King's College Murcia Safeguarding and Child Protection Policy

Contents

1 Safeguarding in our school

1.1 Our aims and responsibilities

Our commitment is to safeguard and promote the welfare, health (including mental health) and safety of our pupils by creating and maintaining an open, safe, caring and supportive atmosphere.

This includes:
• Proactively teaching pupils about safeguarding
• Ensuring that systems and procedures are in place to protect pupils
• Acting in the best interests of the child

All staff have the following responsibilities:
• Contribute to providing a safe environment in which all children can learn and flourish
• Know what to do if a child tells you that he or she is being abused or neglected
• Know what to do if you are concerned about the behaviour or conduct of an adult in the school
• Manage the requirement to maintain an appropriate level of confidentiality
• Identify children who may benefit from Early Help
• Refer any concern to the Designated Safeguarding Lead (DSL) or the Deputy DSL
• Be aware of our local Early Help process and our role in it
• Be aware of the process for making a referral to Children's Social Care and understand the role you might be expected to play in statutory assessments

Systems are in place, and are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

1.2 Definition of safeguarding

Safeguarding and promoting the welfare of children is defined as:
• protecting children from maltreatment;
• preventing impairment of children's physical and *mental 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.

*Mental Health
All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation:
-Staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood.
- It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour and education.
-If staff have a mental health concern about a child, immediate action should be taken, following their child protection policy and speaking to the designated safeguarding lead or a deputy.

mental health and behaviour in schools guidance

In our school, safeguarding is everyone's responsibility

No single professional can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a duty and responsibility to play in identifying concerns, sharing information and taking prompt action. All teaching staff are expected to read this policy as well as Part1 of KCSIE 2022. Annex A of KCSE 2022 is a condensed version of Part one. It is provided (instead of Part 1) to those staff who do not directly work with children as a better basis for those staff to promote the welfare and safeguard children.

1.3 Who this policy applies to

This policy and procedure applies to all pupils in the school, including those in the early years and sixth form.

This policy and procedure applies to all teaching and non-teaching staff, residential, pastoral, support, peripatetic, contract staff and ancillary staff, volunteers, non-school based King's staff and any other adults working at the school, including the senior leadership team. All references in this document to "staff" or "members of staff" should be interpreted as relating to the aforementioned, unless otherwise stated. It applies to adults in the early years' and sixth form phase of the school.

This Safeguarding Policy and the Code of Conduct applies to all pupils and adults in the school, including when being educated off-site and undertaking an educational visit. It also applies to students who are on an exchange and being hosted by the school.

1.4 Information sharing and inter-agency working

The school is committed to inter-agency working in order to secure the best levels of safeguarding for all of its pupils and understands that information sharing is essential for effective safeguarding and promoting the welfare of children and young people. Fears about sharing information will not stand in the way of the need to promote the welfare, and protect the safety, of pupils, which is always the School's paramount concern. The School understands that the GDPR and Data Protection Act 2018 provide a framework to ensure that personal information is shared appropriately.

The school contributes to inter-agency working in accordance with statutory guidance. The school works with social care, the police, health services and other services to promote the welfare of children and protect them from harm and ensure that all relevant information is shared for the purposes of early help assessments, and assessments and child protection investigations. .

While the School will share information with those involved where and when it is appropriate to do so, they may be unable to for reasons of data protection and confidentiality, for example because to do so may pose a risk of harm to others or because it has been prohibited by external agencies.

This section of the policy should be read alongside the following document to support staff
Information sharing advice for safeguarding practitioners

Concerns about a child's welfare should be referred to local authority children's social care. Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and if appropriate the police) is made immediately. Referrals should follow the local referral process

This part of the policy should be read alongside the information in the following link:
Contextual Safeguarding Network

Where there is a safeguarding concern, governing bodies, proprietors and school or college leaders should ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems should be in place for children to express their views and give feedback.

1.5 Definitions and terminology

'Children' includes everyone under the age of 18.
'DSL' refers to the school's named Designated Safeguarding Lead. References to the DSL include the Deputy DSL where the DSL is unavailable.
'Designated Officer' refers to the person appointed by the local authority to deal with allegations against adults
'KCSIE' refers to the statutory guidance Keeping Children Safe in Education

This policy is updated annually and is published to all staff and volunteers and placed on the school website. This policy is based on KCSIE 2022.

Internal documents:
- Behaviour Policy
- Rewards and Sanctions Policy
- Preventing and Tackling Bullying Policy
- Online Safety Policy
- Exclusion Policy
- Mobile Phone Policy
- Preventing Extremism and Radicalisation Policy
- Safer Recruitment Policy
- Staff Code of Conduct
- Whistleblowing Policy
- Risk assessment Policy
- Youth Produced Sexual Imagery Policy / Sexting in Schools Policy
- SEN Policy
- Health and Safety Policy
- Weapons, Dangerous Objects and Substance Policy
- Attendance and Registration Policy
- Working with and monitoring children who are working online policy

2 Key safeguarding facts

a) The safety and wellbeing of our pupils is our number one priority

b) Safeguarding and promoting the welfare of children is everyone's responsibility

c) We are a 'sharing organisation'

d) All concerns should be reported

e) We operate within a culture of openness and recognise and accept that abuse can happen in any organisation

f) All concerns about a child (including signs of abuse and neglect) must be reported immediately to the Designated Safeguarding Lead (DSL) or, in their absence, to the Deputy Designated Safeguarding Lead (DDSL)

g) In the event that a child is suffering, or is likely to suffer from harm, a referral should be made to Children's Social Care and/or the police immediately

3 Key people and external contacts

The following pages outline the contact details of named staff in school, King's Group and external agencies linked to child protection and safeguarding that we have worked with.

School and King's Group Contacts

Designated Safeguarding Lead	Mr Ewen McIntyre
Deputy Designated Safeguarding Leads	Mrs Holly Behan & Mrs Rhiannon Williams
Other staff trained to DSL level (Level3)	Dawn Akyurek (headteacher) Robert Snowden (deputy head) Jennifer O'Brien (head of KS5) Shane Nicklin (head of KS4) Sophie Gardiner (head of KS3 Miffy Lawrence (assistant head of Primary) Kirsty Marrs (head of KS1 / EYFS) Lucy Williams (school SENDCo) Sheryl Henderson (Primary SENDCo) Laura Cerezuela Gracia (nurse) Pilar del Baño (school counsellor) Sofía García (learning support specialist)
Headteacher	Mrs Dawn Akyurek
Inspired group COO is the Board appointed person responsible for Safeguarding and Child Protection in the group.	Mrs Elena Benito

External Contacts and Services in the Murcia Region

Emergencies - 112

Local Police - Torre Pacheco - 968585151

Servicio de Protección de Menores de la CARM,
Noelia Laso Fuentes, noelia.laso@carm.es, 968 273161

Servicio de Familia,
Josefa García Serrano, josefa.garcia2@carm.es, 968366030 / 968273165 / 968273209

Consejería de Educación y Cultura,
Francisca Munuera Giner, francisca.munuera@carm.es, 968 279628

Inspectora de Educación. Secretaría General. Consejería de Educación. Comunidad Autónoma de la Región de Murcia (CARM)
María del Reposo Sánchez Reyes, mreposo.sanchez@carm.es, 968 36 57 50

Proyecto LUZ
Regional governement (CARM) organisation that deals with acts of sexual abuse, sexual harrassment and sexual violence towards minors in the region of Murcia: assessing, providing support and advice for any concerns or referrals.

Fundación Anar
Helping children at risk
900 20 20 10 OR 116 111

Social Services
for each municipality can be found on the website of the town council
spd_accionsocial@murciaeduca.es

Servicios Sociales de San Pedro del Pinatar
Maria Angeles Rosique Gómez: Técnico de la Concejalía de Bienestar Social
educadora@sanpedrodelpinatar.es
968 18 03 88 (preguntar por mí directamente)

Servicios Sociales de Roldán y Lo Ferro
Sede de atención: Centro Médico de Roldán,
C/ Parque s/n. 30709-Roldán-Torre Pacheco.
Tlf: 968 58 50 03
Fax: 968 58 50 33

Servicios Sociales de Torre Pacheco
Avda. de Europa, 2.   30700 -   Torre Pacheco (Murcia)   Tfno: 968 58 50 03
hcaperrot@laicosnoicca.aiverpatic

Servicios Sociales de Murcia Centro
serviciossociales@ayto-murcia.es
francisco.garcia@ayto-murcia.es

Observation Forms from Family Services
Protocolo escuelas infantiles.doc
Protocolo secundaria.doc
Protocolo primaria.doc

English speaking
Education Support (0044 8000 562 561)

Samaritans (0044 116 123)

NSPCC (0044 20 7825 2505)

Offer free and confidential helplines 24/7

Copies of Part 1 and Annex A of KCSIE 2022 in Spanish (for parents and staff)

https://national.lgfl.net/digisafe/kcsie/kcsietranslate

4 Types of abuse

The term 'abuse' is often used as an umbrella term. All staff should be aware of indicators of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection. Abuse 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.

Reading alongside this policy:

What to do if you're worried a child is being abused. Advice for Practitioners March 2015

4.1 Abuse

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children.

School's response

The school's or college's initial response to a report from a child is important. How the school or college responds to a report can encourage or undermine the confidence of future victims of any forms of abuse. It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward and that they will be supported and kept safe and they are never made to feel like they are creating a problem for reporting abuse, sexual violence or sexual harassment. How a school or college responds to an incident will impact future victims of sexual violence or sexual harassment. Barriers shouldn't stop staff being professionally curious and haring any concerns they have with the DSL or a DDSL

Telling someone about abuse

It is important to note that children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report or a member of school or college staff may overhear a conversation that suggests a child has been harmed. Children may not be ready or know how to tell someone about abuse they've experienced. Children may also not recognise their experiences as harmful, or they might be embarrassed, humiliated or threatened not to tell anyone about their abuse.

Domestic abuse

It may involve seeing or hearing the ill-treatment of another. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Witnessing others being abused in or outside the home can have a serious, long lasting emotional and psychological impact on children and also makes them victims. Domestic abuse can be physcial, sexual, financial, psychological or emotional. Children can be victims, and perpetrators in their own relationships too. This can include:

- telling someone what they can and can't do
- threatening to post images or information online

- reading the other person's texts or messages
- making the other person do something sexual they don't want to do
- physical abuse, such as hitting, kicking or pushing someone

4.2 Physical abuse

Physical abuse is 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 of, or deliberately induces, illness in a child.

Signs of physical abuse can include:
• *injuries to parts of the body where accidents are unlikely, such as thighs, back, abdomen;*
• *respiratory problems from drowning, suffocation or poisoning;*
• *untreated or inadequately treated injuries;*
• *bruising which looks like hand or finger marks or caused by an implement;*
• *cigarette burns, human bites; or*
• *scarring, scalds and burns.*

4.3 Emotional and psychological abuse

Emotional and psychological abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. 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. Signs of emotional abuse tend to be behavioural rather than physical.

4.4 Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex), or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

Signs of sexual abuse displayed by children may include:
• pregnancy
• sexually transmitted infection/diseases;
• pain/itching/bleeding/bruising/discharge to the genital area/anus/mouth;
• urinary infections;
• difficulty walking or sitting or standing;

• persistent sore throats; or
• stomach aches

4.5 Neglect

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

Signs of possible neglect include:
• the child seems underweight or is very small for their age, or their weight deteriorates;
• the child seems very overweight for their age;
• they are poorly clothed, with inadequate protection from the weather;
• they are often absent from school for no apparent reason; or persistently arrive late: or
• they are regularly left alone, or in charge of younger brothers or sisters.

4.6 Behavioural signs of abuse and neglect

If a child is being abused, their behaviour may change in a number of ways.

For example, they may:
• behave aggressively or be disruptive, act out, demand attention and require more discipline than other children;
• become angry or disinterested and/or show little creativity;
• seem frightened of certain adults;
• become sad, withdrawn or depressed; have trouble sleeping;
• become sexually active at a young age;
• exhibit inappropriate sexual knowledge for their age or sexualised behaviour in their play with other children;
• refuse to change for gym or participate in physical activities;
• develop eating disorders;
• self-harm;
• refuse to attend school or run away from home;
• lack confidence or have low self-esteem; or
• use drugs or alcohol.

4.7 Children with Special Educational Needs and/or Disabilities

Children with special educational needs (SEN) and/or disabilities are statistically more vulnerable to child abuse, including child on child abuse. they are more vulnerable, for example, because:

• They might rely on others more

• They can be more vulnerable to grooming and exploitation

- They might find it harder to tell someone about their abuse

- Signs of abuse might be missed or dismissed

- They might be less likely to understand their experiences as abuse

Looked after children and previously looked after children

The Proprietor ensures that staff have the skills, knowledge and understanding to keep looked after children safe and the information they need in relation to a child's looked after legal status, for example:
• whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order;
• contact arrangements with birth parents or those with parental responsibility;
• information about a child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her.

The DSL maintains these details, including contact details of the child's social worker.

4.8 Signs of abuse or neglect manifested by the parents or other responsible adult

• unrealistic expectations of the child i.e. demand a level of academic or physical performance of which they are not capable;
• offers conflicting or unconvincing explanation of any injuries to the child;
• appears indifferent to or overtly rejects the child;
• denies existence of or blames the child for the child's problems at home or at school;
• sees and describes the child as entirely worthless, burdensome or in another negative light;
• refuses offers of help for the child's problems; or
• is isolated physically/emotionally.

4.9 Grooming

Grooming is the process by which an individual prepares a child, significant adults and the environment for abuse of this child. Children and young people can be groomed online or in the real world, by a stranger or by someone they know. Groomers may be male or female. They could be any age. Many children and young people do not understand that they have been groomed, or that what has happened is abuse. The signs of grooming are not always obvious. Groomers will also go to great lengths not to be identified.

Children may:
• be very secretive, including about what they are doing online;
• have older boyfriends or girlfriends;
• go to unusual places to meet friends;
• have new things such as clothes or mobile phones that they can't or won't explain;
• have access to drugs and alcohol;
• go missing from home or school;
• display behavioural changes;
• have sexual health issues; or
• present as suicidal, self/harming, feeling depressed, unworthy.

In older children, signs of grooming can easily be mistaken for 'normal' teenage behaviour, but you may notice unexplained changes in behaviour or personality, or inappropriate sexual behaviour for their age. See the NSPCC website for further information about grooming,

4.10 Signs of grooming and/or online abuse

A child may be experiencing abuse online if they:
• spend lots, much more, or much less time online, texting, gaming or using social media;
• are withdrawn, upset or outraged after using the internet or texting;
• are secretive about who they're talking to and what they're doing online or on their mobile phone; and/or
• have lots of new phone numbers, texts or e-mail addresses on their mobile phone, laptop or tablet.

4.11 Signs of grooming manifested by sex offenders

It is important to remember that not all sex offenders will exhibit the signs listed below and if an individual exhibits some or all of these signs, it does not mean that they are a sex offender:
• Overly affectionate behaviour with a child
• Affording special attention or preferential treatment to a child
• Excessive time spent alone with a child outside of the classroom/school
• Frequently spending time with a child in private or isolated areas
• Transporting a child to or from the school
• Making friends with a child's parents and visiting their home
• Acting as a particular child's confidante
• Giving small gifts, money, toys, cards, letters to a child
• Using texts, telephone calls, e-mails or social networking sites to inappropriately communicate with a child
• Flirtatious behaviour or making suggestive remarks or comments of a sexual nature around a child

4.12 Modus operandi of institutional grooming

• Target vulnerable victim: Perpetrators target victims who are vulnerable, isolated, insecure and/or have greater emotional needs.
• Gain victim's trust: Offenders may allow a child to do something (e.g. eat ice cream, stay up late, view pornography) which is not normally permitted by the child's parents or the school in order to foster secrecy.
• Gain the trust of others: Institutional offenders are often popular with children and parents, successfully grooming not only the victim but also other members of the victim's family and the community at large.
• Filling a need/becoming more important to the child: This can involve giving gifts, rewards, additional help or advice, favouritism, special attention and/or opportunities for special trips or outings.
• Isolating the child: The perpetrator may encourage dependency and subtly undermine the victim's other relationships with friends or family members.
• Sexualising the relationship: This can involve playful touches, tickling and hugs. It may involve adult jokes and innuendo or talking as if adults, for example about marital problems or conflicts.
• Maintaining control and secrecy: Offenders may use their professional position to make a child believe that they have no choice but to submit to the offender.

4.13 Signs of grooming for radicalisation

Radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home). There are no known definitive indicators that a young person is vulnerable to radicalisation, but there are a number of signs that together increase their risk of being groomed in this way. Signs of vulnerability include:

• Underachievement
• Being in possession of extremist literature
• Poverty
• Social exclusion
• Traumatic events
• Global or national events
• Religious conversion
• Change in behaviour
• Extremist influences
• Conflict with family over lifestyle
• Confused identity
• Victim or witness to race or hate crimes
• Rejection by peers, family, social groups

This part of the policy should be read alongside the following documents
Channel and Prevent Multi-Agency Panel (PMAP) guidance
Educate Against Hate - Prevent Radicalisation & Extremism
Prevent duty guidance

4.14 Children missing education

Children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. School attendance registers are carefully monitored to identify any trends and staff report concerns to the DSL and Heads of Key Stage. Action should be taken in accordance with the school policy if any absence of a pupil from the School gives rise to a concern about his / her welfare.

Where reasonably possible the School will hold more than one emergency contact for each pupil.

The School shall inform the local authority of any pupil who:
• fails to attend School regularly enough or has been absent without the School's permission for a continuous period of time without suitable justification and / or where the School is unable to resolve the issue with the parents suitably.

This will assist the local authority to:
• fulfil its duty to identify children of compulsory school age who are missing from education; and
• follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect or radicalisation.

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. It is important that lessons in school focus on building children's confidence and abilities in keeping themselves safe outside of school rather than simply warning them about all strangers.

useful resources:
[Action Against Abduction: Home](#)
[Clever Never Goes: Home](#)

This part of the policy should be read alongside the following document
[KCM Attendance and Registration Policy](#)

4.15 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. It is a form of child abuse with long-lasting harmful consequences. Potential signs include:

- Asking for help or confiding that it's happened

- Difficulty walking, sitting or standing

- Looking uncomfortable or finding it hard to sit still

- Prolonged or repeated absence

- Change in behaviour or mood

- Talking about pain or discomfort between her legs

- Spending more time in the toilet

- Avoiding PE or exercise

- Frequent urinary, menstrual or stomach problems

All staff must be aware of the requirement for teachers to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate. If the teacher is unsure whether this reporting duty applies, they must refer the matter to the DSL in accordance with this policy.

4.16 Forced marriage

This can occur when an individual (male or female) is forced to marry without their full consent, when they do not have the capacity to consent (i.e. they have learning needs) or where they are coerced to marry either through psychological/emotional threats or other means.

Staff should speak to the DSL if they have any concerns. Pages 32-36 of the [Multi-agency guidelines: handling case of forced marriage](#) focus on the role of schools in detecting and reporting forced marriage.

4.17 Child criminal exploitation (CCE - County Lines) and Child Sexual Exploitation (CSE)

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Children can be targeted through social media and should be educated on this. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. It is important to note that the experiences girls have may be very different to those of boys and staff should know the possible indicators that boys or girls are involved in CCE and/or serious crime violence, as well as the risk factors that could lead to more involvement.

Some of the following signs may be indicators of CCE and CSE:
• appear with unexplained gifts or new possessions;
• associate with other young people involved in exploitation;
• have older boyfriends or girlfriends;
• suffer from sexually transmitted infections or become pregnant;
• suffer from changes in emotional well-being;
• misuse drugs and alcohol;
• go missing for periods of time or regularly come home late; and
• regularly missing school or education or do not taking part in education

5 Child on child abuse

As a school we have a zero tolerance approach towards abuse. All staff should be alert to the risk of child on child abuse and understand their role in preventing, identifying and responding to it. Staff should know and accept that children are capable of abusing their peers in any setting. They should never dismiss abusive behaviour as a normal part of growing up, 'banter' or 'just having a laugh', and should not develop high thresholds before taking action. Abuse is abuse and child on child abuse should be taken as seriously as abuse by adults. All staff understand that even if there are no reports in school it does not mean it is not happening, it may be the case that it is just not being reported.

Read alongside 'KCM Preventing and Tackling Bullying Policy', 'KCM Behaviour Policy', 'Sexting in Schools' and 'Exclusion Policy'.

https://murcia.kingscollegeschools.org/about-us/policies-and-guidelines/

5.1 What is child on child abuse?
For these purposes, child on child abuse is any form of abuse perpetrated by a child towards another child.

- abuse in intimate personal relationships between peers;
- bullying (including cyberbullying, prejudiced based and discriminatory bullying);
- 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 stand-alone or part of a broader pattern of abuse;
- sharing nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery);
- 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;
- 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;
- upskirting.

These categories of abuse rarely take place in isolation and often indicate wider safeguarding concerns. For example, a teenage girl may be in a sexually exploitative relationship with a teenage boy who is himself being physically abused by a family member or by older boys.

Equally, while children who abuse may have power over those who they are abusing, they may be simultaneously powerless to others.

Youth produced sexual imagery can but does not always constitute abusive behaviour. All incidents involving youth produced sexual imagery should be responded to with reference to the school's policy and in accordance with this policy.

5.2 What role does gender and LGBTQ+ play?

Child on child abuse often manifests itself differently for boys than it does for girls. For example, girls seem to be at greater risk of sexual assault and/or exploitation, whereas boys seem to be at greater risk of physical gang-related violence and serious youth violence. Being LGBTQ+ in itself doesn't put children at greater risk, but they may be targeted by others more, or might not have a trusted adult they can talk to and a school should be aware of this.

5.3 When does behaviour become abusive?

Factors which may indicate that behaviour is abusive include:
a) where it is repeated over time and/or where the perpetrator intended to cause serious harm:
b) where there is an element of coercion or pre planning and
c) where there is an imbalance of power, for example, as a result of age, size, social status or wealth.

This list is not exhaustive and staff should always use their professional judgement and discuss any concerns with the DSL.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life.

5.4 How can I identify victims of child on child abuse?

Identifying child on child abuse can be achieved by being alert to children's well-being and to general signs of abuse. Signs that a child may be suffering from child on child abuse overlap with those relating to other types of abuse – see indicators of abuse, earlier in this document.

Signs can include:
a) failing to attend school, disengaging from classes or struggling to carry out school related tasks to the standard you would ordinarily expect.
b) physical injuries.
c) having difficulties with mental health and/or emotional wellbeing.
d) becoming withdrawn, shy, experiencing headaches, stomach aches, anxiety, panic attacks, suffering from nightmares or lack of sleep or sleeping too much.
e) drugs and/or alcohol use.
f) changes in appearance and/or starting to act in a way that is not appropriate for the child's age.

This list is not exhaustive and the presence of one or more of these signs does not necessarily indicate abuse.

5.5 Are some children particularly vulnerable to abusing or being abused by their peers?

Any child can be affected by child on child abuse and staff should be alert to signs of such abuse amongst all children. Research suggests that:
a) child on child abuse is more prevalent amongst children aged 10 and older, although it also affects younger children, including by way of harmful sexual behaviour.
b) children who are particularly vulnerable to abuse or to abusing others include those who have (i) witnessed or experienced abuse or violence themselves; (ii) suffered from the loss of a close family member or friend; or (iii) experienced considerable disruption in their lives.
c) children with SEN/D, young carers and children with disabilities are particularly vulnerable to both abuse and child on child abuse.
d) LGBTQ+ may also be targeted more by others

5.6 What should I do if I suspect either that a child may be being abused, or that a child may be abusing others?

If a member of staff thinks for whatever reason that a child may be at risk of abuse from another child or young person, or that a child may be abusing others, the member of staff should report their concern to the DSL without delay in accordance with this policy. If a child is suffering or is likely to suffer from harm, it is important that a referral to Children's Social Care and/or the police is made immediately.

5.7 How will the DSL respond to concerns of child on child abuse?

The DSL will discuss the behaviour with the member of staff and will, where necessary, take any immediate steps to ensure the safety of the victim(s) or any other child. Where the DSL considers or suspects that the behaviour might constitute dangerous abuse of any kind, Children´s Social Care will be contacted immediately and, in any event, within 24 hours of the DSL becoming aware of it. The DSL will discuss the incident with Children's Social Care and agree on a course of action, which may include (a) taking any steps to ensure the safety and wellbeing of any children affected; (b) further investigation; (c) referral to other agencies such as the police (where a crime may have been committed), CAMHS, a specialist harmful sexual behaviour team and/or youth offending services

Any response should be decided in conjunction with Children's Social Care and other relevant agencies and should:

• investigate the incident and the wider context and assess and mitigate the risk posed by the perpetrator(s) to the victim(s) and to other children, attempting to understand why the alleged abuser has acted this way;

• consider that the abuse may indicate wider safeguarding concerns for any of the children involved

• treat all children (whether perpetrator or victim) as being at risk and needing support - while the perpetrator may pose a significant risk of harm to other children, s/he may also have considerable unmet needs and be at risk of harm themselves;

• remain impartial - take into account the complexity of child on child abuse and of children's experiences and consider the interplay between power, choice and consent. While children may appear to be making choices, if those choices are limited, they are not consenting

• take appropriate action in respect of the perpetrator – any action should address the abuse, the causes of it, attitudes underlying it and the support that may be needed if the perpetrator is at risk.

• be prepared for false accusations, continuing to give support and trying to understand why the false accusation was made

Factors to consider include: the risk the perpetrator(s) poses and will continue to pose to other children, their own unmet needs, the severity of the abuse and the causes of it. Disciplinary action may be appropriate, including (a) to ensure that the perpetrator takes responsibility for and realises the seriousness of his or her behaviour; (b) to demonstrate to the perpetrator and others that abuse can never be tolerated; and (c) to ensure the safety and wellbeing of the victim and other children in the school. A pupil against whom an allegation of abuse has been made may be suspended from the School as a neutral measure during the investigation. The School will carry out risk assessments and take all appropriate action to ensure the safety and welfare and continued education of all pupils including the pupil or pupils accused of abuse.

All those involved in such allegations will be treated as being at risk and in need of support. The school will provide on-going support including by (a) ensuring their immediate safety; (b) responding promptly and appropriately to the abuse; (c) assessing and addressing any unmet needs; (d) following the procedures set out in this Safeguarding Policy (including where the child is in need of early help or statutory intervention); (e) monitoring the child's wellbeing closely and ensuring that s/he receives on-going support from all relevant staff members within the school; (f) engaging with the child's parents and any external agencies to ensure that the child´s needs are met in the long-term g) consider the lessons that can be learnt from the abuse and put in place measures to reduce the risk of such abuse recurring.

This may include, for example: gender and equalities work, work around school safety, security and supervision, awareness raising for staff, students and parents about a particular form of abuse, training for staff on handling certain types of incidents or abuse.

5.8 How does the school raise awareness of, and reduce the risk, of child on child abuse?

Staff are trained on the nature, prevalence and effect of child on child abuse, how to prevent, identify and respond to it. The school actively seeks to prevent all forms of child on child abuse by educating students and staff, challenging the attitudes that underlie such abuse, encouraging a culture of tolerance and respect amongst all members of the school community, and responding to all cases of child on child abuse and any cases of bullying (no matter how trivial) promptly and appropriately.

The School has robust anti-bullying procedures in place. Children are educated about the nature and prevalence of child on child abuse via PSHE, assemblies and work in tutor time. They are told what to do if they witness or are victims of such abuse, the effect that it can have on the victims and the possible reasons for it, including vulnerability of the perpetrator. They are regularly informed about the school's

approach to such issues, including its zero tolerance policy towards all forms of bullying and child on child abuse.

6 Sexual Violence and Sexual Harassment between Children

Child on child abuse can include two specific forms, known as Sexual Violence and Sexual Harassment. Any response to these should fall within, and be consistent with, the school's wider approach to child on child abuse (see above). The school has a zero tolerance approach to sexual violence and sexual harassment.

Sexual harassment is any <u>unwanted</u> conduct of a sexual nature that can occur online and offline and both inside and outside of school/college. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to involve some or all of the following aspects:

-violate a child's dignity
-make them feel intimidated, degraded or humiliated
-create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories about someone; making lewd comments; making sexual remarks about someone's clothes and appearance; rumours about sexual activity and calling someone sexualised names / sexist name calling;
- sexual "jokes" or taunting directed towards someone;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes, unwanted touching;
- displaying pictures, photos or drawings of someone of a sexual nature;
- being photographed or videoed without their knowledge or consent;
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment. It may include: consensual and non-consensual sharing of nude and semi-nude images and videos; sharing of unwanted explicit content; being sent sexual pictures or videos they did not want to see.
- upskirting (highly intrusive practice, which typically involves someone taking a picture under another person's clothing without their knowledge, with the intention of viewing their genitals or buttocks (with or without underwear).
- sexualised online bullying.
- unwanted sexual comments and messages, including on social media.
- sexual exploitation; coercion and threats; feeling pressured to do sexual things they did not want to; being put under pressure to provide sexual images of themselves.

Online sexual harassment
Almost half of 13-17 year olds have witnessed their peers editing photos of someone to make them sexual e.g. placing sexual emojis over them or adding different faces to pornographic images.

Online sexual harassment is unwanted sexual conduct on any digital platform and it is recognised as a form of sexual violence. It encompasses a wide range of behaviours that use digital content (images, videos, posts, messages, pages) on a variety of different platforms (private or public).

Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive.

[Sharing nudes and semi-nudes: how to respond to an incident](#)

Sexual Violence and Sexual Harassment can:
• occur between any two children, or a group of children against one individual or group
• be perpetrated by children of any age against a child of any age
• be perpetrated by children of any sexual orientation against a child of any sexual orientation
• include behaviours that exist on an often progressive continuum and may overlap
• be online and offline (physical or verbal) and are never acceptable
• they can happen in school or outside of school

Advice from the Department for Education on Sexual Violence and Sexual Harassment between Children in Schools and Colleges
This section of the policy should be read in line with Part 5 of KCSIE 2021.
[Keeping children safe in education 2022 - GOV.UK](#)

Key Points from the guidance
• stresses the importance of making it clear that sexual violence and sexual harassment are not acceptable, will never be tolerated, and are not an inevitable part of growing up.
• highlights the risks of tolerating or dismissing any forms of sexual violence or sexual harassment, which can lead to an unsafe environment and abuse being normalised, instead and encouraging early intervention to avoid potential escalation
• advises on how to embed training and education on these issues within a strong pastoral system, and a planned taught programme across the whole curriculum
• encourages forums and channels of communication that enable children to talk about issues openly which are well promoted, easily understood and easily accessible, as well as making sure that they know any allegations will be taken seriously.
• includes a list of possible topics that any taught programme could cover - including consent, gender roles, stereotyping and equality, healthy relationships, and power imbalances in relationships;
• advises on how to manage a disclosure, either from the child who has suffered abuse or from other children.
• provides guidance on when to carry out a risk and needs assessment for children affected by sexual violence or sexual harassment;
• provides guidance on initial considerations which schools should take into account when faced with a concern or allegation of sexual violence or sexual harassment - including the age and developmental stages of the children, and any power imbalance between them;
• provides guidance on difficult scenarios which schools might encounter, for example: - how to handle an incident between two pupils which is alleged to have taken place away from school premises.
• advice on supporting the alleged perpetrator and victim in school during and after any incidents
• advice of how looking out for potential patterns of concerning, problematic or inappropriate behaviour and what action to take if they are identified

Contextual safeguarding
Safeguarding incidents and / or behaviours can be associated with factors outside the School and / or can occur between children outside the School.

All staff, including the DSL, should consider the context within which such incidents and / or behaviours occur, for example where wider environmental factors are present in a child's life that may be a threat to their safety and / or welfare.

Harmful Sexual Behaviour?
Children's sexual behaviour exists on a wide continuum, from normal and developmentally expected to inappropriate, problematic, abusive and violent. When considering HSB (Harmful Sexual Behaviour) as a possibility the school will take into account different actors.

-ages and the stages of development of the children are critical factors.
-whether there is an inequality in size, age, power and developmental ability between the children involved
-what the risk is to the health and safety of the children
-what the persistence, intensity, frequency and duration of the behaviour has been
-whether the behaviour has been excessive, compulsive, coercive, forceful, degrading, threatening, secretive, manipulative and involves bribery and trickery

Staff Training
All teaching staff will have INSET training on being able to identify, understand and respond to what is and what is not normal sexual developmental behaviour. This way all teaching staff can work together to support developmentally appropriate behaviour and tackle problematic and harmful behaviour.

Unsubstantiated, Unfounded, False or Malicious Reports and Accusations
If a report is determined to be unsubstantiated, unfounded, false or malicious, the designated safeguarding lead should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate.

If a report is shown to be deliberately invented or malicious, it should be considered whether any disciplinary action is appropriate against the individual who made it as per their own behaviour policy.

RE and RSE

Relationships Education (RE) for primary aged pupils and Relationships and Sex Education (RSE), for secondary aged pupils is an important part of the curriculum, where pupils are supported to encourage healthy and appropriate sexual developmental behaviour. Whereas the scheme of work takes a proactive and preventative approach to try and reduce the possibility of the pupils developing harmful or problematic sexual behaviour, the lessons are also useful opportunities to analyse and discuss issues that have arisen in school to try and prevent any recurrence of these issues. Further useful advice on approaching this is provided in the document underneath.

gov.uk - Relationships and sex education (RSE) and health education

The programme is age and stage of development appropriate (especially when considering SEND children and their cognitive understanding), and tackles such issues as:

• healthy and respectful relationships;
• what respectful behaviour looks like;
• consent;
• stereotyping, equality;
• body confidence and self-esteem;
• prejudiced behaviour;
• that sexual violence and sexual harassment is always wrong; and
• addressing cultures of sexual harassment.

7 Stages of child protection

The school can use a range of arrangements depending on the information available. The school will always work cooperatively with external agencies, including the local authority and the police.

Child suffering or likely to suffer significant harm

Children in need

Early help

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and, if appropriate, the police) is made immediately by the DSL, who should follow the local authority's referral process. If the DSL is not available then there should be no delay in the school making a referral.

7.1 Early Help

Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. The School understands that providing early help is more effective in promoting the welfare of children than reacting later.

If early help is appropriate, the DSL or DDSL will generally 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 professional. Any such cases should be kept under constant review and consideration given to a referral to Children's Social Care for assessment for statutory services, if the child's situation does not appear to be improving or is getting worse.

Any child may benefit from early help, but all school 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 (whether or not they have a statutory education, health and care plan);
• is a young carer;
• is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
• is frequently missing/goes missing from care or from home;
• is at risk of modern slavery, trafficking or exploitation;
• is at risk of being radicalised or exploited;
• is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
• is misusing drugs or alcohol themselves;
• has returned home to their family from care;
• is a privately fostered child.
• is persistently absent from education
• is at risk of honour-based abuse such as Female Genital Mutilation or Forced Marriage;

• has a mental health need
• has witnessed others being abused in our outside the home

7.2 Children in Need

A Child in Need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. A child who is deemed to be a Child in Need will have been assessed by Children's Social Care under section 17 of the Children Act 1989.

7.3 Children suffering or likely to suffer significant harm

Local authorities, with the help of other organisations as appropriate, have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation or other so-called honour based violence, and extra-familial threats like radicalisation and sexual exploitation. Should an investigation occur, then the school's involvement and any action may be determined on the advice given by the investigating agency.

Children who need a social worker (Child in Need and Child Protection Plans)

DSL should enquire with local authorities or be told by them and/or the parents if 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 the provision of pastoral and/or academic support, alongside action by statutory services).

7.4 What to do if you have a concern about a child

If staff have any concern about a pupil's welfare, action should be taken immediately.

If in doubt or you have any concerns about the safety and welfare of a child report a concern on MyConcern system.

Discuss the content of the concern with the DSL or Deputy DSL.

If the concern involved an allegation against staff, this must be reported in accordance with the procedures set out in the whistleblowing policy

Maintain confidentiality

Safeguarding and promoting the welfare of children is everyone's responsibility (KCSIE 2022). All staff should know what to do when a child discloses abuse to them, they have concerns about a child's welfare, or when children or staff raise concerns about a pupil to them.

If a child tells a member of staff that they know about or have been a victim of abuse or neglect the member of staff should:
• Listen carefully and allow the child to speak freely and remain calm. Do not interrupt the child or be afraid of silences.
• Provide reassuring nods and words such as, "I am so sorry this has happened", "You are doing the right thing in talking to me". Avoid saying things like, "I wish you had told me about this earlier" or "I cannot believe what I am hearing".
• Questioning of the child about what they are saying should not be extensive as partner agencies will lead any investigation. Limit questioning to the minimum necessary for clarification using *What, When, How and Where* but avoid leading questions such as, "Has this happened to your siblings?" Do *not* use questions beginning with *Why* as this can apportion feelings of guilt within a child.
• If the child discloses abuse, then it is appropriate to ask whether any other adults were present and observed the abuse and whether the abuse has happened before.
• At an appropriate time tell the child that the matter will be referred in confidence. Do not promise confidentiality.
• Tell the child what will happen next. The child may want to accompany you to see the DSL, otherwise let the child know that someone will come to see them before the end of the day.
• Only record the facts as the child presents them.
• Where the report includes an online element, do not view or forward illegal images of a child.
• Manage reports with another member of staff present (preferably the DSL or DDSL), if possible.
• Inform the DSL as soon as practically possible if the DSL is not involved in the initial report.

7.4.1 Recording

Staff should Report the concern on MyConcern, using a body map if needed. Make a written record of the conversation as soon as possible:

• Staff should use the specific words that the child used (e.g. if referring to parts of their body), indicating these by using "speech marks/inverted commas".
• Only record the facts as the child presents them, avoiding any of your own opinions and emotions
• Where the report includes an online element, do not view or forward illegal images of a child.
• Manage reports with another member of staff present (preferably the DSL or DDSL), if possible.
• Inform the DSL as soon as practically possible if the DSL is not involved in the initial report.

If a disclosure of abuse has been made by the child, immediately discuss the concerns verbally with the DSL, Deputy DSL or Headteacher prior to writing up the record.

The DSL or the DDSL should always be available to discuss safeguarding concerns and may be contacted on their mobile phones in relation to any safeguarding concerns out of School hours.

If in exceptional circumstances the DSL is not available then this should not delay appropriate action being taken and staff should speak to the DDSL, Headteacher or, failing that, a member of the SLT. All documents should be kept in a secure location with restricted access.

Where a child is suffering, or is likely to suffer from harm, a referral to children's social care and/or police should be made immediately.

Any action should be shared with the DSL or DDSL, or a member of the senior leadership team, as soon as is practically possible.

Action by the DSL/DDSL
On receipt of a report of a concern, the DSL will consider the appropriate course of action. Such action may include:
• managing any support for the pupil internally via the School's own pastoral support processes, seeking advice from children's social care where required;
• an early help assessments; or
• a referral for statutory services.

The views of the child will be taken into account when considering the appropriate course of action but will not be determinative.

Where the concern relates to the welfare of a pupil who is aged 18 or over, the DSL will consider whether it is necessary to refer such concern to a suitable authority rather than, or in addition to, children's social care.

If it is decided that a referral is not required, the DSL will keep the matter under review and give ongoing consideration to a referral if the pupil's situation does not appear to be improving.

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.

7.4.2 Making referrals to statutory agencies

If a child is thought to be at risk of harm
When a child is thought to be at risk of harm or is likely to be at risk of harm (see above), then a referral should be made **immediately** to Children's Social Care or the police if a criminal act is thought to have occurred. Whilst it is the role of the DSL, any member of staff can make a referral to Children's Social Care or the police. *The school does not require parental consent for referrals to be made to statutory agencies.* Consent to do this must **not** be obtained from the parents if to gain consent would put the child's safety at risk or to do so could jeopardise any investigation by partner agencies.

If a child has unmet needs
When a child is not considered at risk of harm, but still has unmet needs that could mean that they are a Child in Need (see above), a referral should be made to Children's Social Care via the local authority process. The school does not require parental consent for referrals to be made to statutory agencies in these circumstances, however, it is best practice that these concerns should be discussed with the parents and any subsequent referral made transparently with the parent's knowledge.

Staff will need to have access to certain information about the child and the safeguarding concern in order to make the referral. In general terms, this information will comprise:
• personal details of the child including the child's developmental needs;
• detailed information about the concern;

• information about the child's family and siblings including the capacity of the child's parents or carers to meet the child's developmental needs and any external factors that may be undermining their capacity to parent.

If the referral is made by telephone, this should be followed up in writing. If the referral is made by someone other than the DSL, the DSL should be informed of the referral as soon as possible.

Confirmation of the referral and details of the decision as to what course of action will be taken should be received from the local authority within one working day. If this is not received, the DSL (or the person that made the referral) should contact children's social care again.

Following a referral, if the child's situation does not appear to be improving, the local escalation procedures should be followed to ensure that the concerns have been addressed and that the child's situation improves.

Confidentiality

Staff should never guarantee confidentiality to pupils or adults wishing to tell them about something serious as this may ultimately not be in the best interests of the child. They should guarantee that they will not tell anyone who does not have a clear need to know and that they will pass on information in confidence only to the people who must be told in order to ensure their safety.

8 Whistleblowing

This section should be read alongside the 'staff code of conduct' and 'whistleblowing policy'

Staff Code of Conduct
Whistle Blowing

All adults have a responsibility to report any concerns about poor or unsafe practice by school staff (including supply staff and volunteers), including in relation to the care and protection of a pupil or pupils. A member of staff should report any concern to the Headteacher if they believe that best practice in this area is not being adhered to or that practice may put a pupil or pupils at risk. It should also be reported where a member of staff or volunteer is involved in an incident outside of school/college which did not involve children but could have an impact on their suitability to work with children. For example, a member of staff is involved in domestic violence at home. No children were involved, but schools/colleges need to consider what triggered these actions and could a child in the school trigger the same reaction, therefore being put at risk.

If the concern relates to the Headteacher, they should report the concern to the Inspired Groups COO of Spain (see the 'key people and contacts' page in this document for the contact details of the above people within King's Group)

Concerns raised under this Whistleblowing Policy are distinct from concerns or allegations about an adult's suitability to work with or have access to children.

Staff may follow the School's whistleblowing policy to raise concerns about poor or unsafe safeguarding practices at the School or potential failures by the School or its staff to properly fulfil its safeguarding responsibilities. Such concerns will be taken seriously.

No member of staff will suffer a detriment or be disciplined for raising a genuine concern about unsafe practice, provided that they do so in good faith and follow the whistleblowing procedures.

Where an adult feels unable to raise a concern about poor safeguarding practice within the School or where they feel that their concern is not being addressed, they can raise their concern externally with the local authorities.

Supply Teachers
Whilst the school is not the employer of supply teachers if they are employed through an agency, they should ensure any allegations are dealt with properly. In no circumstances should a school or college decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the local authority designated officer to determine a suitable outcome. Governing bodies and proprietors should discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

9 The role of the Designated Safeguarding Lead and Deputy Designated Safeguarding Lead

The Designated Safeguarding Lead (DSL) is the senior member of staff responsible for leading safeguarding in the school (including online safety). The DSL must be a member of the school leadership team. The DSL takes the lead responsibility for safeguarding and child protection in the school (see Annex C of KCSIE 2022).

Keeping children safe in education 2022 - GOV.UK

9.1 Deputy DSL

The role of the Deputy DSL is to support the DSL in their safeguarding role and to carry out the activities of the DSL if the DSL is unavailable. Whilst the *activities* of the DSL can be delegated to DDSLs, the ultimate lead responsibility for child protection must remain with the DSL, and this lead responsibility must not be delegated. The Deputy DSLs are trained to the same level as the DSL and the duties of the Deputy DSLs are reflected explicitly in their job descriptions. It is also recommended that a number of staff, such as the school nurse, heads of key stages and school counsellor, are DSL level trained.

9.2 Inter-agency working and exclusions
This section should be read alongside the 'Exclusion' policy

https://www.murcia.kingscollegeschools.org/about-us/policies-and-guidelines

The DSL and Deputy DSLs liaise with the local authority and work in partnership with other agencies and in the best interests of children in the school.

Collaborative work with the pupils will always be used where possible to encourage them to adopt good habits. Nevertheless any action which has or potentially has a serious impact on the well-being of themselves or others will NOT be tolerated under any circumstances.

We take cases of this type of behaviour very seriously. The sanctions for these will be the following, but any of them could be chosen depending on the gravity of the situation and the level of risk involved by having the pupil remain in school:

1. Internal suspension – loss of break times
2. Internal suspension – all day supervision, as well as lessons and break times.
3. External Suspension – from 2 to 5 days The pupil returns on a contract (signed by pupil, parents and headteacher) which stipulates the conditions under which the pupil is returning to school and the consequences of any further similar high-risk behaviour.
4. Permanent exclusion from the school.

Examples of behaviour which are not tolerated are as follows (this could be behaviour in school, online or outside of school if it affects the wellbeing of one or more of our pupils).

1. Bullying and abuse - all forms
2. Fighting/all forms of violence (including threats of violence)
3. Vandalism or theft
4. Sexual harassment or violence
5. Insolence or insubordination
6. Misbehaving on school transport
7. Drug, alcohol and tobacco use in school
8. Any discriminatory behaviour (including hate speech) – on the grounds of gender (including gender reassignment), sexual orientation, race or ethnicity, religion or belief, or disability
9. Any action which has / could potentially have a serious impact on the well-being of themselves or others
10. Repetition of poor behaviour in spite of warnings from school

As a school we will always consider to what extent any issue can be resolved in school by talking to the children involved and their parents / guardians and the CEO, as well as reflecting on the nature of the behaviour. Nevertheless it remains the right of the school to contact the police and social services directly if they feel that any issue can not or should not be resolved in school or if the school feels it does not understand the circumstances surrounding the incident well enough to be able to resolve things appropriately and fairly in school.

9.3 Support for DSL

The DSL is given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters; to take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of children.

There are 4 key elements to the DSL role. They will:
• Manage referrals
• Work with others
• Train
• Raise awareness

9.4 Manage referrals

The DSL is expected to:
• refer cases of suspected abuse to the local authority children's social care as required;
• support staff who make referrals to local authority children's social care;
• refer radicalisation concerns as required;
• refer cases where a person is dismissed or has left due to risk/harm to a child to the Disclosure and Barring Service as required; and
• refer cases where a crime may have been committed to the police as required.

9.5 Work with others

The DSL is expected to:
• liaise with the Headteacher to inform him or her of issues;
• as required, liaise with the "case manager" (in relation to allegations against adults) and the Designated Officer(s) at the local authority for child protection concerns in cases which concern a staff member;
• liaise with staff (especially pastoral support staff, school nurses, IT technicians, counsellors and SENDCos) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and
• act as a source of support, advice and expertise for all staff.

9.6 DSL Training

The DSL (and any deputies) have undertaken training to provide them with the knowledge and skills required to carry out their role, including inter-agency working. This training must be updated at least every two years. The DSL will undertake additional Prevent awareness training to the government Prevent training that all school staff undertake.

In addition to the formal training set out above, the DSLs knowledge and skills will be refreshed via informal updates (for example e-bulletins, meeting other designated safeguarding leads, participating in safeguarding meetings or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role so they:
• understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements
• have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
• ensure each member of staff has access to, and understands, the school or college's child protection policy and procedures, especially new and part time staff;
• are alert to the specific needs of children in need, those with special educational needs and young carers;
• understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation;
• understand the importance of information sharing, both within the school, and with the LSCB, other agencies, organisations and practitioners;
• are able to keep detailed, accurate, secure written records of concerns and referrals;
• understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;

• are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college;
• can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
• obtain access to resources and attend any relevant or refresher training courses; and
• encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

9.7 Raise awareness

The DSL should:
• ensure the school's safeguarding and child protection policies are known, understood and used appropriately;
• ensure the school's safeguarding and child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the proprietor regarding this;
• ensure the safeguarding and child protection policy is available publicly and parents are aware of the fact that referrals to children's social care or the police about suspected abuse or neglect may be made and the role of the school in this; and

9.8 Safeguarding Files

When a child leaves the school, it is the responsibility of the DSL to ensure that a copy of their safeguarding records are transferred securely and confidentially to the new school. The transfers will be carried out through MyConcern. Before transferring, the DSL will arrange a telephone call with the DSL or Headteacher in the receiving school.

The DSL will obtain confirmation of receipt. Receiving schools should ensure key staff, such as DSLs and SENCOs, are aware as required.

In addition to the Safeguarding File, the DSL should also consider if it would be appropriate to share any information with the new school in advance of a child leaving. For example, information that would allow the new school to continue supporting victims of abuse and have that support in place for when the child arrives. This should be done with the parent's consent unless to do so would place a child or parent at heightened risk.

On receiving a child protection file, the DSL will ensure that key staff are aware as required, including the SENDCO.

9.9 Availability

During term time the DSL (or a deputy) will always be available (during school hours) for staff in the school to discuss any safeguarding concerns. Whilst generally speaking the DSL (or deputy) will normally to be available in person, the Headteacher will define what "available" means and whether in exceptional circumstances availability via phone and/or Skype or other such media is acceptable.

10 Responsibilities of the proprietor

King's Group is the proprietor of the school. As proprietor, King's Group will comply with all duties under legislation and will always take into account statutory guidance, ensuring that all policies, procedures and training are effective and comply with the law at the time.

It is the responsibility of the proprietor to:
• Ensure that all staff read a least Part One of Keeping Children Safe in Education
• Ensure that all staff follow the requirements of this Safeguarding and Child Protection Policy and Procedure
• Ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities, as set out in Part One of Keeping Children Safe in Education
• Designate a senior board member to take leadership responsibility for safeguarding arrangements, (this is Elena Benito Inspired Group COO)
• Ensure that all safeguarding arrangements take into account the procedures and practice of the local authority as part of the inter-agency procedures set up by the LCSB
• Ensure that appropriate policies and procedures are in place in order for appropriate action to be taken in a timely manner to safeguarding and promote children's welfare
• Ensure that each school works in line with local inter-agency procedures
• Ensure that the Safeguarding Policy is updated annually and made available via the school website
• Provide a Staff Code of Conduct and Acceptable Use Policy
• Ensure that all responsibilities regarding Children Missing from Education are followed
• Instruct schools to hold more than one contact number for each child, where possible
• Ensure that schools report to their local authority the removal of a child from the school roll in line with statutory and local authority guidance
• Ensure that all staff undergo safeguarding and child protection training (including online safety) at induction
• Recognise the expertise staff build by undertaking safeguarding training and managing concerns on a daily basis
• Ensure that appropriate filters and monitoring systems are in place to keep children safe online
• Ensure that children are taught about safeguarding, including online safety

11 Induction

At the point of induction, **all** staff that work directly with children will be provided with, will read and will be trained in:
-Keeping Children Safe in Education 2022 – Part One
-The Safeguarding and Child Protection Policy and Procedure, including whistleblowing
-Behaviour Policy
-Preventing and Tackling Bullying Policy
-Staff Code of Conduct
-Whistleblowing Policy
-Weapons, Dangerous Objects and Substance Policy
-Attendance and Registration Policy
-Working with and monitoring children who are working online policy

12 Training

12.1 Staff employed in school who work directly with children

All staff including the Headteacher will receive a copy of this policy and Part 1 of KCSIE 2022 and where appropriate, Annex A of KCSIE, and will be required to confirm that they have read and understand these, along with the above mentioned policies

All staff employed in school should receive annual safeguarding and child protection training, usually at the commencement of the academic year. Staff should also receive safeguarding and child protection updates regularly throughout the year, provided by the DSL, in order to provide them with relevant skills and knowledge to safeguard children effectively.

Staff development training during the year will also include further training on areas such online safety, Prevent duty, child on child abuse, building and anit disctimination culture, working with and supporting children with mental health concerns etc..

The School has mechanisms in place to assist staff to understand and discharge their role and responsibilities and to ensure that they have the relevant knowledge, skills and experience to safeguard children effectively, through staff meetings, and professional development sessions.

Whilst considering the above training requirements, governing bodies and proprietors should have regard to the Teachers' Standards which set out the expectation that all teachers manage behaviour effectively to ensure a good and safe educational environment, and require teachers to have a clear understanding of the needs of all pupils.

12.2 Third-party contractors

It is good practice for those employed as third-part contractors who work regularly in school with opportunity for contact with pupils to have basic safeguarding training at a level appropriate to their role.

Where governing bodies or proprietors hire or rent out school or college facilities/premises to organisations or individuals (for example to community groups, sports associations and service providers to run community or extra-curricular activities) they should ensure that appropriate arrangements are in place to keep children safe.

When services or activities are provided by the governing body or proprietor, under the direct supervision or management of their school or college staff, their arrangements for child protection will apply. However, where services or activities are provided separately by another body this is not necessarily the case. The governing body or proprietor should therefore seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with the school or college on these matters where appropriate. The governing body or proprietor should also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

12.3 Teaching about safeguarding

The school is committed to proactively teaching children about safeguarding, including online safety, as part of our approach to offering a broad and balanced curriculum. Through ongoing work with the

children, we aim to build resilience so that every child knows that we are a 'telling school' and that speaking up about any concern is valued and actively promoted. This includes raising a concern about themselves or about another.

Pupils are taught about harmful sexual behaviours, including sexual violence and sexual harassment, through PSHE education appropriate to their age and stage of development.

The safe use of technology is a focus in all areas of the curriculum and key ICT safety messages are reinforced as part of assemblies and tutorial / pastoral activities. The School has appropriate filters and monitoring systems in place and is mindful that this should not lead to unnecessary restrictions on learning.

Safeguarding is also taught in the following way:

Relationships education is in primary schools.

Our approach to this is to teach children about healthy relationships in a variety of ways. It is explicitly taught as part of our Personal, Social, Personal and Health Education (PSHE) and also through day to day conversations, assemblies and in other lessons.

Sex and Relationships education (SRE) is taught in all secondary schools

Our approach to this is through our Personal, Social, Health and Economic Education curriculum. We actively promote the view that children should feel able to raise any concerns that they may have. This includes when they have a concern about a friend or peer. We take the following measures to ensure that children know how to raise a concern: through assemblies, advisory and form classes, through discussion in lessons, as examples .

13 Online safety

All staff and pupils should be aware of the risks posed to children by technology and the internet and should understand their role in preventing, identifying and responding to harm caused by its use. Training is provided to staff and pupils at the beginning of the year focusing on areas of **Content, Contact Commerce and Conduct.** This issue is then reviewed with staff and pupils as necessary, updating them on trends online, concerns that have arisen and useful advice.

All staff should be familiar with the school's Online Safety Policy, which sets out the school's approach to online safety in further detail.

KCM Online Safety Policy

13.1 Youth produced sexual imagery/'Sexting'
This section should be read in line with the 'Sexting in Schools Policy'

https://www.murcia.kingscollegeschools.org/about-us/policies-and-guidelines

Whilst many professionals refer to the issue as 'sexting', there is no clear definition of 'sexting'. According to professionals, staff should consider sexting to be 'sending or posting sexually suggestive images, including nude or semi-nude photographs, images or videos, via mobiles or over the internet'.

Yet, recent NSPCC research has revealed that when children are asked 'What does sexting mean to you?' they are more likely to interpret sexting as 'writing and sharing explicit messages with people they know. Similarly, a recent ChildLine survey has revealed that many parents think of sexting as flirty or sexual text messages, rather than images.

This policy only covers the sharing of sexual imagery by children. Possessing, creating, sharing and distributing sexual photos and videos of under-18s is illegal, and therefore causes the greatest complexity for schools (amongst other agencies) when responding. It also presents a range of risks which need careful management.

13.2 What is youth produced sexual imagery?

'Youth produced sexual imagery' best describes the practice because:
• 'Youth produced' includes children sharing images that they, or another child, have created of themselves.
• 'Sexual' is clearer than 'indecent'. A judgement of whether something is 'decent' is both a value judgement and dependent on context.
• 'Imagery' covers both still photos and moving videos (and this is what is meant by reference to imagery throughout the policy).

13.3 What types of incidents are covered by this policy?

Yes**:**
• A child creates and shares sexual imagery of themselves with a peer (also under the age of 18)
• A child shares sexual imagery created by another child with a peer (also under the age of 18) or an adult
• A child is in possession of sexual imagery created by another child

No:
• The sharing of sexual imagery of children by adults as this constitutes child sexual abuse and schools should always inform the police
• Children sharing adult pornography or exchanging sexual texts which do not contain imagery
• Sexual imagery downloaded from the internet by a child
• Sexual imagery downloaded from the internet by a child and shared with a peer (also under the age of 18) or an adult

13.4 Disclosure

All members of staff (including non-teaching staff) should be aware of how to recognise and refer any disclosure of incidents involving youth produced sexual imagery. This will be covered within staff training. Disclosure about youth produced sexual imagery can happen in a variety of ways. The child affected may inform a class teacher, the DSL in school, or any member of the school staff. They may report through an existing reporting structure, or a friend or parent may inform someone in school or colleague, or inform the police directly. Any direct disclosure by a child should be taken very seriously. A child who discloses they are the subject of sexual imagery is likely to be embarrassed and worried

about the consequences. It is likely that disclosure in school is a last resort and they may have already tried to resolve the issue themselves.

13.5 Handling incidents

All incidents involving youth produced sexual imagery should be responded to in line with policy and the 'sexting in school policy'. When an incident involving youth produced sexual imagery comes to a member of staff's attention:
• The incident should be referred to the DSL as soon as possible
• The DSL should hold an initial review meeting with appropriate school staff

Members of staff should not view sexual imagery which is reported to them, or copy, print or share the images under any circumstances. In referring any incident of sexting, members of staff should describe the content of the images as reported to them.

Where viewing an image is unavoidable:
• viewing should take place on School premises wherever possible;
• the image should be viewed by a person of the same sex as the person alleged to be shown in the image (where this is known);
• a senior member of staff should be present to monitor and support the person viewing the image. This member of staff should not view the image;
• full details of the viewing must be recorded in the School's safeguarding records, including who was present, the date and time, the nature of the image and the reasons for viewing it;
• any member of staff who views an indecent image should be given appropriate support.

As a subsequent procedure:
• There should be interviews with the children involved (if appropriate);
• Parents of each child should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the child at greater risk of harm and jeopardise any police/social care investigation;
• At any point in the process, if there is a concern a child has been harmed or is at risk of harm, a referral should be made to Children's Social Care and/or the police immediately.

If any devices need to be confiscated (whether in order to view the image(s) or to pass evidence to the appropriate authority), they should be turned off and locked away securely until they are required.

The Youth Produced Sexual Imagery Policy sets out further information about the procedures that will be followed should an incident of sexting take place.

14 Host families (please refer to Annex D KCSIE 2022)
Keeping children safe in education 2022 - GOV.UK

15 Use of mobile technology
The School's policy on the use of mobile technology, including phones and cameras, in the School, is as follows:

• the School's acceptable use policy for pupils sets out the expectations on pupils. In the EYFS setting, pupils are not permitted to bring mobile phones or any mobile device with a camera facility onto the premises;

• all staff (including staff in the EYFS setting) should use mobile devices and cameras in accordance with the guidance set out in the staff code of conduct;
• parents of all pupils (including parents of pupils in the EYFS setting) may bring mobile devices onto the premises but may only take photographs during events such as plays, concerts or sporting events for personal use. Parents should be reminded that the publication of such images (including on personal social networking sites even where access to the image may be limited) may be unlawful.

The School's approach to online safety is set out in the School's 'Online Safety Policy'.

16 Acting on concerns

This section should be read inline with the 'whistle blowing policy' and 'staff code of conduct'

Staff Code of Conduct
Whistle Blowing

The safety and wellbeing of children in our school is dependent on the vigilance of all our staff and their prompt communication to the Headteacher of any concerns, no matter how small, about any conduct by an adult which causes you to doubt that adult's suitability to work with or have access to children. All references in this section to "adult" should be interpreted as meaning any adult (defined above) and any visitor, unless otherwise stated. The school is committed to its duty of care to pupils and will always act, including if alerted to the possibility of abuse arising from situations or persons outside the school setting.

The notification and prompt handling of all concerns about adults is fundamental to safeguarding children. It helps to identify and prevent abuse and to protect adults against misunderstandings or misinterpretations. It also encourages openness, trust and transparency and it clarifies expected behaviours. Those raising concerns or reporting allegations in good faith will always be supported, and adults in respect of whom concerns or allegations have been raised will not suffer any detriment unless the concern or allegation is found to be substantiated.

16.1 Code of Conduct

All staff must behave responsibly and professionally in all dealings with children and specifically with pupils for whom they have a duty of care. All staff must follow the procedures set out in our 'Staff Code of Conduct'. Staff should always avoid behaviour which might be misinterpreted by others. As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people are in positions of trust in relation to the young people in their care. A relationship between a member of staff and a pupil cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people and all members of staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification. Staff should note that it is an offence for a person aged 18 or over and in a position of trust to touch a child in a sexual way or have a sexual relationship with a child, even if the relationship is consensual. A position of trust could arise even if the member of staff does not teach the child.

King's Group does not permit the use of personal mobile phones and cameras by staff where children are present.

16.2 Our concern policy

The overarching aim of the school's low-level concern policy is to facilitate a culture in which the clear values and expected behaviours which are set out in our Code of Conduct are lived, constantly monitored, and reinforced by all staff. In particular, the intention of this policy is to:

• maintain a culture of openness, trust and transparency in which staff are confident and clear about expected behaviours of themselves and their colleagues, the delineation of boundaries and reporting lines;
• ensure staff feel empowered to raise any low-level concern, whether about their own or a colleague's behaviour, where that behaviour might be construed as falling short of the standards set out in our Staff Code of Conduct; and
• provide for responsive, sensitive and proportionate handling of such concerns when they are raised – maintaining on the one hand confidence that concerns when raised will be handled promptly and effectively whilst, on the other hand, protecting staff from false allegations or misunderstandings.

16.3 What is a concern?

A low-level concern for this purpose is any concern, no matter how small and even if no more than a 'nagging doubt', that an adult may have acted in a manner inconsistent with the school's Code of Conduct or simply – even if not linked to a particular act or omission – a sense of unease as to the adult's behaviour particularly towards or around children.

Low-Level Concerns about self (self-referring)
From time to time an individual may find him/herself in a situation which might appear compromising to others or which could be misconstrued. Equally, an individual may for whatever reason have behaved in a manner which on reflection he/she considers falls below the standard set out in the Staff Code of Conduct. Self-reporting in these circumstances is encouraged as it demonstrates both awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived. As such, the school sees self-reporting of low-level concerns as an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

Low-level concerns about an adult
From time to time an individual may notice behaviour or actions in others which leave them concerned. These are behaviour or actions which fall short of a formal allegation of abuse. These tend to be behaviours which indicate that our Code of Conduct has not been met. Any such concerns can be dealt with as a Low-Level Concern.

16.4 What should I do if I have one?

Where a low-level concern exists it should be reported to the Headteacher as soon as reasonably possible in writing and, in any event, within 24 hours of becoming aware of it (where the concern relates to a particular incident).

16.5 How will my low-level concern be handled?

The DSL will discuss all low level concerns s/he receives with the Headteacher as soon as possible and in any event within 24 hours of becoming aware of it. The Headteacher will, in the first instance, satisfy him/herself that it is a low-level concern and should not be reclassified as an *allegation* and dealt with under the appropriate procedure (outlined later in this document).

The circumstances in which a low-level concern might be reclassified as an allegation are where:
a) the threshold is met for an allegation
b) there is a pattern of low-level concerns which collectively amount to an allegation or
c) there is other information which when taken into account leads to an allegation.

Where the Headteacher is in any doubt whatsoever, advice will be sought from the DSL, if necessary on a no-names basis.

Having established that the concern is low-level, the Headteacher will discuss it with the individual who has raised it and will take any other steps to investigate it as necessary. Most low-level concerns by their very nature are likely to be minor and will be dealt with by means of management guidance, training etc.

16.6 What records will be kept?

Where a low-level concern has been communicated, a confidential record will be kept in a central file which logs all low-level concerns. This is necessary to enable any patterns to be identified. However, no record will be made of the concern on the individual's personnel file (and no mention made in job references) unless either:
a) the concern (or group of concerns) has been reclassified as an allegation as above; or
b) the concern (or group of concerns) is sufficiently serious to result in formal action under the school's grievance, capability or disciplinary procedure.

16.7 Data Protection Act 2018 and the GDPR.

Governing bodies and proprietors should ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR. This includes:
-processing, storing and sharing conditions
-sharing special category personal data without consent
-when to share and withhold information

The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare / protect the safety of children.

data protection toolkit- Guidance to support schools with data protection activity, including compliance with the GDPR.

Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. Schools and colleges have clear powers to share, hold and use information for these purposes.

17 Allegations of abuse made against teachers and other staff

The purpose of this section of the policy is to outline how allegations against adults will be handled. Allegations will always be dealt with in accordance with statutory guidance provided in Keeping Children Safe in Education.

17.1 What is an allegation?

Allegations represent situations that might indicate a person would pose a risk of harm to children if they continue to work in regular or close contact with children in their present position, or in any capacity. This procedure applies to all adults in the school if it is alleged that they have:
• behaved in a way that has harmed a child, or may have harmed a child;
• possibly committed a criminal offence against or related to a child; or
• behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children.

An allegation may be triggered by one specific incident or by a pattern of behaviour by the adult, or low-level concerns which when considered *collectively* amount to an allegation.

17.2 What should I do if I have an allegation?

Allegations about staff or volunteers, including the DSL, should be reported to the Headteacher immediately. The adult to whom the concern or allegation relates should not be informed.

If the allegation is about the Headteacher, it must be referred to the King's COO immediately, without informing the Headteacher.

17.3 Duties as an employer and an employee

This policy relates to members of staff and volunteers who are currently working in any school, regardless of whether the school is where the alleged abuse took place. Allegations against a teacher who is no longer teaching should be referred to the police. Historical allegations of abuse should also be referred to the police.

King's Group has a duty of care to all employees. King's Group will provide effective support for anyone facing an allegation in accordance with Part 4 of Keeping Children Safe in Education and the School's employment procedures. It is essential that any allegation of abuse made against a teacher or other member of staff or volunteer is dealt with very quickly, in a fair and consistent way that provides effective protection for the child and, at the same time, supports the person who is the subject of the allegation.

17.4 Dealing with an allegation

The procedures for dealing with allegations need to be applied with common sense and judgement. Many cases may well either not meet the criteria set out above, or may do so without warranting consideration of either a police investigation or enquiries by local authority Children's Social Care services. In these cases, local arrangements will be followed to resolve cases without delay. Some rare

allegations will be so serious they require immediate intervention by Children's Social Care services and/or the police.

The Headteacher or CEO will not undertake any investigation before first speaking to the Designated Officer.

The Headteacher (or CEO where there is an allegation against the Headteacher) / 'case manager' will inform the Designated Officer immediately and in any event within one working day of all allegations that come to the school's attention and appear to meet the criteria set out above.

Where appropriate, the case manager will also consult the DSL.

After notifying the Designated Officer and, where appropriate, DSL, the Headteacher must notify the CEO of the allegation and the action taken.

Disclosure of information

The Case Manager will inform the accused person of the allegation as soon as possible after the Designated Officer(s) has been consulted.

The parents or carers of the child / children involved will be informed of the allegation as soon as possible if they do not already know of it. They may also be kept informed of the progress of the case, including the outcome of any disciplinary process. The timing and extent of disclosures, and the terms on which they are made, will be dependent upon and subject to the laws on confidence and data protection and the advice of external agencies.

Where a strategy discussion is needed and the police or Children's Social Care services need to be involved, the case manager (school) will **not** inform the accused person until those agencies have been consulted, and have agreed what information can be disclosed to the accused.

The reporting restrictions preventing the identification of a teacher who is the subject of such an allegation in certain circumstances will be observed.

Where it is clear that an investigation by the police or Children's Social Care services is unnecessary, or the strategy discussion or initial evaluation decides that is the case, the designated officer(s) will discuss the next steps with the case manager. In those circumstances, the options open to the school depend on the nature and circumstances of the allegation and the evidence and information available and action may be taken in accordance with the school's employment procedures.

17.5 Further action to be taken by the school

King's Group has a duty of care to their employees. King's Group will act to manage and minimise the stress inherent in the allegations process. Providing effective support for the accused individual is vital to fulfilling this duty. Action will be taken in accordance with Part 4 of KCSIE and the school's employment procedures.

17.6 Oversight and monitoring
The DSL has overall responsibility for oversight of the procedures for dealing with allegations, for resolving any inter-agency issues, and for liaison with the Local Safeguarding Children Board on the

subject. The DSL will provide advice and guidance to the case manager, in addition to liaising with the police and other agencies, and monitoring the progress of cases to ensure that they are dealt with as quickly as possible consistent with a thorough and fair process. Reviews should be conducted at fortnightly or monthly intervals, depending on the complexity of the case.

17.7 Outcome of an allegation

The following definitions will be used when determining the outcome of allegation investigations:
• Substantiated: there is sufficient evidence to prove the allegation;
• Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;
• False: there is sufficient evidence to disprove the allegation;
• Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence;
• Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

17.8.Ceasing to use staff

If the school ceases to use the person's services, or the person resigns or otherwise ceases to provide his or her services because they are unsuitable to work with children, a settlement agreement will not be used and King's Group will promptly refer the case to the DBS for consideration of whether inclusion on the barred lists is required if the criteria for referral are met. The School may also need to consider a referral to the DBS if a member of staff is suspended, or deployed to another area of work that is not regulated activity.

If a member of staff tenders his or her resignation, or ceases to provide his or her services at a time when child protection concerns exist in relation to that person, those concerns will still be followed up by the School in accordance with this policy and a referral to the DBS will be made promptly if the criteria for referral are met.

In the case of a member of teaching staff at a school, separate consideration will be given as to whether the matter should be referred to the Teaching Regulation Agency (TRA) where a teacher has been dismissed, or would have been dismissed had he / she not resigned, because of unacceptable professional conduct, conduct that may bring the profession into disrepute, or a conviction at any time for a relevant offence. An interim referral to the TRA may also be considered and made if appropriate.

17.9 Malicious or unsubstantiated allegations

If an allegation is determined to be unfounded, unsubstantiated or malicious, the DSL will refer the matter to the Children's Social Care services to determine whether the child concerned is in need of services, or may have been abused by someone else.

If an allegation is shown to be deliberately invented or malicious, the Headteacher and proprietor will consider whether any disciplinary action is appropriate against the pupil who made it; or whether the police should be asked to consider if action might be appropriate against the person responsible, even if he or she were not a pupil.

Where a parent has made a deliberately invented or malicious allegation the Head will consider whether to require that parent to withdraw their child or children from the School on the basis that they have treated the School or a member of staff unreasonably.

17.10 Learning lessons

At the conclusion of a case in which an allegation is substantiated, the DSL will review the circumstances of the case with the case manager to determine whether there are any improvements to be made to the school or college's procedures or practice to help prevent similar events in the future, with a report being presented to the proprietor without delay.

17.11 Record keeping

Details of allegations that are found to have been malicious will be removed from personnel records. However, for all other allegations, it is important that a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, is kept on the confidential personnel file of the accused, and a copy provided to the person concerned.

The School will retain all safeguarding records and relevant personnel records for as long as reasonably required. The Information Commissioner has published guidance on employment records in its Employment Practices Code and supplementary guidance, which also provides some practical advice on record retention.

17.12 References

Cases in which an allegation was proven to be false, unfounded,
unsubstantiated or malicious will not be included in employer references. A history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious will also not be included in any reference. See KCSIE 2022 for further information on references.

18 Risk assessment

Where a concern about a pupil's welfare is identified, the risks to that pupil's welfare will be assessed and appropriate action will be taken to reduce the risks identified.

The format of risk assessment may vary and may be included as part of the School's overall response to a welfare issue, including the use of individual pupil welfare plans (such as behaviour, healthcare and education plans, as appropriate). Regardless of the form used, the School's approach to promoting pupil welfare will be systematic and pupil focused.

The Head has overall responsibility for ensuring that matters which affect pupil welfare are adequately risk assessed and for ensuring that the relevant findings are implemented, monitored and evaluated.

Day to day responsibility to carry out risk assessments under this policy will be delegated to the DSL who has been properly trained in, and tasked with, carrying out the particular assessment.

19 Monitoring and review

The DSL will ensure that the procedures set out in this policy and the implementation of these procedures are updated and reviewed regularly, working with the Proprietor as necessary and seeking contributions from staff. The DSL will update the Senior Management Team regularly on the operation of the School's safeguarding arrangements.

Any safeguarding incidents at the School will be followed by a review of these procedures by the DSL and a report made to the Proprietor. Where an incident involves a member of staff, the Designated Officer(s) will be asked to assist in this review to determine whether any improvements can be made to the School's procedures. Any deficiencies or weaknesses in regard to safeguarding arrangements at any time will be remedied without delay.

The Proprietor will undertake an annual review of this policy and the School's safeguarding procedures, including an update and review of the effectiveness of procedures and their implementation and the effectiveness of inter-agency working.

The DSL will work with the Nominated Safeguarding Governor, preparing a written report commissioned by the Proprietor. The written report should address how the School is approaching staff training on safeguarding; referral information; issues and themes which may have emerged in the School and how these have been handled; and the contribution the School is making to multi-agency working in individual cases or local discussions on safeguarding matters. The Proprietor should also consider independent corroboration, such as:
- inspection of records or feedback from external agencies including the Designated Officer(s);
- reports of ISI / BSO inspections;
- the outcome of any relevant parental complaints; and
- press reports.

The Proprietor will review the report, this policy and the implementation of its procedures and consider the proposed amendments to the policy before giving the revised policy its final approval. Detailed minutes recording the review by the Proprietor will be made.

20 Record keeping

All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

The records created in accordance with this policy may contain personal data. The School has a number of privacy notices which explain how the School will use personal data for the benefit of pupils and parents. The privacy notices are published on the School's website. In addition, staff must ensure that they follow the School's data protection policies and procedures when handling personal data created in connection with this policy. This includes the School's data protection and information security policy.

All records created in accordance with this policy are managed in accordance with the School's policies that apply to the retention and destruction of records.

21 Working with and monitoring pupils who are learning online

Pupils now have the option of being part of the class through learning online instead of coming to the school building. Even though the parents/guardians of a pupil are choosing to have their child/ren learn online, the underpinning principles of safeguarding children remain the same, and the welfare of children and young people is expected to remain paramount. Staff should make sure they are aware of their responsibilities by reading the two policies underneath.

KCM policy for working with and monitoring pupils who are learning online
Attendance and Registration Policy
Safeguarding and remote education

ANNEX A - Ley de la Infancia contra la Violencia (de protección integral a la infancia y la adolescencia frente a la violencia)

Following the release in Spain of this law in June 2021, we are also using this document as a training template for staff and reference document as part of our safeguarding policies and procedures in school and with external services, to make sure that we are following national guidance and law regarding the protection of children in Spain. We support the requirements of the law for schools in Spain in the following areas:

1) having as a priority and with effective measures in place, the protection of our pupils against violence and abuse, providing a safe environment in school.

2) providing an education to our pupils, adapted to their level of maturity, which teaches them to respect and understand the importance of equality and children's fundamental rights as a means of eradicating violence and abuse in society both inside and outside of the family setting. The education helps the pupils to recognise abuse and violence and how to react to it, with the overall aim of allowing any child or adolescent to grow up free of prejudice, discrimination, physical, mental or emotional abuse, as well as neglect, exploitation or any form of poor treatment, violence or abuse (bullying, cyberbullying, sexual abuse or violence, gender violence, domestic abuse, genital mutilation, forced marriage, infant marriage, unwanted access to pornography etc.)

3) being aware that certain groups of children can be more vulnerable, potentially needing more support, and include this knowledge as part of our safeguarding policies and practices in school. Examples of more vulnerable children are those with disabilities; from different ethnic and racial groups or of different nationalities; who are economically disadvantaged; belong to the group LGBTQ+ community etc.

4) communicating when necessary detected situations of abuse or violence involving our pupils to the appropriate external services, so that they can investigate and analyse the circumstances and help coordinate support and protection for the child/ren and support for the family where necessary.

5) having a trained and qualified member of staff in school to manage and lead safeguarding who works under the supervision of the headteacher. See Capítulo IV 'del ámbito educativo', artículo 35 'coordinador de bienestar y protección', for a list of recommended roles the DSL should have.

6) providing our pupils at least at the beginning of each academic year with the means and details to report any abuse or violence they have been part of, have witnessed or have become aware of both in

an easy and secure way internally (in school) and to external services. This information is updated if need be and placed in a visible and easily accessible place where the pupils can view it freely at any time.

7) making staff and pupils aware of how radicalisation and indoctrination can lead to forms of violence and abuse and how this can be detected, reported and subsequently prevented.

8) encouraging and promoting the following principles in school: positive treatment of eachother; mutual respect; human dignity; the peaceful resolution of problems; equal right to protection under the law; equal opportunities and the prohibition of discrimination towards others.

9) encouraging and promoting safety and appropriate conduct online:

-educating pupils that it is unlawful online or offline to promote or encourage any form of abuse, discrimination or violence targeting or involving children (includes self harm, suicide and eating disorders), as well as any promotion of sexist, racist, homophobic, biphobic, transphobic or aporophobic attitudes or those against disabled people, which can lead to people being excluded socially.

-educating pupils to understand the Ley Orgánica 3/2018, de 5 de diciembre, de Protección de Datos Personales, particularly with the aim of them understanding personal and family privacy and the protection of personal data.

-providing our pupils with the means and details to report in an easy and secure way, internally (in school) and/or to external services, any materials, websites, adverts etc. that promote these areas, which they have witnessed, been part of or have become aware of.

10) promoting the importance of children being listened to in school and having the right to be heard, so that they feel that their views are important, taken seriously and acted upon if need be.

11) working with parents to help them to understand and to practise 'positive parenting', as well as communicating to them any information that will help them understand the roles and practices of safeguarding in school.

12) ensuring that the child exercises his/her right to be involved and to participate in any discussions, procedures or decisions which affect him/her.

13) ensuring that internal policies, training and procedures are in place so that anyone in the school community is aware of their responsibility to be vigilant and report any violence or forms of abuse they have detected and so that subsequently the appropriate action is then taken / support put in place.

14) ensuring that our Single Central Register provides evidence that all our school staff have a 'certificación negativa del Registro Central de Delincuentes Sexuales y de Trata de Seres Humanos', which is a legal requisite for having access to professions, jobs or activities where there is regular contact with children.

Created and Reviewed by :	Policy Category:
Dawn Akyurek October 2018/September 2017	Safeguarding
	Reviewed: DSL and Headteacher September 2022
Approved by Inspired Board September 2022	**Next Review: September** 2023