INNOV4TE INDEPENDENT SCHOOL

CHILD PROTECTION AND SAFEGUARDING POLICY

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| Date effective from | Sept 2024 |
| Next review due by | Sept 2025 |
| Person Responsible | Carla Astbury  Designated  Safeguarding Lead |

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# Important contacts

| Role/organisation | Name | Contact details |
| --- | --- | --- |
| Designated safeguarding lead (DSL) | Carla Astbury | Mobile- 07467860071  Email- Castbury@innov4te.co.uk |
| Deputy DSL | Stacy Millington Moss | Mobile-07876010068  Email- Stacy@innov4te.co.uk |
| Local authority designated officer (LADO) | Sandwell:  Dudley:  Walsall:  Wolverhampton: | 0121 569 4770/4771  01384 813110  01384813164  07432 422205  01902 550 477 |
| Channel helpline |  | 020 7340 7264 |

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# 1. Aims

INNOV4TE INDEPENDENT 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

# 2. Legislation and statutory guidance

This policy is based on the Department for Education’s (DfE’s) statutory guidance [Keeping Children Safe in Education (2024)](https://www.gov.uk/government/publications/keeping-children-safe-in-education--2) and [Working Together to Safeguard Children (2023)](https://www.gov.uk/government/publications/working-together-to-safeguard-children--2), the [Maintained Schools Governance Guide](https://www.gov.uk/guidance/governance-in-maintained-schools/) and [Academy Trust Governance Guide](https://www.gov.uk/guidance/-governance-in-academy-trusts). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners (see section 3).

This policy is also based on the following legislation:

* Section 175 of the [Education Act 2002](http://www.legislation.gov.uk/ukpga/2002/32/section/175), which places a duty on schools and local authorities to safeguard and promote the welfare of learners
* [The School Staffing (England) Regulations 2009](http://www.legislation.gov.uk/uksi/2009/2680/contents/made), which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques
* [The Children Act 1989](http://www.legislation.gov.uk/ukpga/1989/41) (and [2004 amendment](http://www.legislation.gov.uk/ukpga/2004/31/contents)), which provides a framework for the care and protection of children
* Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](http://www.legislation.gov.uk/ukpga/2015/9/part/5/crossheading/female-genital-mutilation), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
* [Statutory guidance on FGM](https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
* [The Rehabilitation of Offenders Act 1974](http://www.legislation.gov.uk/ukpga/1974/53), which outlines when people with criminal convictions can work with children
* Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](http://www.legislation.gov.uk/ukpga/2006/47/schedule/4), which defines what ‘regulated activity’ is in relation to children
* [Statutory guidance on the Prevent duty](https://www.gov.uk/government/publications/prevent-duty-guidance), which explains duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
* [The Human Rights Act 1998](https://www.legislation.gov.uk/ukpga/1998/42/contents), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](https://www.echr.coe.int/Pages/home.aspx?p=basictexts&c) (ECHR)
* [The Equality Act 2010](https://www.legislation.gov.uk/ukpga/2010/15/contents), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their learners with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting learners (where we can show it’s proportionate). This includes making reasonable adjustments for disabled learners. For example, it could include taking positive action to support girls where there’s evidence that they’re being disproportionately subjected to sexual violence or harassment
* [The Public Sector Equality Duty (PSED)](https://www.equalityhumanrights.com/guidance/public-sector-equality-duty-psed), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve learner outcomes. Some learners may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination
* Guidance for safer working practice (2022)

Domestic abuse act 2022 Which outlines the objectives, understanding, recognition, Impact, differing experiences of domestic abuse and the response required.

Behaviour in schools, searching, screening, confiscation guidance July 22

# 3. 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 Innov4te Independent school 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 and or computer-generated imagery.

**Children** includes everyone under the age of 18.

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will arrange to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

* The local authority (LA)
* A clinical commissioning group for an area within the LA
* The chief officer of police for a police area in the LA area

# 4. 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 10)
* 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
* Are at risk due to either their own or a family member’s mental health needs
* Are looked after or previously looked after (see section 12)
* Are missing from education
* Whose parent/carer has expressed an intention to remove them from the Innov4te Independent school home educated

# 5. Roles and responsibilities

Safeguarding and child protection is **everyone’s** responsibility. This policy applies to all staff, volunteers and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to off-site activities.

5.1 All staff

All staff will read and understand part 1 and annex B of the Department for Education’s statutory safeguarding guidance, [Keeping Children Safe in Education](https://www.gov.uk/government/publications/keeping-children-safe-in-education--2), and review this guidance at least annually.

Although KCSIE guidance states that staff not working directly with children need not to read annex B, at INNOV4TE we ensure all staff have read both annex A and B as best practice.

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 [positive conduct policy/code of conduct], the role and identityof the designated safeguarding lead (DSL) and [deputy/deputies], the positive code of conduct policy, and the safeguarding response to children who go missing from education.
* The early help process (sometimes known as the common assessment framework) 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
* The process for making referrals to local authority children’s social care and for statutory assessments that may follow a referral, including the role they might be expected to play
* What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, 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 peer-on-peer abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation
* The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe

Section 15 and appendix 4 of this policy outline in more detail how staff are supported to do this.

5.2 The designated safeguarding lead (DSL)

The DSL is one of Innov4tes Directors. Our DSL is Carla Astbury. The DSL takes lead responsibility for child protection and wider safeguarding at Innov4te Independent school.

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

To contact- Carla Astbury

Mobile- 07467860071

Email- Castbury@innov4te.co.uk

When the DSL is absent,

If the DSL and [deputy/deputies] are not available, one of the directors will be available to discuss any safeguarding concerns (for example, during out-of-hours/out-of-term activities).

The DSL 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
* Contribute to the assessment of learners
* Refer suspected cases, as appropriate, to the relevant body (local authority children’s social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly

The DSL will also keep the Directors informed of any issues and liaise with local authority case managers and designated officers for child protection concerns as appropriate.

The full responsibilities of the DSL and deputy are set out in their job description.

5.4 The Directors

The Directors are responsible for the implementation of this policy, including:

* Ensuring that staff (including temporary staff) and volunteers:
* Are informed of our systems which support safeguarding, including this policy, as part of their induction
* Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect

Communicating this policy to parents/carers when their child joins Innov4te Independent school and via the Innov4te Independent 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 updating the content of the training 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)

# 6. Confidentiality

* 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
* The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.
* If staff need to share ‘special category personal data’, the DPA 2018 contains ‘safeguarding of children and individuals at risk’ as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.
* 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.

The governments [information sharing advice for safeguarding practitioners](https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice) includes 7 ‘golden rules’ for sharing information, and will support staff who must make decisions about sharing information

* If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy)
* Confidentiality is also addressed in this policy with respect to record-keeping in section 14, and allegations of abuse against staff in appendix 3

# 7. Recognising abuse and taking action

All staff are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to the potential need for early help for a child who:

* Is disabled
* Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
* Is a young carer
* Is bereaved
* Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
* Is frequently missing/goes missing from education, care or home
* Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
* Is at risk of being radicalised or exploited
* Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
* Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
* Is misusing drugs or alcohol
* Is suffering from mental ill health
* Has returned home to their family from care
* Is at risk of so-called ‘honour’-based abuse such as female genital mutilation (FGM) or forced marriage
* Is a privately fostered child
* Has a parent or carer in custody or is affected by parental offending
* Is missing education, or persistently absent from school, or not in receipt of full-time education
* Has experienced multiple suspensions and is at risk of, or has been permanently excluded

.

Staff and volunteers 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 DSL)”.

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

Make a referral to children’s social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm or is in immediate danger. **Anyone can make a referral.**

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

<https://www.gov.uk/report-child-abuse-to-local-council>

7.2 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 what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
* Log your conversation using Innov4te independent school’s safeguarding software ARBOR as soon as possible in the child’s own words. Stick to the facts, and do not put your own judgement on it
* Date the log and notify the DSL,in the absence of the DSL notify the DDSL. Alternatively, if appropriate, make a referral to children’s social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process
* Use ARBOR to log the disclosure or concern as soon as possible afterwards using the words that the child has used.
* Ensure all information is factual do not record your assumptions and interpretations, just what you heard and saw.
* Do not destroy any original notes you may have made.
* Do not ask a child to write an account or sign any of your documentation as this may compromise enquiries that need to be made later by children’s social care or Police.
* All safeguarding concerns or records need to be added to ARBOR before the end of the working day.

**7.3 If you discover that FGM has taken place, or a learner is at risk of FGM**

Keeping Children Safe in Education explains that female genital mutilation (FGM) comprises “all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs”.

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as ‘female genital cutting’, ‘circumcision’ or ‘initiation’.

Possible indicators that a learner has already been subjected to FGM, and factors that suggest a learner may be at risk, are set out in appendix 4 of this policy.

**Any teacher** who either:

* Is informed by a girl under 18 that an act of FGM has been carried out on her; or
* Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl’s physical or mental health or for purposes connected with labour or birth.

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children’s social care as appropriate.

**Any other member of staff** who discovers that an act of FGM appears to have been carried out on a **learner under 18** must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a learner is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine learners.

**Any member of staff** who suspects a learner is *at risk* of FGM or suspects that FGM has been carried out must speak to the DSL and follow our local safeguarding procedures.

Staff are required to report Known cases of FGM to the police on 101 (Non-emergency) - Staff have a personal duty and this cannot be transferred to anyone else.

Failure to report is not a criminal offence but may lead to disciplinary procedures.

**Contextual safeguarding also now known as extra Familial safeguarding.**

Safeguarding incidents and/or behaviours can be associated with factors outside of Innov4te Independent school and/or can occur between children outside Innov4te Independent school. All staff, but especially the designated safeguarding lead (and deputies) should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child’s life that are a threat to their safety and/or welfare.

**Children potentially at greater risk of harm - Children who need a social worker (Child in Need and Child Protection Plans)**

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child’s experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health.

Local authorities should share the fact a child has a social worker, and the designated safeguarding lead should hold and use this information so that decisions can be made in the best interests of the child’s safety, welfare, and educational outcomes. This should be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools and colleges to safeguard and promote the welfare of children.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering Innov4te Independent school pastoral and/or academic support, alongside action by statutory services).

Findings from the Children in Need review, ‘Improving the educational outcomes of Children in Need of help and protection’ contains further information; the conclusion of the review, ‘Help, protection, education’ sets out action Government is taking to support this.

7.4 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 below, before section 7.7, 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 and/or take advice from local authority children’s social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

Make a referral to local authority children’s social care directly, if appropriate (see ‘Referral’ below). Share any action taken with the DSL as soon as possible.

**Early help**

If early help is appropriate, the DSL will lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

The DSL will keep the case under constant review and the Innov4te Independent school will consider a referral to local authority children’s social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

Early help contacts for Sandwell

**For more information about Early Help, please email:**[**ecaf\_queries@sandwell.gov.uk**](mailto:ecaf_queries@sandwell.gov.uk)

**For advice and guidance, contact your local Community Operating Group (COG):**

Oldbury - 0121 569 7295

Rowley - 0121 569 7296

Smethwick - 0121 569 7297

Tipton - 0121 569 7291

Wednesbury - 0121 569 7294

West Bromwich - 0121 569 7292

Early help Dudley

Contact -01384 81439

If you require further information about Early Help or need support in completing an assessment, please contact the respective Family Centre. Please complete the Early Help Assessment using the [Dudley Children’s Portal site](https://childrensocialcare.dudley.gov.uk/web/portal/pages/home).

* Stourbridge Family Centre - Forge Rd, Stourbridge, DY8 1XF, 01384 818780, [fs.stourbridge@dudley.gov.uk](mailto:email%20to:%20fs.stourbridge@dudley.gov.uk)
* Halesowen Family Centre - Lye By-Pass, Stourbridge, DY9 8HT, 01384 813954, [fs.halesowen@dudley.gov.uk](mailto:email%20to:%20fs.halesowen@dudley.gov.uk)
* Brierley Hill Family Centre - 18 Parkes Street, Brierley Hill, DY5 3DY, 01384 813322, [fs.brierleyhill@dudley.gov.uk](mailto:email%20to:%20fs.brierleyhill@dudley.gov.uk)
* Dudley North Family Centre - Bayer Street, Bilston, WV14 9DS, 01384 813096, [fs.dudleynorth@dudley.gov.uk](mailto:email%20to:%20fs.dudleynorth@dudley.gov.uk)
* Dudley Central Family Centre - Selbourne Road, Dudley DY2 8LJ, 01384 812440, [fs.dudley@dudley.gov.uk](mailto:email%20to:%20fs.dudley@dudley.gov.uk)

Early help Walsall

* Early Help, Civic Centre, Darwall Street, Walsall, WS1 1TP
* 0300 555 2866

**Referral**

If it is appropriate to refer the case to local authority children’s social care or the police, the DSL will make the referral or support you to do so.

If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

The local authority will decide within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

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.

A multi-agency referral from should be completed immediately

Innov4te independent school liaises with the following local authorities’ referrals are made to the relevant local authority dependant on the address of the young person.

Contact details for children’s social care are:

Sandwell 0121 569 3100 (available out of hours)

Birmingham 0121 303 1888 (out of hours - 0121 675 48)

Walsall 0300 555 2866 (out of hours - 0300 555 2922)

Wolverhampton 01902 555392 (out of hours – 01902 552999)

Dudley 0300 555 0050 (out of hours - 0300 555 8574)

NSPCC Helpline

0808 800 5000

7.5 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 the directors and/or seek advice from local authority children’s social care. Make a referral to local authority children’s social care directly, if appropriate (see ‘Referral’ above). Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the police or [Channel](https://www.gov.uk/government/publications/channel-guidance), the government’s programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority children’s social care team.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which staff can call to raise concerns about extremism with respect to a learner. You can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 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

7.6 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 in section 7.4.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.

Schools, colleges and other Educational Providers have an important role to play in supporting the mental health and wellbeing of their learners.

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. Proprietors should ensure they have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.

A range of advice can be accessed to help them identify children in need of extra mental health support; this includes working with external agencies. More information can be found in the mental health and behaviour in schools’ guidance, colleges may also wish to follow this guidance as best practice. Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing, and resilience among young people. See Rise Above for links to all materials and lesson plans.

**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. See section 7.4 for what to do.)



7.7 Concerns about a staff member, supply teacher, volunteer, or contractor

If you have concerns about a member of staff (including a supply teacher, volunteer, or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer, or contractor) posing a risk of harm to children, speak to one of the directors as soon as possible. If the concerns/allegations are about one of the Directors, speak to another Director they will then follow the procedures set out in appendix 3, if appropriate.

If you have concerns about a member of staff (including a supply teacher, volunteer, or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer, or contractor) posing a risk of harm to children, speak to one of the Directors as soon as possible. If the concerns/allegations are about the Directors, speak to the proprietor. Where the Directors are also the proprietors, speak to the local authority designated officer (LADO)

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 Directors, report it directly to the local authority designated officer (LADO).

7.8 Allegations of abuse made against other learners.

We recognise that children can abuse their peers. 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 learners.

We also recognise the gendered nature of peer-on-peer abuse. However, all peer-on-peer abuse is unacceptable and will be taken seriously.

Most cases of learners hurting other learners will be dealt with under our 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 learners at Innov4te Independent school at risk
* Is violent.
* Involves learners being forced to use drugs or alcohol.
* Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, up skirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

See appendix 4 for more information about peer-on-peer abuse.

**Procedures for dealing with allegations of peer-on-peer abuse**

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

* You must record the allegation and tell the DSL, but do not investigate it
* The DSL will contact the local authority children’s social care team and follow its advice, as well as 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.
* The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

**Creating a supportive environment and minimising the risk of peer-on-peer abuse**

We recognise the importance of taking proactive action to minimise the risk of peer-on-peer 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 learners, and initiation or hazing type violence with respect to boys.
* Ensure our curriculum helps to educate learners about appropriate behaviour and consent.
* Ensure Learners can easily and confidently report abuse using our reporting systems (as described in section 7.10 below)
* Ensure staff reassure victims that they are being taken seriously.
* Ensure staff are trained to understand:
* Ensure all incidents are logged on ARBOR and assigned to relevant staff. Each individual incident is followed up and interventions are put in place to address topics with individuals and are implemented into the curriculum.
* Support, education, and interventions are also provided via external agencies.
* How to recognise the indicators and signs of peer-on-peer abuse, and know how to identify it and respond to reports
* That even if there are no reports of peer-on-peer abuse, 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 learner 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 must play in preventing peer-on-peer 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

7.9 Sharing of nudes and semi-nudes (‘sexting’)

**Your responsibilities when responding to an incident.**

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos also includes ‘psuedo images, which are computer generated images that otherwise appear to be a photograph or a video’, you must report it to the DSL immediately.

You must **not**:

* View, copy, print, share, store or save the imagery yourself, or ask a learner 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 learner to delete it.
* Ask the learner(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 learners) 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 learners) that they will receive support and help from the DSL.

**Initial review meeting**

Following a report of an incident, the DSL will hold an initial review meeting with appropriate staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

* Whether there is an immediate risk to learner(s)
* If a referral needs to be made to the police and/or children’s social care
* If it is necessary to view the image(s) to safeguard the young person (in most cases, images or videos should not be viewed)
* What further information is required to decide on the best response?
* Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
* Whether immediate action should be taken to delete or remove images or videos from devices or online services
* Any relevant facts about the learners 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 learners involved (in most cases parents/carers should be involved)

The DSL will make an immediate referral to police and/or children’s social care 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 images or videos 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 learner in the images or videos is under 13.
* The DSL has reason to believe a learner is at immediate risk of harm owing to the sharing of nudes and semi-nudes (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 Directors and other members of staff as appropriate, may decide to respond to the incident without involving the police or children’s social care. The decision will be made and recorded in line with the procedures set out in this policy.

**Further review by the DSL**

If at the initial review stage, a decision has been made not to refer to police and/or children’s social care, the DSL will conduct a further review to establish the facts and assess the risks.

They will hold interviews with the learners involved (if appropriate).

If at any point in the process there is a concern that a learner 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/carers**

The DSL will inform parents/carers 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 learner at risk of harm.

**Referring to the police**

If it is necessary to refer an incident to the police, this will be done through a community police officer.

**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 section 14 of this policy also apply to recording these incidents.

**Curriculum coverage**

Learners are taught about the issues surrounding the sharing of nudes and semi-nudesas part of our PSHE curriculum and computing programmes. Teaching follows best practice in delivering safe and effective education. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

* What it is
* How it is most likely to be encountered
* The consequences of requesting, forwarding, or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment.
* Issues of legality
* The risk of damage to people’s feelings and reputation

Learners also understand the strategies and skills needed to manage:

* Specific requests or pressure to provide (or forward) such images.
* The receipt of such images

This policy on the sharing of nudes and semi-nudesis also shared with learners so they are aware of the processes that Innov4te Independent school will follow in the event of an incident.

7.10 Reporting systems for our learners

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 learners feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

* Put systems in place for learners to confidently report abuse.
* Ensure our reporting systems are well promoted, easily understood and easily accessible for learners.
* Make it clear to learners that their concerns will be taken seriously, and that they can safely express their views and give feedback.
* Learners are made aware of reporting procedures during induction process and information on who to report to is displayed around site at Innov4te Independent School
* A learner friendly disclosure guide is available in classrooms and around the building to give learners a clear understanding of how to disclose and to who.

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# 8. Online safety and the use of mobile technology

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, Innov4te Independent School aims to:

* Have robust processes in place to ensure the online safety of learners, staff, volunteers, and visitors.
* Protect and educate the whole Innov4te Independent 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 of Innov4te Independent schools’ community.
* Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

Innov4te Independent School learners are searched upon entry into the building Mobile phones are stored safely and not permitted for use on site by learners.

* Staff are allowed to bring their personal phones for their own use but will limit such use to non-contact time when learners are not present. Staff members’ personal phones will remain in their bags or cupboards during contact time with learners. All Staff during staff induction will read and sign a copy of the acceptable user agreement policy.
* Staff will not take pictures or recordings of learners on their personal phon es or cameras.

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, learners and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Bard.

Innov4te Independent School recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard learners. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose learners to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

Innov4te Independent School will treat any use of AI to access harmful content or bully learners in line with this policy and our anti-bullying/positive conduct policy.

Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being used by the school.

**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; and
* **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 learners 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 learners 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 for their own use but will limit such use to non-contact time when learners are not present.
* Staff will not take pictures or recordings of learners on their personal phones or cameras.
* Make all learners, parents/carers, staff, volunteers aware that they are expected to sign an agreement regarding the acceptable use of the internet, use of Innov4te Independent Schools ICT systems and use of their mobile and smart technology.
* Explain the sanctions we will use if a learner is in breach of our policies on the acceptable use of the internet and mobile phones.
* Make sure all staff, learner’s and parents/carers are aware that staff have the power to search learners’ phones, as set out in the [DfE’s guidance on searching, screening and confiscation](https://www.gov.uk/government/publications/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 Innov4te Independent schools 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 community.

# 9. Notifying parents or carers

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

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

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children’s social care team before doing so.

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

# 10. Learners with special educational needs, disabilities or health issues

We recognise that learners with SEND or certain health conditions can face additional safeguarding challenges. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation 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.
* Learners being more prone to peer group isolation or bullying (including prejudice-based bullying) than other learners.
* The potential for learners 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.
* Cognitive understanding

We offer extra pastoral support for these learners. This includes:

Support with learning with one-to-one support from staff.

One to one support from a member of the team who can collaboratively work with external agencies for learners to be able to access extra support.

To include

CAMHS

DECCA

FORWARD THINKING

KALIEDASCOPE

HERE FOR YOUTH

# 11. Learners with a social worker

Learners may need a social worker 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 social workers to help protect vulnerable children.

Where we are aware that a learner has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the learner’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
* Innov4te Independent school pastoral and/or academic support

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# 12. Looked-after and previously looked-after children

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. We will ensure that:

* Appropriate staff have relevant information about children looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements.
* The DSL has details of children’s social workers and relevant virtual school heads.

As part of their role, they will:

* Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
* Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children.

# Learners who are lesbian, gay, bisexual or gender questioning

(LGBTQ+) can be targeted by other children. See our positive conduct policy for further information on prevent bullying based on gender or sexuality. We also recognise that LGBTQ+ children are more likely to experience poor mental health. Any concerns should be reported to the DSL. When families/carers are making decisions about support for gender questioning learners, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal children.

When supporting a gender questioning learner, we will take a cautious approach as there are still unknowns around the impact of social transition, and a learner may have wider vulnerability, such as complex mental health and psychosocial needs, and in some cases, autism spectrum disorder (ASD) and/or attention deficit hyperactivity disorder (ADHD).

We will also consider the broad range of their individual needs, in partnership with their parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the learner). We will also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying.

Risks can be compounded where children lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where learners can speak out or share their concerns with members of staff.

# 13. Complaints and concerns about Innov4te Independent School safeguarding policies

13.1 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 3).

13.2 Other complaints

Please see complaints policy

13.3 Whistleblowing

Please refer to whistle blowing policy

# 14. 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.

Records will include:

* A clear and comprehensive summary of the concern
* Details of how the concern was followed up and resolved.
* A note of any action taken, decisions reached and the outcome.
* Instances where referrals were or were not made to another agency such as local authority children’s social care or the prevent programme etc.

Concerns and referrals will be stored on Innov4te Independent School safeguarding system ARBOR.

Any non-confidential records will be readily 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 which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

If a child for whom Innov4te Independent school has, or has had, safeguarding concerns moves to another school or provision, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main learner 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.

* Records are kept electronically, and some are paper based.
* Records are password protected, and some are also kept in the child’s file in a locked cabinet.
* Records are kept confidential and are only shared through secure emails that are password protected.
* Concerns and referrals are stored, and password protected on ARBOR.
* Safeguarding records relating to individual children will be retained in line with GDPR and stored securely until the child reaches the age of 25 years.

In addition:

* Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks.
* Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff.

# 15. Training

15.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including whistle-blowing procedures and online safety, to ensure they understand Innov4te Independent school’s safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation or neglect.

This training will be regularly updated and will:

* Be integrated, aligned, and considered as part of Innov4te Independent School’s safeguarding approach and wider staff training, and curriculum planning.
* Be in line with advice from the 3 safeguarding partners.
* Have regard to the Teachers’ Standards to support the expectation that all teachers:
* Manage behaviour effectively to ensure a good and safe environment.
* Have a clear understanding of the needs of all learners.

All staff will have training on the government’s anti-radicalisation strategy, Prevent, to enable them to identify children at risk of becoming involved with or supporting terrorism and to challenge extremist ideas.

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

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

15.2 The DSL and [deputy/deputies]

The DSL and [deputy/deputies] will undertake specific DSL related child protection and safeguarding training at least every 2 years.

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).

They will also undertake Prevent awareness training.

15.3 Recruitment – interview panels

At least one person conducting any interview for any post at the Innov4te Independent school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

See appendix 2 of this policy for more information about our safer recruitment procedures.

15.4 Staff who have contact with learners and families

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

# 16. Monitoring arrangements

This policy will be reviewed **annually**. At every review, the Directors will approve it.

# 17. Links with other policies

This policy links to the following policies and procedures:

* Positive Code of Conduct Policy
* Staff behaviour /code of conduct
* Complaints
* Health and safety
* Attendance
* Online safety
* Mobile phone use
* Equality
* Relationships and sex education
* First aid
* Curriculum
* Privacy notices
* Whistle blowing
* Anti-bullying

**These appendices are based on the 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 cyber-bullying), 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 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 because 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.

### Appendix 2: safer recruitment and DBS checks – policy and procedures

Recruitment and selection process

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

**Advertising**

When advertising roles, we will make clear:

* INNOV4TE’S commitment to safeguarding and promoting the welfare of children
* That safeguarding checks will be undertaken
* The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
* Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are ‘protected’, so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

**Application forms**

Our application forms will:

* Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
* Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

**Shortlisting**

Our shortlisting process will involve at least 2 people and will:

* Consider any inconsistencies and look for gaps in employment and reasons given for them
* Explore all potential concerns

Once we have shortlisted candidates, we will ask shortlisted candidates to:

* Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they can share relevant information and discuss it at interview stage. The information we will ask for includes:
* If they have a criminal history
* Whether they are included on the barred list
* Whether they are prohibited from teaching
* Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
* Any relevant overseas information
* Sign a declaration confirming the information they have provided is true

**Seeking references and checking employment history**

We will obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references, we will:

* Not accept open references
* Liaise directly with referees and verify any information contained within references with the referees.
* Ensure any references are from the candidate’s current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the Directors as accurate in respect to disciplinary investigations.
* Obtain verification of the candidate’s most recent relevant period of employment if they are not currently employed.
* Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children.
* Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate.
* Resolve any concerns before any appointment is confirmed.

**Interview and selection**

When interviewing candidates, we will:

* Probe any gaps in employment, or where the candidate has changed employment or location frequently and ask candidates to explain this.
* Explore any potential areas of concern to determine the candidate’s suitability to work with children.
* Record all information considered and decisions made.

Pre-appointment vetting checks

We will record all information on the checks carried out in the Innov4te Independent schools single central record (SCR). Copies of these checks, where appropriate, will be held in individuals’ personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

**New staff**

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

* Verify their identity.
* Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed, we may keep a record of the fact that vetting took place, the result of the check and recruitment decision taken.
* Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available.
* Verify their mental and physical fitness to carry out their work responsibilities.
* Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff’s employment and for 2 years afterwards.
* Verify their professional qualifications, as appropriate.
* Ensure they are not subject to a prohibition order if they are employed to be a teacher.
* Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. Where available, these will include:
* For all staff, including teaching positions: [criminal records checks for overseas applicants](https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants)
* For teaching positions: obtaining a letter of professional standing from the professional regulating authority in the country where the applicant has worked
* Check that candidate taking up a management position\* are not subject to a prohibition from management (section 128) direction made by the secretary of state

\* Management positions are most likely to include but are not limited to Directors.

**Regulated activity** means a person who will be:

* Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
* Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
* Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

**Existing staff**

In certain circumstances, we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

* There are concerns about an existing member of staff’s suitability to work with children; or
* An individual moves from a post that is not regulated activity to one that is; or
* There has been a break in service of 12 weeks or more

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

* We believe the individual has engaged in [relevant conduct](https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs#relevant-conduct-in-relation-to-children); or
* We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the [Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Innov4te Independent schools) Regulations 2009](http://www.legislation.gov.uk/uksi/2009/37/contents/made); or
* We believe the ‘harm test’ is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
* The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

**Agency and third-party staff**

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

**Contractors**

We will ensure that any contractor, or any employee of the contractor, who is to work at the Innov4te Independent school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

* An enhanced DBS check with barred list information for contractors engaging in regulated activity
* An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival.

**Trainee/student teachers**

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

All proprietors will also have the following checks:

* Identity
* Right to work in the UK
* Other checks deemed necessary if they have lived or worked outside the UK

**Staff working in independent school settings**

As an Independent school, it is extremely rare that we would place a learner in another alternative placement, however, there may be times when this is necessary and in the best interests of the learner. Where we do place a learner with an alternative provider Innov4te Independent school will obtain written confirmation from the provider, that they have carried out the appropriate safeguarding checks on individuals working there, that we would otherwise perform.

**Adults who supervise learners on work experience**

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a Learner under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Learners **staying with host families**

Where Innov4te Independent school arranges for learners to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where Innov4te Independent school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partners abroad to ensure that similar assurances are undertaken prior to the visit.

### Appendix 3: allegations of abuse made against staff.

Section 1: allegations that may meet the harms threshold.

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

* Behaved in a way that has harmed a child, or may have harmed a child, and/or
* Possibly committed a criminal offence against or related to a child, and/or
* Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or
* Behaved or may have behaved in a way that indicates they may not be suitable to work with children – 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 Directors who are also the proprietor where they are the subject of the allegation. The case manager will be identified at the earliest opportunity.

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

Suspension of the accused until the case is resolved.

Suspension of the accused 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 there 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 Innov4te Independent 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 Innov4te Independent school so that they do not have unsupervised access to children.
* Moving the child or children to classes where they will not meet the individual, making it clear that this is not a punishment and parents/carers have been consulted.
* Temporarily redeploying the individual to another role in a different location.
* If in doubt, the case manager will seek views from Innov4te Independent school’s personnel adviser and the designated officer at the local authority, as well as the police and children’s social care where they have been involved.

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, or to cause harm to the subject of the allegation
* **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 case manager will take the following steps:

* Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below.
* Discuss the allegation with the designated officer at the local authority. 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 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 (and the police or children’s social care services, where necessary). Where the police and/or children’s social care 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 Innov4te Independent 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.
* Where the case manager is concerned about the welfare of other children in the community or the individual’s family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children’s social care.
* **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** regarding 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 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 (following agreement with children’s social care services and/or the police, if applicable). 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 (only in relation to their child – no information will be shared regarding the staff member)
* Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

If Innov4te Independent school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the Innov4te Independent school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school’s disciplinary process, should this be required at a later point.

**Additional considerations for supply teachers and all contracted staff**

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

* We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
* The Directors will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the Innov4te Independent school, while the school carries out the investigation
* We will involve the agency fully, but the Innov4te Independent school will take the lead in collecting the necessary information and providing it to the LADO as required
* We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are considered (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

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

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

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, considering information provided by the police and/or children’s social care services.

**Conclusion of a case where the allegation is substantiated.**

If the allegation is substantiated and the individual is dismissed or the Innov4te Independent school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, Innov4te Independent school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, Innov4te Independent school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

**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 Innov4te Independent school.

**Unsubstantiated, unfounded, false or malicious reports**

If a report is:

* Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation needs help, or the allegation may have been a cry for help, a referral to children’s social care may be appropriate.

Shown to be deliberately invented, or malicious, Innov4te Independent 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 LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation needs help, or the allegation may have been a cry for help, a referral to children’s social care may be appropriate.
* Shown to be deliberately invented, or malicious, Innov4te Independent school will consider whether any disciplinary action is appropriate against the individual(s) who made it.

Confidentiality and information sharing

Innov4te Independent 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 LADO, 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.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual’s personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

* A clear and comprehensive summary of the allegation
* Details of how the allegation was followed up and resolved.
* Notes of any action taken, decisions reached and the outcome.
* A declaration on whether the information will be referred to in any future reference

In these cases, the Innov4te Independent school will provide a copy to the individual, in agreement with children’s social care or the police as appropriate.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

* Not refer to any allegation that has been found to be false, unfounded, unsubstantiated, or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
* Include substantiated allegations, provided that the information is factual and does not include opinions

Learning lessons

After any cases where the allegations are *substantiated*, the case manager will review the circumstances of the case with the local authority’s designated officer 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

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority’s procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the Innov4te Independent school that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: 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 section 1 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 All learners at Innov4te independent school.

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 Innov4te Independent school may have acted in a way that:

* Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
* Does not meet the 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 as per section 7.7 of this policy.
* 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

At Innov4te Independent school learners’ wellbeing is at the heart of getting it right for every child. This means focusing on the wellbeing of every child to ensure they are safe, healthy, achieving, nurtured, active, respected, responsible and included.

* Relationships staff build with learners are paramount in creating an open culture.
* Staff are always on hand with open door policies to speak with learners and address any concerns.

Responding to low-level concerns

If the concern is raised via a third party, the Directors 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 Directors will use the information collected to categorise the type of behaviour and determine any further action, in line with the school’s [staff behaviour policy/code of conduct].

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, held securely, and comply with the DPA 2018 and UK 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, 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 Innov4te Independent 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 designated officer at the local authority and is found to be substantiated; and/or
* The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance.

### Appendix 4: specific safeguarding issues

**Assessing adult-involved nude and semi-nude sharing incidents**

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

**Sexually motivated incidents**

In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.

Potential signs of adult-involved grooming and coercion can include the child or young person being:

* Contacted by an online account that they do not know but appears to be another child or young person
* Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
* Moved from a public to a private/E2EE platform
* Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
* Offered something of value such as money or gaming credits
* Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort ‘real’ images

**Financially motivated incidents**

Financially motivated sexual extortion (often known as ‘sextortion’) is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person’s account to make initial contact. To financially blackmail the child or young person, they may:

* Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them
* Use images that have been stolen from the child or young person taken through hacking their account
* Use digitally manipulated images, including AI-generated images, of the child or young person

The offender may demand payment or the use of the victim’s bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

* Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person
* Quickly engaged in sexually explicit communications which may include the offender sharing an image first
* Moved from a public to a private/E2EE platform
* Pressured into taking nudes or semi-nudes
* Told they have been hacked and they have access to their images, personal information and contacts
* Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person

Children absent 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.

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

* Are at risk of harm or neglect.
* Are at risk of forced marriage or FGM.
* Come from Gypsy, Roma, or Traveller families.
* Come from the families of service personnel.
* Go missing or run away from home or care.
* Are supervised by the youth justice system.
* Cease to attend a school/ education setting.
* Come from new migrant families.

Innov4te independent school staff are aware of how to follow 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, exploitation and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves Innov4te Independent school without a new school being named and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child’s name from the admission register at non-standard transition points.

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.

If a member of Innov4te independent school staff suspects that a child is suffering from harm or neglect, they should follow the child protection policy procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children’s social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

We will ensure that learners who are expected to attend Innov4te independent school but fail will be referred to relevant authorities.

When a learner leaves Innov4te Independent school, we will record the name of the learner’s new school and their expected start date.

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, it may involve an 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 DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority’s children’s social care team and the police, if appropriate.

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. It may involve an exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. 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 DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority’s children’s social care team and the police, if appropriate.

Domestic abuse

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn’t physical, as well as witnessing the ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

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. Children who witness domestic abuse are also victims.

Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult at Innov4te Independent school (usually the designated safeguarding lead) before the child or children arrive at school the following day.

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

All Innov4te independent school staff receive training on domestic violence.

Sandwell Children’s Safeguarding Partnership (SCSP) and Dudley’s safeguarding people’s partnership DSPP operate Operation Encompass that is a police and education early intervention safeguarding partnership that supports children and young people exposed to Domestic Abuse (including controlling behaviour and coercive control). It aims to ensure schools are notified in a timely manner of any Domestic Abuse incident where children are present or registered at the address.

Advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

<https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/domestic-abuse/signs-symptoms-effects/>

<http://www.safelives.org.uk/knowledge-hub/spotlights/spotlight-3-young-people-and-domestic-abuse>

Homelessness

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

The DSL [and deputy/deputies] will be aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children’s social care.

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 DSL, who will activate local safeguarding procedures.

**FGM**

The DSL 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.

Section 7.3 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 learner is at risk of FGM.

Indicators that FGM has already occurred include:

* A learner confiding in a professional that FGM has taken place
* A mother/family member disclosing that FGM has been carried out
* A family/learner ready being known to social services in relation to other safeguarding issues
* 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 learner 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 family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
* A girl:
  + Having a mother, older sibling or cousin who has undergone FGM
  + Having limited level of integration within UK society
  + 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 consider the context of the discussion)
  + Being unexpectedly absent from school
  + Having sections missing from her ‘red book’ (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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 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 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 learner is being forced into marriage, they will speak to the learner about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

* Speak to the learner about the concerns in a secure and private place
* Activate the local safeguarding procedures and refer the case to the local authority’s designated officer
* Seek advice from the Forced Marriage Unit on 020 7008 0151 or [fmu@fco.gov.uk](mailto:fmu@fco.gov.uk)
* Refer the learner to an education welfare officer, pastoral tutor, learning mentor, or counsellor, as appropriate

Preventing radicalisation

* **Radicalisation** refers to the process of a person legitimising support for, or use of, terrorist violence
* **Extremism** is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to**:**
  + Negate or destroy the fundamental rights and freedoms of others; or
  + Undermine, overturn or replace the UK’s system of liberal parliamentary democracy and democratic rights; or
  + Intentionally create a permissive environment for others to achieve the results outlined in either of the above points
* **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.

Independent schools have a duty to prevent children from becoming involved with or supporting terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of learners who attend Innov4te Independent school becoming involved with or supporting terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place and equip our learners to stay safe online at Innov4te independent school and at home.

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

Staff will be alert to changes in learners’ behaviour.

The government website [Educate Against Hate](http://educateagainsthate.com/parents/what-are-the-warning-signs/) and charity [NSPCC](https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/protecting-children-from-radicalisation/) say that signs that a learner 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 learner, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Staff should **always** act if they are worried.

Further information on Innov4te independent school measures to prevent radicalisation are set out in other policies and procedures, including

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. It can also take place both face-to-face and online, and can occur simultaneously between the 2.

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that doesn’t mean that this kind of abuse isn’t happening.

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 children (this is sometimes known as ‘teenage relationship abuse’)
* 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 nude and semi-nude 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 section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school’s approach to this type of abuse.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma and will offer them appropriate support.

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

* Between 2 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, likely, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same Innov4te Independent 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 follow the procedures set out in section 7 of this policy, as appropriate. Section 7.8 and 7.9 set out more detail about our approach to this type of abuse.

Further guidance and advice can be found here

[Sexual violence and sexual harrassment betwen children in schools and colleges](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/999239/SVSH_2021.pdf)

Serious violence

Indicators that 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 that 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 learner being involved in, or at risk of, serious violence, they will report this to the DSL.

Assessment of risk outside the family home (formerly Contextual Safeguarding)

Safeguarding incidents and/or behaviours can be associated with factors outside of Innov4te independent school and/or can occur between children outside Innov4te Independent school. All staff, but especially the DSL, should consider the context within which such incidents and/or behaviours occur.

This is known as ‘Assessment of risk outside the family home’, which simply means assessments of children should consider whether wider environmental factors are present in a child’s life that are a threat to their safety and/or welfare. By providing this information, to children’s social care, as part of the referral process, assessments can then consider all the available evidence and the full context of any abuse. Additional information is available here: <https://contextualsafeguarding.org.uk/about/what-is-contextual-safeguarding>

Child Criminal Exploitation: County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”.’ Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Children with a social worker

At innov4te independent school we recognise that when a child has a social worker, it is an indicator that the child is more at risk than most students. This could mean that they are more vulnerable to further harm, as well as facing barriers to attendance, learning, behaviour, and poor mental health.

Innov4te independent school will support learners with a social worker by monitoring their attendance and meet with other agencies and key professionals.

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

If the visitor is unknown to the setting, we will check their credentials 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.

Visitors to innov4te independent school will be met by the relevant member of staff.

Visitors to the Innov4te Independent school who are visiting for a professional purpose, such as educational psychologists will be asked to show photo ID and:

* Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
* The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out

All other visitors, including visiting speakers, will be always accompanied by a member of staff. We will not invite into Innov4te independent school any speaker who is known to disseminate extremist views and will carry out appropriate checks to ensure that any individual or organisation using Innov4te independent school facilities is not seeking to disseminate extremist views or radicalise learners or staff.

Non-collection of children

If a child is not collected at the end of the session/day, we will:

* Contact parent/carer
* Contact other emergency contacts on student’s profile.
* Contact key professionals if child is subject to a plan.

Missing learners

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:

* Contact parents/carers immediately
* Attend a home visit if necessary
* Report child missing to the police

Please see absconding policy for further guidance