

Child Protection and Safeguarding Policy



Approved by: Mirlinda Boshnjaku

Date: January 8th, 2024

Last reviewed on: January 8th, 2024

Next review due by: August 2024

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Important contacts

ROLE/ORGANISATION NAME CONTACT DETAILS
Head of School / Mirlinda Boshnjaku mirlinda.boshnjaku@wat.a
Designated Safeguarding Lead (DSL) / Fjorda Shijaku, fjorda.shijaku@montessori.al
Deputy DSL / Genta Kokonaj. info@montessori.al
Regional Head of Schools (RHoS) Karl Wilkinson karl@orbital.education
Chief Executive Officer (CEO) David Pottinger david@orbital.education

1. Aims

The school aims to ensure that:

- appropriate action is taken in a timely manner to safeguard and promote children's welfare;
- all staff are aware of their statutory responsibilities with respect to safeguarding;
- staff are trained in recognising and reporting safeguarding issues.

2. Legislation and statutory guidance

This policy is based on the UK Department for Education's (DfE's) statutory guidance [Keeping Children Safe in Education \(2023\)](#) and [Working Together to Safeguard Children \(2018\)](#), and the [Governance Handbook](#). It also complies with:

- [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR).
- [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our board members and Principal should carefully consider how they are supporting their students with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting students (where we can show it is proportionate). This includes making reasonable adjustments for disabled students. For example, it could include taking positive action to support girls where there's evidence that they are being disproportionately subjected to sexual violence or harassment.
- [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve student outcomes. Some students may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination.

At all times, it will also adhere to Albanian and international requirements/regulations.

This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#).

3. Definitions

Safeguarding and promoting the welfare of children means:

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

Child Protection is part of this definition, and refers to activities undertaken to prevent

children suffering, or being likely to suffer, significant harm.

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

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

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

Children include everyone 18 years of age or younger. However, at WAT this policy is extended to all students, regardless of age.

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

4. Equality statement

Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- have special educational needs and/or disabilities (SEND) or health conditions (see Section 10);
- have English as an additional language;
- may experience discrimination due to their race, ethnicity, religion, gender identification or sexuality;
- are at risk due to either their own or a family member's mental health needs;
- are young carers;
- are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence;
- are at risk of FGM, sexual exploitation

5. Roles and responsibilities

Safeguarding and Child Protection is **everyone's** responsibilities. This policy applies to all staff, volunteers, and board members in the school and is consistent with the procedures of the three safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing students for 'model society and global citizenship' and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by our:

- Behaviour Policy;
- pastoral support system;
- planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
 - healthy and respectful relationships;
 - boundaries and consent;
 - stereotyping, prejudice and equality;
 - body confidence and self-esteem;
 - how to recognise an abusive relationship (including coercive and controlling behaviour);
 - the concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence and FGM and how to access support;
 - what constitutes sexual harassment and sexual violence, and why they are always unacceptable.

5.1 All staff

Staff who work directly with children are expected to read at least Part 1 and Annex B (about specific safeguarding issues) of [Keeping Children Safe in Education](#) (KCSIE).

All other staff are expected to read Annex A of KCSIE.

All staff will:

- review the KCSIE guidance at least annually;
- sign a declaration at the beginning of each academic year to say that they have reviewed the guidance;
- reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g., sites they need to visit or who they will be interacting with online).

All staff will be aware of:

- our systems which support safeguarding, including this Child Protection and Safeguarding Policy, the Staff Handbook and Staff Code of Conduct, the role

and identity of the Designated Safeguarding Lead (DSL), Deputy DSL and policies as may relate to safeguarding;

- the assessment framework and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment;
- the process for making referrals to local children's social care and for assessments that may follow a referral, including the role they might be expected to play;
- what to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals;
- the signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM and serious violence;
- the importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe;
- the fact that children can be at risk of harm inside and outside of their home, at school and online;
- what to look for to identify children who need help or protection. Section 15

of this policy outlines in more detail how staff are supported to do this.

5.2 Designated Safeguarding Lead (DSL)

The DSL is a member of the senior leadership team. **Our DSL is Fjorda Shikjau (Director of IMSA)**. The DSL takes lead responsibility for child protection and wider safeguarding in the school.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns, and can be contacted during or, if necessary, outside of school hours by e-mail to fjorda.shijaku@montessori.al.

When the DSL is absent, the **Deputy DSL, Genta Kokonaj (Communication and Admission officer)** will act as cover.

If the DSL and Deputy are not available, the **Head of School, Mirlinda Boshnjaku** will act as cover (for example, during out-of-hours/out-of-term activities).

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

- provide advice and support to other staff on child welfare and child protection matters;
- take part in strategy discussions and inter-agency meetings and/or support other staff to do so;
- contribute to the assessment of children;
- refer suspected cases, as appropriate, to the Regional Head of Schools

(RHoS)/CEO and, if necessary, to the relevant local bodies (local authority children's social care, and/or police) and support staff who make such referrals directly;

- have a good understanding of harmful sexual behaviour;
- have a good understanding of the filtering and monitoring systems and processes in place at our school.

The DSL will also:

- keep the Head of School informed of any issues;
- liaise with the RHoS, local authority case managers and designated officers for child protection concerns as appropriate;
- be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment and be confident as to how to access this support;
- be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search.

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

Please note - in this and subsequent sections, you should take any references to the DSL to mean "the DSL or Deputy DSL."

5.3 School Board

The School Board will:

- facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development;
- evaluate and approve this policy at each review, ensuring it complies with the law, and hold the Head of School to account for its implementation;
- be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local safeguarding arrangements with other agencies;
- appoint a senior Board-level (or equivalent) lead to, with the RHoS, monitor the effectiveness of this policy in conjunction with the full School Board. This is always a different person from the DSL.

All Board members will be aware of the key aspects and responsibilities referenced in KCSIE.

Section 15 of this policy has information on how Board members are supported to fulfill their role.

5.4 Regional Head of Schools will:

The RHoS will:

- on behalf of the School Board, ensure all staff undergo Safeguarding and Child Protection training, including online safety, and that such training is regularly updated and is in line with advice from safeguarding partners;
- ensure that the school has appropriate filtering and monitoring systems in place and review their effectiveness. This includes:
 - making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training;
 -
- make sure:
 - the DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support;
 - the school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 2 of this policy covers this procedure;
 - that this policy reflects that children with SEND or certain medical/physical health conditions can face additional barriers to any abuse or neglect being recognised;
- where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
 - seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed;
 - make sure there are arrangements for the body to consult with the school about safeguarding arrangements, where appropriate;
 - make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply.

The RHoS/CEO will function as the 'case manager' in the event that an allegation of abuse is made against the Head of School, where appropriate (see Appendix 2).

5.5 The Head of School

The Head of School is responsible for the implementation of this policy, including:

- ensuring that staff (including temporary staff) and volunteers:
 - are informed of school systems which support safeguarding, including this policy, as part of their induction;
 - understand and follow the procedures included in this policy, particularly

- those concerning referrals of cases of suspected abuse and neglect;
- communicating this policy to parents/carers when their child joins the school and via the school website;
- ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent;
- ensuring the relevant staffing ratios are met, where applicable;
- making sure each child in the Early Years is assigned a key person;
- acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see Appendix 2);
- making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL and RHoS on this.

6. Confidentiality

IMSA's approach to confidentiality and data protection with respect to safeguarding children is described in the school's Staff Handbook.

You should note that:

- timely information sharing is essential to effective safeguarding;
- fears about sharing information must not be allowed to stand in the way of safeguarding children - the Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe and we will operate in a consistent manner to these legislations;
- if staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if:
 - it is not possible to gain consent.
 - it cannot be reasonably expected that a practitioner gains consent;
 - or if to gain consent would place a child at risk;
- staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests;
- if a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
 - there is no definitive answer, because even if a victim does not consent to sharing information, staff may still lawfully share it if there is another legal basis under the GDPR and National Data Protection Laws that applies;
 - the DSL will have to balance the victim's wishes against their duty to protect the victim and other children;
 - the DSL should consider that:

- parents or carers should normally be informed (unless this would put the victim at greater risk);
 - the basic safeguarding principle is if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to the relevant authority;
 - rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 14, if the alleged perpetrator is under 14, the starting principle of referring to the police remains.
- regarding anonymity, all staff will:
 - be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system;
 - do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report and any support for children involved;
 - the UK government’s [information sharing advice for safeguarding practitioners](#) includes 7 ‘golden rules’ for sharing information and will support staff who have to make decisions about sharing information;
 - if staff are in any doubt about sharing information, they should speak to the DSL (or deputy).

Confidentiality is also addressed in this policy with respect to record-keeping in Section 14 and allegations of abuse against staff in Appendix 2.

7. Recognising abuse and taking action

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

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

Whilst social care is not well-established or funded in Albania, the instruction from the Ministries of the Interior and Education is to make a referral to the police immediately if you believe a child is suffering or likely to suffer from harm or is in immediate danger. Anyone can make a referral.

The general contact number to make such a referral is 129, and the Chief of the Criminal Department police (Mr. Behar Mema, 069 41 02 650) has direct responsibility for concerns relating to the school.

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

7.2 If a child makes a disclosure to you.

If a child discloses a safeguarding issue to you, you should:

- listen to and believe them. Allow them time to talk freely and do not ask leading questions;
- stay calm and do not show that you are shocked or upset;
- tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner;
- explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret;
- write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it;
- sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.

Bear in mind that some children may:

- not feel ready or know how to tell someone that they are being abused, exploited or neglected;
- not recognise their experiences as harmful;
- feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers.

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

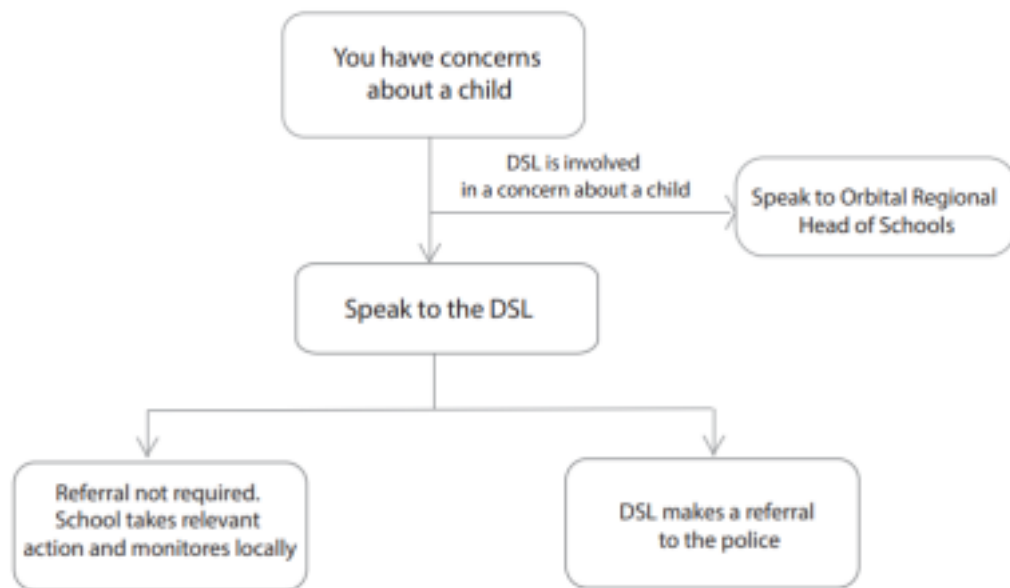
7.3 If you have concerns about a child.

(as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

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

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

Figure 1, below, illustrates the procedure to follow if you have any concerns about a child's welfare *(as opposed to believing a child is suffering or likely to suffer from harm or is in immediate danger)*:



If the DSL is unavailable, this should not delay action. Follow the steps throughout Section 7 for what to do.

7.3.i Assessment framework

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

We will discuss and agree with safeguarding partners/other agencies, levels for the different types of assessment, as part of local arrangements.

The DSL will keep the case under constant review and the school will consider a referral to Social Services or the police if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

7.3.ii Referral

If it is appropriate to refer the case to the police or Social Services, the Head of School, or the DSL after consultation with the Head of School and RHoS, will make the referral.

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

7.4 Concerns about a staff member, supply teacher, volunteer or contractor.

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the Head of School as soon as possible. If the concerns/allegations are about the Head of School, speak to the RHoS.

The Head of School/RHoS will then follow the procedures set out in Appendix 2, if appropriate.

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

If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow our school safeguarding policies and procedures, informing the DSL (as you would with any safeguarding allegation) and the Head of School.

7.5.i Initial review meeting

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

- if it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed);
- whether there is an immediate risk to students;
- whether to refer to the RHoS;
- if a referral needs to be made to the police;
- what further information is required to decide on the best response;
- whether immediate action should be taken to delete or remove images or videos from devices or online services;
- any relevant facts about the students involved which would influence risk assessment;
- if there is a need to contact another school, setting or individual;
- whether to contact the parents or carers of the students involved (in most cases parents/carers should be involved).

The DSL will make an immediate referral to the police if:

- the incident involves an adult;

- the DSL has reason to believe a student is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming).

If none of the above apply, then the DSL (in consultation with the Head of School, RHoS and other members of staff as appropriate) may decide to respond to the incident without involving the police. The decision will be made and recorded in line with the procedures set out in this policy.

7.5.ii Further review by the DSL

If, at the initial review stage, a decision has been made not to refer to the police, the DSL will conduct a further review to establish the facts and assess the risks.

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

If at any point in the process there is a concern that a student has been harmed or is at risk of harm, a referral will be made to the police immediately.

7.6.i Informing parents/carers

The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the student at risk of harm.

7.6.ii Referring to the police

If it is necessary to refer an incident to the police, this will be done through the Head of School in consultation with the RHoS.

7.6.iii Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording these incidents.

7.7 If you discover that FGM has taken place or a student is at risk of FGM.

Whilst relatively unusual in Albania, Female Genital Mutilation (FGM) comprises “all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs.”

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

Any member of staff who:

- is informed by a girl under 18 that an act of FGM has been conducted on her;
- observes physical signs which appear to show that an act of FGM has been conducted on a girl under 18 and they have no reason to believe that the act was necessary for the girl’s physical or mental health or for purposes connected with labour or birth;
- suspects a student is *at risk* of FGM or discovers that a student aged 18 or over

appears to have been a victim of FGM, must immediately report this to the DSL, who will discuss the case with the police and involve Social Services as appropriate.

Staff should not examine students.

7.8 If you have concerns about extremism.

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

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

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

7.9 If you have a concern about mental health.

Mental health problems can, in some cases, be an indicator that a child has suffered (or is at risk of suffering) abuse, neglect or exploitation.

Staff will be alert to behavioral signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in Section 7.3.

If you have a mental health concern that is **not** also a safeguarding concern, notify the SENCO of a potential issue.

- SENCO will arrange for a classroom observation to observe the student;
- if necessary, SENCO will facilitate a parent meeting to propose strategies for supporting the student. SENCO may recommend for the family to consult with an external specialist;
- if behaviour indicates a mental health situation that could pose an immediate threat to the student or community members, the DSL should be notified, who may liaise with the appropriate local agency.

Refer to the guidance on [mental health and behaviour in schools](#) for more information.

7.10 Reporting systems.

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

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

To achieve this, we will:

- put systems in place for students to confidently report abuse;
- ensure our reporting systems are well promoted, easily understood and easily accessible for students;

- make it clear to students that their concerns will be taken seriously, and that they can safely express their views and give feedback.

A comprehensive point of contact (POC) list is available as part of the Community Handbook. Included in this POC list is the student POC for Child Safeguarding and Protection. Students are made aware of the reporting system and school resources through the school's pastoral program.

8. Notifying parents or carers.

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

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

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the police before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- meet with the victim's parents or carers, with the victim, to discuss what is being put in place to safeguard them and understand their wishes in terms of what support they may need and how the report will be progressed;
- meet with the alleged perpetrator's parents or carers to discuss support for them, what is being put in place that will impact them (e.g. moving them out of classes with the victim), and the reasons behind any decisions.

9. Students with special educational needs, disabilities or health issues.

We recognise that students with SEND or certain health conditions can face additional safeguarding challenges, and are three times more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group, including:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
- students being more prone to peer group isolation or bullying (including prejudice-based bullying) than other students;
- the potential for students with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs;
- communication barriers and difficulties in managing or reporting these challenges.

We offer additional pastoral support for these students. This includes:

- individual consultation sessions with members of the SEND team. Sessions are

during regular school hours with parent consent. *Note: WAT SEND staff do not provide therapy or any type of diagnosis;*

- creation of Individual Education Plans to overcome barriers to academic achievement;
- general classroom observations in support of teachers who teach classes where students with SEND may be at risk;
- group sessions with classes that contain SEND students who may be at risk. These sessions, as needed, will focus on bullying, gender/sexuality issues, etc.

Any abuse involving students with SEND will require close liaison between the DSL and SENCO.

10. Looked-after and previously looked-after children

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children safe, including those who have previously been looked-after. In particular, we will ensure that:

- appropriate staff have relevant information about children's looked-after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements;
- the DSL has details of children's social workers.

We have appointed an appropriately trained staff member, Xhensila Xhelil, School's psychologist, to take the lead on promoting the educational achievement of looked-after and previously looked-after children. She will work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to.

11. Complaints and concerns about school safeguarding policies

11.1 Complaints against staff

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

11.2 Whistleblowing

Concerns regarding the way the school safeguards students – including poor or unsafe practice, or potential failures – should be raised under our Whistleblowing Policy.

At IMSA, we want to encourage the reporting of legitimate concerns that affect the health, safety, and wellbeing of our community members. Wherever possible, the identity and privacy of these raising concerns will be protected. Individuals who raise legitimate claims will not be targeted for harassment, disciplinary action, or have their job performance negatively affected.

12. Record-keeping

We strive to maintain the maximum possible privacy protection whilst still providing staff the information they need to fulfil their duties. Non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

All safeguarding records are kept securely by the DSL. Concerns and referrals will be kept in a separate child protection file for each child. These will include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome.

Safeguarding records, including incident reports and other documentation, will be stored electronically on drives that are only accessible by the DSL. Written documents will be scanned and uploaded, and the originals destroyed.

All computers with access to safeguarding information will be password protected.

Safeguarding records relating to individual children will be retained for a minimum of 5 years after a child has left the school, in line with our records retention schedule.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will consult with the Head of School and RHoS before forwarding a copy of their child protection file securely, and separately from the main student file. If the concerns are significant or complex, and/or other agencies are involved, the DSL should endeavour to speak to the DSL of the receiving school to provide information to enable them to make any necessary preparations to ensure the safety of the child.

Safeguarding records will be shared with the police upon the presentation of a valid warrant. When a valid warrant has not been provided, the Head of School and RHoS will assess the request and make a determination of whether or not to release the information.

13. Training

13.1 All staff

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

This training will be regularly updated, and will:

- be integrated, aligned and considered as part of the whole-school and Orbital group safeguarding approach, wider staff training and curriculum planning;
- include online safety (including an understanding of the expectations, roles

and responsibilities for staff around filtering and monitoring);

- have regard to the Orbital Teacher Standards to support the expectation that all teachers:
 - manage behaviour effectively to ensure a good and safe environment;
 - have a clear understanding of the needs of all students.

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

Contractors will also receive safeguarding training.

Volunteers will receive appropriate safeguarding training if applicable.

13.2 The DSL and Deputy DSL

The DSL and DDSL will undertake high-level child protection and safeguarding training at least every two years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (e.g. through e-bulletins, webinars, meeting other DSLs, or taking time to read and digest safeguarding developments).

13.3 Board members

All Board members receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

- have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge;
- can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding.

The RHoS and CEO undertake high-level child protection and safeguarding training at least every two years. As they may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Head of School, they receive training in managing allegations for this purpose.

13.4. Recruitment – interview panels

All staff involved in conducting interviews for any post at the school and all HR staff will have undertaken safer recruitment training. This will cover, as a minimum, the contents of KCSIE and the school's safeguarding procedures.

13.5. Staff who have contact with students and families.

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

14. Monitoring arrangements

This policy will be reviewed **annually** by the Head of School and RHoS. At every review, it will be approved by the full Board.

15. Links with other policies

This policy links to the following policies and procedures:

- Employee Handbook
- Parent Handbook
- Emergency Response Plan (first aid)
- Curriculum (Academic Integrity, Assessment, Language, Inclusion, and Admissions)

Appendices

Appendix 1: Types of Abuse

Abuse (including neglect) and safeguarding issues are rarely standalone events that can be covered by just one definition or label. In most cases, multiple issues will overlap.

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

Emotional Abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse may involve:

- conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person;
- not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate;
- age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction;
- seeing or hearing the ill-treatment of another;
- serious bullying, causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

Sexual Abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the

child is aware of what is happening. The activities may involve:

- physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing;
- non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).

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

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in 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 caregivers);
- ensure access to appropriate medical care or treatment.

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

Appendix 2: Managing safeguarding concerns about staff

In the event a staff member witnesses actions, including low-level concerns, that might endanger the health, safety, and welfare of community members:

- the staff member should report the incident to the DSL, who will notify the Head of School. If the staff member believes that local laws have been broken or there is the potential for imminent physical or psychological harm, the police should also be notified;
 - if the report concerns the DSL or the Head of School, the report should be made directly to the RHoS;
 - the school's leadership team will conduct an investigation, and will take prudent measures to prevent reoccurrence while this is ongoing. This may include the suspension of staff or students during the period of the investigation or the re-assignment of teachers or students to other classes if it is believed to be in the best interest of the individuals involved or the community as a whole. If warranted, the police will be contacted and provided with all relevant information;
 - upon completion of the investigation, the school will take appropriate action,

which may include (but is not limited to) re-training, formal warnings, dismissal of staff, or expulsion of students.