



CENTRO EDUCACIONAL
LEONARDO DA VINCI

An **inspired** school

Safeguarding and Child Protection Policy and Procedures

Centro Educacional Leonardo Da Vinci

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Key school contacts

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Human Resources Lead	Ilana Kauffmann ilana.kauffmann@inspirededu.com

Key external contacts

Child Protection Services	Conselho Tutelar de Vitória/ES. Disk denuncia: 27 100 Email: ctcontinental@vitoria.es.gov.br Telephone: +55 27 33154983
Police	Emergency telephone number: 190 Non-emergency telephone number: Delegacia de Proteção à Criança e ao Adolescente - DPCA: Telefone de contato: 27 31321917
School's Police liaison officer	NA

1 Aims

- 1.1 This is the safeguarding and child protection policy and procedures of Centro Educacional Leonardo da Vinci.
- 1.2 The aims of this policy are as follows:
 - 1.2.1 to actively promote the well-being of pupils;
 - 1.2.2 to safeguard and promote the welfare of children, staff and others who come into contact with the School and to protect them from harm;
 - 1.2.3 to have clear procedures in place for dealing with and referring concerns about the welfare of any individual and / or allegations of abuse, neglect and / or exploitation;
 - 1.2.4 to raise awareness about how to report concerns and how they will be investigated, whether they are current or historic in nature;
 - 1.2.5 to raise staff awareness about the School's safeguarding expectations;
 - 1.2.6 to ensure staff are competent to carry out their safeguarding responsibilities and feel supported in this role;
 - 1.2.7 to ensure consistent good safeguarding practice throughout the School, to include the promotion of a zero-tolerance approach to child-on-child sexual violence and harassment in which pupils are confident to report it and staff are confident to identify and respond to it;
 - 1.2.8. to promote a whole school culture of safety, equality and protection;
 - 1.2.9. to ensure the School works together effectively with parents, local authorities, partner organisations and agencies.
- 1.3. Every pupil should feel safe and protected from any form of abuse and neglect.
- 1.4. All staff should understand the indicators of abuse and neglect and specific safeguarding risks so that they can identify them and report any concerns about children. The indicators and key safeguarding risks for the School community are set out in Appendix 1.
- 1.5. Members of the School community (including alumni) should also feel able to raise any safeguarding concerns, whether current or non-recent, safe in the knowledge that they will be supported, the matter will be handled sensitively, and appropriate action taken.
- 1.6. Anyone about whom a concern is raised should feel confident that they will be supported, and the matter will be handled sensitively, and that appropriate action will be taken.
- 1.7. This policy forms part of the School's whole school approach to promoting child safeguarding and wellbeing, which seeks to involve everyone at the School to ensure that the best interests of pupils underpins and is at the heart of all decisions, systems, processes and policies.
- 1.8. Although this policy is necessarily detailed, it is important to the School that our safeguarding policies and procedures are transparent, clear and easy to understand for staff, pupils, parents and carers. The School welcomes feedback on how we can continue to improve our policies.

2. Scope and application

- 2.2. This policy applies to the whole School Centro Educacional Leonardo da Vinci.
- 2.3. This policy applies at all times including where pupils or staff are away from the School, whether they are on school-arranged activities or otherwise, and whether or not the School is open. It will therefore apply out of School hours and in the holidays.
- 2.4. This policy applies to core School activities and to out of hours and commercial activities run by the school. Where a third party is using the premises, the School will ensure that there is a written agreement in place confirming they have adequate safeguarding procedures.
- 2.5. This policy is designed to address the specific statutory obligations on the School to safeguard and promote the welfare of children.
- 2.6. A child is someone who has not yet reached their 18th birthday, but in practice this policy applies to all young people studying at Centro Educacional Leonardo da Vinci.

3. Regulatory framework

- 3.2. The following School policies, procedures and resource materials are relevant to this policy:
 - 3.2.8. Staff Code of Conduct;
 - 3.2.9. Student Code of Conduct (Behaviour/Discipline);
 - 3.2.10. School Handbook (Anti-bullying policy, which includes cyber-bullying);
 - 3.2.11. Technology Policies - Acceptable Use Policy for Staff and Pupils; Online Safety Policy; Social Media Policy;
 - 3.2.12. Safer Recruitment Policy;

4. Publication and availability

- 4.2.8. This policy is published on the School website and a hard copy is available on request.
- 4.2.9. A copy of the policy is available for inspection from the Head's office during the School day.
- 4.2.10. This policy can be made available in large print or other accessible format if required.
- 4.2.11. This policy and all policies referred to in it are also available to staff on the **Central Educational Website** and on the school website

5. Definitions

- 5.2.8. **Safeguarding** is the protection of people from harm.

- 5.2.9. **Safeguarding and promoting the welfare of children** is defined in WTSC and KCSIE as:
- 5.2.9.1. protecting children from maltreatment;
 - 5.2.9.2. preventing impairment of children's mental and physical health or development;
 - 5.2.9.3. ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
 - 5.2.9.4. taking action to enable all children to have the best outcomes.
- 5.2.10. **Abuse** is defined by KCSIE as a form of maltreatment of a child. Detailed descriptions of the categories of abuse and risk indicators to help staff to recognise them are included in Appendix 1.
- 5.2.11. **DSL** means the School's Designated Safeguarding Lead. References to the DSL include the Deputy DSL (**DDSL**) where the DSL is unavailable.
- 5.2.12. References to **harmful sexual behaviour** in this policy refer to problematic, abusive and violent sexual behaviours expressed by children and young people under the age of 18 years old that are developmentally inappropriate and may cause developmental damage, may be harmful towards self or others, or abusive towards another child, young person or adult.
- 5.2.13. Reference to **staff** includes all those who work for or on behalf of the School, regardless of their employment status, including part-time staff, contractors, supply staff, volunteers and Governors unless otherwise indicated.
- 5.2.14. **Senior Leadership Team** (SLT) comprises the Head, Section Heads, Curriculum Coordinators, School Counsellors, the DSL and, when appropriate, the Head of Operations.

6. Responsibility statement and allocation of tasks: the School's approach to safeguarding leadership

6.2. Governance

- 6.2.8. Safeguarding and the implementation of policies and procedures is monitored at the School through an annual cycle of review between the head, DSL, area CEO and Global Head of Safeguarding of the following areas:
- (a) Training;
 - (b) Child protection issues and concerns raised in the last academic year;
 - (c) Incidents of bullying;
 - (d) Online safety incidents;
 - (e) Feedback from pupil forums or surveys on matters relating to well-being and safeguarding;

- (f) The effectiveness of multi-agency working; and
- (g) Lessons learned.

6.3. **Head**

- 6.3.8. The Head is responsible for the overall management of the School and for the management of concerns and allegations about staff.
- 6.3.9. The Head ensures that the School's policies and procedures, particularly those concerning referrals of cases of suspected abuse and neglect), are understood, and followed by all staff.

6.4. **Designated Safeguarding Lead (DSL)**

- 6.4.8. The DSL is a senior member of staff of the School's leadership team with the necessary status and authority to take lead responsibility for all ¹ aspects of safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place) throughout the School.
- 6.4.9. The DSL has the appropriate status and authority within the School to carry out the duties of the post, and the time, funding, training, resources and support to enable them to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings (and / or to support other staff to do so) and to contribute to the assessment of children. The name and contact details of the DSL are set out in the School contacts list at the front of this policy. .
- 6.4.10. The DSL will also liaise with the Head to inform them of issues relating to any police investigations and the statutory requirements for children to have an appropriate adult. The role of the appropriate adult is to safeguard the rights, entitlements and welfare of juveniles to whom the provisions of PACE code C and any other code of practice apply.
- 6.4.11. The school counsellor (s) will undertake the role of senior mental health lead(s) and is(are) responsible for developing a holistic approach to promoting and supporting the mental wellbeing of pupils and staff. The DSL will be consulted when mental health issues lead to risks in safeguarding.
- 6.4.12. If the DSL is unavailable the activities of the DSL will be carried out by the Deputy DSL, who is trained to the same level as the DSL, where this role exists. The Deputy DSL's details are also set out in the School contacts list at the front of this policy, if appropriate.

7. Specific safeguarding duties in relation to children

- 7.2. Safeguarding and promoting the welfare of children is **everyone's** responsibility. Staff should speak with their DSL if they need clarification or further training about any of the contents or procedures outlined in this policy.

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7.3. The School is committed to acting in the best interests of the child so as to safeguard and promote the welfare of children and young people. The School requires everyone who comes into contact with children and their families to share this commitment.

7.3.8. The School will:

- 7.3.8.1. be alert to signs of abuse whether in school, within the child's family or from outside, and take steps to protect individuals from any form of abuse, or neglect whether from an adult or another child;
- 7.3.8.2. include opportunities within the curriculum for children to develop the skills they need to recognise, and stay safe from abuse;
- 7.3.8.3. promote the systems in place for children to confidently report abuse, ensuring they know their concerns will be treated seriously, they can safely express their views and give feedback;
- 7.3.8.4. take active steps to promote school attendance:
- 7.3.8.5. allow staff to determine how best to build trusted relationships with pupils which facilitate communication within the parameters of the staff code of conduct;
- 7.3.8.6. deal appropriately with every suspicion or complaint of abuse and support children who have been abused in accordance with appropriate education, child protection and / or welfare plans;
- 7.3.8.7. design and operate procedures which, so far as possible, ensure that staff, pupils and others who are innocent are not prejudiced by malicious, false, unsubstantiated or unfounded allegations;
- 7.3.8.8. prepare staff to identify and support children who may benefit from early help and encourage them to be particularly alert to the potential need for early help for children with the indicators listed in KCSIE or WTSC;
- 7.3.8.9. be alert to children who are at potentially greater risk of harm (both online and offline);
- 7.3.8.10. be alert to the needs of pupils with physical or mental health conditions, special educational needs or disabilities, which could be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation, and where additional barriers can exist when detecting abuse or neglect;
- 7.3.8.11. encourage a culture of listening to pupils and victims of abuse and taking account of their wishes and feelings in any measure put in place and actions taken by the School to protect them;
- 7.3.8.12. operate robust and sensible health and safety procedures and operate clear and supportive policies on drugs, alcohol and substance misuse;
- 7.3.8.13. identify pupils who may be susceptible to extremist ideology and radicalisation and know what to do when they are identified;
- 7.3.8.14. consider and develop procedures to deal with any other safeguarding issues which may be specific to individual pupils in the School or in the local area.

7.3.8.15. consider the additional factors relevant to safeguarding boarders e.g. inappropriate pupil relationships, the potential child-on-child abuse and the risks associated with children sharing overnight accommodation.

7.4. Staff may follow the School's whistleblowing policy to raise concerns about poor or unsafe safeguarding practices at the School or potential failures by the School or its staff to properly fulfil its safeguarding responsibilities. Such concerns will be taken seriously. The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns about child protection failures internally (see the front of this policy for the relevant contact details). Staff may also report concerns directly to the School's Local Authority if they consider that the School has failed to deal with concerns appropriately.

8. Reporting obligations of staff

8.2. Reporting obligations generally

8.2.8. Staff members should be vigilant and maintain an attitude of "**it could happen here**" where safeguarding is concerned. When concerned about the welfare of a pupil, staff members should always act in the **best** interests of the pupil.

8.2.9. Staff should be aware that pupils may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful e.g. a child may feel embarrassed, humiliated, or being threatened due to their vulnerability, disability and/or sexual orientation or language barrier. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.

8.2.10. All staff have a duty to:

8.2.10.1. report any concerns they may have about the safety and / or well-being of pupils;

8.2.10.2. report any concerns they may have about the safety and / or well-being of other persons associated with the School;

8.2.10.3. report any safeguarding concerns about staff or anyone else associated with the School; and

8.2.10.4. follow up on any such reports to ensure that appropriate action is or has been taken.

8.2.11. The procedures for doing so are set out below. If staff are unsure about the appropriate process to use, they should not hesitate to exercise professional curiosity and speak to the DSL, any member of the SLT or directly to children's social care or police in their absence for guidance.

8.3. What to do if staff have a concern about a pupil's welfare

8.3.8. If staff have **any concern about a pupil's welfare**, they should follow the procedures in this policy and report their concern to the DSL (or the DDSL in the DSL's absence) **immediately**.

- 8.3.8.1. The contact details of the DSL and DDSL are set out in the contacts list at the front of this policy;
- 8.3.8.2. See Appendix 2 for guidance about what to do when receiving a disclosure and paragraph 23 below relating to recording a concern.
- 8.3.9. A concern about a child is not defined and should be interpreted broadly. It may relate to a recognition that a child would benefit from extra support, to an emerging problem or to a potentially unmet need, or may reflect a concern that a child may be deemed to be "in need" or at "immediate risk of harm" as defined by the Children Act 1989.
- 8.3.10. If the concern involves an **allegation or concern raised about a member of staff**, supply staff, contractors or volunteers this must be reported.
- 8.3.11. **What if the DSL is unavailable?**
 - 8.3.11.1. The DSL or the DDSL should always be available to discuss safeguarding concerns and may be contacted on their mobile phones in relation to any safeguarding concerns out of School hours.
 - 8.3.11.2. If in exceptional circumstances the DSL and DDSL are unavailable, staff must not delay taking action. Staff should speak to their line manager or a member of the SLT and / or advice should be taken from children's social care. Their contact details are set out at the front of this policy.
 - 8.3.11.3. Where a child is suffering, or is likely to suffer from harm, a referral to children's social care and / or police should be made immediately. Staff should be aware of the process for making referrals direct to children's social care and / or the police in these circumstances. See section 11 below for further details on making a referral.
 - 8.3.11.4. Any action taken by a member of staff pursuant to this requirement should then be shared with the DSL or DDSL, or a member of the SLT, as soon as is practically possible.

8.4. **Action by the DSL**

- 8.4.8. On receipt of a report of a concern, the DSL will consider the appropriate course of action in accordance with the appropriate Local Safeguarding Children Partnership's procedures and referral threshold document. Such action may include:
 - 8.4.8.1. managing any support for the pupil internally via the School's own pastoral support processes, seeking advice from children's social care where required (see 9 below);
 - 8.4.8.2. undertaking an early help assessment (which generally requires parental consent) (see 10 below); or
 - 8.4.8.3. making a referral for statutory services (see 11 below).
- 8.4.9. The views of the child will be taken into account when considering the appropriate course of action, but will not be determinative.

- 8.4.10. If it is decided that a referral is not required, the DSL will keep the matter under review and give ongoing consideration to a referral if the pupil's situation does not appear to be improving.

9. Managing support for pupils internally

- 9.2. The School has a framework for the identification, assessment, management and review of risk to pupil welfare, so that appropriate action can be taken to reduce the risks identified.
- 9.3. The School will ensure that appropriate advice and consultation is sought about the management of safeguarding issues, including advice from CSC where necessary.
- 9.4. The School's safeguarding training includes guidance about early help processes and prepares all staff to identify children who may benefit from early help. Staff are mindful of specific safeguarding issues and those pupils who may face additional safeguarding challenges. Staff should be particularly alert to the potential need for early help for a child who:
- 9.4.8. is disabled or has certain health conditions and has specific additional needs;
 - 9.4.9. has special educational needs (whether or not they have a statutory education, health and care plan);
 - 9.4.10. has a mental health need;
 - 9.4.11. is a young carer;
 - 9.4.12. is showing signs of being drawn into antisocial or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
 - 9.4.13. is frequently missing / goes missing from care or from home;
 - 9.4.14. is at risk of modern slavery, trafficking, sexual or criminal exploitation;
 - 9.4.15. is at risk of being radicalised or exploited;
 - 9.4.16. has a family member in prison, or is affected by parental offending;
 - 9.4.17. is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
 - 9.4.18. is misusing alcohol or other drugs themselves;
 - 9.4.19. is looked after or has returned home to their family from care;
 - 9.4.20. is at risk of 'honour' based abuse such as Female Genital Mutilation or Forced Marriage;
 - 9.4.21. is a privately fostered child; and
 - 9.4.22. is persistently absent from education including persistent absences for part of the school day.

10. Making a referral

- 10.2. **Where a child is suffering, or is likely to suffer from harm, the child must be protected and consideration given to referring to child protection services and / or the police.**
- 10.3. "Harm" is the "ill treatment or impairment of the health or development of a child."² Seeing or hearing the ill-treatment of another person is also a form of harm. It can be determined "significant" by "comparing a child's health and development with what might be reasonably expected of a similar child."

11. Allegations against pupils - child on child abuse

- 11.2. Allegations against pupils should be reported in accordance with the procedures set out in this policy in Appendix 3. The views of the alleged victim will be taken into account but will not be determinative.
- 11.3. All those involved in such allegations will be treated as being at risk and in need of support and the safeguarding procedures in accordance with this policy will be followed. Appropriate support will be provided to all pupils involved, including support from external services as necessary.

12. Extra-familial harm

- 12.2. Safeguarding incidents and / or behaviours can be associated with factors outside the School and / or can occur between children outside the School, inside and outside of home and online.
- 12.3. All staff, including the DSL, should consider the context within which such incidents and / or behaviours occur, for example where wider environmental factors are present in a child's life that may be a threat to their safety and / or welfare, and should record these appropriately.
- 12.4. Children's social care should be informed of all such information to allow any assessment process to consider all available evidence and the full context of any abuse.
- 12.5. Extra-familial harm: all staff, but especially the DSL (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence and county lines and radicalisation.

13. Risk assessment

- 13.2. Where a concern about a pupil's welfare is identified, the risks to that pupil's welfare will be assessed and appropriate action will be taken to reduce the risks identified.
- 13.3. The format of risk assessment may vary and may be included as part of the School's overall response to a welfare issue, including the use of individual pupil welfare plans (such as

² Section 31 Children Act 1989

behaviour, healthcare and education plans, as appropriate). Regardless of the form used, the School's approach to promoting pupil welfare will be systematic and pupil focused.

- 13.4. The Head has overall responsibility for ensuring that matters which affect pupil welfare are adequately risk assessed and for ensuring that the relevant findings are implemented, monitored and evaluated.
- 13.5. Day to day responsibility to carry out risk assessments under this policy will be delegated to the DSL who has been properly trained and tasked with carrying out the particular assessment.

14. What to do if staff have a safeguarding concern about someone else's welfare

- 14.2. Staff who have safeguarding concerns about the welfare of others or any other safeguarding issue not expressly covered by this policy, should report them.
- 14.3. In the absence of an express procedure about reporting, they should report such concerns to their line manager or the DSL in the first instance.

15. Allegations made and or/concerns raised about staff and others in School

- 15.2. The School has a policy and procedures for managing allegations made and/or concerns raised about any adult working for, or on behalf of, the School, whether paid or unpaid, or any other adult (as defined in Appendix 4) which may affect the safety and welfare of children.
- 15.3. The procedures in this policy apply to staff who pose a risk of harm to children or may behave in a way that indicates that they may be unsuitable to work with children. They also apply to low level concerns that do not meet the harm threshold. The policy and procedures aim to strike a balance between the need to protect children from abuse and the need to protect staff from malicious, unfounded, false, or unsubstantiated allegations.
- 15.4. The School will follow its employment procedures for dealing with any other safeguarding concern raised about staff, involving external agencies as appropriate.
- 15.5. Detailed guidance is provided to staff to ensure that all staff are clear on the rules of conduct and the expectations of the School in relation to contact with pupils, parents, colleagues and any other person who comes into contact with the School.

16. Informing parents

- 16.2. Parents will normally be kept informed, as appropriate, of any action to be taken under these procedures. However, there may be circumstances when the DSL will need to consult the Head, the Designated Officer(s), children's social care, the police and / or the pupil before discussing details with parents.

- 16.3. See also Appendix 4 for details about the disclosure of information where an allegation has been made against a member of staff.

17. Additional reporting

- 17.2. In addition to the reporting requirements explained above, the School will consider whether it is required to report safeguarding incidents to any other regulatory body or organisation

17.2.8. Insurers

- 17.2.8.1. The School will consider whether it is necessary to report a safeguarding incident to the relevant insurers and/or brokers. It may be necessary to report to a number of insurers as there may be concurrent cover under existing and historic policies.
- 17.2.8.2. Care should be taken to ensure this is done before renewal to ensure that the School complies with its duties under the Insurance Act 2015. If the School is in any doubt with regard to the correct insurer and / or policy and / or if it is unable to locate the relevant insurer, professional advice should be sought.

18. Safer recruitment and supervision of staff

- 18.2. The School is committed to practising safer recruitment in checking the suitability of staff (including staff employed by another organisation). See the School's separate recruitment policy.
- 18.3. The School maintains a single central register of appointments for all staff.
- 18.4. The School will ensure that visiting speakers are suitable and appropriately supervised.
- 18.5. The school will ensure appropriate use of mobile technology.
- 18.6. The School's policy on the use of mobile technology, including phones and cameras, in the School, is as follows:
- 18.6.8. the School's mobile and electronic device policy sets out the expectations on pupils from Year 1 to Year 9. In the EYFS setting, pupils are not permitted to bring mobile phones or any mobile device with a camera facility onto the premises;
- 18.6.9. all staff (including staff in the EYFS setting) should use mobile devices and cameras in accordance with the guidance set out in the Technologies Policies;
- 18.6.10. parents of all pupils (including parents of pupils in the EYFS setting) may bring mobile devices onto the premises but may only take photographs during events such as presentations, plays, concerts or sporting events for personal use. Parents should be reminded that the publication of such images (including on personal social networking sites even where access to the image may be limited) may be unlawful.
- 18.7. The School allows access to the internet onsite. Appropriate internet safety measures are taken to manage associated risks, including use of filters and monitoring of usage.

- 18.8. The School's approach to online safety is set out in the School's Online Safety Policy and Acceptable Use Policy for Pupils.

19. Training

- 19.2. The School ensures that regular guidance and training is arranged on induction and at regular intervals thereafter so that staff understand what is expected of them by this policy and have the necessary knowledge and skills to carry out their roles.

- 19.3. The level and frequency of training depends on the role of the individual member of staff.

- 19.4. The School maintains written records of all staff training.

19.5. Induction

- 19.5.8. All staff, including temporary staff and volunteers, will be provided with induction training in line with the recommended training from Inspired Head Office and includes: (and where relevant includes the provision of copies of):

19.5.8.1. this policy;

19.5.8.2. the role, identity and contact details of the DSL and his / her Deputy;

19.5.8.3. the Student Code of Conduct for pupils;

19.5.8.4. the School Handbook, which includes details of the School's policy on bullying, cyberbullying and prejudice-based and discriminatory bullying;

19.5.8.5. the staff code of conduct including the whistleblowing policy, social media policy and acceptable use of technology policy;

19.5.8.6. the safeguarding response to children who are absent from education, particularly on repeated occasions and/or prolonged periods;

19.5.8.7. the School's approach to online safety which includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring;

19.6. Safeguarding training

- 19.6.8. Staff not working directly with children will complete the training as outlined in the Inspired Head Office training schedule on an annual basis.

- 19.6.9. School leaders and all staff working directly with children will receive a copy of this policy and will complete training as per Inspired Head Office training schedule on an annual basis.

- 19.6.10. Staff development training will also include training on online safety which should, amongst other things, include an understanding of the filtering and monitoring systems and processes in place in the School, searching pupils for prohibited and banned items, and Prevent duty training assessed as appropriate for them by the School.

19.6.11. Additionally, the School will make an assessment of the appropriate level and focus for staff training and responsiveness to specific safeguarding concerns such as child on child abuse, harmful sexual behaviour, child criminal and child sexual exploitation, cyberbullying, prejudiced-based and discriminatory bullying and mental health.

19.6.12. **Designated Safeguarding Lead (DSL)**

19.6.12.1. The DSL and Deputy DSL will undertake training to provide them with the knowledge and skills required to carry out the role. This training includes inter-agency working and prevention awareness training and will be updated at least every two years.

19.6.12.2. In addition, their knowledge and skills will be refreshed at regular intervals, at least annually, to allow them to understand and keep up with any developments relevant to their role.

19.6.13. **Teaching pupils about safeguarding**

19.6.13.1. The School teaches pupils about safeguarding through the curriculum and PSHE/LIV (Laboratório de Inteligência de Vida). This includes guidance on adjusting behaviour to reduce risks, particularly online, building resilience to protect themselves and their peers, fostering healthy and respectful relationships with others and providing information about who they should turn to for help.

19.6.13.2. The School recognises that a one size fits all approach may not be appropriate for children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed.

19.6.13.3. The safe use of technology is a focus in all areas of the curriculum and key ICT safety messages are reinforced as part of assemblies and tutorial / pastoral activities so that pupils learn how to keep themselves safe online and when accessing remote learning. The School has ensured appropriate filters and monitoring systems are in place at the School and meet the DfE's filtering and monitoring standards and is mindful that this should not lead to unnecessary restrictions on learning.

19.6.13.4. The School keeps in regular contact with parents and carers to reinforce the importance of pupils being safe online and make them aware of the systems in place to filter and monitor online use and the sites pupils will be expected to access during learning.

20. Monitoring and review

20.2. The DSL will ensure that the procedures set out in this policy and the implementation of these procedures are updated and reviewed regularly

20.3. This policy will be updated whenever needed to ensure that it remains up to date with safeguarding issues as they emerge and evolve, including in relation to lessons learnt.

21. Record keeping

- 21.2. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. This will also help if/when responding to any complaints about the way a case has been handled by the School. Information should be kept confidential to those who need to know and stored securely. Concerns and referrals will be kept in a separate child protection file for each child. These should include:
- 21.2.8. a clear and comprehensive summary of the concern;
 - 21.2.9. details of how the concern was followed up and resolved; and
 - 21.2.10. a note of any action taken, decisions reached and the outcome.
- 21.3. The information created in connection with this policy may contain personal data. The School's use of this personal data will be in accordance with data protection law. The School has published on its website privacy notices which explain how the School will use personal data.
- 21.4. All records created in accordance with this policy are managed in accordance with the School's policies that apply to the retention and destruction of records.
- 21.5. **Information sharing and multi-agency working³**
- 21.5.8. The School will treat all safeguarding information with an appropriate level of confidentiality, only involving others where appropriate. The School will always act in order to safeguard and promote the welfare of others.
 - 21.5.9. The School understands that information sharing is essential for effective safeguarding and promoting the welfare of children and young people, including their educational outcomes.
 - 21.5.10. The School will cooperate with child protection services where legally able to do so, to ensure that all relevant information is shared.
 - 21.5.11. Where allegations have been made against staff, the School will consult with the Global head of Safeguarding, area CEO and HR.
 - 21.5.12. While the School will share information with those involved where and when it is appropriate to do so, they may be unable to for reasons of data protection and confidentiality, for example because to do so may pose a risk of harm to others or because it has been prohibited by external agencies.

Appendix 1

Forms of abuse and neglect and specific safeguarding risks

1 Abuse and neglect

- 1.1 Staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label and in most cases, multiple issues will overlap with one another, therefore staff should always be vigilant and always raise any concerns with the DSL (or deputy).
- 1.2 Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

2 Definitions of abuse and neglect

- 2.1 **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 in person and/or wholly online or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children.
- 2.2 **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.
- 2.3 **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or "making fun" of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying (including cyberbullying and prejudiced-based or discriminatory 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.
- 2.4 **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts

such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse) in education and all staff should be aware of it. The school policy and procedures can be found in Appendix 3.

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

3 **Signs of abuse**

- 3.1 Possible signs of abuse include, but are not limited to:
- 3.1.1 the pupil says he / she has been abused or asks a question or makes a comment which gives rise to that inference;
 - 3.1.2 there is no reasonable or consistent explanation for a pupil's injury, the injury is unusual in kind or location or there have been a number of injuries and there is a pattern to the injuries;
 - 3.1.3 the pupil's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour, or there is a sudden or significant change in the pupil's behaviour;
 - 3.1.4 deterioration in educational progress and/or lack of engagement;
 - 3.1.5 the pupil asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons;
 - 3.1.6 the pupil's development is delayed, the pupil loses or gains weight or there is deterioration in the pupil's general well-being;
 - 3.1.7 the pupil appears neglected, e.g. dirty, hungry, inadequately clothed;
 - 3.1.8 the pupil is reluctant to go home, or has been openly rejected by his / her parents or carers; and
 - 3.1.9 inappropriate behaviour displayed by other members of staff or any other person working with children, for example inappropriate sexual comments; excessive one-to-one attention beyond the requirements of their usual role or responsibilities; or inappropriate sharing of images.

4 **Specific safeguarding issues**

- 4.1 Statutory guidance acknowledges the following as specific safeguarding issues:
- 4.1.1 child abduction and community safety incidents;
 - 4.1.2 children and the court system;
 - 4.1.3 children missing from education (see section 5 below);
 - 4.1.4 children with family members in prison;
 - 4.1.5 child criminal exploitation and child sexual exploitation (see section 7 below);
 - 4.1.6 modern slavery and the national referral mechanism;
 - 4.1.7 cybercrime;
 - 4.1.8 domestic abuse;
 - 4.1.9 homelessness;
 - 4.1.10 so-called 'honour-based' abuse (including Female Genital Mutilation and Forced marriage);
 - 4.1.11 preventing radicalisation;
 - 4.1.12 child on child abuse;
 - 4.1.13 sexual violence and sexual harassment between children in schools;
 - 4.1.14 upskirting.
- 4.2 Staff should be particularly aware of the safeguarding issues set out below.

5 **Children who are absent from education**

- 5.1 Children being absent from school, particularly repeatedly and/or for prolonged periods and children missing education, can act as a vital warning sign of a range of safeguarding issues including neglect, sexual abuse and child sexual and criminal exploitation. It may indicate mental health problems, risk of substance abuse. School attendance registers are carefully monitored to identify any trends. Action should be taken in accordance with this policy if any absence of a pupil from the School gives rise to a concern about his / her welfare.
- 5.2 Where reasonably possible the School will hold more than one emergency contact for each pupil.
- 5.3 Where available, the school will report absences in line with Education Ministry Guidelines in order to:
- 5.3.1 fulfil its duty to identify children of compulsory school age who are missing from education; and

- 5.3.2 follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect or radicalisation or involvement with serious violent crime.

6 **Child Sexual Exploitation (CSE) and Child criminal exploitation (CCE)**

- 6.1 Both CSE and CCE are forms of abuse where an individual or group (adult or another child) takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity:
 - 6.1.1 in exchange for something the victim needs or wants e.g. money, gifts or affection; and / or
 - 6.1.2 for the financial advantage or increased status of the perpetrator or facilitator; and/ or
 - 6.1.3 through violence or threat of violence to victims (and their families).
- 6.2 Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation - where this is the case, it is important that the child perpetrator is also recognised as a victim.
- 6.3 CSE and CCE can affect children of any sex and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.
- 6.4 The victim may have been exploited even if the activity appears consensual.
- 6.5 CCE can include children being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.
- 6.6 Some of the following can be indicators of both CSE and CCE, including children who:
 - 6.6.1 appear with unexplained gifts, money or new possessions;
 - 6.6.2 associate with other young people involved in exploitation;
 - 6.6.3 suffer from changes in emotional well-being;
 - 6.6.4 misuse drugs and alcohol;
 - 6.6.5 go missing for periods of time or regularly come home late; or
 - 6.6.6 regularly miss school or education or do not take part in education.
- 6.7 Children who have been exploited will need additional support to help maintain them in education.
- 6.8 CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

6.9 The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media). The above CCE indicators can also be indicators of CSE, as can children who:

6.9.1 have older boyfriends or girlfriends; or

6.9.2 suffer from sexually transmitted infections or become pregnant.

7 Organised Criminal Networks

7.1 All school staff should be attentive to the possibility of students being involved in gangs and organised criminal networks involved in exporting illegal drugs. Drug dealers or other criminal networks are likely to exploit children and vulnerable adults to move store and sell drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

7.2 Children are increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

7.3 Additional reporting duties:

7.3.1 if a child is suspected to be at risk of, or involved in criminal, gang or drug-related activities, a safeguarding referral should be considered alongside consideration of availability of local services / third sector providers who offer support to victims;

8 Serious violence

8.1 Indicators which may signal children are at risk from, or are involved with serious violence crime may include:

8.1.1 Increased absence from school;

8.1.2 a change in friendships or relationships with older individuals or groups;

8.1.3 a significant decline in performance;

8.1.4 signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries;

8.1.5 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.

8.2 Staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence e.g. being male, having frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Further advice for

schools is provided in the British Home Office's Preventing youth violence and gang involvement and its criminal exploitation of children and vulnerable adults: county lines guidance.

9 **Cybercrime**

- 9.1 Cybercrime is a criminal activity committed using computers and / or the internet. It's broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but enabled at scale and speed online e.g. fraud, purchasing of illegal drugs, child sex abuse and exploitation) or 'cyber-dependent' (crimes that can only be committed by using a computer).
- 9.2 Cyber-dependent crimes include:
 - 9.2.1 Unauthorised access to computers (illegal hacking) e.g. accessing a school's computer network to look for test papers or change grades awarded;
 - 9.2.2 Denial of Service (Dos or DDos) attacks or 'booting' - attempts to make a computer, network or website unavailable by overwhelming it with internet traffic;
 - 9.2.3 Making, supplying or obtaining malware e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans with intent to commit further offence.
- 9.3 Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

10 **Domestic abuse**

- 10.1 Domestic abuse can encompass a wide range of behaviours and may be a single incident or pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional.
- 10.2 Children can be victims of domestic abuse. They may see, hear or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of this can have a detrimental and long-term impact on their health, well-being, development and ability to learn.
- 10.3 All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and / or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

11 **So-called 'honour-based' abuse**

- 11.1 All forms of so-called 'honour-based' abuse are abuse (regardless of motivation) and should be handled and escalated as such. Abuse committed in the context of preserving "honour" often involves additional risk factors such as a wider network of family or community pressure and the possibility of multiple perpetrators which should be taken into account when deciding what safeguarding action to take. Staff should speak to the DSL if they have any doubts.

- 11.2 If appropriate, the DSL will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

12 **Forced marriage**

- 12.1 Forced marriage is also a form of so-called 'honour-based' abuse. Forcing a person into marriage is a crime in Brazil. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form or coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage.

13 **Radicalisation and the Prevent duty**

- 13.1 The School has a duty to have due regard to the need to prevent people from being drawn into terrorism and will work with partner agencies where necessary.

14 **Child on child abuse**

- 14.1 All staff should be aware that children can abuse other children (often referred to as child-on-child abuse) and that it can happen both inside and outside of school or online.
- 14.2 The School's policy and procedures for dealing with child-on-child abuse can be found in Appendix 3 below.
- 14.3 Risk assessments are undertaken by the School to assess the risk of child-on-child abuse and/or any other safeguarding issues associated with children sharing overnight accommodation in school trips or sleep overs.

15 **Online safety**

- 15.1 All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life.
- 15.2 It is essential that children are safeguarded from potentially harmful and inappropriate online material. An effective, whole school approach to online safety empowers a school to protect and educate pupils, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate. See the School's online safety policy for further guidance.
- 15.3 The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:
- 15.3.1 **content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-semitism, radicalisation and extremism.

- 15.3.2 **contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- 15.3.3 **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- 15.3.4 **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If pupils, students or staff are at risk, it should be reported to the Anti-Phishing Working Group (<https://apwg.org/>).

16 Sharing nudes and semi-nude images and videos

- 16.1 Consensual and non-consensual sharing of nudes and semi-nude images and/or videos can be signs that children are at risk.
- 16.2 "Sharing nudes and semi-nudes" means the taking and sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It can also involve sharing between devices offline e.g. via Apple's AirDrop. This is also known as sexting or youth produced sexual imagery.
- 16.3 The School treats all incidents of sharing nudes and semi-nude images as safeguarding matters to be actioned in accordance with this policy.
- 16.4 Members of staff must not intentionally view any nude or semi-nude images which are reported to them, or copy, print or share the images under any circumstances. In referring to any incident of sharing images, members of staff should describe the content of the images as reported to them.
- 16.5 The DSL may in exceptional circumstances view images with the prior approval of the Head and only where:
 - 16.5.1 it is the only way to make a decision whether to involve other agencies, as there is insufficient information available as to its contents;
 - 16.5.2 it is necessary to report the image to a website, app or suitable reporting agency to have it taken down, or to support the pupil or parent in making a report; or
 - 16.5.3 a pupil has reported the image directly to a member of staff in circumstances where viewing the image is unavoidable or images have been found on the school's devices or network.
- 16.6 Where viewing an image is unavoidable:
 - 16.6.1 viewing should take place on School premises wherever possible;
 - 16.6.2 the image should be viewed by a person of the same sex as the person alleged to be shown in the image (where this is known);

- 16.6.3 a senior member of staff should be present to monitor and support the person viewing the image. This member of staff should not view the image;
- 16.6.4 full details of the viewing must be recorded in the School's safeguarding records, including who was present, the date and time, the nature of the image and the reasons for viewing it;
- 16.6.5 any member of staff who views an indecent image should be given appropriate support.
- 16.7 If any devices need to be confiscated (whether in order to view the image(s) or to pass evidence to the appropriate authority), they should be turned off and locked away securely until they are required.
- 16.8 If an electronic device that is prohibited by the school rules has been seized and the member of staff has reasonable grounds to suspect that it contains evidence in relation to an offence, or that it contains a pornographic image of a child or an extreme pornographic image, the device will be given to the police.
- 16.9 If external agencies do not need to be involved, the School must consider the deletion of any images. Pupils should be asked to delete images themselves and to confirm that this is done. Members of staff should not search devices to delete images.
- 16.10 If images have been shared online and cannot now be deleted by the person who shared them, the School should consider reporting the images to the relevant web host or service provider (if an option is provided), or contacting the Internet Watch Foundation or ChildLine (if the website does not provide this option).
- 16.11 Where a pupil receives unwanted images, the School should advise the pupil and his / her parents of options that may be available to block the sender or to change the pupil's mobile phone number or email address.

17 **Upskirting**

- 17.1 Upskirting typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any gender can be a victim.
- 17.2 The School will treat incidences of upskirting as a breach of discipline and also as a safeguarding matter under the School's child protection procedures.

18 All matters relating to upskirting images and devices which may have been used in connection with an allegation of upskirting will be dealt with in a similar manner to sharing sexual images / sexting.

19 **Special educational needs and disabilities or physical health issues**

- 19.1 The School welcomes pupils with special educational needs and disabilities and will do all that is reasonable to ensure that the School's curriculum, ethos, culture, policies, procedures and premises are made accessible to everyone.

- 19.2 Additional barriers can exist when detecting the abuse or neglect of pupils with SEN or certain medical or physical health conditions that can create additional safeguarding challenges for those involved in safeguarding and promoting the welfare of this group of children. The School is mindful in particular that:
- 19.2.1 assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the pupil's condition without further exploration;
 - 19.2.2 pupils with SEN or certain health conditions may be more prone to peer group and isolation and can be disproportionately impacted by bullying (including prejudice-based and discriminatory bullying) without outwardly showing any signs;
 - 19.2.3 some pupils may be unable to understand the difference between fact and fiction in online content and can repeat the content/behaviour in school without understanding the consequences; and
 - 19.2.4 there may be communication barriers which are difficult to overcome to identify whether action under this policy is required.
- 19.3 The School should consider providing extra pastoral support and attention for these pupils, along with ensuring any appropriate support for communication is in place.

20 **Mental Health**

- 20.1 Staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- 20.2 Staff should not attempt to make a diagnosis as this can only be done by a trained professional. However, staff who have concerns that a child's behaviour may suggest they are experiencing mental health problems should follow the child protection policy and speak to the school counsellor and, if appropriate, to the DSL or deputy DSL

21 **Children who are lesbian, gay, bi, or trans (LGBT)**

- 21.1 The School recognises that pupils who are or perceived to be LGBT are vulnerable to being targeted by other children.
- 21.2 All staff are aware of these vulnerabilities and the School endeavours to provide a safe space to speak out or share concerns.

Appendix 2

Concerns about a child - guidance for staff

1 Receiving a disclosure

- 1.1 Listen carefully and keep an open mind. Do not take a decision as to whether or not the abuse has taken place.
- 1.2 Do not ask leading questions, i.e. a question which suggests its own answer. Use 'tell me, explain to me, describe to me' (TED) questioning. It is particularly important not to continue questioning a pupil if they disclose something which suggests that a criminal offence may have been committed – the Police will need to take the lead on investigating and your questioning might compromise possible criminal proceedings.
- 1.3 Take the pupil to the School Sick Bay if there is a medical need and do not examine the injury yourself.
- 1.4 Reassure the pupil, they are being taken seriously and they will be supported and kept safe so that no victim will be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment and no victim ever be made to feel ashamed for making a report.
- 1.5 Do not give a guarantee of absolute confidentiality. Explain the need to pass on the information in accordance with this policy so that the correct action can be taken.
- 1.6 Keep a sufficient written record of the conversation (see 2 below). All other evidence, for example, scribbled notes, mobile phones containing text messages, clothing, computers, must be kept securely with the written record.
- 1.7 Pass on the record when reporting the concern in accordance with this policy.

2 Recording a concern

- 2.1 Staff must record all concerns in writing
- 2.2 Records should be factual and signed and dated, with the name of the signatory clearly printed in writing. Records should include:
 - 2.2.1 the pupil's details: name; date of birth; address and family details;
 - 2.2.2 date and time of the event / concern / conversation;
 - 2.2.3 a clear and comprehensive summary of the event /concern / conversation;
 - 2.2.4 details of how the concern was followed up and resolved,
 - 2.2.5 a note of any action taken and by whom, decisions reached and the outcome;
 - 2.2.6 the name and position of the person making the record.

3 Use of reasonable force

-
- 3.1 There are circumstances when it would be appropriate for staff to use reasonable force to safeguard pupils. 'Reasonable' in these circumstances means using no more force than is needed⁴.

Dealing with allegations of child-on-child abuse

1. Child on child abuse

- 1.1. Children of any age can abuse other children (often referred to as child-on-child abuse) and this can happen inside and/or outside school and/or online. This includes, but is not limited to:
 - 1.1.1. bullying (including cyber-bullying and prejudice-based and discriminatory bullying);
 - 1.1.2. abuse within intimate personal relationships between peers (teenage relationship abuse);
 - 1.1.3. physical abuse such as hitting, kicking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates and / or encourages physical abuse);
 - 1.1.4. sexual violence, such as rape, assault by penetration and sexual assault (including grabbing bottoms, breasts and genitalia under or over clothes, flicking bras, unwanted kisses or embraces) possibly with an online element which encourages sexual violence;
 - 1.1.5. sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
 - 1.1.6. 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;
 - 1.1.7. Consensual and non-consensual sharing of nude and semi-nude images (also known as 'sexting' or 'youth produced sexual imagery') means the taking and sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It can also involve sharing between devices offline, for example via Apple's AirDrop;
 - 1.1.8. upskirting, typically involving taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
 - 1.1.9. initiation / hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may include an online element);

2. The School's approach to child-on-child abuse

- 2.1. Staff understand that, even if there are no reports of child-on-child abuse at the School, it does not mean it is not happening; it may be the case that it is just not being reported. Staff understand the importance of reporting any concerns regarding child-on-child abuse to the DSL (or the DDSL in the DSL's absence).
- 2.2. Such behaviour is never acceptable and should be considered as both a safeguarding issue and potentially a disciplinary one. The School will adopt a zero-tolerance approach to abuse. Downplaying certain behaviours (by, for example, dismissing sexual harassment as "banter",

"having a laugh" or "part of growing up") can lead to a culture of unacceptable behaviours, an unsafe environment for children and its worst to a culture that normalises abuse.

- 2.3. All staff should challenge inappropriate behaviour between pupils and anyone who suffers, witnesses or hears of abuse of any form between pupils is asked to report it in accordance with this policy and / or the school's behaviour and discipline and anti-bullying policies, so that appropriate action can be taken.
- 2.4. Appropriate action will involve supporting all members of the school community who may be involved as a priority. This may require investigation by the school or other agencies. Until investigations have been undertaken and findings made, the school will work on the basis that the allegations may or may not be true and undertake careful risk assessment of the welfare of those involved to determine how best to manage the situation. This should be undertaken whether or not the incident is alleged to have occurred at school, or when the pupil involved was under the school's care and whether or not the pupil is under 18, as an issue which may impact pupil welfare. Disciplinary action will follow separately, if appropriate.
- 2.5. Staff should be careful about the terminology used to describe the pupils involved – whilst 'victim' and 'alleged perpetrator' are used in guidance these may not be appropriate terms to use in front of the children.

3. Sexual violence and sexual harassment

- 3.1. Where the misconduct may constitute sexual violence⁵ (rape, assault by penetration, sexual assault⁶ or causing someone to engage in sexual activity without consent) or sexual harassment (unwanted conduct of a sexual nature), it should be reported to the DSL and will be managed in accordance with this policy. This kind of misconduct is never acceptable.
- 3.2. Whilst any report of sexual violence or sexual harassment should be taken seriously, staff are aware that it is more likely that girls will be the victims and more likely it will be perpetrated by boys.
- 3.3. SVSH can occur between two or more children of any age or sex from primary to secondary stage. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.
- 3.4. SVSH exists on a continuum and may overlap. Addressing inappropriate behaviour (even where it seems to be relatively innocuous) can be an important intervention which helps to prevent problematic or abusive behaviour in the future by setting and enforcing clear expectations of behaviour, supporting victims and encouraging them and others to speak out and facilitating targeted support for those demonstrating harmful sexual behaviour.
- 3.5. All staff are therefore trained to identify signs of abuse and on how to respond to a report.

4. Management of allegations of child-on-child SVSH

4.1. The initial report

- 4.1.1. The School recognises that it is not easy for children to tell staff about abuse. Staff are trained in signs of abuse and required to look out for them and act upon them; and to

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respond to all reports of abuse, however they are reported and whether they are made by victims directly or third parties.

4.1.2. The School acknowledges that the initial response is incredibly important and may impact not just the management of that issue, but others of SVSH. Staff are also trained in how to receive a report. Where possible they should be accompanied by the DSL or other member of staff.

4.1.3. They should:

- 4.1.3.1. listen carefully and respectfully, reassuring the person making the report that they are being taken seriously and offer support without promising confidentiality or making a judgement about its veracity;
- 4.1.3.2. where possible they should ask open questions about whether pupil(s) have been harmed, the nature of the harm or if they may be at risk of harm;
- 4.1.3.3. where there is an online element, considering the searching, screening
- 4.1.3.4. explain the next steps and how the report will be progressed;
- 4.1.3.5. make a written record of the report (recording the facts as the child has presented them);
- 4.1.3.6. inform the DSL (or deputy) as soon as practically possible, if they are not involved in the initial report and then only share the report with those necessary in order to progress it.

21.6. **DSL's considerations**

4.1.4. Reports of SVSH are often complex and require difficult professional decisions to be made. Further disclosures may follow and the facts may be difficult to establish. These decisions are made on a case-by-case basis taking all of the circumstances into account, in the best interest of the pupils involved. The School's response is led by the DSL who will involve other staff as relevant. School's considerations

4.1.5. The school will consider:

- 4.1.5.1. the victim's wishes in terms of how they want to proceed. Victims should be given as much control as is reasonably possible over decisions made about investigation and support, but their wishes will not always be determinative as the school may have to take action to protect other children;
- 4.1.5.2. the nature of the alleged incident (including whether it was a one-off or sustained pattern), whether a crime may have been committed and whether harmful sexual behaviour⁷ has been displayed;
- 4.1.5.3. the ages and developmental stages of the children involved and any imbalance between them;

⁷ [Hackett's sexual behaviours across a continuum table](#) - which helps to identify whether sexual behaviours are normal, inappropriate, problematic, abusive or violent may be helpful here.

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- 4.1.5.4. if there is an intimate personal relationship between the children;
 - 4.1.5.5. whether there are any ongoing risks to those involved;
 - 4.1.5.6. the time and location of any incident, and any action required to make the location safer;
 - 4.1.5.7. the wider context;
- 21.6.8. Before deciding how best to support and protect those involved the School will undertake immediate risk and needs assessments. These will be undertaken in cases of sexual violence and considered otherwise. Where appropriate, they will be discussed with those involved and their parents. This may involve suspension pending investigation. Risk and needs assessments will be recorded and kept under review in the knowledge that police investigation and criminal proceedings can take several months to conclude.
- 21.6.9. The School will make a proportionate response to these matters in light of the circumstances and the factors identified above and decide if any further action is appropriate.
- 21.6.10. The School will do all it reasonably can to protect the anonymity of children involved in sexual violence or sexual harassment. Amongst other things, this will mean carefully considering, based on the nature of the report, which staff should know about the report and any support that will be put in place for the children involved.

5. Investigations and findings

- 5.1. The School will record the findings of investigations undertaken by the police and/or the CPS and if the police decide not to take any further action, it will consider whether an investigation should be undertaken or commissioned by the School to enable it to determine whether or not it is likely that the allegations are substantiated, unsubstantiated, unfounded, false or malicious. There may be circumstances where this is not appropriate, as it may prejudice a possible future investigation, for example if a victim does not currently wish to make a victim statement. In those circumstances the School should consider whether a limited investigation is appropriate. The concerns, discussions, decisions and reasons for these should be recorded.
- 5.2. The School should continue to support those involved and should also consider whether further referral and / or disciplinary action may be appropriate against either the perpetrator where concerns are substantiated and/or harmful sexual behaviours identified or the victim where concerns were found to be deliberately invented or malicious.

Appendix 4

Raising allegations and low-level concerns

1 Key contact information

1.1 Below is the key contact information you may need to raise an allegation or low-level concern under this policy.

DSL - Fabiana Ferrari Vieira	+55 2733346351 fabiana.vieira@davincivix.com.br
Head - Mario Broetto	+55 27 33346321 mario.Broetto@davincivix.com.br
CEO - Paulo Moraes	+55 11 95414-6148 paulo.moraes@inspirededu.com
Global Head of Safeguarding - Jez Prior	+44 7831 568013 jez.prior@inspirededu.com

2 Purpose and application

2.1 **Purpose:** the School takes safeguarding extremely seriously. It is of paramount importance that we maintain an open and transparent culture in which all concerns about adults are shared promptly, responsibly and with the right person. We recognise the importance of ensuring adults who work with, or otherwise come into contact with children, do so in a way that is consistent with our values, culture and expected standards of behaviour. We also recognise that concerns may arise in several ways and from a number of sources. The purpose of this policy is to provide a framework for all concerns to be raised, recorded and dealt with effectively by the School.

2.2 **Application:** The Policy applies to all adults working in or on behalf of the School (whether on a paid or unpaid basis), including governors, supply staff, volunteers and contractors (**Staff**).

2.3 **Other adults:** although this policy directly relates to those who work for the School, the School recognises that its safeguarding role extends to the protection of everyone associated with it, including adults who do not work for the School. Should concerns be raised about people who are not Staff or pupils, then they should be reported to the Head or DSL who will take appropriate action and co-operate with the relevant agencies as appropriate.

3 Key Staff duties

3.1 **Staff behaviour:** all Staff must comply with the School's Code of Conduct which sets out appropriate and expected standards of behaviour.

3.2 **Duty to report:** as a member of Staff, you must immediately follow this policy to report **any** concerns you have about the conduct of a member of Staff or any other adult (which could

include adults not employed by the School). This includes any concern however it arises, for example behaviour you have witnessed, a concern raised with you by a colleague, pupil, parent or another adult, or as result of checks or information brought to your attention.

3.3 Duty to self-refer: you must refer yourself to the Head where, for example, you have found yourself in a situation which could be misinterpreted, which might appear compromising to others, and / or on reflection if you believe you have behaved in such a way that may fall below the standards expected of you.

3.4 A culture of sharing: all Staff have a positive obligation to support the School's culture of openness and sharing without fear of reprisal.

4 What needs to be reported?

4.1 Reporting all concerns: all concerns must be raised whether they are considered to be "low level" concerns or conduct which may meet the harm threshold.

4.2 Low level concerns: a low-level concern is any concern, no matter how small, and even if no more than a sense of unease or a "nagging doubt", that a member of Staff may have acted in a way that is inconsistent with expected professional standards and / or the staff Code of Conduct, whether inside or outside work. No concern is too small or minor to raise under this policy.

4.3 Concerns that meet the harm threshold: allegations that may meet the harm threshold are those that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children, for example where the individual has:

4.3.1 behaved in a way that has harmed a child, or may have harmed a child; and / or

4.3.2 possibly committed a criminal offence against or related to a child; and / or

4.3.3 behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children; and / or

4.3.4 behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes behaviour that may have happened outside the School which creates a transferable risk.

4.4 Definition of Harm: it is important to understand the types of conduct that may be harmful to children, and to recognise that harm may not be limited to the most obvious types of physical abuse. There is no single legal definition of harm but to assist your understanding of what may amount to "harm" you should consider the following:

4.4.1 the Safeguarding Vulnerable Groups Act 2006 which does not give a definition of harm, encouraging people to apply a "normal, everyday meaning";

4.4.2 the Children Act 1989 defines:

(a) "harm" as "ill-treatment or the impairment of health or development [including, for example, impairment suffered from seeing or hearing the ill-treatment of another]";

(b) "ill-treatment" as including "sexual abuse and forms of ill treatment which are not physical";

(c) "health" as "physical or mental health".

5 How to raise concerns and allegations

- 5.1 **Duty of the DSL to refer concerns to the Head:** the Head remains the ultimate decision-maker in respect of all low-level concerns. Save for in cases involving the Head, the DSL must therefore promptly report any concern raised with them to the Head. Wherever possible the DSL must speak to the Head in person about the concern as soon as possible after the concern is raised, and always on the same day the concern is raised. If it is not possible to speak to the Head in person about the concern, the DSL must email the Head with a summary of the concern on the same day the concern is raised.
- 5.2 **Concerns about Staff:** where you have a concern about the conduct of a member of Staff (other than the Head) whether this a low-level concern or an allegation of harm that may meet the harm threshold, you must raise this immediately with the Head.
- 5.3 **Concerns involving the Head and conflicts of interest:** where you identify a concern about the Head, you must report the matter immediately to the Nominated Safeguarding Governor without first notifying the Head.
- 5.4 **Concerns involving Governors:** where you identify a concern about a Governor, you must report the matter immediately to the Chair of Governors or the Nominated Safeguarding Governor. If either the Chair of Governors or the Nominated Safeguarding Governor is the subject of an allegation, you must report the matter to the other.
- 5.5 **Concerns involving individuals/organisations using School premises: where the School** receives an allegation relating to an incident that happened when an individual or organisation was using the premises for the purposes of running activities for children (e.g. community groups, sports associations, or service providers that run extra-curricular activities) it will follow its own safeguarding policies and procedures, including informing the LADO.
- 5.6 **Reports to the DSL:** If it is not possible for you to make a report to the Head or Nominated Safeguarding Governor, you must instead immediately make a report to the DSL. The DSL will take action in accordance with these procedures and will as soon as possible inform the Head or, where appropriate, the Nominated Safeguarding Governor.

6 The School's response to concerns and allegations

- 6.1 **Appropriate action:** the School will ensure that appropriate action is taken to address concerns that are raised under this policy.
- 6.2 **Assessing concerns:** the Head (or, if the concern relates to the Head, the CEO and Global Head of Safeguarding) will determine whether the concerns raised are low level or potentially meet the harm threshold.
- 6.3 **Low level concerns:** if the School determines the concern is a low-level concern, then the School will address the concern as appropriate. This will usually involve making the individual aware of the concern against them, undertaking any investigation that may be required and may include giving management guidance and advice or invoking the School's capability or disciplinary procedures.
- 6.4 **Borderline cases:** the Head (or, if the concern relates to the Head, the CEO) may take advice from the Global Head of Safeguarding in borderline cases in order to establish whether the concern is a low-level concern or an allegation that potentially meets the harm threshold.

6.5 **Responding to an allegation that may meet the harm threshold:** where an allegation is made that may meet the harm threshold, the School will take advice from The Global Head of Safeguarding, the Regional CEO and HR.

6.6 **Informing the child's parents / carers where appropriate:** the DSL will agree when and how the parents or carers of the child / children involved will be informed of the allegation if they do not already know of it.

6.7 **Involvement of external agencies:** police or children's social care may need to be involved. Decisions will be taken on a case by case basis, with guidance from The Global Head of Safeguarding, the Regional CEO and HR.

7 Record keeping

7.1 **Records of low-level concerns:** low level concerns will be recorded in writing. The record of the concern will be retained so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and addressed. Records of low-level concerns that have been addressed with an individual will usually be kept on the individual's personnel file. In addition all low-level concerns, including those that have not been addressed formally under the School's procedures, will also be stored securely in a central file (**Concerns and Allegations Record**).

7.2 **Recording low level concerns:** the Concerns and Allegations Record will set out the name of the individual involved (if an individual is named), a brief description of the concern and the context in which it arose, any investigation that has been carried out, and the outcome / result of the investigation into the concern. The name of the individual who has raised the concern should also be noted. Where that individual wishes to remain anonymous the School will try to accommodate this as far as reasonably possible, but cannot guarantee anonymity in all circumstances.

7.3 **Records of allegations that may meet the harm threshold:** details of allegations that may meet the harm threshold will be recorded both on the individual's personnel file and the Concerns and Allegations Record. The individual's personnel file and the Concerns and Allegations Record will include a summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken in response to the allegation.

7.4 **Storage and security of Concerns and Allegations Record:** the Concerns and Allegations Record will be stored in accordance with HR advice.

7.5 **Malicious or false low-level concerns and allegations:** details of low-level concerns and allegations found to be malicious or false will be removed from personnel records and the Concerns and Allegations Record.

7.6 **Retention of records:** information stored on staff personnel files about low level concerns and allegations that may meet the harm threshold, and the Concerns and Allegations Record, will be retained by the School indefinitely. The School may in future be required to produce this information if it is notified of an allegation of historic abuse relating to a current or former member of staff, if a former member of staff is accused of committing safeguarding offences elsewhere or if a former member of staff is the subject of safeguarding allegations arising elsewhere.

8 References

8.1 **Low level concerns:** low level concerns will not be disclosed in a reference unless they were addressed formally and resulted in a sanction under the School's disciplinary or capability policies and procedures and it is otherwise appropriate to disclose them.

8.2 **Allegations that meet the harm threshold:** allegations that meet the harm threshold will be disclosed in a reference if the allegation was found to be substantiated (including any cases in which any disciplinary sanction has expired). The School will not disclose information about allegations that were found to be false, unfounded, unsubstantiated, or malicious.

9 Questions

9.1 **Contact:** please contact the Head Teacher or the DSL if you have any questions about this policy.