online harms, radicalisation, mental health, SEND and other factors which may increase vulnerability.

- Work with relevant strategic leads to understand the impact of safeguarding and welfare concerns on children's attendance, engagement, attainment and educational outcomes.
- Ensure appropriate safeguarding cover arrangements are in place whenever the DSL is unavailable.

9.7 DDSL will be trained to the same standard as the DSL and will support the DSL in carrying out safeguarding responsibilities. In the absence of the DSL, the DDSL will undertake the functions necessary to ensure the ongoing safety and protection of children. The DSL retains ultimate lead responsibility.

9.8 Detailed responsibilities of the DSL and DDSL are set out in their role descriptions and in KCSIE 2026, Annex B.

All Staff

9.9 All staff, including temporary staff, volunteers and contractors where applicable, are responsible for safeguarding and promoting the welfare of children. They will:

- Maintain an attitude that '*it could happen here*' and recognise that safeguarding is everyone's responsibility.
- Read and understand Part One of KCSIE 2026 and follow this policy and Italia Conti's safeguarding procedures.
- Attend required safeguarding and child protection training and regular updates, including online safety.
- Know how to recognise indicators of abuse, neglect and exploitation, including risks occurring online and outside of Italia Conti, and exercise professional curiosity when concerns arise.
- Know how to identify children who may require additional support or early help and understand the routes for obtaining help and making safeguarding referrals.
- Establish and maintain safe, respectful relationships with children, listen to their views and ensure children know how and where to raise concerns.
- Take all concerns seriously, respond sensitively to disclosures and never promise confidentiality where information may need to be shared to safeguard a child.
- Report safeguarding concerns to the DSL or DDSL without delay, in accordance with this policy. If a child is in immediate danger, staff should contact the police and/or emergency services as appropriate. Staff should escalate concerns directly to the appropriate external agency where necessary if the DSL is unavailable.
- Record concerns accurately and promptly, including relevant facts, actions, decisions and outcomes, and share information appropriately to safeguard children.
- Report concerns, allegations or low-level concerns about any member of staff, volunteer, contractor or other adult in accordance with the relevant procedure.
- Follow Italia Conti's procedures for child-on-child abuse, sexual harassment, sexual violence, harmful sexual behaviour and online safety.

- Support children receiving early help or statutory safeguarding support and contribute appropriately to safeguarding plans and multi-agency processes.
- Raise concerns about unsafe practice through the appropriate safeguarding or whistleblowing route.

9.10 Staff should not attempt to investigate safeguarding concerns themselves or delay reporting while seeking further evidence. If in doubt, they should consult the DSL.

10 What to do if you have concerns about a child's welfare

10.1 If staff have concerns about a child's welfare, they must act on them immediately by following the procedures below. These procedures apply to all staff working / volunteering at Italia Conti and will be covered in training to ensure everyone understands their role and responsibility. Italia Conti staff can use the What to do if you're worried a child is being abused guidance in conjunction with this Policy.

10.2 We recognise the significant emotional impact being involved with or aware of safeguarding incidents can have. Staff have access to the Employee Assistance Programme and the safeguarding team if they need any support during or following a safeguarding incident.

If a child is in immediate danger, or is suffering or likely to suffer significant harm

10.3 **Call the police on 999** if a child is in immediate danger. Anyone can make a referral to children's services if a child is suffering or likely to suffer significant harm. If staff make a direct referral, they will update the DSL as soon as possible.

10.4 If a child needs urgent medical attention and there is a 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.

Disclosures

10.5 We recognise that it takes a lot of courage for a child to disclose they are being harmed. Staff should consider that:

- Children may not feel ready or know how to tell someone they are being harmed.
- The child may not realise that what is happening to them is harmful.
- They may feel embarrassed, humiliated or are being threatened. This could be due to their vulnerability, disability, sexual orientation, and/or language barriers.

Handling a disclosure

- ➔ Listen to them carefully and believe in what they are saying. Do not be afraid of silent moments.
- ➔ Be careful not to express your own views or feelings and stay calm.
- ➔ Do not investigate. Only ask enough questions to work out if you need to share this matter with the DSL. Only ask open questions, such as: How? When? Who? Where?, and open statements, such as: Tell me, Describe, and Explain.
- ➔ If there are injuries or marks on the child, do not examine the child intimately or take pictures.
- ➔ Reassure them that they have done the right thing by telling you. Do not say to the child that you wish they had told you sooner.
- ➔ Do not automatically offer physical touch to comfort the child. Consider what may be comforting for the child, rather than how you prefer to be comforted.
- ➔ Tell the child it is not their fault, and you are taking them seriously.
- ➔ Explain what you will do next. Tell the child that you cannot keep what they have told you a secret and that you will pass this information onto someone who can help.

After a child has made a disclosure

- ➔ Make an initial record of the information related to the concern as soon as possible. Details of this record are listed below.
- ➔ Make sure the DSL is aware of the disclosure. If appropriate, contact children's services and/or the police directly and tell the DSL as soon as possible. All staff must be prepared to and know how to refer directly to C-SPA if there is potential for immediate significant harm in the absence of the DSL.
- ➔ Do not share the disclosure with anyone else unless children's services, the police or another relevant agency involved in the safeguarding process tells you to.
- ➔ Get support for yourself if you need it.
- ➔ Where there are doubts or reservations about involving the child's family, the DSL should clarify with the C-SPA or the police whether the parents should be told about the referral and, if so, when and by whom, particularly in cases where the police may need to conduct a criminal investigation. The child's views should also be considered.

Recording a disclosure or safeguarding concern

- ➔ Record the date, time, place and persons present.
- ➔ Use the child's own words, verbatim where possible, and stick to the facts. Avoid making assumptions and do not put your own judgement on it.
- ➔ Record any noticeable non-verbal behaviour. Detail any visible marks or injuries and record them on a body map.
- ➔ Keep any original notes you have made on file.

Do not ask children to make written statements themselves or sign records.

What happens next?

10.6 Following a concern being raised with the DSL, the DSL will assess the concern on a case-by-base basis and determine the appropriate course of action. This will take into account the level of harm caused, or the potential level of harm that may arise. Where appropriate, children's services and/or the police will be contacted. The staff member who reported the concern will be informed by the DSL of the outcome and any further actions taken.

10.7 If the staff member does not receive any follow-up information after a report was made, they should proactively seek an update. If they believe that the concern has not been acted upon appropriately, they should inform the Principal, or their nominee, or contact the C-SPA for advice.

11 Concerns about a child who is not in immediate danger, or is suffering or likely to suffer significant harm

11.1 In the first instance, speak to the DSL. If the DSL is unavailable, speak to a member of the SLT or take advice from children's services immediately.

Early help

11.2 Any child may benefit from support before statutory intervention, including from universal services and community-based early help, or the targeted early help level of Family Help. 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;
- has 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; or
- is persistently absent from the site (including for part of the day).

11.3 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, where applicable, help complete the early help assessment.

11.4 If early help is assessed to be appropriate, the DSL will complete an early help assessment form with the parents. 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.

Referral to children's services

11.5 Concerns about a child or a disclosure should be discussed with the DSL who will help decide whether a referral to children's services is appropriate. The DSL will use the Continuum of Support for Children and Families in Surrey and Continuum of Support Matrix to decide whether there are sufficient grounds for suspecting harm, in which case a request for support must be made to the C-SPA and the police where appropriate.

12 If a child has experienced or is at risk of female genital mutilation (FGM)

12.1 FGM is illegal in England. It involves removal, part removal or injury to the female genital internal or external organs for non-medical reasons. It is sometimes known as 'cutting' or female 'circumcision'.

12.2 For section 12 only, 'Teachers' refers to qualified teachers or persons who are employed or engaged to carry out teaching work at Italia Conti.

12.3 Teachers who come to know, in the course of their work, that FGM has been carried out on a child **must directly** report this to the police. Failure to do so will result in disciplinary sanctions. The teacher should tell the DSL, who will support them in making a direct report to the police. The teacher may need to support a referral to children's services.

12.4 All staff should speak to the DSL when a concern about FGM arises or there is reasonable suspicion that FGM has been carried out on a child.

12.5 Staff will never examine children.

13 Concerns about nudes or semi-nudes

13.1 When responding to any incident that comes to the attention of staff:

- ➔ **Report** it to the DSL immediately.
- ➔ **Never** view, copy, print, share, store or save the imagery yourself, or ask a child to share or download it – this is illegal.
- ➔ **If you have already viewed the imagery** by accident, report this to the DSL and seek support.
- ➔ **Do not delete** the imagery or ask the child to delete it.
- ➔ **Do not** ask the child(ren) who is involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL.
- ➔ **Do not** say or do anything to blame or shame any young people involved.
- ➔ **Do** explain to them that you need to report it and reassure them that they will receive support and help from the DSL.

13.2 Staff reserve the right to confiscate a device in the possession of a child if they have concerns about sharing nudes or semi-nudes in relation to the device. This is consistent with the Searching, screening and confiscation: advice for schools guidance.

13.3 The DSL will follow the government's Sharing nudes and semi-nudes: advice for education settings working with children and young people guidance. Once they are aware of an incident, the DSL will hold an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns.

13.4 The initial review meeting will consider the initial evidence and aim to establish:

- Whether there is an immediate risk to any student;
- If a referral should be made to the police and/or children's social care;
- If it is necessary to view the image(s) in order to safeguard the student;
- What further information is required to decide on the best response;
- Whether the image(s) has been shared widely and via what services and/or platforms - this may be unknown;
- Whether immediate action should be taken to delete or remove images or videos from devices or online services;
- Any relevant facts about the student(s) involved that would influence risk assessment;
- If there is a need to contact another education school or individual; and
- Whether to contact parents of the student(s) involved.

13.5 The DSL will make an immediate referral to the police and/or children's services if:

- The incident involves an adult;
- There is reason to believe that a student has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent;

- What they know about the images or videos suggests the content depicts sexual acts that are violent;
- They have reason to believe a student is at immediate risk of harm owing to the sharing of nudes and semi-nudes; or
- They become aware of the making or sharing of nudes or semi-nudes.

13.6 If none of the above apply, the DSL can decide to respond to the incident without involving the police or children's services. Italia Conti holds the right to escalate the incident to the police or children's services at any time if further information and / or concerns are disclosed at a later date. First, the DSL will be confident that they have enough information to assess the risks to any child involved and the risks can be managed within Italia Conti's pastoral support, disciplinary procedures and, if appropriate, the local network of support.

13.7 If the DSL believes there are wider issues that meet the threshold for children's services involvement, they will make a referral in line with this Policy and local safeguarding procedures.

Viewing the imagery

13.8 The decision to view any imagery will be based on the judgement of the DSL and will comply with this Policy. Imagery will never be viewed if the act of viewing will cause significant distress or harm to a child. If a decision is made to view imagery, the DSL will be satisfied that viewing:

- Is the only way to make a decision about whether to involve other agencies because it is not possible to establish the facts from any child or young person involved.
- Is necessary to report it to a website, app or suitable reporting agency to have it taken down or support the child or parent in making a report.
- Is unavoidable because a child or young person has presented it directly to a staff member or nudes or semi-nudes have been found on a school device or network.

Deletion of images

13.9 Should Italia Conti decide that other agencies do not need to be involved, then consideration will be given to deleting imagery from devices and online to limit any further sharing. This decision will be based on the DSL's judgement in line with the guidance.

14 Child-on-child abuse (including harassment and violence)

Responding to allegations of child-on-child abuse

14.1 Follow the 'handling a disclosure' procedure set out in section 10 of this Policy. A record of the allegation must be kept, and the DSL must be informed. If the DSL is not available, the Principal and / or the children's services will be informed.

14.2 When responding to allegations, the DSL will make a decision from the following options depending on level of risk or harm:

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

14.3 Records will be kept of all concerns, discussions had, decisions made and any outcomes reached. If a criminal offence has been committed or is being investigated, the DSL will work closely with the police to avoid impacting the criminal investigation while protecting children or following disciplinary procedures.

14.4 Where it is decided by the DSL, children's services or the police that the concern should be handled internally, Italia Conti will thoroughly investigate the concern using the Disciplinary Policy. A risk assessment and prevention plan will be completed. The plan will be monitored by the DSL and a date set for a follow-up evaluation with everyone concerned.

Responding to allegations of sexual harassment and sexual violence

14.5 All allegations of sexual harassment and sexual violence will be referred to Italia Conti's Harassment, Sexual Misconduct and Sexual Violence dashboard, in particular, the Harassment, Sexual Misconduct and Sexual Violence Policy. The procedures laid out in section 5 of the Harassment, Sexual Misconduct and Sexual Violence Policy will be followed, in conjunction with the response listed below.

14.6 Following a report, and in conjunction with the steps taken under the Harassment, Sexual Misconduct and Sexual Violence Policy, 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 precautionary sanctions;
- the victim and the alleged perpetrator sharing classes and space at Italia Conti; and
- the wider Italia Conti community, including staff and students, and any actions that are appropriate to protect them from future harm.

14.7 The risk assessment will be recorded and kept under review by the DSL.

Ongoing response

14.8 The DSL will manage each case individually and will ensure the risk assessment is reviewed regularly with relevant partner agencies.

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

14.10 The DSL will consider how best to keep the victim and perpetrator a reasonable distance apart on Italia Conti premises and on transport where appropriate.

14.11 Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, Italia Conti will take suitable action. Where the rape or assault constitutes a serious breach of discipline, it may lead to the view that allowing the perpetrator to remain on site would seriously harm the education or welfare of the victim (and potentially themselves and other children).

14.12 Where a criminal investigation into sexual assault leads to a conviction or caution, Italia Conti will, if it has not already, consider any suitable sanctions, in line with the Disciplinary Policy, which may include consideration of permanent exclusion. Where the perpetrator(s) is going to remain on site, Italia Conti will continue to keep the victim and perpetrator in separate classes and will continue to consider the most appropriate way to manage potential contact on Italia Conti premises and transport to and from the site. The nature of the conviction or caution and wishes of the victim will take priority in determining how to proceed in such cases.

14.13 The victim, alleged perpetrator(s) and any other children and adults affected will receive appropriate support and safeguards on a case-by-case basis.

14.14 Italia Conti will take any disciplinary action against the alleged perpetrator(s) in accordance with the Disciplinary Policy.

14.15 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.

14.16 Italia Conti will take reasonable steps to protect the anonymity of any children involved in a report, including applying a ‘need to know’ approach, maintaining appropriate records and providing appropriate support. Whilst taking steps to protect the child’s identity, Italia Conti recognises the potential impact of social media and the limitations of our ability to control information shared by others.

Unsubstantiated, unfounded, false or malicious reports

14.17 If a report is found to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the student who has made the allegation is in need of help or may have been abused by someone else. In such circumstances, a referral to children's services may be appropriate. If a report is shown to be deliberately invented or malicious, we will consider whether any disciplinary action is appropriate according to the Disciplinary Policy.

If a child who has experienced sexual violence or sexual harassment asks the school not to make a referral

14.18 The victim may request confidentiality. If the victim does not give consent to share information, staff may still lawfully share it if a legal basis under the UK GDPR applies, such as the public task basis which allows sharing to fulfil a legal duty. Advice should be sought from the DSL, who will consider:

- Informing parents or carers, unless doing so would put the victim at greater risk;
- Referring to local authority children's social care if a child is at risk of harm, is in immediate danger, or has been harmed; and
- Reporting rape, assault by penetration or sexual assault 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.

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

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

15 Concerns about mental health

15.1 If staff have a mental health concern about a child that is also a safeguarding concern, they will speak to the DSL, unless the child is in immediate danger, in which case they will call the police first.

15.2 Although staff may be 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, only appropriately trained professionals should attempt to diagnose a mental health illness. Where necessary, the DSL will make a referral to C-SPA.

16 Concerns about extremism and radicalisation

16.1 Extremism is the vocal or active opposition to our fundamental British values. Radicalisation is the process of a person legitimising support for, or use of, terrorist violence. See Appendix 1 for more information.

16.2 If staff are concerned that a child may be at risk of radicalisation or involvement in terrorism and they are in **immediate danger**, contact the police on 999. If the child is not in immediate danger, staff should refer to section 9 of the Extremism and Anti-Radicalisation Policy and inform the DSL.

16.3 The DSL may discuss their concerns with the parents to investigate whether there are any mitigating home circumstances, in accordance with the Extremism and Anti-Radicalisation Policy.

16.4 The DSL will follow up with any referrals, and the child will be monitored for a period of time to look at whether there has been any change in attitude or behaviour. If concerns are still expressed, the DSL will contact the local Prevent Co-ordinator.

16.5 The DSL should report concerns that a student may be at risk of radicalisation or involvement in terrorism by using the Prevent referral form or by emailing preventreferrals@surrey.pnn.police.uk .

16.6 Extremism and anti-radicalisation contact list:

Further advice	**Police**	101
	Prevent Supervisor for Surrey	07795043842
		01865555618
Staff to raise concerns	**Counter extremism email**	counter.extremism@education.gsi.gov.uk
Staff with information relating to terrorism	**Anti-terrorist hotline**	0800 789 321
Staff to raise concerns around Prevent	**Telephone helpline**	0800 0113764

16.7 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/ .

16.8 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.

17 Confidentiality, sharing and withholding information

17.1 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, including compliance with General Data Protection Regulation (GDPR) and the Data (Use and Access) Act 2025.

17.2 Under the The Data Protection Act 2018, information will be shared with staff within Italia Conti who 'need to know', which includes 'information that may help another relevant person exercise their functions, including assess risk, make a decision, provide support or take action to safeguard and promote the welfare of a child' (Information Sharing Duty, Statutory guidance for safeguarding organisations and their practitioners, 2026).

17.3 Relevant staff have due regard to the DPA 2018, GDPR and Data (Use and Access) Act 2025, which does not prevent, or limit, the sharing of information for the purposes of keeping children safe. These principles include:

- 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, the Data (Use and Access) Act 2025 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, Date (Use and Access) Act 2025, 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.

17.4 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. All staff are aware that they cannot make a promise to keep secrets that might impact the child's safety or wellbeing.

18 Record keeping

18.1 Staff will record any welfare concern they have about a child using the Safeguarding concern (Level 4) 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.

18.2 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.

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

18.4 Where a student transfers from Italia Conti to another school / educational setting, the DSL will ensure that their safeguarding file is transferred to the new educational setting within 5 days of an in-year transfer or withing 5 days of the start of a new term. This will be securely transferred separately from their main file, and a confirmation of receipt will be requested and kept. Where appropriate, the DSL will share information in advance of the student transferring particularly where the information would support an assessment of risk to others in the school as well as the individual, so support can be put in place ready for when the child starts. When a student transfers to Italia Conti, we will ensure key staff are aware of the safeguarding file as soon as possible.

19 Safeguarding concerns and allegations made about staff, including supply teachers, volunteer and contractors and LADO procedure

19.1 Surrey's LADO procedure will be followed where it is alleged that anyone working at Italia Conti that provides education for children under 18 years of age, including supply staff, student teachers, 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;
- possibly committed a criminal offence against or related to a child;

- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

19.2 Where the allegation is in relation to a member of supply staff or student teacher, the school will inform the teacher training provider of the process for managing allegations and ensure they are fully involved in enquiries.

19.3 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).

19.4 In dealing with allegations or concerns against an adult, staff must report any concerns to the COO immediately, who will consider whether an onward referral to the LADO is required.

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

19.6 In liaison with the LADO, Italia Conti 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 Italia Conti to seek guidance in following procedures set out in Part 4 of KCSIE 2026 and the SSCP procedures.

19.7 If there is an immediate risk to a child, the police should be contacted on 999. LADO should be consulted following a report to the police.

19.8 Following consultation with the LADO, Italia Conti will inform the parents of the allegation unless there is a good reason not to.

20 Low-level concerns

20.1 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 Italia Conti 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.

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

20.3 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.

20.4 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 as defined in Part 4 of KCSIE 2026, sections 1 and 2, they will consult with the LADO.

20.5 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 Staff Code of Conduct Policy and their employer should be notified about the concern so that any potential patterns of inappropriate behaviour can be identified.

21 Whistleblowing

21.1 All staff, have a duty to raise concerns about poor or unsafe practice and potential failures in how Italia Conti manages safeguarding. Any concerns should be raised with the SLT and will be taken seriously. Italia Conti has a separate Whistleblowing Policy, which lists the procedures for raising concerns. The SLT monitor the email address: speakup@italiaconti.co.uk, which acts as a way of raising student and staff concerns.

21.2 Any concerns regarding the Principal or the CEO should be made to the Chair of the Board, who can be contacted at: chairoftheboard@italiaconti.co.uk

21.3 If it becomes necessary to consult outside Italia Conti, concerns should be directed to the LADO in the first instance, in accordance with the Whistleblowing Policy.

21.4 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.

21.5 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. Staff can call: 0800 028 0285. The line is available from 8:00am-8:00pm, Monday – Friday, or email: help@nspcc.org.uk.

22 Online safety and the use of smart devices

22.1 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.

22.2 Abuse can happen online through:

- abusive, harassing and misogynistic message;
- non-consensual sharing of indecent nude and semi-nude images / videos, including those generated by AI, especially in chat groups; and
- sharing of abusive images and pornography, to those who do not want to receive it.

22.3 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; and
- recognise it can take place inside and outside of the Italia Conti premises and/or online.

The 4Cs

22.4 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.

22.5 **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.

22.6 **Contact:** being subjected to harmful online interaction with other users or generative AI applications that simulate this; 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.

22.7 **Commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If students or members of staff report any issues, we will report it to the Anti-Phishing Working Group (https://apwg.org/).

22.8 Italia Conti's approach to online safety will consider the 4Cs above. This approach is also reflected in our ICT, Disciplinary and Anti-bullying Policies.

22.9 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.

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

22.11 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

Mobile phones and smart technology (including smart watches and glasses)

22.12 Italia Conti recognises that children could be harmed or harm other online. This may include sexually harassing, bullying and the making or sharing of nudes or semi-nudes (often via large chat groups). To protect children from these risks while they are studying at Italia Conti, we do not permit any use of mobile phone and/or tablet devices in our studios, unless in exceptional cases where arrangements have previously been agreed upon between the child and the member of staff.

Learning from home

22.13 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 as though 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 Children potentially at greater risk of harm

At Italia Conti, we recognise that some groups of children are potentially at greater risk of harm. The information below highlights some of the groups of children this applies to.

Looked After Children and Previously Looked After Children

23.1 The most common reason for children becoming looked after is as a result of abuse and/or neglect.

23.2 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.

23.3 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. The DSL should have details of the child's social worker and the name of the Virtual School Head in the authority that looks after the child.

Children with Special Educational Needs and Disabilities or health issues

23.4 Children with SEND or certain medical or physical health conditions can face additional safeguarding challenges both online and offline, such as:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration.
- 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.
- 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.

23.5 Any reports of abuse will require close liaison with the DSL. Italia Conti will consider additional pastoral support and attention for these children, along with ensuring that any appropriate support for communication is in place.

Safeguarding children with medical conditions

23.6 Incidents relating to the management of a child's medical condition (including allergies) will not normally require a safeguarding referral. However, Italia Conti will consider a referral where concerns indicate that a child may be at risk of neglect, abuse, or exploitation because of their medical condition. This may include situations where important medical information is withheld from Italia Conti or where a child is repeatedly without essential medication, placing them at risk. Staff will report to the DSL where safeguarding concerns arise.

Children who are lesbian, gay or bisexual

23.7 Staff at Italia Conti know that a child or young person being lesbian, gay or bisexual is not in itself a risk factor for harm, but they can sometimes be vulnerable to discriminatory bullying. We will take steps to prevent discriminatory bullying and put appropriate sanctions in place where this has been reported.

Children who are questioning their gender

23.8 Italia Conti recognises that some children and young people may question their gender and may require support, understanding and careful consideration. The welfare, wellbeing and safeguarding of the child will always be the primary consideration in any decision-making.

23.9 Responses will be individualised and based on the child's age, needs, wishes, circumstances and best interests. Staff will listen respectfully, respond sensitively and avoid making assumptions, whilst remaining alert to any safeguarding concerns, vulnerabilities, mental health needs, bullying, online harms or other risks that may affect the child.

23.10 Italia Conti will take reasonable steps to protect children who are questioning their gender from bullying, harassment, discrimination, abuse and victimisation and will maintain appropriate records of concerns, decisions and support arrangements.

24 Lettings and off-site arrangements

24.1 When services or activities are provided by Italia Conti, under the direct supervision or management of our school staff, the safeguarding procedures listed in this policy will apply. This may not be the case when we hire or rent our premises to other organisations or individuals, such as community groups, sport associations and extra-curricular activities providers.

25 Staff induction, awareness and training

25.1 All members of staff have been provided with a copy of Part One of the KCSIE 2026, which provides an overview of safeguarding duties and responsibilities. The SLT will read the entire document. Staff are required to confirm by email that they have read Part One.

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

- The Safeguarding and Child Protection 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 any DDSLs).

25.3 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);
- 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 external support 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; and
- Understand what ineffective filtering and monitoring systems look like and how to report any concerns or issues.

25.4 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.

25.5 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 as part of the Annual Safeguarding Report.

26 Safer Recruitment

26.1 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.

26.2 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 2026 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.

26.3 Italia Conti will ensure that the safer recruitment process covers relevant paragraphs of KCSIE 2026 in relation to advertisement, application form, shortlisting, employment history and references, selection, ID, DBS checks etc.

26.4 The Board will ensure that the SLT and at least one member of the Board complete accredited Safer Recruitment Training in line with statutory requirements.

26.5 Italia Conti is responsible for ensuring that it 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.

26.6 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.

27 Curriculum and staying safe

27.1 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.

27.2 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.

27.3 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 systems
- Anti-Bullying Statement
- Equality, Diversity and Inclusion Committee

28 Complaints

28.1 Italia Conti has a Complaints Policy which is available to parents, students and members of staff who wish to report concerns. This can be found on the website: Italia Conti Policies.

28.2 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 will be dealt with under the Staff Disciplinary Procedures, found in the Staff Handbook.

29 Appendix 1: Types of abuse and specific safeguarding concerns

These appendices are based on the Department for Education's KCSIE guidance.

Forms of abuse and neglect

29.1 **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. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

29.2 **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.

29.3 **Emotional abuse:** the persistent emotional maltreatment of a child so as to cause severe and persistent 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 verbal abuse, such as persistent criticism, belittling, or name-calling, as well as 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 cyber bullying), 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.

29.4 **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 penetration with an object) 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.

29.5 Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

29.6 **Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate caregivers);
- ensure access to appropriate medical care or treatment; or
- provide suitable education.

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.

Specific safeguarding concerns

29.7 This section is based on Annex B of KCSIE 2026. Annex B includes further information about other safeguarding issues to be aware of. All concerns under this section should be addressed in line with What to do if you have concerns about a child's welfare section of this document, unless otherwise stated.

Children and young people absent from education

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

29.9 Italia Conti recognises that children and young people missing from education or who are persistently absent, without explanation and/or for prolonged periods, acts as a vital warning sign to a range of safeguarding issues. Further, it may also indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, so called 'honour'-based abuse or risk of forced marriage. We are aware that absence can increase any existing safeguarding risks.

29.10 Italia Conti has a procedure in place for responding to unauthorised absences and responding to children who go missing from education outlined in our Attendance Policy and Student Handbook.

29.11 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 Italia Conti's register.

29.12 Italia Conti will make reasonable enquiries to establish the whereabouts of a child jointly with the Local Authority, before deleting the child's name from Italia Conti's 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).

29.13 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 Italia Conti; and
- Notify Surrey County Council when they are about to remove a child's name from the 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.

Anti-Bullying / Cyberbullying

29.14 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.

29.15 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.

29.16 Risks can be compounded where students who are LGBT lack a trusted adult with whom they can be open.

Restrictive physical intervention

29.17 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.

29.18 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.

29.19 Italia Conti recognises 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.

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

29.20 Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance of 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

29.21 CSE is a form of child sexual abuse which can affect any child. 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. This can be committed by an individual or an organised network. Most sexual abuse is committed by those previously known to the victim. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

29.22 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.

29.23 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

29.24 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.

29.25 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.

29.26 Children can become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Serious Violence

29.27 Staff at Italia Conti will be aware that serious violence may involve physical assault, carrying, threatening with, or using weapons, often in the context of peer conflict or bullying and can also be associated with criminal exploitation.

29.28 Staff will be aware of the indicators, which may signal children are at risk from, or are involved in serious violence, which may include:

- Increased absence from school;
- A change in friendships or relationships with older individuals or groups;
- A significant decline in performance;
- Signs of self-harm or a significant change in wellbeing;
- Signs of assault or unexplained injuries; or
- Unexplained gifts or new possessions (could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation).

29.29 Risk factors increasing the likelihood of involvement in serious violence may include:

- Being male-presenting;
- Having been suspended, spent time in Alternative Provision or permanently excluded from Italia Conti;
- Having experience child maltreatment; or
- Having been involved in offending, such as theft or robbery.

29.30 The Police, Crime, Sentencing and Courts Act 2022 introduced a new Serious Violence Duty on a range of specified authorities, such as the police, local government, youth offending teams, health and probation services, to work collaboratively, share data and information, and put in place plans to prevent and reduce serious violence within their local communities. Educational authorities and prisons/youth custody authorities are under a separate duty to co-operate with core duty holders when asked, and there is a requirement for the partnership to consult with all such institutions in their area. The Duty does not replace or duplicate existing safeguarding duties.

Mental Health

29.31 Italia Conti recognises that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

29.32 Staff will be trained to recognise the signs of a child who may be experiencing a mental health problem. If a child is struggling with their mental health, self-harming, has an eating disorder, or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs, which could include:

- Significant changes in behaviour;
- Ongoing difficulty sleeping;
- Withdrawing from social situations;
- Not wanting to do things they usually like; or
- Physical signs of self-harm or neglecting themselves.

Domestic Abuse

29.33 Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. This form of abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional, and includes coercive or controlling behaviour. It occurs regardless of race, ethnicity, gender, class, sexuality, age, religion, mental or physical ability inside or outside the home. The Domestic Abuse Act 2021 states 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 including physical, sexual, emotional abuse and stalking).

29.34 These experiences can have a serious and long-term impact on a child's health, well-being, development, and ability to hear. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. The Act states that domestic abuse occurs between at least two people over the age of 16. Therefore, legally, some older children can also commit domestic abuse either in their own intimate relationships or against their parents.

Homelessness

29.35 Italia Conti recognises that 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.

Child-on-child abuse (including harassment and violence)

29.36 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.

29.37 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.

29.38 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.

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

- bullying (including online bullying, prejudice-based and discriminatory bullying);
- abuse between children in an intimate relationship;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (including when a child encourages or threatens physical abuse online);
- physical assault and harm, or the threat of harm with a weapon;
- sexual violence, such as rape, assault by penetration and sexual assault (including when a child encourages or threatens this online);
- harmful sexual behaviour, sexual violence and sexual harassment – which may include misogyny/misandry;
- sexual harassment, such as sexual comments, jokes and online sexual harassment.

- consensual and non-consensual making or sharing of nudes and semi-nudes, including those generated using AI;
- 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; or
- upskirting and initiation/hazing type violence and rituals.

29.40 Staff are aware that child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator. Child-on-child abuse is preventable, and staff know how to recognise behaviours and indicators of risk early and that timely, evidence-based support can be key to preventing children from going on to commit abuse or violence.

29.41 Italia Conti takes a zero-tolerance approach to sexual harassment and sexual violence.

Harmful Sexual Behaviour (HSB)

29.42 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.

29.43 Italia Conti will operate early intervention when inappropriate behaviour, such as misogyny, is observed as early intervention can help to prevent escalation to more serious abuse, including sexual harassment and sexual violence. Children who display HSB will be offered appropriate support as it is common for those who display HSB to have experienced their own abuse and trauma.

Upskirting

29.44 'Upskirting' is a criminal offence and will not be tolerated at Italia Conti. The Criminal Prosecution Service (CPS) defines 'upskirting' as: "a colloquial term referring to the action of placing equipment such as a camera or mobile phone beneath a person's clothing to take a voyeuristic photograph without their permission".

Sharing nudes and semi-nudes

29.45 This is defined as the sending or posting of nudes or semi-nude images, videos or live streams online by young people under the age of 18 (UKCIS, 2024). It is a form of child sexual abuse. All incidents will be dealt with as safeguarding concerns. The primary concern at all times will be the welfare and protection of the children involved. While sharing nudes and semi-nudes of themselves or their peers breaks the law, we know it is important to avoid criminalising young people unnecessarily.

29.46 Sextortion is when someone threatens to share or distribute nudes or semi-nudes images of another person if they do not do what is asked. It can happen to anybody, but a large number of cases involve teenage boys. The explicit imagery may be used to blackmail the young person into sending more images, money, or in some cases, into recruiting more victims. Images can be both real or generated by artificial intelligence.

29.47 We are aware of the alert guidance and support provided by the National Crime Agency and CEOP and will use it to respond to incidents.

So-called 'Honour'-based abuse (HBA), including FGM and forced marriage

29.48 HBA encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or community, including female genital mutilation (FGM), forced marriage and practices such as breast ironing, Italia Conti is aware that this abuse often involves a wider network of family or community pressure and can include multiple perpetrators.

Female genital mutilation (FGM)

29.49 FGM is illegal in England and Wales under the FGM Act (2003). It is a form of child abuse with long-lasting harmful consequences. Section 5B of the Female Genital Mutilation Act 2003 places a statutory duty upon **teachers**, along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases may face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should **not** be examining pupils or students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professional to whom this mandatory reporting duty applies. Information can be found here: mandatory reporting duty.

Forced marriage

29.50 A forced marriage is non-consensual. Either person could be forced/pressured in several ways, including physically, psychologically, financially, sexually and emotionally. It is a criminal offence in England and Wales.

29.51 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.

29.52 A forced marriage is not the same as an arranged marriage. 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.

One Chance Rule

29.53 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.

29.54 Italia Conti 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.

Private fostering

29.55 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).

29.56 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.

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

29.58 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.

Modern slavery

29.59 Modern slavery encompasses exploitation, including sexual exploitation, criminal financial exploitation, human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including forced labour, slavery, servitude, forced criminality and the removal of organs.

Radicalisation, Extremism and Terrorism

29.60 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.

29.61 Extremism is defined as 'the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.'[3] This also includes calling for the death of members of the armed forces.

29.62 Radicalisation refers to "the process of a person legitimising support for, or use of, terrorist violence'.

29.63 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.'

29.64 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.

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

30 Appendix 2: 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.

31 Appendix 3: Keeping yourself safe when responding to disclosures

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

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

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

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

5. **Remember**
   - Contact the DSL.
   - The DSL may be required to make appropriate records available to other agencies.
   - Get some support for yourself, dealing with disclosures can be traumatic for professional.