

SAFEGUARDING AND CHILD PROTECTION POLICY

1. Introduction

1.1 Safeguarding and promoting the welfare of children is defined as protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; taking action to enable all children to have the best outcomes. The term children, includes anyone under the age of 18 years old. (Keeping Children Safe in Education (KCSIE) September 2021).

NB – KCSIE 2021 includes additional paragraphs (41-45) to remind all staff that they 'should also 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' and that 'only appropriately trained professionals should attempt to make a diagnosis of a mental health problem'.

At COA International staff are aware of the indicators of the level of their students emotional wellbeing on a day-to-day basis. If there are any concerns whatsoever a staff member or volunteer should immediately contact Vladimir Krasniakov, the Headmaster and Designated Safeguarding Lead, who will consult with parents/carers as a matter of urgency unless there is reason to suppose that this would be contra-indicated.

1.2 This policy applies to all online students in the School.

1.3 The purpose of this policy is to inform staff, parents, contractors, agency staff, and volunteers about the School's responsibilities for safeguarding children and to enable all parties to have a clear understanding of how these responsibilities should be carried out. It applies wherever staff members are working with students.

1.4 This policy is published on the School's website and is available to parents of current and prospective students from the School's office on request. Large print or other accessible formats can also be made available.

1.5 The policy is drafted in accordance with all relevant legislation and with regard to the following government guidance documents:

- Keeping Children Safe in Education (KCSIE), (From September 1st 2021)
- Statutory Framework for the Early Years Foundation Stage, (September 2021)
- Education (Independent School Standards) Regulations, 2019
- Working Together to Safeguard Children (WTSC), 2018
- Prevent Duty Guidance for England and Wales, 2019
- Disqualification Under the Childcare Act, 2018
- The inter-agency procedures of the East Sussex Safeguarding Children Partnership, 2019
- Children Missing Education, 2016
- Strategy for dealing with safeguarding issues in charities, 2017
- Data protection: a toolkit for schools, 2018
- Information sharing: advice for practitioners providing safeguarding services, 2018
- Relationships Education, Relationships and Sex Education (RSE) and Health Education, 2019

1.6 Every complaint or suspicion of abuse from within or outside the School will be taken seriously and action will be taken in accordance with this policy.

2. Principles

2.1 COA International (the 'School') is committed to safeguarding and promoting the welfare of all students in our care, and expects all staff and volunteers to share this commitment. To achieve this, the School seeks to create a safe online school environment and a strong pastoral system. Staff are trained to listen to students' concerns, identify issues early and respond

appropriately following agreed procedures. The School will consider, at all times, what is in the best interest of the child.

2.2 The School will take all reasonable measures to:

- ensure that we practise safer recruitment in checking the suitability of staff, volunteers and supply teachers, (including staff employed by other organisations) to work with children and young people;
- ensure that, where staff from other organisations are working with our students, we have received confirmation that appropriate child protection checks and procedures apply to those members of staff and that any such checks do not raise any issues of concern in relation to the suitability of those staff members working with children;
- support students in need through early intervention and, where appropriate, support them in co-operation with multi-agencies;
- be alert to signs of abuse, both in the School and from outside and to protect each student from any form of abuse, whether from an adult or another student;
- deal appropriately with every suspicion or complaint of abuse and support students who have been abused in accordance with their agreed child protection plan;
- design and operate procedures which promote this policy, but which, so far as possible, ensure that teachers and other staff who are innocent are not prejudiced by false allegations;
- be alert to the needs of students with physical and/or emotional conditions;
- operate robust and sensible health and safety procedures;
- operate clear and supportive policies on drugs, alcohol and substance misuse;
- assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, based on an understanding of the potential risk in the local area;
- identify children who may be vulnerable to radicalisation, and know what to do when they are identified;
- teach students about safeguarding issues and about how to keep themselves safe (including on-line);

- ensure that any deficiencies in our child protection and safeguarding procedures are remedied without delay.

3. Roles and responsibilities

3.1 All staff (including volunteers) are under a general legal duty to:

- contribute to providing a safe environment in which children can learn;
- attend appropriate safeguarding and child protection training on an annual basis or additionally as directed by the DSL;
- be aware of indicators of the different forms of abuse and neglect;
- assist children in need and protect children from abuse, neglect, radicalisation and extremism;
- be familiar with the School's policies pertaining to safeguarding and child protection procedures (see Paragraphs 10 and 11 of this document) and follow them;
- know how to access and implement the procedures, independently if necessary;
- keep a sufficient record of any significant complaint, conversation or event;
- report any matters of concern to the DSL or, where appropriate, to one of the key contacts in accordance with this policy;
- support social services and any other agencies following any referral.

3.2 Senior Students

Senior students are aware that they would be expected to report to Vladimir Krasniakov, the Headmaster and DSL, about allegations and any indicators or suspicions of another student being emotionally distressed, in need of help, or at risk of harm. This is because children often tell other young people about child abuse and safeguarding issues, rather than staff or other adults.

3.3 The Designated Safeguarding Lead (DSL)

The School has appointed the Headmaster Vladimir Krasniakov as the Designated Safeguarding Lead (DSL). The DSL takes lead responsibility for safeguarding and child protection, including on-line safety, and Headmaster's job description includes these duties.

He is the first point of contact for parents, students, staff and others if they have any concerns whatsoever. A full description of the responsibilities of the DSL is contained within Keeping Children Safe in Education, 2021, but can be summarised as follows:

- raise awareness;
- provide support, advice and expertise on all matters concerning safeguarding;
- encourage a culture among staff of listening to students that takes into account their wishes and feelings;
- ensure this policy is known, understood and used appropriately, and reviewed at least annually;
- monitor the operation of this policy and regularly review and update the School's child protection procedures and their implementation;
- ensure that all members of staff and volunteers receive the appropriate training on child protection, keep and maintain records of this training and ensure that staff are aware of training opportunities and the latest local policies on safeguarding;
- refer cases of suspected abuse to the children's social services department via their 'Single Point of Advice', and to the local authority Designated Officer (generally known as the LADO) where appropriate; also support staff who make or consider making any such referrals and liaise with the local authority children's social services on behalf of the School as required;
- refer cases to the Channel programme where there is a radicalisation concern as required and support staff who make or consider making any such referrals;
- refer cases where a voluntary or paid staff member is dismissed or left due to risk/harm to a child, to the Disclosure and Barring Service;
- refer cases where a crime may have been committed to the police. KCSIE 2021 has added a link to the recently published and useful NSPCC guidance document 'When To Call The Police – Guidance for Schools and Colleges'
- keep detailed, accurate, secure written records of concerns or referrals;
- where appropriate, take part in child protection conferences or reviews by the local authority;

- monitor records of students in the School who are subject to a child protection plan, to ensure that they are maintained and updated as notifications are received;
- monitor the confidentiality and storage of records relating to child protection and where a student leaves, ensure their child protection file is transferred to the new school as soon as possible and separately from the main student file, and also ensuring secure transit and confirmation of receipt is obtained;
- represent COA International in terms of multi-agency safeguarding arrangements and multi-agency working, in line with statutory guidance Working Together to Safeguard Children;
- Prevent understand and support the School with regard to the requirement of the Prevent duty and provide advice and support to staff on protecting children from the risk of radicalisation;
- ensure that staff inviting visiting speakers to the School have completed a risk assessment for the visit, and also that they complete a post visit evaluation.

3.4 The Headmaster

At COA International the Headmaster has taken on the responsibilities of both the head teacher and the DSL. As the Headmaster, he is responsible for ensuring that the procedures outlined in this policy are followed on a day-to-day basis. To this end the Headmaster will ensure that:

- the safeguarding and child protection policy and procedures adopted by the governing body are implemented and followed by all staff;
- sufficient time, training, funding, support and resources necessary to enable the DSL to carry out his role effectively is allocated, including time for the assessment of students and attendance at strategy discussions and other necessary meetings;
- matters which affect student welfare are adequately risk assessed by appropriately trained individuals and that the relevant findings are implemented, monitored and evaluated;
- systems are in place for children to express their views and give feedback which operate with the best interests of the child at heart;

- all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively;
- students are provided with opportunities throughout the curriculum to learn about safeguarding and keeping themselves safe, including keeping themselves safe online;
- safer recruitment procedures in line with Part 3 of KCSIE, September 2021 are being adhered to;
- they liaise with the local authority Designated Officer (LADO) before taking any action and on an ongoing basis, where an allegation has been made against a member of staff, supply teacher or volunteer; and it meets the threshold of harm;
- if the allegation does not meet the threshold of harm, the Headmaster follows the instructions in KCSIE September 2021, recording the information, including any steps taken and keeping the situation under review;
- notify the Disclosure and Barring Service and, where appropriate, the Teaching Regulatory Authority of anyone who has harmed or may pose a risk to a child.

4. Staff training

Staff training encourages all members of staff to maintain an attitude of ‘it could happen here’ where abuse and neglect are concerned. Induction training for all new members of staff, including temporary employees or volunteers, includes formal child protection training which covers this safeguarding policy and related policies on Anti-Bullying and Cyber-bullying, E-Safety, and Prevent, government advice on sexual violence and sexual harassment between children in schools and colleges, September 2021, and on how to manage a report on child on child sexual violence and sexual harassment.

4.1 All staff, including the Headmaster and volunteers involved in regulated activity, will undertake appropriate child protection training which, in line with the government statutory guidance document, Keeping Children Safe in Education 2021, is updated at least every two years. In addition, all staff will receive safeguarding updates delivered through a combination of INSET and e-bulletin updates on a regular basis and at least annually. Safeguarding training is coordinated by the DSL and includes online safety and Prevent training.

4.2 All staff receive updated copies of the School policies referred to above and are required to confirm that they have read and understood them. In addition, Part 1 of KCSIE are reissued

to staff whenever this statutory guidance is updated by the DfE. Staff training provides an opportunity to check and consolidate their understanding of the policies. Staff can also access the policies via the school website.

4.3 The School continually assesses the appropriate focus for staff training so that it can respond to specific safeguarding concerns such as emotional wellbeing, online safety, radicalisation, child sexual exploitation, sexual violence and harassment, and female genital mutilation.

4.4 The DSL undertake training that is in accordance with locally-agreed procedures to provide them with the knowledge and skills necessary to carry out their role. This training includes Prevent awareness training and is updated every two years. They also refresh their knowledge and skills at regular intervals (and at least annually) by following developments in safeguarding to:

- be aware of best practice for promoting a culture of listening to children;
- understand the assessment process for providing early help and intervention, for example through locally-agreed common and shared assessment processes such as early help assessments;
- have an up-to-date working knowledge of how local authorities conduct a child protection case conferences so they can contribute to these effectively when required to do so;
- be alert to the specific needs of children in need, those with special educational needs and young carers;
- understand and support the School with regard to the requirements of the Prevent duty and provide advice and support to staff on protecting children from the risk of radicalisation;
- be able to keep proper written records of concerns and referrals.

5. Early help

5.1 The School recognises the importance of providing early help to students for a problem as soon as it arises and to prevent it from escalating. We recognise that young people may face many challenges that put them in need of support and ensure that staff are aware of

them. These include: stress, peer pressure, body image concerns, anxiety and relationship issues.

5.2 Students are encouraged to raise concerns as soon as they are identified, either to their class teacher or directly to the Designated Safeguarding Lead, so that effective early support can be provided.

5.3 If a staff member believes that a student could benefit from early help, they should discuss the matter with the DSL who will, taking into account East Sussex threshold criteria, consider what action should be taken.

5.4 If early help is provided, the situation will be monitored carefully and a referral to children's social services made if the student's situation does not appear to be improving.

5.5 The School has various mechanisms to help identify emerging problems, including monitoring systems related to child development and academic progress, the School's pastoral system, the PSHE programme and various policies, including anti-bullying and cyber-bullying, e-safety, emotional health and Prevent. Staff training also prepares staff to identify children who might benefit from early help.

5.6 The School recognises the increased vulnerability of young people to whom any or all of the following apply:

- They are disabled or have special educational needs;
- They do not have English as a first language;
- They are living away from home for the first time;
- They are 'looked after children' (ie. 'looked after by' or 'in care to') the local authority;
- They are acting as a 'young carer' (ie. in some way they 'care for' siblings, parents, or those who traditionally would be considered to be their carer);
- They are showing early signs of abuse or neglect;
- They may be subject to discrimination and maltreatment on the grounds of race, religion, ethnicity, sexual orientation or sexual identity.

Such children may be more likely to need early help. Also, recognising abuse or neglect may be more difficult for these children for many reasons, including:

- assumptions that indicators of possible abuse such as behaviour, mood or injury relate to a student's disability without further exploration;

- that students with special educational needs or disabilities can be disproportionately impacted by bullying without outwardly showing any signs;
- communication barriers and difficulties overcoming these barriers;
- a disabled child's understanding of abuse.

6. What to look out for and when to be concerned

6.1 All staff should be aware of the types and signs of abuse and neglect so that they are able to identify students who may be in need of help or protection. If staff members are unsure, they should always speak to the DSL.

6.2 Child abuse is 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. 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.

6.3 Staff should be aware of the four main categories of child abuse which are commonly identified:

- Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child 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.

- **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily 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 also be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.
- **Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing or 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 care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

NB - Serious bullying is a form of abuse and will be treated as a child protection concern if there is reasonable cause to suspect a child is suffering, or likely to suffer, significant harm.

6.4 Some other forms of abuse which staff should be aware of are:

- Children missing from education;
- Child sexual exploitation (CSE);
- Child criminal exploitation (county lines);
- Domestic abuse;
- Honour-Based Violence (HBV) and Female Genital Mutilation (FGM);

- Forced marriage;
- Radicalisation;
- Peer-on-peer abuse;
- Sexual violence and harassment (including ‘upskirting’ and ‘sexting’, which are now both criminal offences).
- Mental health issues. These are defined in Part 1 of KCSIE 2021.

7. Signs of abuse

7.1 Possible signs of abuse include the following (but are not limited to and do not necessarily mean that abuse is occurring):

- the student discloses that he or she has been abused, or asks a question which gives rise to that inference;
- a student’s injury cannot be reasonably or consistently explained, or is unusual in type or location;
- a pattern or frequency of injuries is emerging;
- the student engages in extreme or challenging behaviour or there is a sudden change in the student’s behaviour;
- the student asks to drop subjects with a particular teacher and seems reluctant to discuss reasons;
- the student appears neglected (e.g. dirty, hungry, inadequately clothed);
- the student is missing from home or appears reluctant to return home or has been openly rejected by parents or guardians;
- the student is missing from school or misses school regularly;
- the student’s development is delayed in terms of emotional progress;
- the student withdraws emotionally – showing a lack of trust in adults;
- the student shies away from being touched or flinches at sudden movements;
- the student loses or gains weight.

8. Listening to students and record keeping

8.1 The School provides a range of opportunities for students to be listened to. Class teachers/tutors, subject teachers and additional staff are all aware that any child or young

person may seek to confide in them, and that if they do it is absolutely imperative to provide a friendly listening ear without delay. The Headmaster interacts with children on an individual or group basis and often sensitive issues are at the centre of this work.

8.2 If a student discloses that he or she has been abused or neglected in some way, the member of staff should:

- immediately stop any other activity to listen (unless to do so would cause a higher level of risk);
- listen carefully to the student and keep an open mind - do not interrupt the child or be afraid of silences;
- limit the questioning to the minimum necessary for clarification using “what, when, how, where” but avoid using leading questions such as, “has this happened to your siblings?” which may prejudice an investigation. TED (Tell me about it/Explain what you mean/Describe what happened) may be very helpful;
- not make any attempt to investigate the incident themselves or make a decision as to whether or not the student has been abused;
- reassure the student, but never promise not to tell anyone. Instead, explain who has to be told to ensure that proper action is taken in accordance with this policy;
- discuss the conversation with the DSL as soon as possible and take no further action unless instructed to do so by the DSL/Headmaster Vladimir Krasniakov;
- only share information on a need-to-know basis;
- make a full written record of the conversation as set out below.

8.3 Staff must record in writing all concerns, discussions and decisions made about a child as soon as possible. The recording must be a clear, precise and factual account of the conversation or observations. Where a child has made a disclosure, the record must include details of:

- its date, time and place;
- what was said and done by whom and in whose presence;
- any noticeable non-verbal behaviour used by the child.

The record should be signed by the person making it, using names, not initials. Any other evidence (for example, scribbled notes, mobile phones containing text messages, clothing,

computers) must be kept securely and passed on to the DSL as soon as possible. No copies should be retained by the member of staff or volunteer, although they may keep a note of the date, time and place that this occurred and of the date and time they notified the DSL.

NB - 'The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children' (KCSIE 2021, Paragraph 110). Professionals are allowed to share personal information without consent where the sharing of that information will enhance the safeguarding of a child.

9. Procedure to be followed by staff if they have concerns about a student's welfare

9.1 Safeguarding incidents and/or behaviours can be associated with factors outside the School. All staff, but especially the Designated Safeguarding Lead, should consider the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding. In practice, this means assessments of students should consider whether wider environmental factors are present in a student's life that are a threat to their safety and/or welfare. Children's social care assessments must consider such factors so it is important to provide as much information as possible as part of the referral process.

9.2 If a member of staff has concerns about a student's welfare, including their emotional welfare/any mental health issue, they must inform the DSL as soon as possible, unless the concerns involve an allegation against a member of staff or volunteer, in which case the procedures set out in the section Allegations against members of staff and volunteers below should be followed.

9.3 All concerns, discussions, decisions made and the reasons for those decisions should be recorded in writing. If in doubt about recording requirements, staff should discuss with the DSL.

9.4 When a child is not considered to be at risk of harm, but still has an unmet need that could indicate that they could be categorised as a Child in Need, a referral should be made by the DSL to Children's Social Care. Parental consent for referrals of this type may not be required in these circumstances, however, it is best practice for such concerns to be discussed first with parents and any subsequent referral to be made transparently with their knowledge.

9.5 If a student is in immediate danger or is at risk of harm, a referral should be made to children's social services and/or the police immediately. Anyone can make a referral, although if a referral is made by someone other than the DSL, the DSL should be informed as soon as possible. Parents/carers may or may not be informed, depending on the situation. East Sussex social care professionals should be asked for advice about whether or not to inform parents. NB Children Social Care are required to respond to a referral within 24 hours or one working day with information about what will happen next.

9.6 If a teacher discovers that an act of female genital mutilation (FGM) appears to have been carried out on a girl under 18, the teacher must report this to the police (Telephone 101). Unless the teacher has a good reason not to, they should also still inform the DSL. This statutory duty does not apply to suspected cases of FGM or those at risk of FGM, which should both be addressed in accordance with the safeguarding procedures described in this policy. (KCSIE 2021, Part 1)

9.7 The normal safeguarding procedures outlined in this policy must be used when there are concerns about children who may be at risk of being drawn into terrorism.

9.8 Parents can report to the DSL on the welfare of any student in the School, whether their own child or not. If preferred, parents may discuss concerns in private with the student's teacher or other member of staff, who will notify the DSL.

9.9 Any member of staff may refer a matter to children's social services directly. This could happen in exceptional circumstances such as in an emergency or if there is a genuine concern that appropriate action has not been taken.

10. Duties of the DSL on being notified of a concern about a student's welfare

10.1 When the DSL is notified of any concerns about a student's welfare, he or she will decide on the appropriate course of action. In particular, the DSL will decide whether a referral should be made to children's social services.

10.2 Factors that the DSL should bear in mind when making their decision include:

- the best interests of the child;
- the nature and seriousness of the complaint;
- contextual factors;
- the referral threshold set by East Sussex social care;
- the child's wishes or feelings;

- the inter-agency procedures of the East Sussex Safeguarding Partnership;
- where relevant, local information-sharing protocols, relating to Channel referrals.

10.3 If the DSL decides not to make a referral, but to support the student with early help, the DSL will record everything, keep the situation under review and consider a later referral to children's social services if the student's situation does not appear to be improving.

11. Making a referral to children's social services

11.1 If a student is NOT in immediate danger or at risk of suffering harm but is in need of additional support from one or more agencies, the DSL will make a referral to children's social services in the Local Authority in which the child lives.

11.2 If the initial referral is made by telephone, the DSL should confirm the referral in writing. Confirmation of the referral and details of the decision on what action will be taken should be received from the Local Authority within one working day. If this is not received, the DSL should contact children's social services again.

11.3 If the DSL is not sure whether a referral should be made, he/she will consult with children's social services on a no-names basis. However, if at any stage sufficient concern exists that a student may be at risk of harm or in immediate danger, a referral to children's social services and/or the police will be made immediately.

11.4 If the referral is made by a member of staff other than the DSL, the DSL should be informed as soon as possible that a referral has been made.

11.5 The School is not required to obtain parental consent prior to a referral under Section 47 of the Children Act 1989 being made to statutory agencies (a child at risk of significant harm).

11.6 If, after a referral, the student's situation does not appear to be improving, the DSL should contact children's social services again to follow the matter up and ensure that their concerns are addressed and the student's situation improves.

11.7 Where relevant, the School will co-operate with the Channel panel and the police in providing any relevant information so that each can effectively carry out its functions to determine whether an individual is vulnerable to being drawn into terrorism. The School will respond to requests for information from the police promptly and in any event within five to ten working days.

11.8 Where a child and family would benefit from coordinated support from one or more agency (for example: education, health, housing, police) there should an inter-agency early help assessment and procedures will be put in place by children's services to arrange this. The School will coordinate with the local agencies involved.

12. Informing parents

12.1 Parents will usually be informed of any action to be taken under these procedures. However, there may be circumstances when the DSL will need to consult with the local authority Designated Officer (LADO), children's social services and/or the police before discussing details with parents.

12.2 For Channel referrals, the DSL will consider seeking the consent of the student (or their parent/guardian) when determining what information can be shared. Whether or not consent is sought will be dependent on the circumstances of the case but may relate to issues such as the health of the individual, law enforcement or protection of the public.

12.3 When the School decides to refer a particular complaint of abuse to social services or the police, the parents/guardian and student will be informed in writing of their right to make their own complaint or referral to social services or the police, where appropriate, and will be provided with contact names, addresses and telephone numbers.

12.4 For the avoidance of doubt, referrals do not require parental consent. Staff must act in the best interests of the child, even if this means making a referral against the parents' wishes.

13. Allegations of abuse made against members of staff, supply staff and/or volunteers

13.1 Staff (including supply staff and volunteers) are advised to be circumspect about placing themselves in situations which may:

- put themselves or their students at risk of harm; or
- give rise to allegations of abuse.

To reduce the risk of allegations, staff (including supply staff and volunteers) should be aware of safer working practices and should be familiar with the detailed guidance on acceptable behaviour and actions contained in the Staff Code of Conduct, which is issued to all staff. Particular care should be taken where staff have one-to-one meetings with a student.

13.2 The following procedures will be used where it is alleged that a member of staff or volunteer (including supply staff) has:

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

NB – This last point was added to KCSIE 2021 to cover situations as described. One reason is because of transferrable risk, where a member of staff or volunteer is involved in an incident outside of school/college which did not involve children but could have an impact on their suitability to work with children. For example, a member of staff was involved in domestic violence at home. No children were involved, but schools/colleges need to consider what triggered these actions and could a child in the school trigger the same reaction, therefore being put ‘at risk’.

These procedures aim to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from false, malicious or unfounded allegations. The procedures follow Part four of KCSIE 2021.

13.3 Reporting an allegation about staff (including supply staff, contractors, and volunteers)

If an allegation is made about staff that appears to meet the criteria in paragraph 13.2:

- The matter should be reported immediately to the Headmaster, Vladimir Kraniakov. The adult to whom the allegation relates should not be informed without the explicit consent of the LADO;
- Allegations about the Headmaster should be reported to Antonina Krasnyakova, Administrative Manager, without notifying the Headmaster;
- The Headmaster or Administrative Manager who receives any such allegation is referred to in these procedures as the ‘case manager’.

13.4 Action to be taken by the case manager

- If the case manager is unsure whether the allegation meets the criteria in paragraph 13.2 above, the LADO will be consulted for advice, and/or the inspectorate will be informed in the case of EYFS;
- Any allegations not meeting the criteria in paragraph 13.2 will be dealt with in accordance with the procedures of the East Sussex Safeguarding Partnership. All such allegations must be dealt with as a priority so as to avoid any delay;
- The case manager will immediately (and in any event within one working day) discuss the matter with the local authority Designated Officer (LADO). This is the person designated by the local authority to be involved in the management of allegations against people who work with children, and contact will be made with the LADO before further action is taken. The case manager may also consult with the DSL, but no attempt will be made to investigate the allegation until the LADO is consulted. The purpose of the initial discussion between the case manager and the LADO is to consider the nature, content and context of the allegation and agree a course of action. All discussions with the LADO should be recorded in writing;
- The initial sharing of information and evaluation may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern, in which case this decision and a justification for it will be recorded by both the case manager and the LADO, and agreement reached on what information should be put in writing to the individual concerned and by whom;
- In situations where a person is deemed an immediate risk to children or where there is evidence of a possible criminal offence, the case manager may, in consultation with the LADO, request police involvement from the outset;
- Any allegations of serious harm or abuse by any person living, working or looking after children in the nursery or EYFS areas (whether that allegation relates to harm or abuse committed on the premises or elsewhere) will be notified to the Independent Schools Association (ISA) as soon as practicable, including details of the action taken in respect of the allegations. ISA may recommend that Ofsted is also informed;
- Historical allegations and allegations against a teacher who is no longer teaching will be referred to the police.

13.5 Disclosure of information

- The case manager will inform the accused person of the allegation as soon as possible, after the LADO has been consulted and given advice about how much may be shared;
- The parents of the student involved will be informed of the allegation as soon as possible if they do not already know of it, although where external agencies are involved the case manager will not inform the accused or the parents until it has been agreed what information can be disclosed. As far as is possible parents will be kept informed of the progress of the case, including the outcome of any disciplinary process;
- The timing and extent of disclosures, and the terms on which they are made, will be dependent upon and subject to the laws on confidence and data protection and the advice of external agencies.

13.6 Investigation

- Allegations about safeguarding are usually conducted by external agencies such as social services or the police rather than by the School. In some cases, the LADO may ask for further enquiries to be made before a formal decision is reached about how to proceed. When this occurs, the LADO will provide specific guidance as to how and by whom the investigation should be conducted;
- Where an external agency is conducting the investigation rather than the School, the School will cooperate fully with external investigators. No internal investigation into possible breaches of the School's disciplinary code will commence until any external investigation or criminal proceedings are complete;
- In accordance with DfE statutory guidance, the following definitions will be used when determining the outcome of allegation investigations:
Substantiated: there is sufficient evidence to prove the allegation;
Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;
False: there is sufficient evidence to disprove the allegation;

Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence;

Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

- The School has a duty of care towards its employees and will ensure that effective support is provided for anyone facing such an allegation. A representative will be appointed to keep him or her informed of the progress of the case and to consider what other support is available;
- Support will also be offered to the student(s) affected and their parents/guardians. The School will consult with the children's social services, or the police as appropriate, as to how this can be done in the most appropriate and effective way.

13.7 Suspension

- In line with government guidance, suspension will not be an automatic response to an allegation and will only be considered in a case where there is cause to suspect a student or other students at the School is or are at risk of significant harm or the allegation is so serious that it might be grounds for dismissal. The School will consider whether the result that would be achieved by suspension could be obtained by alternative arrangements, such as redeployment. A member of staff will only be suspended if there is no reasonable alternative. The School will balance the need to ensure the safety and welfare of the student with the need for a full and fair investigation. The LADO will be consulted as to the appropriate action to take;
- If suspension is deemed appropriate, the reasons and justification will be recorded by the School and the individual notified of the reasons for the suspension. The School will ensure that the suspended person is given the contact details for the representative who has been appointed to keep him or her informed about the progress of the case;
- If it is decided that the person who has been suspended should return to work, the School will consider how to facilitate this; for example, whether a phased return would be appropriate. The School may provide a mentor and will also consider how to manage contact with the student who made the allegation;

13.8 Confidentiality

- The School will make every effort to guard the privacy of all parties during and after an investigation into an allegation. It is in everyone's best interest to maintain this confidentiality to ensure a fair investigation with minimum impact for all parties;
- A breach of confidentiality will be taken seriously and may warrant its own investigation. It is a criminal offence to publish information that could lead to the identification of a member of staff who is the subject of an allegation before they are charged with an offence. Publication includes any speech, writing, relevant programme or other communication in whatever form, which is addressed to the public at large or any section of the public.

13.9 Malicious allegations

- If an allegation by a student is shown to have been deliberately invented or malicious, the Headmaster will consider whether to take disciplinary action against the student in accordance with the School's Behaviour and Discipline Policy;
- If a parent has made a deliberately invented or malicious allegation the Headmaster will consider whether to require that parent to withdraw their child or children from the School, on the basis that they have treated the School or a member of staff unreasonably;

Whether or not the person making the allegation is a student or a parent (or other member of the public), the School reserves the right to contact the police to determine whether any action might be appropriate.

13.10 Record keeping and references

- Details of allegations that are found to be malicious will be removed from personnel records. For all other allegations, a comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken will be kept on the employee's file. A copy of this summary will be provided to the individual concerned. Such records will be retained at least until the employee reaches the normal pension age (or for a period of ten years from the date of the allegation, if this is longer);

- Allegations that are proven to be false, unsubstantiated or malicious will not be referred to in any reference provided by the School.

13.11 Dismissals and resignations

- If an allegation is substantiated and the member of staff, contractor or volunteer is dismissed because they are unsuitable to work with children, or would have been had the person not resigned, a settlement agreement (sometimes referred to as a compromise agreement) will not be used and a report to the Disclosure and Barring Service will be made promptly and in any event within one month of the person leaving the school;
- Any such incidents will be followed by a review of the safeguarding procedures within the School;
- If a member of staff, contractor or volunteer tenders his or her resignation, or ceases to provide his or her services, any child protection allegations will still be followed up by the School in accordance with this policy and a referral will be made to the Disclosure and Barring Service as soon as possible (within one month) if the criteria for referral are met;
- If a teacher has been dismissed, or would have been dismissed had they not resigned, in cases involving unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction for a relevant offence, the School will give separate consideration to whether a referral should be made to the Teaching Regulation Agency (TRA). The School will follow the advice set out in the TRA documents: Teacher misconduct: information for teachers and Teacher misconduct: the prohibition of teachers (as updated from time to time) to decide whether a referral should be made.

14. Arrangements for dealing with peer-on-peer abuse, allegations of abuse made against students, sexual violence and sexual abuse

14.1 Most instances of students causing harm to each other will be dealt with under the School's Anti-bullying and Behaviour Policies. However, all staff should be aware that safeguarding concerns can arise as a result of conduct by a student towards another

(sometimes referred to as peer-on-peer abuse). Examples of students' conduct towards each other that could raise safeguarding concerns are:

- bullying (including cyberbullying);
- physical violence such as hitting, kicking, biting etc;
- sexual violence;
- sexual harassment;
- 'upskirting' (Typically this involves taking a picture under a person's clothing without their knowledge, with the intention of viewing their genitals or buttocks for sexual gratification, or to cause humiliation or distress). Upskirting is a criminal offence as of 2019;
- youth produced sexual imagery ('sexting');
- initiation rituals or 'hazing' (that is, any activity expected of someone in joining or participating in a group, that humiliates, degrades, abuses, or endangers them, regardless of a person's willingness to participate).

14.2 Peer-on-peer abuse often manifests itself differently for boys than it does for girls. For example, girls seem to be at greater risk of sexual assault and/or exploitation whereas boys seem to be at greater risk of physical gang-related violence and serious youth violence.

14.3 Students with special educational needs or disabilities (SEND) are particularly vulnerable to peer-on-peer abuse.

14.4 Sexual violence and sexual harassment can occur between students of any age and sex. However, staff should be aware that some groups are at greater risk than others. Girls, students with special educational needs or disabilities (SEND) and lesbian, gay, bisexual or transgender (LGBT) students are more likely to be victims of these types of abuse. Sexual violence includes acts such as sexual assault, assault by penetration, and rape. A key feature of such acts is that the sexual activity takes place without the consent of the victim. Consent can only be given if an individual has the freedom and capacity to choose to participate in a sexual act, and under the age of 16 years a child is legally deemed to be unable to give such consent.

14.5 Sexual harassment refers to 'unwanted conduct of a sexual nature' and can occur online and offline. Sexual harassment can take a wide variety of forms:

- Sexual comments e.g. making lewd comments or sexualized remarks about a person's clothes or appearance, using sexualised names etc;
- Physical behaviour e.g. deliberately brushing against someone, interfering with clothing (flicking bra straps, lifting up skirts etc), displaying pictures, drawings or photos of a sexual nature;
- Online harassment e.g. non-consensual sharing of images and videos, unwanted sexualised comments and messages.

14.6 The School has an important role in developing students' understanding of what constitutes peer-on-peer abuse, sexual violence and sexual abuse. With this in mind, staff should be aware of the importance of:

- enforcing the School's rules which are explicit about the high standards of behaviour and courtesy the School expects;
- implementing the school's Behaviour Policy in a consistent way;
- being clear that sexual violence or sexual harassment is abusive behaviour and will never be dismissed as 'banter', 'just having a laugh' or 'teenagers being teenagers';
- implementing the School's anti-bullying strategy.

Other strategies include:

- providing developmentally appropriate PHSE lessons which develop students' understanding of acceptable behaviour. Themes covered in these lessons that are particularly relevant to peer-on-peer abuse include: consent, gender roles, stereotyping and equality, healthy relationships, and power imbalances in relationships;
- having systems in place for any students to raise concerns with staff, knowing that they will be listened to, believed and valued;
- delivering targeted work on assertiveness and keeping safe for those students identified as being potentially vulnerable;
- having robust supervision arrangements;
- provision of the legally-required Relationships Education (Junior School) or Relationships, Sex Education and Health Education (Senior School) from April 2021.

14.7 If an allegation of sexual violence, sexual harassment or peer-on-peer abuse is made, the DSL will follow part 5 KSCIE.

14.8 A student against whom an allegation of abuse has been made may be suspended during the subsequent investigation and the School's policies on behaviour and discipline will apply. If it proves necessary for a student to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of children's social services, parents are informed as soon as possible and that an appropriate adult supports the student during the interview.

14.9 Both the victim and the perpetrator will be treated as being at risk and safeguarding procedures in accordance with this policy will be followed. The DSL as part of these procedures will produce a welfare risk assessment which will consider the needs of all those involved (victim, perpetrator and other students at the School) and the measures that need to be taken to protect and keep them safe. When compiling the risk assessment appropriate weight will be given to:

- the wishes of the victim;
- the nature of the alleged incident;
- the ages of those involved;
- whether the incident was an isolated one or part of a pattern;
- any power imbalance between the victim and perpetrator;
- any ongoing risks to the victim and other students; and any relevant contextual factors.

Children's social services will independently risk assess the situation and any report produced by them will be used to inform and update the School's own risk assessment which, in any event, will be reviewed on a regular basis.

15. Other safeguarding arrangements

15.1 Teaching students to keep themselves safe.

The School is committed to educating students about how to stay safe, based on a wide view of what may happen to students, not only in School but also in the wider world. The

provision of Relationships Education is mandatory in all primary schools, as is the provision of Relationships and Sex Education in secondary schools since April 2021. School continues to explore issues including radicalisation, grooming, child sexual exploitation, healthy relationships, mental health, substance misuse and bullying and all other issues contained within the government's related statutory guidance, in a variety of contexts, including assemblies, academic and PSHE lessons, and online safety training (for example cyber-bullying and sexting). Students are also taught how to identify risks and how to modify their behaviour to mitigate risks. Staff are aware of the ongoing need to promote fundamental British values as a means of building resilience to the risks of radicalisation. The safe use of technology is a focus in all areas of the curriculum and key ICT safety measures are routinely reinforced in lessons and assemblies and at pastoral events.

15.2 Risk assessment

The School recognises that the evaluation of risks and putting in place measures to mitigate those risks contributes to promoting the welfare and protection of students. Risk assessments may pertain to the whole school, to specific curricular or extra-curricular activities that have hazards associated with them, or to individual students or staff.

15.3 Safer recruitment

All prospective members of staff undergo DBS checks and will also be subject to the other checks required under the Education (Independent School Standards) Regulations 2014 and in accordance with the latest version of KCSIE.

15.4 Children Missing Education (CME) procedures

All staff are aware that children going missing, particularly repeatedly, is a potential indicator of a range of safeguarding issues such as: neglect, sexual abuse or exploitation, child criminal exploitation, emotional wellbeing problems, substance abuse, travelling to conflict zones, female genital mutilation or forced marriage.

The School has clear procedures in place for following up on unexplained absences and, where required, reporting to the local authority students who are missing from school for

more than 10 school days (continuous). The procedure includes the requirement to record any incident, the action taken and the reasons given by the student for being missing.

15.5 The Prevent Duty

All schools are subject to a duty under Section 26 of the Counter-Terrorism and Security Act 2015 to have ‘due regard’ to the need to prevent people from being drawn into terrorism. This duty is known as the Prevent duty. There are three specific elements to the School’s approach to meeting the statutory requirements imposed by the Prevent duty. In summary these are:

- Risk assessment – working with the Local Authority, who provide contextual information about the area, the School assesses the risk of students being drawn into terrorism, including extremist ideologies;
- Working in partnership – liaising closely with the East Sussex Safeguarding Partnership to ensure students requiring support are referred at a suitably early stage;
- Staff training – enabling staff to identify students at risk of being drawn into terrorism and to challenge extremist ideas.

15.6 Visiting speakers

Any student or member of staff who wishes to invite a speaker to address students must provide details of the individual in so that a vetting procedure can be carried out by the DSL. In cases where specific vetting checks are not prescribed by KCSIE the visiting speaker will be accompanied at all times by a member of staff to ensure there is no unsupervised access to students.

15.7 Confidentiality and information sharing

The School will keep all child protection records confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children. The School will co-operate with police and children's social services to ensure that all relevant information is shared for the purposes of child protection investigations. Where a student who is subject to a child protection plan is moving to another school, the DSL will ensure their child protection file is securely transferred to the new school as soon as possible. This file will be transferred separately from the main student file, to the DSL at the new

school and confirmation of safe receipt will be obtained. The DSL should also consider if it would be appropriate to share any information with a new school in advance of a child leaving their school, for example, information that would allow the new school to continue supporting victims of abuse and have support in place for when the child arrives.

Where allegations have been made against a member of staff, the School will consult with the LADO and, where appropriate, with the police and social services to agree the information that should be disclosed and to whom.

Information sharing is essential for effective safeguarding and promoting the welfare of children and young people. The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children. Information that is relevant to safeguarding is regarded as ‘special category personal data’ and as such can be shared securely on a need-to-know basis. Further non-statutory guidance Information Sharing was published by the Government in July 2018.

15.8 Whistleblowing

All staff are required to report to the Headmaster any concerns about:

- poor or unsafe safeguarding practices at the School;
- potential failures by the School or its staff to properly safeguard the welfare of students; or
- other wrongdoing in the workplace that does not involve the safeguarding and welfare of students.

If the member of staff feels unable to raise their concern with the Headmaster or if they believe any concern has not been dealt with, they should contact the Administrative Manager. The NSPCC whistleblowing advice line is available for staff who do not feel able to raise safeguarding concerns internally. Any member of staff can whistle-blow without fear of retribution or disciplinary action provided the report was made in good faith. However, malicious allegations may be considered as a disciplinary offence.

15.9 Monitoring this Policy

Any child protection incidents at the School will be followed by a review of the safeguarding procedures in the School. Where an incident involves a member of staff the LADO will be asked to assist in this review to determine whether any improvements can be made to the School's procedures.

The DSL will monitor the operation of this policy and procedures on a day-to-day basis. The Headmaster will undertake an annual review of the policy and implementation of its procedures including good co-operation with local agencies and of the efficiency with which the related duties have been discharged. The Headmaster will draw on the expertise of staff, when considering amendments to policies and/or arrangements related to safeguarding. Any deficiencies or weaknesses in child protection and safeguarding arrangements identified at any time will be remedied without delay.

Vladimir Krasniakov
Headmaster

Date Reviewed	Approved By
16 of November 2021	Headmaster
27 of December 2021	Headmaster
23 of February 2022	Headmaster