

Child Protection and Safeguarding

Cambridge School of Bucharest



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IMPORTANT CONTACTS

| Role | Name | Contact details |
|--|----------------------|---|
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| Designated Child Safeguarding Officer (DCSO) | Naomi Springer | Naomi.springer@cambridgeschool.ro |
| Designated Child Safeguarding Officer (DCSO) | Connor Butler | Connor.butler@cambridgeschool.ro |
| Designated Child Safeguarding Officer (DCSO) | Heather Tereszczenko | Heather.tereszczenko@cambridgeschool.ro |
| Designated Child Safeguarding Officer (DCSO) | Ioana Simonia | ioana.simonia@cambridgeschool.ro |
| Designated Child Safeguarding Officer (DCSO) | Clint Bowers | Clint.Bowers@cambridgeschool.ro |
| School Director | Rita Hayek Maalouf | Rita.Maluf@cambridgeschool.ro Tel: 0040 21 210 21 31 |
| School Partner | Joseph Khoury | Tel: 0040 21 210 21 31 Joseph.Khoury@cambridgeschool.ro |
| Police | | 112 |

| Role | Name | Contact details |
|--|------|--|
| Child's Phoneline (Telefonul Copilului) Asociatia Telefonul (Copilului Romania) | | 116 111 www.telefonulcopilului.ro |
| Emergency phone number to help abused children In Romania Sts.ro www.sts.ro Serviciu de Telecomunicatie Speciale | | 119 |
| Child Protection Voluntari | | 0040 21 270 4790 |

AIMS

The school aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues

LEGISLATION AND STATUTORY GUIDANCE

This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education (2021) and Working Together to Safeguard Children (2018), the Governance Handbook, and Regulations of Law 272/ 2004 of the Civil Code of Laws of the State of Romania regarding Children's Rights and Child Protection and Safeguarding (2016).

This policy is also based on the following legislation:

The Standards for British schools overseas, which places a duty on independent schools to safeguard and promote the welfare of students at the school.

This policy also meets requirements relating to safeguarding and welfare in the framework for the Early Years Foundation Stage.

DEFINITIONS

Safeguarding and promoting the welfare of children means:

- 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

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix A explains the different types of abuse.

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

Child/Children includes everyone under the age of 18.

CSB refers to Cambridge School of Bucharest.

DBS refers to Disclosure and Barring Services

DCSO refers to the Designated Child Safeguarding Officer.

HOY refers to Head of Year.

ICPC refers to the International Child Protection Certificate.

Lead DCSO refers to the Lead Designated Child Safeguarding Officer.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.

Parents refers to birth parents and other adults who are in a parenting role, such as adoptive parents, step-parents, and foster carers.

PSCHEE refers to Personal, Social, Citizenship, Health, and Economic Education.

Staff refers to all those working for or on behalf of the school (full time, part time, paid or voluntary).

Student refers to any young person up to and over the age of 18 within CSB.

Sharing of nudes and semi-nudes (also known as Sharing of nudes and semi-nudes or youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.

EQUALITY STATEMENT

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities

- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers and / or refugees
- Are at risk due to either their own or a family member's mental health needs
- Students in care
- Are missing from education
- Whose parent /carer has expressed an intention to remove them from school to be home educated.

ROLES AND RESPONSIBILITIES

Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers and the proprietor of the school. Our policy and procedures also apply to extended school and off-site activities.

All staff

All staff will read and understand Part 1 and Annex A of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually. All staff members will undergo child protection training (including online safety) that is regularly updated and considered as part of the whole-school approach. They will also receive regular safeguarding and child protection updates as required, and at least annually.

Staff, who work directly with children, are also expected to read Annex B of KCSIE (about specific safeguarding issues).

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the Teachers' Handbook, the behaviour policy, and the role and identity of the designated safeguarding lead (LDCSO) and DSCOs.
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- The signs of different types of abuse and neglect, as well as specific safeguarding issues (see Appendix B).
- Report any Child Protection concerns using Engage, using the "Child Protection Referral" Daybook (see Appendix D) or the white forms (Appendix E).
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.

Lead Designated Child Safeguarding Officer (LDCSO)

The LDCSO is a member of the School Administration. Our LDCSO is Julia Suroz. The LDCSO takes lead responsibility for child protection and wider safeguarding.

During term time, the LDCSO will be available during school hours for staff to discuss any safeguarding concerns.

The LDCSO can also be contacted out of school hours by email Julia.Suroz@cambridgeschool.ro or by calling this number - 0746234607

When the LDCSO is absent, the DSCOs (refer to the important contacts section for their names and contact details) – will act as cover.

If the LDCSO and DSCOs are not available, Rita Maalouf, the School Director will act as cover (for example, during out-of-hours/out-of-term activities).

The LDCSO will be given the time, funding, training, resources, and support to:

- Provide advice and support to other staff on child welfare and child protection matters

- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so, and their knowledge and skills should be updated at least annually.
- Contribute to the assessment of children
- The LDCSO and DCSO will undergo training every 2 years.

The LDCSO will also keep the School Director informed of any issues, and liaise with any relevant agencies.

The full responsibilities of the LDCSO and DCSOs are set out in their job description.

The Proprietor

The Proprietor will approve this policy at each review, and hold the School Director to account for its implementation.

The Proprietor will facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.

The Proprietor will act as the 'case manager' in the event that an allegation of abuse is made against the School Director, where appropriate.

The Proprietor, and other school owners, will read relevant sections of the yearly updates to Keeping Children Safe in Education.

The School Director

The School Director is responsible for the implementation of this policy, including:

- Ensuring that staff and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction
- Making sure all staff have the relevant background checks
- Communicating this policy to parents via the school website
- Ensuring that the LDCSO has appropriate time, funding, training, and resources, and that there is always adequate cover if the LDCSO is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate.

CONFIDENTIALITY

The school complies with the principles of the Romanian Personal Data Protection Act 2018, and the Regulation (EU) No. 679/2016 of the European Parliament and of the Council of the European Union on the protection of individuals with regard to the processing of personal data (GDPR).

All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the student and staff involved, but also to ensure that being released into the public domain does not compromise evidence.

Staff should only discuss concerns with the LDSCO / DSCO. That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis. Any written records of concern forms, and other written information, will be stored in a locked facility and any electronic information will be password protected and only made available to relevant individuals.

The school is concerned with and committed to protecting and maintaining the privacy of all parents and students, as well as protecting and securing all their collected personal data.

You should note that:

- Timely information sharing is essential to effective safeguarding.
- 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.
- GDPR does not prevent, or limit, the sharing of information for the purposes of keeping children safe.
- If staff need to share 'special category personal data', GDPR does not prevent, or limit, the sharing of information for the purposes of keeping children safe.
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests.
- If staff are in any doubt about sharing information, they should speak to the LDSCO or a DSCO.
- Confidentiality is also addressed in this policy with respect to record-keeping, and allegations of abuse against staff.

RECOGNISING ABUSE AND TAKING ACTION

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

Contact the LDSCO, using the contact details in the important contact section. If the LDSCO is unavailable, a DSCO or the School Director can be contacted using the safeguarding phone number available in the contact's section.

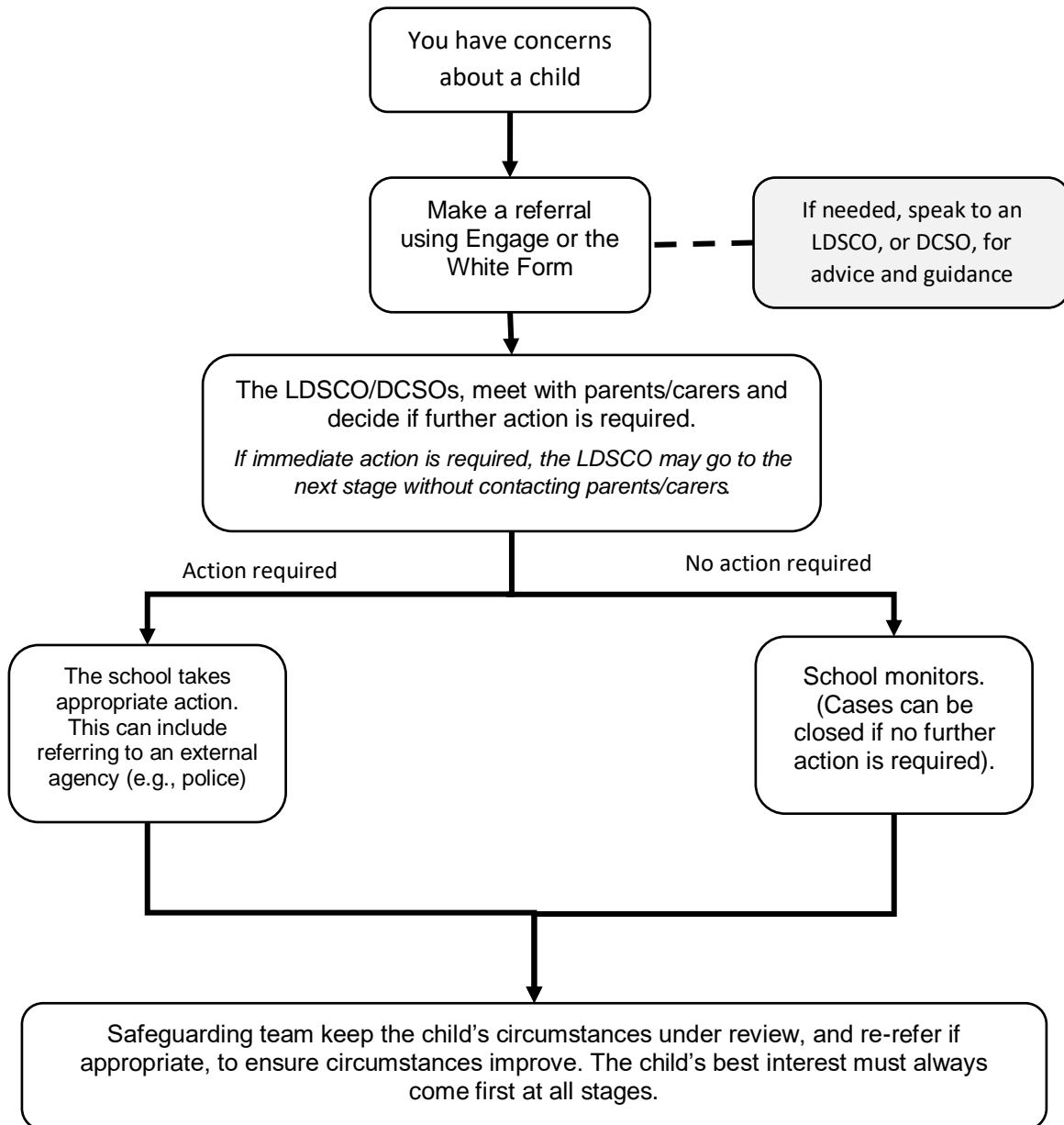
If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

Figure 1 illustrates the procedure to follow if you have any concerns about a child's welfare.

REFERRAL

Referrals can be made via Engage or the white forms located in key areas around the school.

Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)



If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset.
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner.
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.
- Write/type up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it.
- Hand the written form to a member of the LDCSO / DCSO or submit the referral using Engage.

If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the LDCSO first to agree a course of action.

If in exceptional circumstances the LDCSO is not available, this should not delay appropriate action being taken. Speak to a DCSO or a member of the senior leadership team.

Where there is a concern, the LDCSO will consider the level of risk and decide on the next steps.

If you have a mental health concern

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.

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps outlined in the referral stages above.

If you have a mental health concern that is not also a safeguarding concern, you can speak to the LDCSO, or DCSO, to agree a course of action. A referral to the school's counsellor can also be made via Engage.

Concerns about a staff member, volunteer or contractor

If you have concerns about a member of staff (including, volunteer or contractor), or an allegation is made about a member of staff (including a volunteer or contractor) posing a risk of harm to children, speak to the School Director as soon as possible. If the concerns/allegations are about the School Director, speak to the proprietor.

The School Director or Proprietor will then follow the procedures set out in Appendix C, if appropriate.

NOTIFYING PARENTS

Where appropriate, we will discuss any concerns about a child with the child's parents. The LDCSO / DCSSO will normally do this in the event of a suspicion or disclosure.

In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved.

E-SAFETY AND THE USE OF MOBILE TECHNOLOGY

The school follows the statutory safeguarding guidance, Keeping Children Safe in Education, and its advice for schools on:

- Teaching online safety in schools.
- Preventing and tackling bullying and cyber-bullying.

The school's LDSCO takes lead responsibility for online safety in school, in particular:

- Supporting the School Director in ensuring that staff understand this policy and that it is being implemented consistently throughout the school
- Working with the School Director, IT manager and other staff, as necessary, to address any online safety issues or incidents
- Ensuring that any online safety incidents are logged and dealt with appropriately in line with this policy
- Ensuring that any incidents of cyber-bullying are logged and dealt with appropriately in line with the school behaviour policy
- Updating and delivering staff training on online safety
- Liaising with other agencies and/or external services if necessary

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

- Have robust processes in place to ensure the online safety of students, staff, and volunteers.
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism
- **Contact** – being subjected to harmful online interaction with other users, such as peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g., consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

Cyber-bullying by students, via texts and emails, will be treated as seriously as any other type of bullying and will be managed through our Anti-Bullying Policy.

Chatrooms and social networking sites are the more obvious sources of inappropriate and harmful behaviour and students are not allowed to access these sites in school.

Staff should contact students only through the official school-sanctioned platforms, Engage, MS Teams and school email address. Staff should never be in contact with a current school student or a group of students via a private social media platform, such as Facebook and Instagram, for instance. Staff may face disciplinary procedures and action, up to and including dismissal and reporting to the police if appropriate, when found to be in breach of school policy.

The school's IT Manager has put into place appropriate filtering and monitoring systems, which are updated on a regular basis and keep students safe from potentially harmful and inappropriate content and contact online while at school, including terrorist and extremist material. The school systems are also secure and protected against viruses and malware.

Students from Year 1 are taught how to:

- Use technology safely and respectfully.
- Keeping personal information private.
- Recognise acceptable and unacceptable online behaviour
- Identify where to go for help and support when they have concerns about content or contact on the internet or other online technologies.
- The rules and principles for keeping safe online, how to recognise risks, harmful content and contact, and how to report them

All staff should ensure that any incidents of cyber-bullying are dealt with appropriately and in line with the school behaviour policy.

All staff and parents have access to the 'National Online Safety' platform to keep up-to-date with their e-safety professional development and current technological risks.

Parents / carers will be educated about online safety via school platforms.

All members of the school community will be notified about the restrictions that have been put in place regarding mobile phones and cameras.

STUDENTS WITH SPECIAL EDUCATIONAL NEEDS AND DISABILITIES

We recognise that students with special educational needs and disabilities (SEND) can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- Students being more prone to peer group isolation than other students
- The potential for students with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

We offer extra pastoral support for students with SEN and disabilities, more information about this can be found in our SEND Policy.

MOBILE PHONES AND CAMERAS – STAFF

Staff are allowed to bring their personal phones to school for their own use.

Staff will not take pictures or recordings of students on their personal phones or cameras.

We will follow the General Data Protection Regulation (GDPR) when taking and storing photos and recordings for use in the school.

RECRUITMENT, SELECTION AND PRE-EMPLOYMENT VETTING

Details can be found in our Safer Recruitment Policy.

CHECKING THE IDENTITY AND SUITABILITY OF VISITORS AND CONTRACTORS

All visitors will be required to verify their identity to the satisfaction of staff.

If the visitor is unknown to the setting, we will check their credentials (ID) and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign the visitors' book and wear a visitor's badge.

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times.

Contractors

To enter the campus, they pass through the security kiosk, when identities are verified.

All contractors have background checks that are ran through the companies who employ them. The school also shares a video providing an overview of the school's child protection and safeguarding procedures. Each company confirms that their employees have watched, and understood, this video.

As much as possible, external contractors work outside of the regular school day, as not to disturb school activities.

RECORD-KEEPING

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded. If you are in any doubt about whether to record something, discuss it with the LDCSO / DCSO.

All records will include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved, and a note of any action taken, decisions, and outcome. They will be written as an electronic referral on Engage and/or white form available and given directly to the LDCSO. All the records will be confidential and available only for LDCSO / DCSOs and the School Director. Written files will be locked and stored. All information will be stored for 20 years.

Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the LDCSO will ensure that their child protection file is forwarded promptly and securely, and separately from the main student file. In addition, if the concerns are significant or complex, the LDCSO will speak to the LDCSO of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

TRAINING

All Staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect.

Staff will also receive regular safeguarding and child protection updates (for example, through emails, e-bulletins, and staff meetings) as required, but at least annually.

Contractors who work on the school site will sent a video that explains the importance of safeguarding at CSB, the school safeguarding and child protection procedures - including referral.

Volunteers will receive appropriate training, if applicable.

The LDSCO and Deputies

The LDSCO and DSCOs will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals.

Governors/Proprietors

All Proprietors receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

LINKS TO OTHER POLICIES

- Teacher/Staff Handbook
- Safer Recruitment Policy
- Uncollected Child Policy
- Missing Child Policy
- Health and Safety Policy
- SEND Policy
- Anti-bullying

APPENDIX A – TYPES OF ABUSE

Article 487-499 of the Civil Code and Law No 272/2004 (Legea nr. 272/2004) on the protection and promotion of children's rights) with regard to the child include:

- Parents have the right and duty to raise the child, to care for the health and physical, psychological and intellectual development of the child, of his/her education, studies and professional training, according to their own beliefs, characteristics and needs of the child.

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

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

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse 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
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- 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
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

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
- 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 (including via the internet)

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

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate caregivers)
- Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Some children may be more at risk of harm for specific issues such as sexual violence, homophobic, biphobic or transphobic bullying, or racial discrimination.

APPENDIX B – SPECIFIC SAFEGUARDING ISSUES

Children missing from education

A child going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

Child Criminal Exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education

If a member of staff suspects CCE, they will discuss this with the LDSCO.

Child Sexual Exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual

activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the LDSCO.

Domestic Abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home.

Older children may also experience domestic abuse and/or violence in their own personal relationships.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.

The LDSCO will provide support according to the child's needs and update records about their circumstances.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

Any concerns would be reported to the LDSCO

So-called 'honour-based' abuse (including FGM and forced marriage)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the LDSCO.

FGM

The LDSCO will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

The referral section of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a student is at risk of FGM.

Indicators that FGM has already occurred include:

- A student confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A girl:
 - Having difficulty walking, sitting or standing, or looking uncomfortable
 - Finding it hard to sit still for long periods of time (where this was not a problem previously)
 - Spending longer than normal in the bathroom or toilet due to difficulties urinating
 - Having frequent urinary, menstrual or stomach problems
 - Avoiding physical exercise or missing PE
 - Being repeatedly absent from school, or absent for a prolonged period
 - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
 - Being reluctant to undergo any medical examinations
 - Asking for help, but not being explicit about the problem
 - Talking about pain or discomfort between her legs

Potential signs that a student may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A girl:

- Having a mother, older sibling or cousin who has undergone FGM
- Confiding to a professional that she is to have a “special procedure” or to attend a special occasion to “become a woman”
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
- Being unexpectedly absent from school

The above indicators and risk factors are not intended to be exhaustive.

Forced marriage

Forcing a person into marriage is a crime. 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 of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the ‘one chance’ rule, i.e., we may only have one chance to speak to the potential victim and only one chance to save them.

If a member of staff suspects that a student is being forced into marriage, they will speak to the student about their concerns in a secure and private place. They will then report this to the LDSCO/ DSCO.

Preventing radicalisation

- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups
- **Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces
- **Terrorism** is an action that:
 - Endangers or causes serious violence to a person/people;
 - Causes serious damage to property; or
 - Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area.

We will ensure that suitable internet filtering is in place, and equip our students to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in students' behaviour.

Signs that a student is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a student, they will follow our procedures set out in the referral section of this policy, including discussing their concerns with the LDSCO / DCSO.

Staff should **always** take action if they are worried.

Child-on-child abuse

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school and online. There is a zero-tolerance approach to abuse at CSB, and it should never be passed off as “banter”, “just having a laugh”, “part of growing up” or “boys being boys” as this can lead to a culture of unacceptable behaviours and an unsafe environment for children. In addition, it is more likely that girls will be victims and boys perpetrators, but all

child-on-child abuse is unacceptable and will be taken seriously. Even if there are no reported cases of child-on-child abuse, such abuse may still be taken place and simply not being reported.

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

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between peers
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nudes and semi nudes images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where children abuse their peers online, this can take the form of, for example, 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 don't want to receive such content.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in the referral section of this policy, as appropriate.

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

- Between children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will complete a 'Sexual Harassment and Violence Report' Daybook in Engage, as appropriate.

Serious violence

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include:

- Being male
- Having been frequently absent or permanently excluded from school
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a student being involved in, or at risk of, serious violence, they will report this to the LDSCO / DCSO.

Non-collection of children

If a child is not collected at the end of the session/day, we will follow the stages outlined in the schools Uncollected Child Policy.

Missing students

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will follow the stages outlined in the schools Missing Child Policy.

Abuse of Trust

All school staff are aware that inappropriate behaviour towards students is unacceptable and that their conduct towards students must be beyond reproach.

In addition, staff should understand that, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the school staff and a student under 18 is a criminal offence, even if that student is over the age of consent (18 years in Romania).

Sharing of Nudes and Semi-nudes

Your responsibilities when responding to an incident

If you are made aware of an incident involving Sharing of nudes and semi-nudes (also known as 'youth produced sexual imagery'), you must report it to the LDCSO / DCSO immediately.

You must **not**:

- View, download or share the imagery yourself, or ask a student to share or download it. If you have already viewed the imagery by accident, you must report this to the LDCSO/DCSO.
- Delete the imagery or ask the student to delete it
- Ask the student(s) who are involved in the incident to disclose information regarding the imagery (this is the LDCSO's / DCSO's responsibility)
- Share information about the incident with other members of staff, the student(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident and reassure the student(s) that they will receive support and help from the LDCSO.

Initial review meeting

Following a report of an incident, the LDCSO will hold an initial review meeting with appropriate school staff. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to student(s)
- If a referral needs to be made to the police
- If it is necessary to view the imagery in order to safeguard the young person (in most cases, imagery should not be viewed)

- What further information is required to decide on the best response
- Whether the imagery has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images from devices or online services
- Any relevant facts about the students involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the students involved (in most cases parents should be involved)

The LDCSO will make an immediate referral to the police if:

- The incident involves a member of staff
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the LDCSO knows about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any student in the imagery is under 13
- The LDCSO has reason to believe a student is at immediate risk of harm owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the LDCSO, in consultation with the School Director and other members of staff as appropriate, may decide to respond to the incident without involving the police.

Further review by the LDCSO

If at the initial review stage a decision has been made not to refer to the police, the LDCSO will conduct a further review.

They will hold interviews with the students involved (if appropriate) to establish the facts and assess the risks.

If at any point in the process there is a concern that a student has been harmed or is at risk of harm, a referral will be made to the police immediately.

Informing parents

The LDCSO will inform parents at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the student at risk of harm.

Referring to the police

If it is necessary to refer an incident to the police, this will be done through by dialing 112.

APPENDIX C - ALLEGATIONS OF ABUSE MADE AGAINST STAFF

This section of this policy applies to all cases in which it is alleged that a current member of staff, including a supply teacher or volunteer, has:

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

It applies regardless of whether the alleged abuse took place in the school. Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the police.

We will deal with any allegation of abuse against a member of staff or volunteer very quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

Our procedures for dealing with allegations will be applied with common sense and judgement.

Suspension of the accused until the case is resolved

Suspension will not be the default position and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted

Definitions for outcomes 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 (this does not imply guilt or innocence)
- Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the School Director (or Proprietor) where the School Director is the subject of the allegation) – the ‘case manager’ – will take the following steps:

- This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police. (The case manager may, on occasion, consider it necessary to involve the police before consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer. Where the police are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police, as appropriate
- If immediate suspension is considered necessary, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- If it is decided that further action is needed, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible. The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against members of staff (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a staff member will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to any relevant agencies for consideration of whether inclusion on the barred lists is required.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case School Director will consider how best to facilitate this.

The School Director, together with the LDCSO, will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated, unfounded, false, or malicious reports

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LDCSO, together with the School Director, will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LDCSO and the School Director will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Concerns that do not meet the harm threshold

This section applies to all concerns (including allegations) about members of staff, volunteers, and contractors, which do not meet the harm threshold set out in above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Disclosure made by a child, parent or other adult within or outside the school

- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**

Examples of such behaviour could include, but are not limited to:

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Using inappropriate sexualised, intimidating or offensive language

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

Responding to low-level concerns

If the concern is raised via a third party, the School Director will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

The School Director will use the information collected to categorise the type of behaviour and determine any further action.

Record keeping

All low-level concerns will be recorded in Engage. In addition to details of the concern raised, records will include a description of the concern, any action taken.

Records will be:

- Kept confidential, held securely and comply with GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action.
- Retained at least until the individual leaves employment at the school

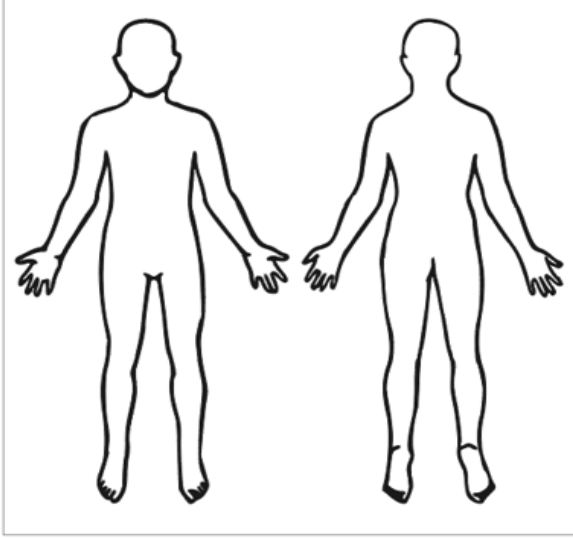
Where a low-level concern relates to a contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

APPENDIX D – DIGITAL REFERRAL FORM

| Form Search | |
|---|--|
| Name: | <input type="text"/> <input type="button" value="Search"/> |
| Available Pupils | Selected Pupil Recipients (0/70) |
| <div> <div></div> <div> <div></div> <div></div> <div></div> <div></div> </div> </div> | |
| Item Date Time | <input type="text" value="10/08/2020"/> <input type="text" value="12:43"/> |
| Type of Concern | <input type="button" value="Select"/> |
| Details of Concern | <div> <div></div> </div> <div> <input type="button" value="Spell Check"/> Total Characters:0 </div> |
| Body Map | <div> <input checked="" type="radio"/> Circle <input type="radio"/> Triangle <input type="radio"/> Square </div> <div> Selected Colour <div> <div></div> <div></div> <div></div> <div></div> <div></div> <div></div> </div> </div> <div>  </div> |
| Staff Notice | <input type="button" value="Send Notice:"/> <input checked="" type="checkbox"/> <input type="button" value="Select Staff:"/> <input type="button" value="All items checked"/> |
| Update History | |
| School Use Only | <input checked="" type="checkbox"/> |
| <input type="button" value="Save"/> <input type="button" value="Save and Close"/> <input checked="" type="checkbox"/> Send Notice <input type="button" value="Cancel"/> | |

APPENDIX D – PAPER BASED REFERRAL FORM (WHITE FORM)



CHILD PROTECTION RECORD – Report of a Concern

| | | | |
|--------------------------------|--------------------------------------|------------------------------------|--|
| Name of referrer: | | Role of referrer: | |
| Child Name: | | | |
| Date of birth: | | Year Group / class: | |
| Details of concern: | <i>(Use body map if appropriate)</i> | | |
| Date / Time / Signature | | | |
| Reported to: | | Role of person reported to: | |
| Signed: | | | |
| Date: | | | |

Body Map

