NEWTON INTERNATIONAL ACADEMY SMASH



SAFEGUARDING AND CHILD PROTECTION POLICY

POLICY REVIEWEDJuly 2025

POLICY TO BE REVIEWEDJuly 2026



SAFEGUARDING AND CHILD PROTECTION POLICY



Updated July 2025

Review date July 2026

This policy applies to the whole school: EYFS, Primary and Secondary

For issue to staff and parents

It should be read in conjunction with the Safeguarding Procedures, the Online Safety Policy, Wellbeing Policy and Anti-Bullying Policy

Key Personnel

At NIA Smash there is 1 Designated Safeguarding Lead and 3 Deputy DSL for EYFS, Primary and Secondary.

Role	Contact
Designated Safeguarding Lead	dhopastoral_niasmash@newtonschools.sch.qa
Mrs Stephanie Hardy- Deputy Head Primary	
(Pastoral)	
Deputy Safeguarding Lead	dhop.niasmash@newtonschools.sch.qa
Jonathan White – Deputy Head Secondary (Pastoral)	
Deputy Safeguarding Lead	eyfscoordinator_niasmash@newtonschools.sch.qa
Lisa Davies – Early Years Coordinator	
Deputy Safeguarding Lead	abdelhafizk@newtonschools.sch.qa
Khadija Abdelhafiz – Arabic Department	

1. Policy Statement

Newton International Academy Smash is committed to a whole school approach to safeguarding and promoting the welfare and wellbeing of children and young people. Our open culture allows students' voices to be heard and by using effective procedures we ensure a safe and supportive environment for all. It is our mission to create students who are emotionally resilient, flexible and inspired to reach their full potential.

All pupils have the right to be protected from all types of harm and abuse, and all school systems, processes and policies should operate with the best interests of the child at their heart. This Safeguarding and Child Protection Policy forms a fundamental part of our approach to providing excellent pastoral care to our pupils. Staff at NIA Smash understand that Safeguarding and promoting the welfare of children is everyone's responsibility.

This policy has been drawn up in line with UK guidance and best practice. It is influenced by the laws that seek to protect children and young people, namely:

- Keeping Children Safe in Education (KCSIE), updated September 2024
- Children Act 1989
- Working Together to Safeguard Children 2018

This policy also refers to guidance from Safeguarding Concerns for International Schools.

'Safeguarding and promoting the welfare of children' has been updated to reflect the changes recommended by the Keeping Children Safe in Education statutory guidance, 2024. The additional points are:

Promoting help and support to meet the needs of children as soon as problems emerge.

Protecting children from maltreatment, inside or outside the home, including online.

Preventing the impairment of children's mental and physical health or development (as stated in previous guidance)

Ensuring that children grow up in circumstances consistent with the provision of safe and effective care (as stated in previous guidance)

Taking action to enable all children to have the best outcome (as stated in previous guidance

1.1 NIA Smash addresses Child Protection via three main elements:

Prevention:

NIA Smash seeks to provide a positive, inclusive environment for all children. Concerns are reported early, effective pastoral support, E-safety and PSHE are available, and associated policies are in place. Pupils are taught about safeguarding both on and offline, including how to adjust their behaviour to reduce risks, keep themselves safe and build resilience; and are made aware of this Policy through the PSHE programme and other means of sharing information appropriate to their context, age and understanding, within a broad and balanced curriculum.

Protection:

Staff are fully aware of their responsibilities with regards to safeguarding and child protection. Staff are trained and supported in dealing appropriately with sensitive matters. The school has robust recruitment systems in place. All staff are required to adhere to the ICT Acceptable Use Agreement, and specifically to ensure that any images taken of pupils are appropriate and stored and managed safely.

Support:

Support for pupils and staff is available, through qualified Designated Safeguarding Leads and School Counsellors.

2. Abuse, Neglect and Exploitation

2.1 Definitions of Abuse

Abuse is a form of maltreatment of a child, *including seeing, hearing or experiencing domestic abuse and its effects*. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institution or community setting by those known to them or, more rarely, by others.

Abuse can take place wholly online, or technology may be used to facilitate offline abuse.

Children may be abused by an adult or adults or another child or children. Abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

The categories listed below are drawn from 'Keeping Children Safe in Education':

Physical abuse

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

• Emotional abuse

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children.

These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. They may also include non-contact activities such as involving children in looking at or the production of sexual images or grooming a child in preparation for abuse. Sexual abuse can take place online and technology can be used to facilitate offline abuse. The sexual abuse of children by other children is a specific safeguarding issue in education.

Neglect

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

Having or sending explicit material on digital devices is also a criminal offence for those under 18. Pupils are taught about this as part of their internet safety education. The school takes incidents of sharing nude and seminude images extremely seriously, and deals with them in accordance with child protection procedures, including if necessary, reporting to the police.

2.2 Who are the Abusers?

Abusers might be parents or carers, siblings or members of the extended family, neighbours, teachers, strangers; in short, an abuser could be anyone.

2.2.1 Child-on-child abuse: all staff should also recognise that children are capable of abusing their peers, and that this can happen and must be addressed whether it occurs inside school, outside school, or online. Even if

there are no reports, it does not mean it is not happening, it may be the case that it is just not being reported. For this reason, it is important that staff are alert to the signs of child-on-child abuse and that pupils feel able to report incidents, knowing they will be treated seriously. Child-on-child abuse is most likely to include, but is not limited to:

- 2.2.2 bullying (including cyber, prejudice-based, and discriminatory bullying)
- 2.2.3 abuse in intimate personal relationships between peers
- **2.2.4** 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)
- **2.2.5** 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)
- **2.2.6** sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- **2.2.7** consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as sexting or youth produced sexual imagery)
- **2.2.8** 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) It is more likely that girls will be victims of child-on-child abuse and boys perpetrators, but all child-on-child abuse is unacceptable and will be taken seriously. Child-on-child abuse should be recognised as abuse and challenged as such. A zero-tolerance approach will be taken whereby it is never passed off as 'banter', 'just having a laugh', 'part of growing up' or 'boys being boys.

This can lead to a culture of unacceptable behaviours, an unsafe environment for children and at worst children accepting this as normal and not coming forward to report it. The school seeks to minimise the risk of such abuse by ensuring that it is clear to all members of the school community that it is not tolerated, and by educating pupils as part of the PSHE programme about healthy and respectful relationships, the wider societal factors (such as sexist stereotypes and language), and how to recognise, report and respond to child-on-child abuse.

Any concern about child-on-child abuse must be reported to the DSL. Allegations will be promptly and thoroughly investigated, recorded and treated according to their gravity, in line with the school's anti-bullying or behaviour policy. The threshold for dealing with an issue of pupil behaviour or bullying under the safeguarding procedure is, subject to local specifics as in any other cases, when there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm.

Victims, perpetrators and any other child affected will be supported within the pastoral care structure, taking account of their views and feelings, and support may include counselling where appropriate. All children involved will be treated as 'at risk'.

2.2.9 Contextual safeguarding: safeguarding incidents and/or behaviours can be associated with factors outside the school and can occur between children outside the school. All staff should consider the context within which such incidents and/or behaviours occur. It is important to provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

2.3 Signs of Abuse

All School staff members should be aware of the signs of abuse, neglect and radicalisation so that they are able to identify cases of children who may be in need of help or protection.

2.3.1 Physical Abuse

- Unexplained injuries/burns
- Untreated injuries
- Bruises/abrasion around the face
- > Bi-lateral injuries e.g. two bruised eyes
- Bite marks
- > Bruising abrasions to lips, cheeks, outer ear

2.3.2 Emotional Abuse

- > Excessive overreaction to mistakes
- Continual self-deprecation
- > Excessive rocking, thumb sucking, hair twisting
- Extreme compliance/aggression
- > Drug, alcohol and substance misuse
- Significant peer relationship difficulties

2.3.3 Sexual Abuse

- > Sexual awareness inappropriate to child's age, including provocative sexual behaviour
- > Self-harm
- Pregnancy
- Sudden changes in behaviour or school performance
- Fear of undressing for swimming/PE
- Depression/withdrawal
- > Drug, alcohol, substance abuse

2.3.4 Neglect

- Constant hunger, tiredness and/or poor personal hygiene
- Untreated medical problems
- Destructive tendencies
- Social isolation
- Poor self-esteem and/or relationship with peers
- Excessive rocking, hair twisting, thumb sucking

3. Missing Children

A child going missing from an education setting is a potential indicator of abuse and neglect. Staff should treat prolonged or repeated absence, or particular patterns of absence, with no satisfactory explanation, as a potential safeguarding issue and take action accordingly.

4. Mental Health

Mental health and pupil wellbeing are integral to creating a safe and supportive learning environment. The school is committed to promoting positive mental health by fostering open communication, raising awareness, and providing access to support systems. Early identification of mental health concerns is prioritised, with staff trained to recognise signs of distress and intervene appropriately. Tailored support ensures that every pupil's needs are met. By embedding mental health education into the curriculum and encouraging resilience, the school helps pupils thrive academically and emotionally.

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering, abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff are, however, well placed to observe children and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

It is also important that staff are aware how adverse childhood experiences can have a lasting impact on children's mental health, behaviour and education.

If staff have a concern about a child which is also a safeguarding concern, immediate action should be taken following the procedures in this Policy.

5. Creating a Culture of Safeguarding

5.1 Keeping Children Safe in Education 2024 defines safeguarding and promoting the welfare of children as:

- protecting children from maltreatment;
- preventing impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of
- · safe and effective care; and
- taking action to enable all children to have the best outcomes.

Where a child is suffering significant harm, or is likely to do so, action will be taken to protect that child. Action will also be taken to promote the welfare of a child in need of additional support, even if they are not suffering harm or at immediate risk. The School recognises the importance of children receiving the right help at the right time, to address risks and prevent issues escalating, the importance of acting on and referring the early signs of abuse and neglect, keeping clear records, listening to the views of the child, reassessing concerns when situations do not improve, sharing information quickly, and challenging in-action.

5.2 The School has systems to:

5.2.1 Prevent unsuitable people working with pupils;

- **5.2.2** Promote safe practice and challenge poor and unsafe practice;
- **5.2.3** Deal with issues of confidentiality, information sharing and consent;
- **5.2.4** Ensure that staff do not, through their actions, place pupils at risk of harm, or place themselves at risk from an allegation of harm (by providing guidance on areas such as 1:1 tuition, sports coaching, conveying by car, inappropriate electronic communication). The school encourages the pupils in its care to raise any concerns that they might have and ensure that these are taken seriously. The school also encourages pupils to contribute their own ideas, appropriate to their age and understanding, about how their safety and welfare could be further improved.

Working together to safeguard children - GOV.UK (www.gov.uk)

Child abuse concerns: guide for practitioners - GOV.UK (www.gov.uk)

6. Role of Staff

Everyone who comes into contact with children and their families has a role to play in safeguarding children.

School staff are particularly important as they are in a position to identify concerns early and provide help for children, to prevent concerns from escalating. School staff have a responsibility to identify children who may be in need of extra help or who are suffering, or are likely to suffer, significant harm. All staff then have a responsibility to take appropriate action, working with other services as needed.

6.1 Any concern, allegation or incident of abuse must be referred to the Designated Safeguarding Lead immediately. Staff should not assume that a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision.

All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. If in doubt about sharing information or recording requirements, staff should discuss this with the Designated Safeguarding Lead. 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.

- **6.2** If staff have concerns about a child they will need to decide what action to take. All staff should be prepared to identify children who may benefit from early help, that is, support as soon as a problem emerges. Such problems should be discussed in the first instance with the Designated Safeguarding Lead. The early help process may also involve sharing information with other professionals and contributing to an early help assessment.
- **6.3** Any child may benefit from early help, but staff should be particularly alert to the potential need for early help for a child who:
- Is disabled and has specific additional needs
- Has special educational needs
- Is showing signs of being drawn into anti-social or criminal behaviour
- Is frequently missing/goes missing from care or from home

- Is in a family circumstance presenting challenges for the child
- Has returned home to their family from care
- Is at risk of being radicalised or exploited
- Is a privately fostered child

7. School Aims:

- Create an environment in the school which is safe and secure for all pupils.
- Encourage our pupils to establish satisfying relationships within their families, with peers and with other adults.
- Encourage children to develop a sense of autonomy and independence.
- Work with parents to build their understanding of and commitment to the welfare of all pupils.

7.1 In order to fulfil these aims the Head will take the necessary steps to ensure that:

• All staff receive training in safeguarding children and an explanation of the systems within the school which support this as part of their induction.

This includes:

- **7.1.1** The School's Safeguarding and Child Protection Policy (which includes whistleblowing procedures) and school Safeguarding Procedures (which incorporates the staff Code of Conduct)
- **7.1.2** The identity and role of the Designated Safeguarding Lead(s) and Deputy Designated Safeguarding Lead(s)
- **7.1.3** Online safety
- **7.1.4** All staff and the Head are trained in child protection regularly, and receive safeguarding and child protection updates as required, but at least annually.
- **7.1.5** Safeguarding training must be integrated, aligned, and considered as part of the whole school safeguarding approach and staff training programme. The Designated Safeguarding Lead(s) must receive the required updated Child protection at least every two years.
- **7.1.6** The School adheres to the Newton Recruitment Policy and guidance and safer recruitment procedures (found in the Safeguarding Procedures). Procedures are in accordance with the MOE's regulations including ensuring that at least one member of any recruitment panel involved in all stages of the recruitment process has undertaken the appropriate training in Safer Recruitment and carrying out all required checks on the suitability of all staff to work with children and young people.
- **7.1.7** Appropriate supervision arrangements are put in place if staff start work before their DBS disclosure has been obtained.

- **7.1.8** The school obtains assurance that appropriate child protection checks are carried out and procedures apply to any staff member of another organisation who works with the school's pupils on another site (for example, on a separate campus).
- **7.1.9** Appropriate checks are carried out on external visitors coming onto the school site, depending on their business with the school and level of contact with children. Where relevant, this will include an assessment of the suitability, educational value and age appropriateness of any activities or material to be delivered.
- **7.1.10** All school staff are alert to signs of abuse and neglect, and all staff know to whom they should report concerns or suspicions of abuse or neglect.
- **7.1.11** All school staff keep themselves updated on safeguarding issues and child protection procedures by accessing advice, guidance and training as appropriate to their role. The school ensures that it has positive communication with the local safeguarding partners to ensure compliance with local protocol and access to relevant support

7.2 Implementation Procedures

The school has implementation procedures to assist staff and volunteers when handling safeguarding concerns.

- **7.2.1** Throughout the setting all persons are required to adhere to the ICT Acceptable Use Agreement on the use of mobile phones and cameras: that is, that images of pupils may not be stored on personal devices. Any images taken on personal devices will be transferred to school systems as soon as reasonably possible and the personal copy permanently removed.
- **7.2.2** Safeguarding training for staff will include guidance on identifying signs of possible abuse and neglect (such as significant changes in a pupil's behaviour, deterioration in wellbeing, physical indications, comments which give cause for concern, or any reasons to suspect neglect or abuse outside the setting), and on how to respond in a timely and appropriate way to such signs or to inappropriate behaviour in other members of staff or any other person working with children

7.3 Children with Special Educational Needs and Disabilities or Physical Health Issues

- **7.3.1** Children with special educational needs and disabilities (SEND) or certain health conditions can face additional safeguarding challenges, including particularly vulnerable to child-on-child abuse. Staff must be alert to the fact that additional barriers can exist when recognising abuse and neglect in this group of children. These may include:
- **7.3.2** Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further explanation;
- **7.3.3** Being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- **7.3.4** The potential for children with SEND or certain medical conditions to be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- **7.3.5** Communication barriers and difficulties in managing or reporting these barriers. To address these additional challenges, such children may require extra pastoral support and attention, alongside any appropriate

support for communication. Their additional vulnerabilities should also be particularly carefully considered in situations where the use of reasonable force may be needed.

8. Key Personnel

8.1 At NIA Smash there is 1 Designated Safeguarding Lead and 3 Deputy DSL for EYFS, Primary and Secondary.

The DSLs are responsible for:

- Keeping written records of concerns about a pupil.
- Ensuring that all such records are kept confidentially
- Providing advice, guidance and support to staff in child protection matters
- Liaising with the Head of Primary to discuss issues and ongoing investigations
- Keeping the Principal informed
- Organising child protection training for all school staff

8.2 The Designated Safeguarding Leads will:

- **8.2.1** be responsible for ensuring that all cases of suspected or actual child protection concerns are dealt with in accordance with the guidance and regulations set out above.
- **8.2.2** refer cases of suspected abuse or allegations to the local Social Services Department and/or the police if necessary
- **8.2.3** receive appropriate training in child protection matters, at least annually and in addition to formal training, update their knowledge and skills at regular intervals in order to keep up with developments relevant to the role.

Deputy DSLs will be trained to the same level as DSL's.

8.2.4 act as a source of advice and support within the school and co-ordinate action regarding referrals in relation to both children and allegations against staff.

The school has appointed Designated Safeguarding Leads and deputies to contact in their absence. The Designated Safeguarding Leads are members of the School's Senior Leadership Team with the necessary status and authority to take lead responsibility for child protection matters (including online safety). This responsibility cannot be delegated. The school will ensure that the Designated Safeguarding Leads are given the time/cover, funding, training, resources and support to fulfil their role.

During term time, the Designated Safeguarding Lead and/or a deputy will always be available (during school hours) for staff to discuss any safeguarding concerns. Adequate and appropriate cover will be arranged for any out of hours/out of term activities. The Designated Safeguarding Leads will ensure that arrangements for cover are communicated clearly to staff.

All disclosures of abuse must be discussed with the Designated Safeguarding Leads. Pupils, staff and parents should feel at ease to discuss any concerns relating to the welfare of a pupil with the DSL.

8.3 Record Keeping

Designated Safeguarding Leads keep accurate and up to date records of child protection concerns and ensure the security of information. Files are not accessible by pupils, parents or staff members. Records should 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.

The Designated Safeguarding Lead should ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice as set out in Part two of KCSIE.

8.4 Staff Training

All staff, including administration and site staff will be asked to read and acknowledge the Safeguarding and Child Protection policy yearly. Child Protection Procedures are disseminated to them as part of their training. All staff will attend a safeguarding briefing at the start of the academic year. DSLs and Deputy DSLs will undergo updated Child Protection training every two years, either online or face-to-face.

The DSLs will

- ensure each member of staff has access to, and understands the Safeguarding and Child Protection Policy especially new members of staff;
- ensure the Safeguarding and Child Protection Policy is reviewed annually (as a minimum) and the
 procedures and implementation are updated and reviewed regularly, and work with governing bodies
 or proprietors regarding this;
- ensure the Safeguarding and Child Protection Policy is available publicly and that parents are made aware of the fact that referrals about suspected abuse or neglect may be made;

8.5 ID

All staff are required to wear an ID on a colour coded lanyard whilst on the school premises. Visitors during the day are required to sign in and wear the visitor's lanyard issued to them on arrival. Security staff monitor staff, pupils and visitors arriving and leaving the premises during the school day.

8.6 International Staff

As part of Qatari requirements for Internationally hired staff, employees are required to undergo a criminal record check and present the attested documents. As a further measure, the school requires a criminal check from countries where the staff member has previously been employed. This is in line with best practice for international schools.

8.7 Locally Hired Staff

Locally hired staff who have not undergone a criminal record check will be required to do so before they are employed. Attested documents are required, along with copies of sponsorship, QID and passports.

8.8 E-Safety

Pupils have access to different devices that give them access to the internet. The Online Safety policy refers to the measures taken to protect pupils from harmful content both at school and outside of school. NIA Smash blocks access to websites deemed to be inappropriate or dangerous and keeps a log of all internet access made on school devices. Logged access is used for monitoring purposes, and flagged terms trigger alerts which the management may investigate. Additionally, email messages between staff and students are scanned for inappropriate language and behaviour.

9. Disclosure Procedures

9.1 Responding to Disclosures of Abuse

- **9.1.1** Children are more likely to be abused by someone they know and trust than by a stranger. Staff members are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members should always take action in the best interests of the child.
- **9.1.2** Staff should make themselves available to reassure the pupil that what they are saying is being taken seriously and without criticism, and should respond in a supportive, calm manner, avoiding asking detailed questions. The role of the staff member is to listen, record and report; not to investigate.

A pupil should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. No pupil should ever be made to feel ashamed for making a report. Staff should also take care to ensure that their behaviour and actions do not place pupils or themselves at risk of harm.

9.1.3 If a pupil reports abuse from another pupil or pupils, staff should follow the procedures in this section. All children involved, whether a potential perpetrator or victim, will be treated as being 'at risk'. The Designated Safeguarding Lead will liaise with local agencies in relation to handling any such cases which arise. A bullying incident will be regarded as a child protection concern where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. See the Anti-Bullying Policy.

9.2 Immediate Response

If a disclosure is made, the member of staff or volunteer should:

- **9.2.1** allow the pace of the conversation to be dictated by the pupil;
- 9.2.2 ask open questions which encourage the pupil to talk such as "can you tell me what happened?"
- **9.2.3** accept what the pupil says and not ask for further detail;
- **9.2.4** acknowledge how hard it was for them to tell you and show by voice tone and/or facial expression that you are taking their concerns seriously;
- **9.2.5** note carefully any clearly visible external signs of possible injury or neglect (but note paragraph 5.5.4 below);

9.2.6 reassure the pupil that they have done the right thing, that they are not at fault, and explain whom you will have to tell (the Designated Safeguarding Lead) and why.

The member of staff should not:

- 9.2.7 burden the pupil with guilt by asking questions such as "why didn't you tell me before?"
- **9.2.8** interrogate or pressure the pupil to provide information;
- **9.2.9** ask any potentially leading questions, as this may impact on any potential case brought to court;
- **9.2.10** undress the child or examine clothed parts of the child's body in an attempt to determine the nature of any such injuries/neglect;
- **9.2.11** criticise the alleged perpetrator, this may be someone they love;
- **9.2.12** promise confidentiality
- **9.2.13** make promises that they cannot keep such as "I'll stay with you all the time" or "it will be alright now";
- **9.2.14** put words in the child's mouth (i.e. finish their sentences);
- **9.2.15** jump to conclusions or speculate about what happened or might have happened, or make accusations;

9.3. Managing a disclosure

If a pupil confides in a member of staff and requests that the information is kept secret, staff must not make promises about confidentiality. Staff must tell the pupil sensitively that they have a responsibility to tell the named Designated Safeguarding Lead so that the child can be helped to stay safe and feel better.

- **9.3.1** In every case, the member of staff should consider whether the pupil is able to provide consent for the information to be shared and if so, seek to obtain that consent in accordance with the school Safeguarding Procedures relating to information sharing and consent. If the pupil does not consent, the member of staff should explain that they need to share the information with the Designated Safeguarding Lead and reassure them that the information will only be disclosed to other people who need to know. The member of staff should refer to the Safeguarding Procedures for further information and guidance.
- **9.3.2** The school recognises that a child who is abused may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth. We recognise that the school may provide the only stability in the lives of children who have been abused or who are at risk of harm. The school has age appropriate systems in place for children to express their views and give feedback so that their wishes or feelings will be taken into account when determining what action to take and what services to provide.

However, the child's wishes or feelings cannot override the duty to refer suspected abuse to children's social care or police.

9.3.3 The School will provide continuing support to a pupil who has disclosed abuse through promoting a caring and safe environment within the school and encouraging self-esteem and self-assertiveness through the curriculum and through relationships. In doing so, the school will act in accordance with guidance from the relevant authorities to ensure that, for example, legal proceedings are not compromised.

9.3.4 All allegations involving staff will be discussed immediately with the Principal before any investigation takes place. In borderline cases, these discussions can be held without naming the individual. In any case of immediate risk or serious harm to children, the police shall be informed at the outset.

9.4. Recording Information

Staff should:

- **9.4.1** make a record of the disclosure or concern, including the date, time, place and context, and what has actually been said (wherever possible using the child's exact words, even if they seem childish, rude or inappropriate), not assumption or interpretation.
- **9.4.2** clearly distinguish between fact, observation, allegation and opinion;
- **9.4.3** record any observed injuries and bruises;
- **9.4.4** note the non-verbal behaviour and the key words in the language used by the pupil (do not translate into "proper terms");
- **9.4.5** alert the Designated Safeguarding Lead;
- **9.4.6** appreciate that their records may be used in criminal proceedings or disciplinary investigations.

9.5 Reporting Concerns

- **9.5.1** Any concerns about pupils must be discussed with the Designated Safeguarding Lead (or in their absence the Deputy Designated Safeguarding Lead) as soon as possible and at latest by the end of the school day.
- **9.5.2** The School's procedures differentiate between safeguarding children who have suffered significant harm and those who are in need of support from one or more agencies. In cases where a child is not suffering or at risk of suffering serious harm, but rather is in need of additional support, an inter-agency assessment will be undertaken to determine the most appropriate action.
- **9.5.3** If, at any point, there is a risk of immediate serious harm to a child a referral should be made immediately. If the child's situation does not appear to be improving the staff member with concerns should press for reconsideration. Concerns should always lead to help for the child at some point.

9.6 Allegations against staff

- **9.6.1** The aim is to deal with any allegation quickly and in a fair and consistent way which provides effective protection for the child and at the same time provides appropriate support for the person who is the subject of the allegation.
- **9.6.2** Where a safeguarding-related allegation or cause for concern is made against any member of staff (including the Designated Safeguarding Lead), the matter should be reported immediately to the Headteacher (unless the allegation relates to the Headteacher or there is a conflict of interest in reporting the matter to the Head). The Headteacher should not speak to the member of staff who is the subject of the allegation at this point.

- **9.6.3** Where a safeguarding related allegation or cause for concern is made against the Headteacher or there is a conflict of interest in reporting the matter to the Head, it should be reported immediately to the Principal without informing the Head.
- **9.6.4** A decision as to how to proceed and eventually whether or not to suspend a member of staff will be taken by the CEO following consultation with the Principal.

Discussions should be recorded in writing, and any communication with both the individual and the parents of the child/children agreed. Suspension is not an automatic response, and the decision will be taken according to the circumstances of each particular case.

9.6.5 If there has been a substantiated allegation against a member of staff, the school will work to determine whether there are any improvements to be made to the school's procedures or practice to help prevent similar events in the future.

9.7. Low level concerns

- **9.7.1** A low level concern about the behaviour of a member of staff is one where such behaviour does not meet the 'harms threshold' and yet appears to be inconsistent with the staff code of conduct or professional boundaries.
- **9.7.2** It is crucial that any such concerns should be shared. This will maintain an open and transparent culture within the school, reinforcing its ethos and values; ensure that adults working in the school act within professional boundaries; and enable concerning, problematic or inappropriate behaviour to be identified and addressed early, minimising the risk of abuse.
- **9.7.3** Low level concerns about a member of staff should be reported as set out above. Staff are also encouraged to self-refer where, for instance, they have found themselves in a situation which could be misinterpreted, or on reflection feel they may have compromised the school's expected professional standards. Reports about supply staff and contractors will be notified to their employers so that any potential patterns of inappropriate behaviour can be identified.
- **9.7.4** The Headteacher will investigate the concern, speaking to the person who raised the concern, the individual involved, and any witnesses. The action to be taken will be determined by and proportionate to the nature of the incident, whether the report can be substantiated and whether any pattern of behaviour appears to be emerging. Support will be offered where appropriate and where needed to enable the member of staff in question to correct their behaviour in future.
- **9.7.5** The Headteacher must record all low-level concerns in writing, including details of:
- The concern,
- The context of the report
- The name of the individual sharing the concern (requests for anonymity should be respected as far as reasonably possible)
- Action taken and the rationale for this.
- **9.7.6** Records of low-level concerns must be reviewed periodically in order to identify any patterns of concerning, problematic or inappropriate behaviour. Should a pattern of behaviour be identified, the school will decide on a course of action depending on the nature of the concerns.

10. Staff Roles and Responsibilities are:

- 10.1 protect pupils from abuse
- **10.2** follow the school's safeguarding policy and procedures, and appropriate to their role, including subsequent updates to this guidance
- 10.3 know how to access and implement the procedures
- **10.4** know the identity of the School's Designated Safeguarding Lead/s and who to speak to in the absence of the Designated Safeguarding Lead/s
- 10.5 report all safeguarding concerns to the Designated Safeguarding Lead
- 10.6 keep a record of any safeguarding concern, conversation or incident
- **10.7** undertake appropriate training as detailed above.

16.2 Duty to report concerns about the management of safeguarding

- **16.2.1** The School recognises that children cannot be expected to raise concerns in an environment where staff fail to do so. Staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime and feel confident that such concerns will be taken seriously by the senior leadership team. The duty to report concerns about the management of safeguarding is part of the Code of Conduct and will also be reflected in staff training.
- **16.2.2** Where staff reasonably believe that safeguarding concerns exist, or where they have concerns regarding the management of safeguarding issues, it is their duty to raise concerns. The members of staff should bring their concerns to the attention of the Designated Safeguarding Lead, or in a case where the concerns relate to the actions or inaction of the Designated Safeguarding Lead, to the Head.
- **16.2.3** An annual review of this Policy and associated procedures, and the efficiency with which associated duties have been discharged, will be undertaken so that any deficiencies or weaknesses can be remedied without delay.

11. Related Policies

The following policies and procedures are also relevant to the school's safeguarding practices:

- (a) Staff Code of Conduct
- (b) Behaviour Policy
- (c) Safer Recruitment and Selection Policy
- (d) Anti-bullying Policy
- (e) Online Safety Policy
- (f) First Aid Policy

- (g) Health & Safety Policy and Procedures
- (h) Educational Visits Policy

The school recognises that safeguarding covers much more than child protection, and so this Policy will operate in conjunction with the Schools Safeguarding Procedures (which itself incorporates the staff Code of Conduct), and other related policies and procedures. The school takes seriously its responsibility to promote and nurture the mental health and wellbeing of all its pupils and staff. This is reflected in its policies and procedures for pastoral care and the School's PSHE programme.

Keeping children safe in education 2024

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Part 1	Safeguarding Information for all staff	All Staff working directly with	Pages 8-24
		children, Principal & SLT	
Part 2	The management of	Principal, SLT, School	Pages 25-55
	safeguarding	Nurses, DSL and Deputy DSL,	
		SENDCo	
Part 3	Safer recruitment	Principal, SLT, DSL, HR	Pages 56-91
		(and any staff	
		involved in interviewing	
		candidates)	
Part 4	Allegations of abuse made	Principal, SLT, DSL	Pages 92-110
	against teachers, and other	and Deputy DSL and HR	
	staff, including supply		
	teachers and volunteers.		
Part 5	Child on Child Sexual	All staff in direct contact with	Pages 111-142
	Violence and Sexual	Pupils, Principal & SLT	
	Harassment		
Annex A	Safeguarding Information for	All staff not working directly in	Pages 143-147
	school and college staff	contact with pupils	
Annex B	Further Information	All Staff working directly with	Pages 148-169
		Children, Principal & SLT	
Annex C	Role of the designated	Principal, DSL, Deputy DSL,	Pages 170-176
	safeguarding lead	SLT and HR	
Annex D	Host families - homestay	Not applicable	Pages 177-179
	during exchange visits		
Annex E	Statutory guidance -	Principal, DSL, Deputy DSL,	Pages 180-182
	Regulated activity (children) -	SLT, Trip leaders if	
	Supervision of activity with	applicable, Head of PE	
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	activity when unsupervised		
Annex F	Table of substantive changes	DSL and Deputy DSL & Principal	Pages 183

Safeguarding and Child Protection Declaration

I confirm that I have read and understood the information contained in the Safeguarding and Child Protection Policy.

I confirm that I will follow this guidance, and

I confirm that I will ask for more information from the Designated Safeguarding Lead if I have any questions, or do not understand anything.

I am aware that a signed copy of this declaration will be placed in the Safeguarding training file.

Signature
(Block Capitals)
(block capitals)
Date