



Child Protection and Safeguarding Policy

February 2022

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POLICIES FOR SAFEGUARDING AND PROTECTING CHILDREN AND YOUNG PEOPLE

1. Introduction

“Children have the right to be protected from all forms of violence (physical and mental). They must be kept safe from harm and they must be given proper care by those looking after them.”¹

1.1. I CAN’s Approach

I CAN acknowledges its responsibility for ensuring the proper care of children and young people. In the context of child protection, the terms children and young people refer to anyone up to and including 18 years of age. We also wish to ensure the safety of our young people aged over 18 and will act accordingly, bearing in mind that they are adults.

I CAN’s approach to the protection of children and young people is based on the principles recognised in the Children Act 1989 and takes account of all relevant guidance, including, but not limited to guidance issued by the Department for Education. In particular, I CAN will have regard to the latest statutory guidance, currently *Working together to safeguard children* (DfE 2020) and, in our schools, *Keeping Children Safe in Education* (KCSIE) (2021) and *Working together should be read alongside the departmental advice What to do if you are worried a child is being abused* (DfE 2015).

I CAN recognises that:

- All children have the right to be protected.
- All children should be listened to and their views taken seriously.
- Children’s needs should be looked at holistically and should not be defined solely in terms of their abuse.
- All interventions must be child-centred.
- To effectively protect children, professionals must identify and work with safe and protective adults within children’s families and communities.
- Professionals need to be aware of how issues of race, gender, disability, culture, sexuality and age impact on an individual’s life experiences.
- Professionals need to be aware of how issues of race, gender, disability, culture, sexuality and age impact on their understanding of and response to keeping children safe.
- Joint working between agencies and disciplines is essential for the protection of children.
- Research indicates that children with disabilities or additional needs are at higher risk of experiencing abuse but less likely to be identified and protected.
- The protection of children with communication difficulties can pose additional challenges and that training for staff should take particular notice of this.

The Purpose of the Policy

- To provide protection for the children and young people with whom I CAN works
- To provide all employees with guidance on how they should behave if they suspect that a child or young person may be experiencing, or be at risk from some form of abuse or harm
- To guide employees on how to respond to and report child protection concern

The Scope of the Policy

- This policy applies to all non-school based I CAN staff including (but not exhaustively) seconded staff, volunteers, governors, trustees, mentors, students, agency workers and contract staff working on behalf of I CAN in any capacity and in any setting other than I CAN schools.
- This document contains the overarching policy of I CAN. Each school adheres to the local safeguarding partnership procedures for child protection and has its own child protection/safeguarding policy. Within each school there are also policies and procedures in place for risk assessment, use of reasonable force, behaviour, bullying appropriate use of information technology and residential care.

¹ United Nations Convention on the Rights of the Child, Article 19 (1989)

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- The policy should be viewed in conjunction with the staff code of conduct, managing allegations and whistleblowing policies.
- This policy is reviewed annually alongside I CAN Schools' safeguarding policies.

1.2. Principles of Good Practice

I CAN adheres to the following principles of good practice. These are to:

- Promote the general health, welfare and development of children and young people and protect them from harm.
- Treat children and young people with care, respect and dignity.
- Work in partnership with children, young people, their parents, carers and other agencies to promote and safeguard young people's welfare.
- Recognise that those working for I CAN will be perceived by children and young people as trusted representatives of I CAN and therefore expect them to behave with integrity.
- Adopt and consistently use rigorous methods of recruitment of staff and volunteers.
- Ensure that staff in contact with children and young people and families will have the requisite knowledge, skill and qualifications to carry out their jobs safely and effectively.
- Maintain an organisation that is safe for staff and children and young people and an environment where poor practice is challenged.
- Adopt clear procedures for dealing with disclosures, allegations or complaints.

2. Recruitment and Training of Staff and Volunteers

I CAN uses rigorous employment procedures to ensure the safe recruitment and appropriate training of adults who may come into contact with children in line with the guidance laid out in Working Together to Safeguard Children (2020) and KCSIE (2021). I CAN operates a safer recruitment process and has at least one member who has undertaken safer recruitment training on any appointment for staff who work directly with children. The recruitment process checks the identity, criminal record (enhanced DBS), mental and physical capacity, right to work in the U.K., professional qualification and seeks confirmation of the applicant's experience and history through references. All recruitment must adhere to the corporate [Safer Recruitment Policy](#).

It is the responsibility of all managers to ensure that the staff and volunteers they are responsible for are aware of and understand the procedures and have levels of knowledge and skills commensurate to the level and nature of their direct involvement with children and young people.

2.1 I CAN Staff

The recruitment steps outlined below are based on part 3 of Keeping Children Safe in Education and this policy applies to the recruitment of all schools-based staff. It also applies to any non-school staff who may, for one reason or another, be based and work from one of our schools.

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

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

This should be read in conjunction with the recruitment and selection and child protection policies.

Advertising

When advertising roles, we will make clear:

- Our schools' commitment to safeguarding and the promotion of the welfare of children.
- That safeguarding checks will be undertaken.
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children.
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent

convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account.

Application forms

Our application forms will:

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

Shortlisting

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

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

Once we have shortlisted candidates, we will ask shortlisted candidates to complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at the interview stage. The information we will ask for includes:

- If they have a criminal history.
- Whether they are included on the barred list.
- Whether they are prohibited from teaching.
- Information about any criminal offences committed in any country in line with the law as applicable in England and Wales.
- Any relevant overseas information.
- A signed declaration confirming the information they have provided is true.

Seeking references and checking employment history

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

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

Interview and selection

When interviewing candidates, we will:

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

In positions working with children and young people, in particular, it is important to explore safeguarding. In particular:

- Motivations for working with children and young people.
- Understanding of child protection principles.
- Boundaries and inappropriate behaviour.

- Witnessing issues of concern.

Pre-appointment vetting checks

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

New staff

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

- Verify their identity.
- Obtain via the successful applicant enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed, we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken.
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available.
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher, as well as any other staff, such as teaching/learning support assistants, as designated as appropriate by the school.
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. Where available, these will include:
 - For all staff, including teaching positions criminal records checks for overseas applicants.
 - For teaching positions: obtaining a letter of professional standing from the professional regulating authority in the country where the applicant has worked.
- Check that successful candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the Secretary of State for Education.
- Where the school has pupils under the age of eight years, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Regulated activity means a person who will be:

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

Existing staff

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

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

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- We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:
 - We believe the individual has engaged in [relevant conduct](#); or
 - We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
 - We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); or
 - The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left.
- Existing staff whose roles are subject to a DBS check will be asked to complete an annual disclosure form.

Agency and third-party staff

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

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check. This will be:

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

We will obtain the DBS check for self-employed contractors. We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances. We will check the identity of all contractors and their staff on arrival at the school.

For self-employed contractors, such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Trainee/student teachers

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

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

In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity.
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity.

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- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment.
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

2.2 I CAN Trustees and School Governors

- All Governor appointments are subject to an enhanced Disclosure & Barring Service (DBS) certificate without barred list check as governors are not in regulated activity.
- I CAN Trustee appointments are subject to an enhanced Disclosure Barring Service (DBS) disclosure without barred list check as trustees are not in regulated activity.
- The induction process for all Governors and Trustee appointments includes awareness raising, as appropriate in respect of safeguarding children.
- All School Governors and Trustees will undertake training in their strategic responsibilities for Child Protection, Safeguarding annually including Safer Recruitment Training where appropriate.

2.3 All Staff and Volunteers who do not come into regular contact with children and young people as part of their roles

- At recruitment a check of identity is made against an official document, such as a passport or birth certificate and checks of proof of relevant qualifications are also made
- At recruitment applicants are asked to provide a full employment history and any gaps are carefully explored.
- All offers of employment are made subject to at least two references satisfactory to I CAN, right to work and qualification/registration checks.
- All offers of employment are made subject to satisfactory DBS disclosure at a level relevant to the role. The holders of the posts of Chief Executive Officer and the Director responsible for the I CAN Schools will always be DBS checked, as will all I CAN staff such as the advisory team who regularly work in schools on behalf of I CAN.
- The induction process includes training or awareness raising, as appropriate, in respect of safeguarding children.
- It is important to ensure the person is who they claim to be, this includes being aware of the potential for individuals to change their name. Best practice is to check the name on their birth certificate, where it is available

2.4 Staff and Volunteers who come into regular contact with children and young people

Posts within the organisational structure that do not have their place of work at an I CAN school do not normally require DBS checks. From time to time, however, there may be posts for which a DBS check will be appropriate. For example, significant work by a post holder engaged on the trial of an intervention at schools may require DBS checks. It is the responsibility of the Director responsible to agree with the Director of Corporate Services whether a particular post requires the post holder to have undergone DBS checks. All I CAN employees who are or will be in regulated activity² are required by law to undertake a barred list check in addition to an enhanced DBS certificate.

2.5 Designated Child Protection Staff

- Each I CAN School has a Designated Safeguarding Lead (DSL).
- I CAN has a Designated Safeguarding Lead for staff not employed at I CAN Schools. This is **Tom Pegler, Director of Education**, who is I CAN's Designated Director with overall responsibility for

² Regulated activity includes a) teaching, training, supervising, caring for children b) driving a vehicle for children or vulnerable adults c) intimate or personal care d) any form of healthcare (e.g. speech & language therapy, physiotherapy, nursing, etc)

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safeguarding across the organisation.

- The Director of Corporate Services has lead responsibility for Safer Recruitment across the organisation.
- These designated persons meet all criteria for staff in regular contact with Children and young people.
- In addition, I CAN has designated a Trustee to lead on safeguarding. The I CAN designated safeguarding trustee is John Willis.
- All designated staff should undertake Child Protection Training relevant to their strategic and/or operational responsibilities and attend annual updates in Child Protection Training.

2.6 Ongoing Support for all groups of staff and volunteers

- Developments in child protection policy or procedures are shared with all members of I CAN through its intranet.
- All staff with contact with children should undertake Child Protection Training annually.
- All I CAN staff who hold a post working directly with children or young people receive regular support and supervision at which child protection concerns may be raised by staff member or line manager.

3. Roles and Responsibilities

3.1. All Staff, Volunteers, Contract staff, Associates Trustees and Governors

- All adults have a responsibility to ensure the safety of children with whom they work. Children can be at risk of harm from a range of sources. It is the responsibility of staff to promote good practice and minimise and manage potential risks.
- Across I CAN, staff are expected to conduct themselves in a manner that shows them to be professional representatives of the organisation.
- All staff should promote a culture that ensures that children and young people are respected. Discrimination, prejudice, oppressive behaviour or language in relation to any of the following is not acceptable: race, culture, age, gender, disability, religion, sexuality or political persuasion.
- Failure by a member of staff to report actual or reasonably suspected physical, sexual or emotional abuse or neglect of a child is a disciplinary offence.
- All staff, including contract staff and associates, have a responsibility to read and be aware of the requirements within these procedures. They should highlight and discuss any issues requiring clarification, and any training issues, with their line manager.
- Staff should avoid developing personal relationships with the children and young people they are assigned to work with; specifically they should follow guidance in respect of social media such as not having pupils as friends on Facebook (see relevant policy and code of conduct in each school for more detail).
- I CAN staff who work within colleges, schools or childcare settings run by third parties should request an identification badge to wear during visits and should make themselves aware of, and abide by, the child protection policies and procedures of those establishments. I CAN will confirm appropriate levels of DBS checks to the setting if they expect to be with children 'unsupervised'.

3.2. Line Managers

- It is the responsibility of managers to ensure that the staff they line manage are aware of and understand the procedures and have levels of knowledge and skills commensurate to the nature of their direct involvement with children and young people.
- Staff should report all concerns to the Designated Safeguarding Lead (Safeguarding Lead) for their workplace.
- Line Managers provide advice and support to employees reporting disclosures or concerns.
- Line Managers work with the Safeguarding Lead for their workplace to resolve issues.

3.3. Designated Staff

Designated Safeguarding Leads are responsible for:

- Management of referrals/cases reported and working with others to ensure resolution.

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- Acting according to local safeguarding procedures and within relevant legislative framework. This may include making a record but taking no immediate action, seeking further advice or, where necessary, referring directly to the necessary authority.
- Reporting child protection issues to their own line managers, the Designated Director and Advisor at the earliest opportunity and continuing to update as appropriate
- Escalating concerns if they believe that appropriate action is not being taken (e.g. by partner agencies)

Designated Director is responsible for:

- Developing I CAN's approach to Safeguarding, reviewing the policy and procedures on a regular basis.
- Reporting Child Protection issues to the Chief Executive and to the board of Trustees.
- Auditing the operation of the policy and procedures.

Director of Corporate Services is responsible for:

- Implementation of the safer recruitment system, including appropriate use of Disclosure and Barring Service checks.
- Implementing a training strategy for employees to ensure that the policy and procedures are implemented throughout the organisation.
- Ensuring that appropriate policies for staff behaviour / code of conduct / managing allegations against staff are in place to safeguard children and young people.
- Liaising with partner agencies, I CAN Chief Executive, Designated Safeguarding Lead and/or school Principals as appropriate in relation to any allegations of abuse made against staff or volunteers / visitors and, where required, making referrals to the Disclosure & Barring Service or other regulatory bodies such as HCPC, NCTL.
- Monitoring the Disclosure & Barring Service updates, training policies and alerting the Director to any shortfalls in implementation.

3.4. Designated Trustee

- In the event of an allegation, in respect of child protection / safeguarding, being made against a Principal of an I CAN School, the Chief Executive should be informed immediately and will discuss with the Designated Safeguarding Lead as soon as possible. The Chief Executive and Designated Safeguarding Lead for I CAN are responsible for liaising with external agencies including the local authority and for taking on the 'case manager' role with support from the Director of Corporate Services. The Chief Executive will keep the Designated Trustee fully informed.
- In the event of an allegation, in respect of child protection, being made against the Chief Executive, the Chair of Trustees (or their nominated Trustee) is responsible for liaising with external agencies including the local authority and for taking on the 'case manager' role with support from the Director of Corporate Services.

3.5. Children and young people engaged by I CAN

Young people on work experience or involved in the work of I CAN should be made aware of this policy. Those with specific communication needs, because of language or disability should have access to information in appropriate forms to ensure their understanding and be introduced to an appropriate staff member who can support them should they wish to raise any concerns in relation to Child Protection or safeguarding.

4. Child Protection procedures

4.1. General Concerns

If a member of non-school staff has a general concern about a child's wellbeing this should be referred to the Designated Safeguarding Lead (Safeguarding Lead) and line manager. The Safeguarding Lead is

responsible for considering the information received and may decide, with appropriate consultation, the next step.

In all cases a full record of the concerns should be made using the disclosure form (Appendix 3). It may be necessary to refer the matter back to a child's home area or, if appropriate, to the school or early years centre that the child attends. This should only be completed following agreement by the Safeguarding Lead.

4.2. Specific Concerns

If a member of non-school staff has a specific concern arising out of a child's disclosure, physical evidence or written material the Safeguarding Lead should be contacted immediately. At the soonest possible moment a signed and dated disclosure form should be completed (see Appendix 3).

Staff who have been the recipient of a child's disclosure are given the opportunity to talk about their feelings and reactions. They may in the first instance talk to their line manager about their feelings in dealing with the disclosure but should not reveal its content.

4.3. Disclosures (helpful advice is available in the document What to do if you are worried a child is being abused 2015- Advice for practitioners).

There are four main categories of abuse and neglect: physical abuse, emotional abuse, sexual abuse and neglect. Each has its own specific warning indicators, which you should be alert to. Working Together to Safeguard Children (2020) statutory guidance sets out full descriptions.

In all cases the staff member:

- should react calmly. Panic may frighten or silence the child
- should take what is said seriously
- should *not* look shocked or disgusted by what the child says
- should tell the child that they were right to tell
- should tell the child they were not to blame
- should keep questions to a minimum to ensure a clear and accurate understanding of what is being said
- should only ask questions if they need to clarify what they are being told—they should not ask about explicit details – it is up to Social Services/the Police to investigate fully
- should not ask leading questions – use TED (Tell, Explain, Describe)
- should listen carefully
- should use language that the child can understand.
- should *not* stop a young person who is freely recalling events
- should *not* express his/her own feelings to the child
- should tell the child that they will need to inform other persons, whom and why
- must keep the child informed of all actions they intend to take and ensure that the child fully understands what is happening
- should *not* immediately suggest that the child should talk to someone else.
- should *not* say that everything will be alright
- should make a full record of what is being said, heard and seen as soon as possible
- should not delay in passing the information onto the Designated Safeguarding Lead

Remember: disclosure does not have to be verbal – children may sign or indicate their worries. If a child requests a private conversation with a member of staff the staff member:

- should inform a colleague of where they will be and which child they are with. Where possible, ask them to stay nearby.
- should *not* shut the door and *never* lock the door
- ensure appropriate support is available for the child's communication as necessary

If the allegation is about the member of staff to whom it is disclosed, the staff member:

- should not enter into a discussion with the child making the allegation
- should report the allegation immediately to the Principal (if they are in a school) or CEO

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- should recognise that it is likely that s/he will be suspended while an investigation is being carried out
- should not have any further contact with the person making the allegation, their relatives or friends
- should maintain confidentiality
- may seek support from a professional organisation

4.4. Concern about a member of staff or volunteer

If a member of staff has a Child Protection or safeguarding related concern about another member of staff, visiting professional or volunteer either within I CAN or in a setting in which they are working; they must report it to the Principal (if they are in a school) or I CAN's Designated Safeguarding Lead in line with the 'managing allegations against staff' policy. If the concern is in connection with the Principal or I CAN's Safeguarding Lead they should go to the Chief Executive. If the concern is regarding the Chief Executive, then this should be raised with the Safeguarding Lead and Chair of the Board of Trustees.

Concerns about staff are treated with the same rigour as other concerns. If there are safeguarding concerns about a member of staff or volunteer the Safeguarding Lead will be informed and will pass this information to the Local Authority Designated Officer (LADO) who may involve Social Services and/or the Police for investigation. The Safeguarding Lead will work with Line Management and HR, referring to the Disciplinary Policy and Procedure to decide whether the member of staff should be suspended pending a full investigation.

Concerns that do not meet the harm threshold

This section applies to all concerns (including allegations) about members of staff. Concerns may arise through, for example:

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

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

Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working children or young people (CYP) may have acted in a way that:

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

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

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

Sharing low-level concerns

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

We will create this culture by:

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

Responding to low-level concerns

If the concern is raised via a third party, the Safeguard Lead/ Head of Corporate Services will collect evidence where necessary by speaking:

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

The Safeguarding Lead/Head of Corporate Services will use the information collected to categorise the type of behaviour and determine any further action, in line with I CAN's standards of conduct.

Record keeping

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

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold
- Retained at least until the individual leaves employment at I CAN
- Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

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

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

4.5. Referrals

I CAN's safeguarding lead, the Chief Executive and external advisors as appropriate, has responsibility for referring the matter onto the relevant Children's Services Department and/or the Police. Referrals should be made within the same working day and certainly within 24 hours (note that any member of staff can contact these services with concerns at any time). This initial report is usually made by telephone and is provided to:

- The child's social worker, if one is allocated, known and available, otherwise the Duty Social Worker or referral Team (or local equivalent) from the child's home Children's Service OR (if the child is residential in one of our schools) to the social care team where the school is situated.
- The Duty Social Worker or referral Team local to the I CAN Service.

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It is the responsibility of the Safeguarding Lead to decide whether the parents/carers of the child or young person should be informed of the referral and should take advice from social care teams where appropriate.

A spoken referral will be followed up in writing within 48 hours usually on the referral form provided by that local authority.

There may be instances where urgent medical attention is needed. In these circumstances, staff should always try to consult with someone else, but it may be necessary to make immediate contact with the Police and/or Children's Services or emergency health services.

It is not the responsibility of I CAN to decide whether or not abuse has taken place. It is the responsibility of staff at I CAN to act if there is cause for concern, in order that the appropriate agencies can investigate and take any action necessary to protect a child or young person.

4.6. Record Keeping

All concerns and any discussions about a child's welfare should be recorded in writing whether or not further action is taken. The notes should be dated.

Staff members:

The member of staff should record the allegation/ incident/suspicion on the form provide (appendix 3). The record should be factual. Any opinions included should be clearly identified as such.

Designated Safeguarding Leads:

All discussions should end with clear and explicit recorded agreement about who will be taking what action. Where no further action is the outcome the reason for this should be clearly recorded.

Storage of Information:

Designated Safeguarding Leads ensure that records are kept securely in a locked place to which access is restricted – electronic records must be held in a secure format with appropriate security certificates. Records, or any information they contain, are made available only to relevant parties. The transfer of information - verbally, through the mail, electronically, etc - should be done in such a way that confidentiality is maintained. Child protection concerns must not be passed between staff by normal email unless appropriately anonymised.

Records pertaining to issues of child protection may be accessible to third parties such as Children's Services, Police, the Courts and Solicitors. These records are held centrally by I CAN's Designated HR Officer (as designated by the Director of Corporate Services).

4.7. Confidentiality

All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and that the Data Protection Act 1998 and General Data Protection Regulations (GDPR) are not a barrier to sharing information where a failure to do so would place a child at risk of harm. There is a lawful basis for child protection concerns to be shared with agencies who have a statutory duty for child protection.

All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing. However, staff are aware that matters relating to child protection and safeguarding are personal to children and families, in this respect they are confidential and the Safeguarding Lead will only disclose information about a child to other members of staff on a need to know basis.

The child or member of staff may ask for their disclosure to be kept confidential. The recipient should make it clear that they have a duty to protect them and will need to pass the information on to others. The member of staff should reassure those concerned that only those who need to know will be given any

information. Explanations of the reasons; the processes; the likely sequence of events; who to contact for information or for support should also be provided, appropriate to the child's level of understanding.

4.8. After an Allegation

After a serious allegation or suspicion about a child protection concern has been investigated, there may be strong feelings among staff, clients, parents and possibly among the wider community, which will need to be addressed.

There are likely to be issues of:

- Communication – rumour or fact
- Guilt and blame – if suspicions have been around for some time
- Impact – on individuals, of the nature of what occurred and to whom

The relevant I CAN senior staff will give careful thought to the provision of appropriate support.

5. Additional Policies

5.1. Working with Partners

Where I CAN is working in a significant partnership with another organisation, in whatever capacity, it must be determined beforehand which organisation and member of staff will be responsible for leading on child protection issues and who staff should report any concerns to.

I CAN will cooperate closely with Ofsted's inspection of safeguarding to ensure the child's needs are paramount. Staff should adhere to I CAN's principles when working with partners but will also familiarise themselves with and adhere to the partner's Safeguarding Policies.

Adequate and legal Safeguarding Policies are a minimum requirement for organisations who wish to work in partnership with I CAN.

5.2. Personal Relationships

Staff should avoid developing personal relationships with the children and young people they are assigned to work with. This includes accepting or requesting young people, known in the context of I CAN employment, as friends on the social networking pages of staff members is a disciplinary matter.

Inviting or accepting invitations from children or young people known through work is not permitted except with explicit agreement from their line manager.

5.3. Media and Publications

Permission from parents and carers must be sought before any still or video footage of their children is captured for any purpose. Specific permission must be sought, in writing, to use images for publicity or fundraising purposes.

Where services are using picture/video images for record-keeping, these are done with parental agreement and within the requirements of the Data Protection Act³.

In either case, staff are urged to bear in mind the appropriate use of any images to ensure that they preserve the dignity and safety of the children or young people involved. Where this is in doubt, advice should be sought from I CAN's Designated Safeguarding Lead.

Images must not be captured on employees' own devices – only use cameras, digital recorders, mobile phones etc provided by the school or I CAN.

³ Data Protection Act 2018

5.4. Online Safety and Websites

The Internet and I CAN Staff Members:

I CAN staff authorised to use the Internet must not download unsuitable material on to I CAN machines, distribute such material to others, or place such material on to the Internet.

Unsuitable material in this context refers to that which

- contains sexually explicit images or related material
- advocates illegal activities
- advocates intolerance for others

Where this is done inadvertently, the user must escape from the website and/or delete the material immediately and report it to their line manager, IT manager and / or the Designated Safeguarding Lead. Breach of this will be treated as gross misconduct.

Where exemption is required, because of the nature of the work of the member of staff, permission must be given jointly, in advance by the line manager and the Director of Corporate Services and the Designated Safeguarding Lead.

The Internet and children and young people:

Any service or project in which children have access to the internet must have an appropriate internet policy shared with the children and young people.

Emails and text messages:

Staff are prohibited from using email to engage in activities or transmit content that is harassing, discriminatory, menacing, threatening, obscene, defamatory, or in any way objectionable or offensive.

5.5. The Prevent Duty

The Prevent duty is the duty in the Counter-Terrorism and Security Act to have due regard to the need to prevent people from being drawn into terrorism. Young people may be particularly vulnerable to being groomed or radicalised, either face-to-face or online.

I CAN schools are expected to assess the risk of children being drawn into terrorism, including support of extremist ideas that are part of terrorist ideology. Where a member of staff identifies a child who is at risk of radicalisation this must be reported to the Designated Safeguarding Lead. It is important that staff members are mindful of the risks to children and young people with SLCN because they may not fully understand or be able to respond appropriately to those who might attempt to draw them into radicalisation. Siblings of children with disabilities might also be at increased risk because they may have had to act as young carers within their family context.

Radicalisation, Extremism and Terrorism

[The Prevent Duty for England and Wales \(2015\)](#) under section 26 of the Counter-Terrorism and Security Act 2015 places a duty on education and other children's services to have due regard to the need to prevent people from being drawn into terrorism.

Extremism is defined as 'as 'vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs'. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious violence to a person/people; causes serious damage to property; or seriously interferes with an electronic system. The use or threat **must** be designed to influence the government or to intimidate the public and

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is made for the purpose of advancing a political, religious or ideological cause.

Some children are at risk of being radicalised; adopting beliefs and engaging in activities which are harmful, criminal or dangerous. This can happen both online and offline.

I CAN is clear that exploitation of vulnerable children and radicalisation should be viewed as a safeguarding concern and follows the Department for Education guidance for schools and childcare providers on preventing children and young people from being drawn into terrorism.

I CAN seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right / Neo Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

When any member of staff has concerns that a pupil may be at risk of radicalisation or involvement in terrorism, they should speak with the Safeguarding Lead in the first instance.

5.6. Contextual Safeguarding

Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. Schools are an important context in which young people spend time, socialise and make friends.

I CAN schools are expected to assess the risk of children experiencing significant harm in extra-familial settings, including the school setting. Where a member of staff identifies a child who is at risk of or is experiencing significant harm this must be reported to the Designated Safeguarding Lead. As with the Prevent Duty staff members should be particularly mindful of the increased risk to children and young people with SLCN (Speech, Language and Communication Needs).

5.7 Children missing from education

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

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

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

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

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

Child criminal exploitation

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

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

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

Indicators of CCE can include a child:

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

If a member of staff suspects CCE, they will discuss this with the Safeguarding Lead. The Safeguarding Lead will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

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

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

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

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

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

If a member of staff suspects CSE, they will discuss this with the Safeguarding Lead. The Safeguarding Lead will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Domestic abuse

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

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

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

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

Homelessness

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

The Safeguarding Lead will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

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

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

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

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

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

FGM

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

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

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

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

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

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- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
 - Having a mother, older sibling or cousin who has undergone FGM
 - Having limited level of integration within UK society
 - Confiding to a professional that she is to have a “special procedure” or to attend a special occasion to “become a woman”
 - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
 - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
 - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
 - Being unexpectedly absent from school
 - Having sections missing from her ‘red book’ (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

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

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

The Safeguarding Lead will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority’s designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fm@fco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

Preventing radicalisation

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

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy

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- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

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

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the SAFEGUARDING LEAD.

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

Peer-on-peer abuse

Peer-on-peer abuse is when children abuse other children. This type of abuse can take place inside and outside of school and online.

Peer-on-peer abuse is most likely to include, but may not be limited to:

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

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about peer-on-peer abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex

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

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

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

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

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

Staff should be aware of the importance of:

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

Serious violence

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

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

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

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

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

6. Monitoring of Child Protection Procedures

6.1. Disclosure & Barring Service disclosures

- The Human Resources Department will determine the appropriate level of DBS disclosure for all posts recruited to.
- The Human Resources Department will keep a log of all DBS disclosures undertaken for staff, volunteers, Governors and Trustees and will issue reminders to staff and line managers if it is appropriate to do so.

All staff who have direct contact with children are subject to DBS checks and references are taken to verify their suitability. Staff in regulated activity are also subject to checks of the barred list. Staff in certain

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professions are checked against their own regulatory body (e.g. teachers – NCTL prohibited list, medical staff – HCPC registration, etc)

6.2. Induction and ongoing training

- The Human Resources Department and School Business Managers will monitor provision of induction and ongoing training appropriate to the role and address any lapses through reports to the line manager.

6.3. Implementation of Procedures

- The Safeguarding Lead will monitor the types and origins of referrals
- The Safeguarding Lead will ensure all discussions, incidents, decisions and actions are recorded.
- The Designated Director will audit the operation of the policy and report this to the Trustees
- The School Governors will have oversight of the safeguarding measures in schools
- The Designated Trustee will have oversight of all safeguarding measures within I CAN.

This policy will be reviewed every year or when there are significant changes in the organisation or relevant legislation.

Last updated: February 2022 - To be reviewed annually

Appendix 1: Definitions and Concepts in Child Protection –

I CAN recognises that children and young people live in many different familial, cultural and economic circumstances which do not in themselves indicate abuse. It interprets abuse in four main categories.

WHAT IS ABUSE AND NEGLECT?

Abuse and neglect are forms 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 a stranger. They may be abused by an adult or adults, or another child or children.

Physical abuse

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

Emotional abuse

The persistent emotional maltreatment of a child such as to cause severe and persistent 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 participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another.

It may involve serious bullying (including cyber bullying), 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 in isolation.

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 (including online).

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

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 as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

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

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

The [Neglect Risk Assessment Tool](#) is available to provide a more detailed information regarding the assessment of neglect.

INDICATORS OF ABUSE

Neglect

The nature of neglect

Neglect is a lack of parental care but poverty and lack of information or adequate services can be contributory factors.

Far more children are registered to the category of neglect on Child in Need and Child Protection plans than to the other categories. As with abuse, the number of children experiencing neglect is likely to be much higher than the numbers on the plans.

Neglect can include parents or carers failing to:

- provide adequate food, clothing and shelter
- protect a child from physical and emotional harm or danger
- ensure adequate supervision or stimulation
- ensure access to appropriate medical care or treatment

NSPCC research has highlighted the following examples of the neglect of children under 12 years old:

- frequently going hungry
 - frequently having to go to school in dirty clothes
 - regularly having to look after themselves because of parents being away or having problems such as drug or alcohol misuse
 - being abandoned or deserted
 - living at home in dangerous physical conditions
 - not being taken to the doctor when ill
 - not receiving dental care.

Neglect is a difficult form of abuse to recognise and is often seen as less serious than other categories. It is, however, very damaging: children who are neglected often develop more slowly than others and may find it hard to make friends and fit in with their peer group.

Neglect is often noticed at a stage when it does not pose a risk to the child. The duty to safeguard and promote the welfare of children (*What to do if You're Worried a Child is Being Abused* DfE 2015) would suggest that an appropriate intervention or conversation at this early stage can address the issue and prevent a child continuing to suffer until it reaches a point when they are at risk of harm or in significant need.

Neglect is often linked to other forms of abuse, so any concerns school staff should be discussed with the Safeguarding Lead.

Indicators of neglect

The following is a summary of some of the indicators that may suggest a child is being abused or is at risk of harm.

It is important to recognise that indicators alone cannot confirm whether a child is being abused. Each child should be seen in the context of their family and wider community and a proper assessment carried out by appropriate persons. What is important to keep in mind is that if you feel unsure or concerned, do something about it. Don't keep it to yourself. The [Neglect Risk Assessment Tool](#) provides staff with a resource to identify and act on concerns regarding neglect.

Physical indicators of neglect

- Constant hunger and stealing food
- Poor personal hygiene - unkempt, dirty or smelly
- Underweight
- Dress unsuitable for weather
- Poor state of clothing
- Illness or injury untreated

Behavioural indicators of neglect

- Constant tiredness
- Frequent absence from school or lateness
- Missing medical appointments
- Isolated among peers
- Frequently unsupervised
- Stealing or scavenging, especially food
- Destructive tendencies

Emotional abuse

The nature of emotional abuse

Most harm is produced in *low warmth, high criticism* homes, not from single incidents. Emotional abuse is difficult to define, identify/recognise and/or prove.

Emotional abuse is chronic and cumulative and has a long-term impact.

All kinds of abuse and neglect have emotional effects although emotional abuse can occur by itself. Children can be harmed by witnessing someone harming another person – as in domestic abuse.

It is sometimes possible to spot emotionally abusive behaviour from parents and carers to their children, by the way that the adults are speaking to, or behaving towards children. An appropriate challenge or intervention could affect positive change and prevent more intensive work being carried out later on.

Indicators of emotional abuse

Developmental issues

I CAN Child Protection and Safeguarding Policy

- Delays in physical, mental and emotional development
- Poor school performance
- Speech disorders, particularly sudden disorders or changes.

Behaviour

- Acceptance of punishment which appears excessive
- Over-reaction to mistakes
- Continual self-deprecation (I'm stupid, ugly, worthless etc)
- Neurotic behaviour (such as rocking, hair-twisting, thumb-sucking)
- Self-mutilation
- Suicide attempts
- Drug/solvent abuse
- Running away
- Compulsive stealing, scavenging
- Acting out
- Poor trust in significant adults
- Regressive behaviour – e.g., wetting
- Eating disorders
- Destructive tendencies
- Arriving early at school, leaving late

Social issues

- Withdrawal from physical contact
- Withdrawal from social interaction
- Over-compliant behaviour
- Insecure, clinging behaviour
- Poor social relationships

Emotional responses

- Extreme fear of new situations
- Inappropriate emotional responses to painful situations (“I deserve this”)
- Fear of parents being contacted
- Self-disgust
- Low self-esteem
- Unusually fearful with adults
- Lack of concentration, restlessness, aimlessness
- Extremes of passivity or aggression

Physical abuse

The nature of physical abuse

Most children collect cuts and bruises quite routinely as part of the rough and tumble of daily life. Clearly, it is not necessary to be concerned about most of these minor injuries. But accidental injuries normally occur on the *bony prominences* – e.g. knees, shins.

Injuries on the *soft* areas of the body are more likely to be inflicted intentionally and should therefore make us more alert to other concerning factors that may be present.

A body map can assist in the clear recording and reporting of physical abuse. The body map should only be used to record observed injuries and no child should be asked to remove clothing by a member of staff of the school.

Indicators of physical abuse / factors that should increase concern

- Multiple bruising or bruises and scratches (especially on the head and face)
- Clusters of bruises – e.g., fingertip bruising (caused by being grasped)
- Bruises around the neck and behind the ears – the most common abusive injuries are to the head
- Bruises on the back, chest, buttocks, or on the inside of the thighs
- Marks indicating injury by an instrument – e.g., linear bruising (stick), parallel bruising (belt), marks of a buckle
- Bite marks
- Deliberate burning may also be indicated by the pattern of an instrument or object – e.g., electric fire, cooker, cigarette
- Scalds with upward splash marks or *tide marks*
- Untreated injuries
- Recurrent injuries or burns
- Bald patches.

In the context of the school, it is normal to ask about a noticeable injury. The response to such an enquiry is generally light-hearted and detailed. So, most of all, concern should be increased when:

- the explanation given does not match the injury
- the explanation uses words or phrases that do not match the vocabulary of the child (adults words)
- no explanation is forthcoming
- the child (or the parent/carer) is secretive or evasive
- the injury is accompanied by allegations of abuse or assault You should be concerned if a child:
 - is reluctant to have parents/carers contacted
 - runs away or shows fear of going home
 - is aggressive towards themselves or others
 - flinches when approached or touched
 - is reluctant to undress to change clothing for sport
 - wears long sleeves during hot weather
 - is unnaturally compliant in the presence of parents/carers.
 - has a fear of medical help or attention
 - admits to a punishment that appears excessive.

SEXUAL ABUSE

The nature of Sexual Abuse

Sexual abuse is often perpetrated by people who are known and trusted by the child – e.g., relatives, family friends, neighbours, babysitters, and people working with the child in school, faith settings, clubs or activities. Children can also be subject to child sexual exploitation.

Sexual exploitation is seen as a separate category of sexual abuse.

Characteristics of child sexual abuse:

- it is often planned and systematic – people do not sexually abuse children by accident, though sexual abuse can be opportunistic
- grooming the child – people who abuse children take care to choose a vulnerable child and often spend time making them dependent (this may occur online)

- grooming the child's environment – abusers try to ensure that potential adult protectors (parents and other carers especially) are not suspicious of their motives.

Most people who sexually abuse children are men, but some women sexually abuse too.

Indicators of sexual abuse

Physical observations:

- Damage to genitalia, anus or mouth
- Sexually transmitted diseases
- Unexpected pregnancy, especially in very young girls
- Soreness in genital area, anus or mouth and other medical problems such as chronic itching
- Unexplained recurrent urinary tract infections and discharges or abdominal pain

Behavioural observations:

- Sexual knowledge inappropriate for age
- Sexualised behaviour or affection inappropriate for age
- Sexually inappropriate behaviour
- Hinting at sexual activity
- Inexplicable decline in education progress
- Depression or other sudden apparent changes in personality as becoming insecure
- Lack of concentration, restlessness, aimlessness
- Socially isolated or withdrawn
- Overly-compliant behaviour
- Acting out, aggressive behaviour
- Poor trust or fear concerning significant adults
- Regressive behaviour,
- Onset of wetting, by day or night; nightmares
- Arriving early at school, leaving late, running away from home
- Suicide attempts, self-mutilation,
- Suddenly drawing sexually explicit pictures
- Eating disorders or sudden loss of appetite or compulsive eating
- Regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys
- Become worried about clothing being removed
- Trying to be 'ultra-good' or perfect; overreacting to criticism.

Appendix 2: Designated Persons and I CAN contact details

Role	Name	Position	Telephone Number
Designated Safeguarding Lead: I CAN Meath Centre	Sian Vaux	Safeguarding and Pastoral Lead	01932 872 302
Designated Safeguarding Lead: I CAN Dawn House Centre	Jenny McConnell	Principal, Dawn House School	01623 795 361
Designated Safeguarding Lead: Central Office and Home Workers <i>(Overall Responsibility for Safeguarding at I CAN)</i>	Tom Pegler	Director of Education	07791505995
Designated HR Personnel	Steve Williams	Director of Corporate Services	020 78432516
Chief Executive	Jane Harris	Chief Executive	020 7843 2511
Designated Trustee	John Willis	Trustee	Contact Charlotte Clososki: 0207 843 2512

Appendix 3

Date:	Time:	Location of disclosure:
Name(s):	D.O.B:	
Staff Member:		
<p>Disclosure (<i>Inform the pupil that you will have to share this information with someone</i>) WHO, WHAT, WHEN, WHERE WHY (T.E.D. Tell, Explain Describe)</p>		
<p style="text-align: right;"><i>PTO.(Use extra sheets if necessary)</i></p>		
Information shared with:	At what time:	