مدرسة الإبداع العلمي الدولية
INTERNATIONAL SCHOOL OF CREATIVE SCIENCE
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Child Protection and Safeguarding Policy

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Child Protection and Safeguarding Policy

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1. Important Contacts

Role	Case Manager	Full Name	Contact Details
Designated Safeguarding Lead (DSL)	Case Manager		
Deputy Designated Safeguarding Lead (DDSL)	Case Manager	Raeesa Modak	raeesa.modak@iscs.bh
Deputy Designated Safeguarding Lead (DDSL) / Principal	Case Manager (if concerning member of leadership)	Ahmed Nadhim Al-Talib	principal@iscs.bh
BEAM Safeguarding Governor & Chair of Governors	Case Manager (if concerning Principal)	Hesham Abdeen	heshams@beam.co.ae
Designated officer at BEAM		Shadi Hassan	shadi.hassan@beam.co.ae

2. 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 training in recognizing and reporting safeguarding issues.

3. Legislation and statutory guidance

This policy is based on the United Kingdom (UK) Department for Education's statutory guidance Keeping Children Safe in Educa tion (2023) and Working Together to Safeguard Children (2018), and the Governance Handbook. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- International Convention on the Rights of the Child
- Child Law promulgated by Law No. (37) of 2012
- Restorative Justice Law for Children and their Protection from Maltreatment promulgated by Law No. (4) of 2021
- Kingdom of Bahrain: National Internet Safety Review (NISR)
- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school.
- This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage.

4. Definitions

Safeguarding and promoting the welfare of children means:

- Protecting children from maltreatment
- Preventing impairment of children's 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.

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

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

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. Appendix 1 defines neglect in more detail.

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

Children includes everyone under the age of 18.

5. 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 or health conditions (see section 14)
- Are young carers.
- May experience discrimination due to their race, ethnicity, religion
- 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 radicalization.
- Are at risk due to either their own or a family member's mental health needs.
- Are missing from education.

We are committed to taking proportionate positive action to address any

disadvantage for students with protected characteristics.

6. Roles and Responsibilities

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

6.1 All staff

All staff will read and understand part 1 and annex B of the UK Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually.

All staff will sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff Code of Conduct, the role and identity of the designated safeguarding lead (DSL) and deputies, the behaviour policy, the school's online safety policy and the attendance policy.
- The early help process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.
- 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, such as child sexual exploitation (CSE), indicators of being at risk from or involved with serious violent crime, FGM and radicalization.
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.

6.2 The designated safeguarding lead (DSL)

The DSLs takes lead responsibility for child protection and wider safeguarding. During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. If you need to contact either DSL after school hours, please email them on their registered school email address.

When the DSL are absent, the deputies identified on page 4 should be contacted. If the DSL and DDSLs are not available, Principal's PA will ensure that contact is made or will escalate to the Principal and/or identified Safeguarding Governors at BEAM. Please note details of safeguarding should not be provided to Principal's PA.

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

- Provide advice and support to other staff on matters related to child welfare and protection.
- Participate in strategy discussions, inter-agency meetings, and/or assist other staff in doing so.
- Contribute to the assessment of children.
- Refer suspected cases, as appropriate, to the relevant authority (Child Protection Centre & Child Helpline 998 Service/Police/Hospital) and support staff making direct referrals.

The DSL and Deputy DSLs will also keep the principal informed of any issues, and liaise with authorities' case managers and designated officers for child protection concerns as appropriate.

6.3 BEAM Safeguarding Governor

The BEAM Safeguarding Governor 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.
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation.
- Appoint a senior board level (or equivalent) lead to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL.
- The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate (see appendix 2).
- All governors will read Keeping Children Safe in Education in its entirety.

6.4 The Principal

The Principal and Designated Safeguarding Lead must:

- Ensuring that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction.
- Communicating this policy to parents when their child joins the school and via the school website.
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL 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 (see appendix 3).
- Ensuring the relevant staffing ratios are met, where applicable.
- Making sure each child in the Early Years Foundation Stage is assigned a key person.

7. Confidentiality

Timely information sharing is essential to effective safeguarding:

- Information must be shared on a 'need-to-know' basis, but you do not need consent to share information if a child is suffering, or at risk of, serious harm.
- Staff should never promise a child that they will not tell anyone about an allegation, as this may not be in the child's best interests.
- Confidentiality is also addressed in this policy with respect to record-keeping in, and allegations of abuse against staff in appendix 2.
  For more information and guidance on information sharing, please read information sharing advice for safeguarding practitioners.

8. Recognising abuse and taking action

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.

Please note – in this and subsequent sections, you should take any references to the DSL to mean "the DSL (or deputy DSLs)".

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

Make a referral to the police immediately if you believe a child is suffering or likely to suffer from harm, or in immediate danger when the DSL is not available to report to. Anyone can make a referral.

Tell the DSL as soon as possible if you make a referral directly.

8.2 If a child makes a disclosure to you

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 to children that the law is in place to protect them from harm and not criminalise them.

- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.
- Write 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.
- Sign and date the write-up and pass it on to the DSL.

All referrals should be made via Appendix 4 and 5, copies of which are available is reception and staff room. Please inform the DSL or DDSL when you have submitted a report in case immediate action is required. If they are not available, please escalate to the principal.

8.3 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 on page 11 illustrates the procedure to follow if you have any concerns about a child's welfare.

Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team. Share any action taken with the DSL as soon as possible.

8.4 Referral

If it is appropriate to refer the case to the police or another government agency, the DSL will make the referral or support you to do so.

If you make a referral directly, you must tell the DSL as soon as possible. The DSL or person who made the referral must follow up with the contacted authority.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

8.5 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 DSL first to agree a course of action.

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

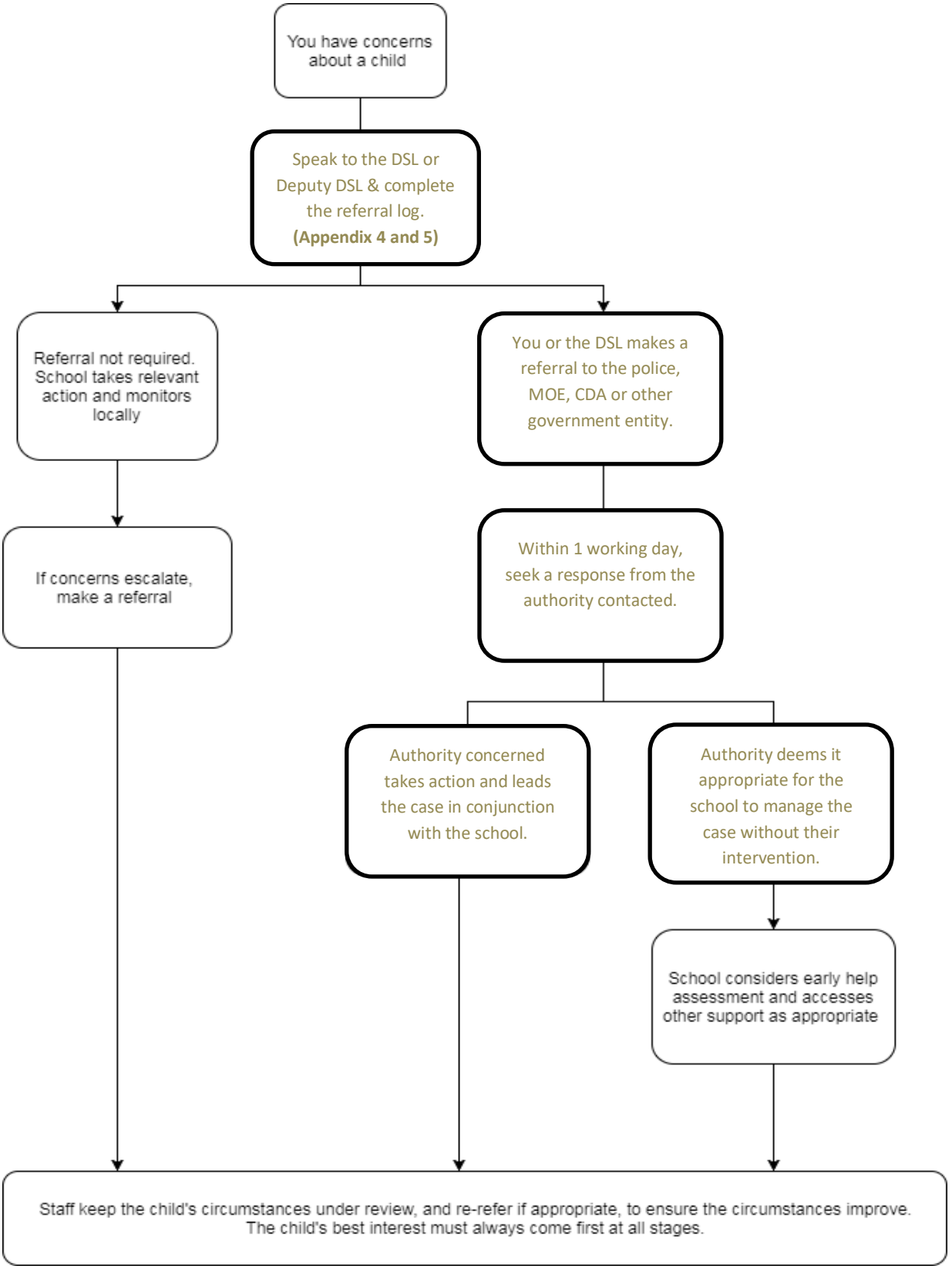
Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to.

In an emergency, call 999 if you:

- Think someone is in immediate danger.
- Think someone may be planning to travel to join an extremist group.
  See or hear something that may be terrorist related.

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)

(Note – if the DSL is unavailable, this should not delay action. Speak to the principal or if not available BEAM Safeguarding Governor.)



8.6 Concerns about a staff member or volunteer

If you have concerns about a member of staff or volunteer, or an allegation is made about a member of staff or volunteer posing a risk of harm to children, speak to the Principal. If the concerns/allegations are about the Principal, speak to the chair of governors.

The Principal/BEAM Safeguarding Governor will then follow the procedures set out in appendix 2 and complete the recording forms in appendix 4 and 5, if appropriate.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the principal, report it directly to the Chair of Governors.

8.7 Allegations of abuse made against other pupils

We recognise that children are capable of abusing other children. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”, as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils. We also recognise the gendered nature of child-on-child abuse (i.e. that it is more likely that girls will be victims and boys’ perpetrators). However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under our school’s behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence.
- Could put pupils in the school at risk.
- Is violent.
- Involves pupils being forced to use drugs or alcohol.
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes).

If a pupil makes an allegation of abuse against another pupil:

- You must record the allegation via appendix 4 and 5 and tell the DSL, but do not investigate it.
- The DSL will contact the police if the allegation involves a potential criminal offence. The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed.

9. Creating a supportive environment in school and minimising the risk of child-on-child abuse

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images.
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys.
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent.
- Ensure pupils are able to easily and confidently report abuse using our reporting systems.
- Ensure staff reassure victims that they are being taken seriously.
- Ensure staff are trained to understand:
    - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
    - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of "it could happen here"
    - That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
- Children can show signs or act in ways they hope adults will notice and react to.
- A friend may make a report.
- A member of staff may overhear a conversation.
- A child's behaviour might indicate that something is wrong.
    - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation.
    - That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.
    - The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it.
    - That they should speak to the DSL if they have any concerns.

10. Sharing of nudes and semi-nudes ('sexting')

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

- View, download or share the imagery yourself, or ask a pupil to share or download it. If you have already viewed the imagery by accident, you must report this to the DSL.
- Delete the imagery or ask the pupil to delete it.
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility).
- Share information about the incident with other members of staff, the pupil(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 pupil(s) that they will receive support and help from the DSL.

11. Initial review meeting

Following a report of an incident, the DSL 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 pupil(s).
- If a referral needs to be made to the police, the Ministry of Education (MOE) or any other authority.
- 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 pupils 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 pupils involved (in most cases parents should be involved).

The DSL will make an immediate referral to police and/or MOE if:

- The incident involves an adult.
- 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 DSL 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 pupil in the imagery is under 18.
- The DSL has reason to believe a pupil 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 DSL, in consultation with the Principal and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care.

11.1 Further review by the DSL

If at the initial review stage, a decision has been made not to refer to police and/or MOE, the DSL will conduct a further review.

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

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents
The DSL 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 pupil at risk of harm.

Referring to the police and/or Child Protection Centre & Child Helpline 998
If it is necessary to refer an incident to the police, this will be done through the Child Protection Centre & Child Helpline 998 Service or through the nearest Police Station.

Recording incidents
All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in appendix 4 and 5 of this policy also apply to recording these incidents.

12. Reporting Systems for our pupils

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse.
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils.
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback.

Notifying Parents

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

Other staff will only talk to parents about any such concerns following consultation with the DSL.

If we believe that notifying the parents would increase the risk to the child, we will discuss this with the MOE and/or Child Protection Centre & Child Helpline 998 Service.

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

13. E-Safety

Staff are allowed to bring their personal phones to school for their own use, and if appropriate, to capture evidence for storage on the school's systems. In classes that do not use school iPads, staff are allowed to use their devices on the school's Wi-Fi network only. In case personal phones are used to take pictures for EduNation (school LMS) or any other school-based platform, it must be stored on teachers' OneDrive account, and not their phone memory.

To address this, our school aims to:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors.
- 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.

13.1 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-to-peer pressure, commercial advertising and adults posing as children or young adults with

the intention to groom or exploit them for sexual, criminal, financial or other purposes.

- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, 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.

- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

To meet our aims and address the risks above we will:

- Educate pupils about online safety as part of our curriculum. For example:
  - The safe use of social media, the internet and technology.
  - Keeping personal information private.
  - How to recognise unacceptable behaviour online.
  - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim.
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year.
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them, so they know how to raise concerns about online safety.
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
  - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present.
- Staff will not take pictures or recordings of pupils on their personal phones or cameras.
- Make all pupils, parents/carers, staff, volunteers, and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology.
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones.
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community.
- Establish a campus-wide (school partnership) e-safety committee which reviews e-Safety in line with NISR standards for regular self-evaluation and action planning.

14. Pupils with Pupils with special educational needs, disabilities, or health issues

We recognise that pupils with special educational needs (SEN) or disabilities or certain health conditions 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 condition without further exploration.
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils.
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs.
- Communication barriers and difficulties in managing or reporting these challenges.

15. Pupils with a Counsellor

Pupils may need a counsellor due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health. The DSL and all members of staff will work with and support counsellor to help protect vulnerable children.

Where we are aware that a pupil has a counsellor, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks.
- The provision of pastoral and/or academic support.

16. Complaints and concerns about school safeguarding policies

16.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 2).

16.2 Whistle-Blowing

The school abides by the Whistle-Blowing procedures available on Link HR and is adopted by Bukhatir Group.

17. 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 in writing. If you are in any doubt about whether to record something, discuss it with the DSL. Our safeguarding records are kept in the principal's office.

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

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL 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.

In addition:

- Our Safer Recruitment Policy sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks.

- Appendix 2 sets out our policy on record-keeping with respect to allegations of abuse made against staff.

18. Training

18.1 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. This training will be regularly updated in line with changing national and international policy.

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.

18.2 The DSL and Deputies

The Principal, DSL, Deputies and Safeguarding Governor will undertake child protection and safeguarding training at least every 2 years at Level 3. In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

18.3 Governors

All governors receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities. As the chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the principal, they receive training in managing allegations for this purpose.

18.4 Recruitment – Interview panels

At least one person conducting any interview for a post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, Keeping Children Safe in Education.

18.5 Staff who have contact with pupils and families

All staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

19. Monitoring arrangements

This policy will be reviewed annually by the DSL and principal. At every review, it will be approved by the Chair of Governors.

These appendices are based on the UK Department for Education's statutory guidance, Keeping Children Safe in Education.

Appendix 1: Types of Abuse

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 care-givers)
- Ensure access to appropriate medical care or treatment
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Domestic abuse is now included as a separate category of abuse, indicating the need for staff to be aware of its distinct nature. Domestic abuse can be psychological, physical, sexual, financial, or emotional. Children can be impacted through seeing, hearing, or experiencing the effects of domestic abuse, and or experiencing it through their own intimate relationships.

Appendix 2: 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 or volunteer 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.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school.

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

A 'case manager' will lead any investigation. This will be the principal, Head of Phase and/or the chair of governors where the principal or Head of Phase is the subject of the allegation. The case manager will be identified at the earliest opportunity.

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.

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

Suspension

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.
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school.

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 principal (or chair of governors if the principal is the subject of the allegation) – the 'case manager' – will take the following steps:

- Immediately discuss the allegation with the designated officer at BEAM and/or MOE. 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 and/or children's social care services. (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 and/or MOE services 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 and/or children's social care services, 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 and/or children's social care services as appropriate.
- 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 if they do not already know. The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher 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).

Timescales

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week.
- If the nature of an allegation does not require formal disciplinary action, we will institute appropriate action within 3 working days.
- If a disciplinary hearing is required and can be held without further investigation, we will hold this within 15 working days.

Specific Actions

Action following a criminal investigation or prosecution.
The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or MOE.

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 case manager and the school's personnel adviser will discuss with the designated officer whether to make a referral to the MOE with respect to future employment in other schools.

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 manager will consider how best to facilitate this.
The case manager 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 or malicious allegations

If an allegation is shown to be deliberately invented, or malicious, the Principal, or other appropriate person in the case of an allegation against the Principal, will consider whether any disciplinary action is appropriate against the pupil(s) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a pupil.

Confidentiality

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the local authority's designated officer, police, and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared.
- How to manage speculation, leaks, and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality.
- What, if any, information can be reasonably given to the wider community to reduce speculation.
- How to manage press interest if, and when, it arises.

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. Such records will include:

- A clear and comprehensive summary of the allegation.
- Details of how the allegation was followed up and resolved.
- Notes of any action taken, and decisions reached (and justification for these, as stated above)
- If an allegation or concern is not found to have been malicious, the school will retain the records of the case on the individual's confidential personnel file.
- The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

References

When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated, or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

Learning lessons

After any cases where the allegations are substantiated, we will review the circumstances of the case with the designated officer at BEAM to determine whether there are any

improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff.
- The duration of the suspension.
- Whether or not the suspension was justified.
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual.

Concerns that do not meet the harm threshold.

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers, and contractors, which do not meet the harm threshold set out in the section 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 encompasses any issue, regardless of its size, wherein an adult working within or on behalf of the school may have behaved in a manner that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work.
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority.

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 Head of Phase 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 principal should be made aware of every low-level concern.
- Low level concerns about supply staff or contractors should be escalated to their employer by the School Principal.
  The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the Bukathir Group and relevant school policies.

The school will review low-level concerns to extrapolate lessons learned to amend staff policies, inform professional development, and take swifter action in future cases.

Record keeping!

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.
Records will be:

- Kept confidential.
- 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, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority.
- Retained at least until the individual leaves' employment at the school.
- Where a low-level concern relates to a supply teacher or 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) has met the threshold for referral to the police or designated officer at the local authority and is found to be substantiated.
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance.

Appendix 3: Making a Start

- Think of a child of whom you have concerns. Can you answer the following questions?
- Is the child average weight/height?
- Is the child clean and well kept?
- Does the child glow with health - do you know of any health problems?
- Is attendance regular, are absences straightforward?
- Does the child concentrate well?
- Is the child achieving satisfactorily?
- Is the child withdrawn, aggressive, and moody?
- Does the child understand "taking turns"?
- Can the child use personal experiences for creative work?
- How does the child respond to adults?
- Who are the child's friends?
- Are those relationships equal?
- Does the child have irritating habits?
- What do you know about the child's home life?

If you have concerns about a student, you should complete the form in Appendix 4 and Appendix 5 if there are visible signs of concern. Both forms should then be passed on to the DSL.

Remember:

- Ask open-ended questions.
- Do not investigate.
- Record, date and sign observations.
- Try to identify patterns.

Never make assumptions about a disclosure that a child has made. Nor should any member of staff discuss their opinion of the disclosure with the child or any member of staff. Disclosures should be recorded using facts and not opinions. When dealing with safeguarding and child protection, all members of staff and parties involved must always adhere to professionalism.

Appendix 4: Recording and Referral Form

Individual of concern			
Year Level		**Date Reported**	
Location		**Time Reported**	

- Please ensure that the information mentioned below is passed to the DSL.
- All concerns regarding student and staff safeguarding matters must be recorded and passed on.
- Staff must not make any undertakings to absolute confidentiality.
- Staff should not investigate a situation.

Mark the relevant suspected abuse.	Suspected Physical Abuse	Suspected Emotional Abuse	Suspected Neglect	Suspected Sexual Abuse	Suspected Domestic Abuse
✓					

Details of Concern (please give full factual details including dates and times):

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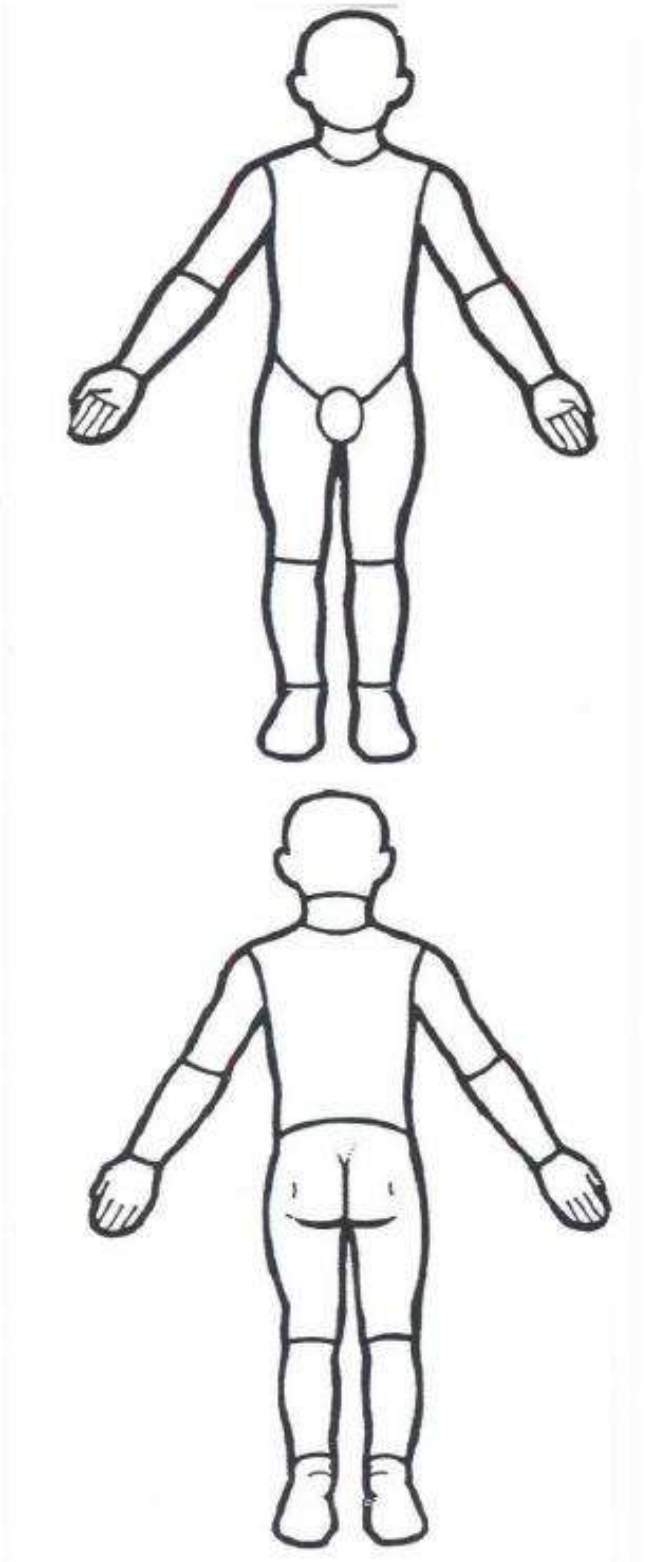
Individual of concern		**Person Reporting**	
Person/s involved		**Case Manager**	
Designated Safeguarding Lead Signature (if necessary)		**Principal and/or BEAM Safeguarding Governor Lead Signature**	
Agencies involved if any.		**Date Closed**	

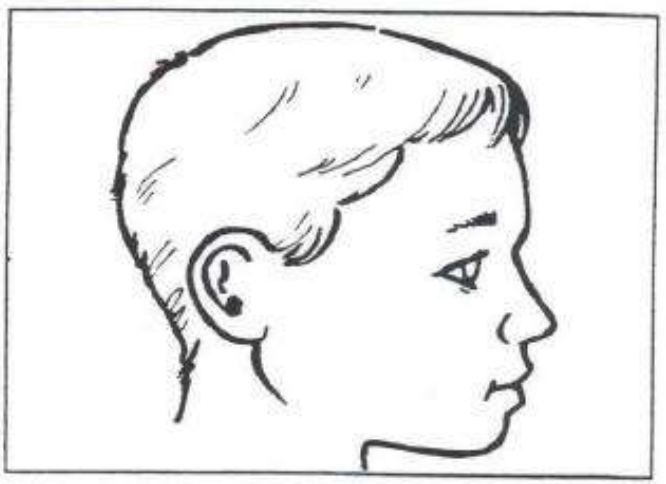
Individual of concern			
Year Level		**Date Reported**	
Location		**Time Reported**	

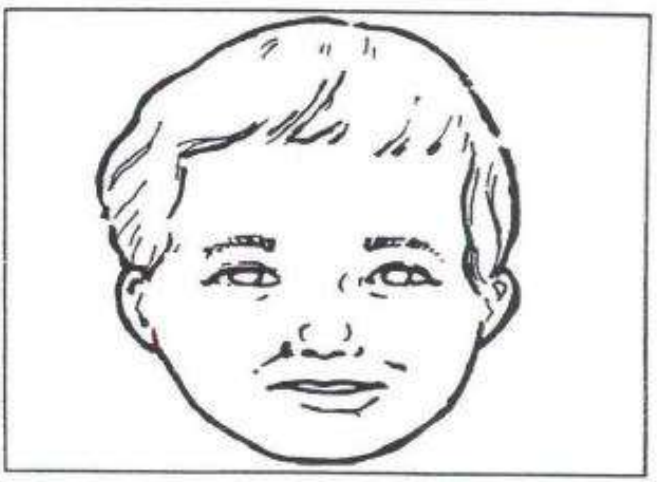
Person Reporting		**Designated Safeguarding Lead Signature** (if necessary)	
Case Manager		**Principal and/or BEAM Safeguarding Governor Lead Signature**	

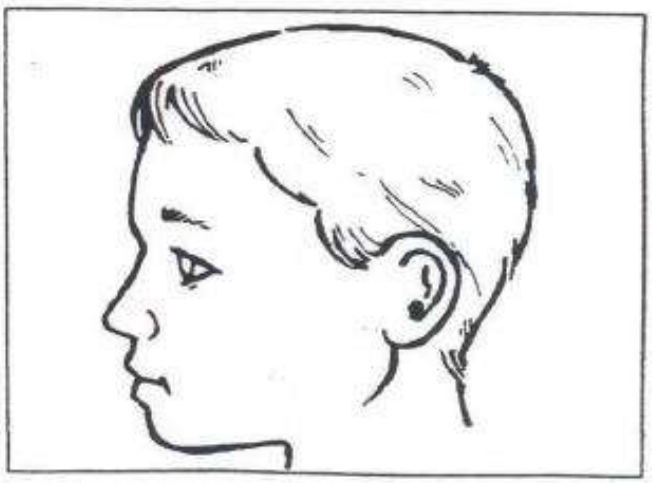
Appendix 5: Marks on a Child Prompting Concern

If there is an injury, please clearly specify the area on the body map where it was observed and attach this information to the Recording and Referral Form.









Appendix 6: Action Taken

This document should be filled out by the case manager who has been engaged in the case. Typically, this individual is the designated safeguarding lead and/or deputy designated safeguarding lead. In situations where the allegations are against school leaders, the form will be completed by the school principal. If the principal is involved, the responsibility falls to the BEAM Safeguarding Governor Lead.

Individual of concern			
Year Level		**Date Reported**	
Location		**Time Reported**	

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Case Manager Name		**Case Manager Signature** (if necessary)	
Principal and/or BEAM Safeguarding Governor Lead Name		**Principal and/or BEAM Safeguarding Governor Lead Signature**	
Date			

Case Manager Name		**Case Manager Signature** (if necessary)	
Date			