



# Safeguarding and Child Protection Policy

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**Approval Period:** Annually\*

\* Unless there are changes in the law or circumstances in which case the policy and/or documents shall be revised accordingly

**Approval Level Required:**

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**Linked Policies:** Recruitment, Selection, and Disclosures Policy  
Data Protection Policy  
Bullying Policy

**Appendices:** Disclosure Form [1]

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## Contents

Purpose:	3
Scope:	3
Policy:	3
1. Definitions	4
2. Legislation and Guidance Underpinning this Policy	6
3. Supreme Education's Aims:	7
3. Supreme Education's Commitment and Success Criteria for this Safeguarding Policy	8
4. Safeguarding Measures	8
5. Responsibilities	10
6. The School Safeguarding and Child Protection Methodology	13
7. Recognising Abuse	18
8. Support for those involved in Child Protection Matters at School	19
9. Procedure to Protect Young People	20
10. Concerns About a Student	21
11. Concerns About a Staff Member	28
<b>Procedure:</b>	32
Appendix 1 – Disclosure Form	33

## Purpose:

Children have the right to be protected from harm. Supreme Education is committed to established clear guidelines that are designed to:

- Keep students safe; and
- Respond effectively, efficiently, and promptly to child protection concerns.

Supreme Education's safeguarding endeavours shall be further supported by good governance, health and safety, financial management, appropriate and adequate Staff supervision and management.

The purpose of this policy is to ensure that Supreme Education exercises its duty of care to safeguard students by setting out the key principles that all Staff members should comply with as well as the framework, roles and responsibilities and procedures for monitoring, and reporting safeguarding concerns by laying out a framework that informs Staff members, and parents/guardians of their own responsibilities in relation to safeguarding.

## Scope:

This policy shall apply to the Head of Centres, all Staff members and volunteers working in the school and will relate to all and any instances and/or safeguarding concerns of a student of Supreme Education.

## Policy:

- Supreme Education shall promote an environment that is safe and commit to ensuring that the school functions in a way that safeguards and promotes the welfare of its students and Staff members.
- All students, regardless of age, gender, ability, culture, race, language, religion or sexual identity, shall have equal rights to protection. All Staff members and volunteers shall have an equal responsibility to act on any disclosure or suspicion that may indicate that a student is at risk.
- Supreme Education shall ensure that students and Staff members who may be involved in child protection issues at school receive appropriate support, as required.
- There are 5 (five) key elements contained within this policy:
  - Ensuring safe recruitment practices, e.g., checking the suitability of Staff members and volunteers to work with students;
  - Developing and implementing procedures to identify and report cases, or suspected cases, of abuse;
  - Equipping students with the skills needed to keep them safe;
  - Establishing a safe environment in which students can learn and develop;
  - Raising awareness of safeguarding and child protection issues;
  - Support a student in accordance with a student's child protection plan, as applicable.

- All Staff shall comply with standard practices and ethical conduct towards students, parents/guardians, and colleagues and shall, furthermore, safeguard the dignity, privacy, and well-being of the students who are under their professional supervision. All Staff members shall respect and obey the law, demonstrate personal and professional integrity, and exemplify honesty. All Staff members will acknowledge and understand that they have accepted a position of trust and that they are responsible for fulfilling their responsibilities towards the students, parents/guardians, and their colleagues.
- Staff members with safeguarding experience may contribute to the writing of this policy and are encouraged to give feedback, make suggestions, etc in relation to the provisions of this policy which may further enhance the school's safeguarding efforts.
- This policy has been written in accordance with locally agreed inter-agency procedures and is available on the school website.

## 1. Definitions

### 1.1 General

- The following definitions have been included for ease of reference and shall apply to the content of this policy, as appropriate and as the content and context dictates:
  - **Safeguarding and promoting the welfare of students:** The process of protecting students from abuse or neglect, preventing the impairment of health or development, ensuring that students grow up in circumstances consistent with the provision of safe and effective care, and undertaking that role so as to enable those students to have optimum life chances and to enter adulthood successfully;
  - **Child Protection:** The processes undertaken to protect students who have been identified as suffering, or being at risk of suffering significant harm;
  - **Staff members:** All those working for or on behalf of Supreme Education, full time or part time, in either a paid or voluntary capacity, including supply Staff;
  - **Abuse:** A form of maltreatment of a child/student, and may involve inflicting harm or failing to act to prevent harm;
  - **Neglect:** A form of abuse identified as the persistent failure to meet a child's/student's basic physical and/or psychological needs, likely to result in the serious impairment of the child's/student's health or development.
  - **Sexting:** (also referred to as youth produced sexual imagery) Students sharing nude or semi-nude images, videos or live streams.

### 1.2 Definitions Relating Specifically to Abuse

- The following definitions have been included for ease of reference and shall apply to the content of this policy, as appropriate and as the content and context dictates:
  - **Abuse:** A form of maltreatment of a young person. A young person may be abused or neglected when someone inflicts harm or fail to act to prevent harm to the young person. Young people may be

abused in a family, or an institutional or community setting, by someone known to them or not. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Young people may be abused by an adult or adults or by another young person/s.

- **Physical abuse:** A form of abuse which may include hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise which causes or may cause physical harm to a young person. Physical harm may also be perpetrated when a parent or guardian fabricates symptoms of, or deliberately induces, illness in a young person.
- **Emotional abuse:** The persistent emotional maltreatment of a young person that may cause or result in severe and adverse effects on the young person's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a young person, although it may occur alone. Emotional abuse may include:
  - o Conveying to a young person that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another;
  - o Not giving the young person opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate;
  - o Age or developmentally inappropriate expectations being imposed on young people, e.g., interactions that are beyond a young person's developmental capability, overprotection and limitation of exploration and learning, or preventing the young person from participating in normal social interaction.
  - o Seeing or hearing the ill-treatment of another;
  - o Serious bullying (including cyberbullying), causing young people frequently to feel frightened or in danger, or the exploitation or corruption of young people.
- **Sexual abuse:** Involves forcing or enticing a young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the young person is aware of what is happening. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse can be perpetrated by either male or female adults, even children and young people. Sexual abuse may include:
  - o Physical contact, including:
    - Assault by penetration, for example rape or oral sex; or
    - Non-penetrative acts, for example masturbation, kissing, rubbing and touching outside of clothing;
    - Non-contact activities, for example young people looking at, or in the production of, sexual images, watching sexual activities, encouraging young people to behave in sexually inappropriate ways, or grooming a young person in preparation for abuse.
- **Child sexual exploitation:** A form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity:
  - o in exchange for something the victim needs or wants, and/or

- o for the financial advantage or increased status of the perpetrator or facilitator.

The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

- **Neglect:** The persistent failure to meet a young person's basic physical and/or psychological needs, which is likely to result in the impairment of the young person's health or development. Neglect may occur at any stage of the young person's life, even during pregnancy, e.g., maternal substance abuse. Neglect may also include a failure to:
  - o Provide adequate food, clothing and/or shelter (including exclusion from home or abandonment);
  - o Protect a young person from physical and emotional harm or danger;
  - o Ensure adequate supervision (including the use of inadequate care-givers);
  - o Ensure access to appropriate medical care or treatment; or
  - o Neglect of, or unresponsiveness to, a young person's basic emotional needs.
- **Physical signs:** These are what define types of abuse, e.g., bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a young person has been inadequately supervised.

Physical signs of abuse may be difficult to identify as young people may hide injuries. It may be difficult to categorise injuries into accidental or deliberate with any degree of certainty, therefore, Staff members of Supreme Education should be aware of additional behavioural indicators of abuse and report any concerns to the Designated Safeguarding Lead for Safeguarding and Child Protection.

## 2. Legislation and Guidance Underpinning this Policy

- ☐ Supreme Education shall endeavour to work within a legislative framework that seeks to safeguard and promote the welfare of all children.
- ☐ Supreme Education's Safeguarding and Child Protection Policy has been developed in accordance with the principles set out in the following source documents:
  - The Children Acts 1989 and 2004;
  - The Education Act 2002;
  - Education and Inspections Act 2006
  - Independent School Standards Regulations 2014 (statutory regulations);
  - [Prevent Duty Guidance for England and Wales \(July 2015\)](#) (statutory guidance);
  - [The Use of Social Media for Online Radicalisation](#) (July 2015) (non-statutory guidance);
  - [What to do if you're worried a child is being abused](#) (March 2015)
  - [Children Missing Education](#) (September 2016) (statutory guidance);
  - [Teaching Online Safety in School](#) (June 2019) (non-statutory guidance);
  - [Sexual Violence and Sexual Harassment between Children in Schools and Colleges](#) (2021) ;

- [Disqualification under the Childcare Act 2006](#) (September 2018) (statutory guidance);
- [Information Sharing – Advice for Safeguarding Practitioners](#) (2018);
- [Keeping Children Safe in Education](#) (September 2023) (statutory guidance)\*;
- [Working Together to Safeguard Children](#) (September 2018) (statutory guidance);
- [Use of Reasonable Force](#) ( Education and Inspections Act 2006
- [Guidance for Safer Working Practice for Adults who work with Children and Young People in Education](#) (May 2019) (non statutory guidance);
- [When to Call the Police](#) (non statutory guidance);
- [Prevent Duty: Departmental Advice for Schools](#) (June 2015) (non statutory guidance).
- \*The changes and implementation of the following:
  - Filtering and monitoring
  - Online searches
  - Clarification on allegations against agencies and individuals
  - Confirmation on DBS documents
  - New standards references

### 3. Supreme Education’s Aims:

#### 2.1 Safeguarding Aims:

- Supreme Education will take all reasonable steps to promote that our students are protected.
- We will aim to safeguard students by:
  - Valuing them, listening to and respecting them;
  - Providing a safe environment for all;
  - Identifying students who are suffering, or likely to suffer significant harm, and reporting concerns swiftly to relevant agencies;
  - Working in partnership with other relevant agencies to support multi-agency safeguarding work, as appropriate and applicable;
  - Responding effectively to any circumstances giving grounds for concern, or where formal complaints or expressions of anxiety are relayed;
  - Providing safeguarding training to all Staff members to promote that they are aware of their responsibilities and are knowledgeable of the types and signs that may raise safeguarding concerns;
  - Recruiting all Staff members safely by ensuring that all the necessary checks are made (refer also to the school’s **Recruitment, Selection, and Disclosures Policy**);
  - Regularly monitoring and evaluating how the policies, procedures, and practices are working to safeguard our students.

#### 2.2 Policy Aims:

- With this policy, Supreme Education shall aim to:
  - Establish a safe environment in which students can learn and develop;

- Provide clear direction to Staff members and other such responsible parties about expected codes of behaviour when dealing with safeguarding and child protection issues;
- Develop awareness in all Staff members, through training and reviews, of the need for child protection, and their responsibilities in identifying abuse;
- Ensure consistent good practice regarding safeguarding activities within the school;
- Demonstrate the school's commitment to safeguarding and child protection;
- Contribute to the school's safeguarding portfolio;
- Equip students with skills aimed at keeping them safe.

### 3. Supreme Education's Commitment and Success Criteria for this Safeguarding Policy

- ☐ Supreme Education is committed to protecting the welfare and safety of all its students and shall continuously work to build a strong, moral ethos where students feel secure and listened to.
- ☐ At Supreme education we believe that safeguarding our students is everyone's responsibility. All Staff members should be aware that safeguarding incidents can happen anywhere and at any time, including outside of the school environment – they must be alert to any possible concerns or signs of a safeguarding concern, including mental and physical health.
- ☐ The students' wellbeing and safety is Supreme Education's highest priority and the school will always take into account what is in the best interest of the student and to take such actions that will enable the students to have the best possible outcomes.
- ☐ The Staff members of Supreme Education are encouraged to know each student as an individual, and promote a safe and secure environment for the students to learn in.
- ☐ At Supreme Education we expect good manners, respect, and fairness in order to give each student the opportunity to develop their full potential and feel positive about themselves as individuals.
- ☐ At Supreme Education, we believe that a strong school ethos emerges when all members of the school community work together in pursuit of a common goal. Supreme Education shall, therefore, welcome and encourage the involvement of parents/guardians and others in the local community.
- ☐ Supreme Education will aim to deal with any and all safeguarding issues as sensitively and effectively as possible.
- ☐ Supreme Education shall have procedures in place to promote that records are maintained accurately and stored securely (refer also to the **Data Protection Policy**).
- ☐ Supreme Education shall follow all local and national procedures relating to the safeguarding of students, as applicable, which may include but shall not necessarily be limited to:
  - [Working Together to Safeguard Children \(2018\)](#);
  - [Keeping Children Safe in Education \(September 2023\)](#);
  - [Prevent Duty Guidance](#) (July 2015) and revised guidance 2019;
  - [Use of Social Media for online radicalisation \(July 2015\)](#);
  - [Sexual Violence and Sexual Harassment between children in schools and colleges 2021](#);
  - [Governance Handbook](#);



- [Teachers Standards](#); and
- [Charity Commission Guidance](#).

#### 4. Safeguarding Measures

- In order to fulfil its safeguarding obligations and promote the wellbeing of all students in a safe and nurturing environment, Supreme Education shall implement a range of safeguarding measures which shall include, but not necessarily be limited to:
  - Highlight to all Staff members the safeguarding procedures contained in the DFE Guidance [Keeping Children Safe in Education September 2023](#) and the most recent version of the [Working Together to Safeguard Children Document](#) (amended Dec 2021)
  - Supreme Education shall have a robust recruitment and selection process in place (refer to the **Recruitment, Selection, and Disclosures Policy**) that shall include provisions for carrying out the required checks on Staff members, as required and set out in Keeping Children Safe in Education (September 2023). The school's policies will aim to ensure that safe recruitment practices are always followed;
  - Supreme Education shall have processes in place to ensure that any staff working with Supreme Education students outside of the school premises, which staff are employed by another organisation, have undergone the required safeguarding checks, as applicable;
  - Ensure that Staff members, volunteers and all other such responsible parties are aware of their duties and responsibilities in recognising the signs of abuse and the procedures for referring any concerns to the school's Designated Person responsible for Safeguarding and Child Protection;
  - All new Staff members and volunteers will undergo initial onboarding training which shall include safeguarding and child protection training. Supreme Education shall maintain a training schedule and log to monitor and manage the school's training requirements.
  - Staff members are strictly forbidden from having a sexual relationship with a student. Staff members shall be made aware that it is an offence for a Staff member over the age of 18 (eighteen) to have a sexual relationship with a student under the age of 18 (eighteen). Staff members are in positions of trust and Staff members should not abuse this, even if the relationship is consensual;
  - Supreme Education shall develop effective links with relevant key agencies and co-operate, as required, with any enquiries from these agencies regarding safeguarding and child protection matters, including attending case conferences;
  - Staff members are required to report any fears or allegations of maltreatment, abuse, neglect, etc. to the school's Designated Safeguarding Lead (as named in this policy). It shall be the responsibility of the Designated Safeguarding Lead to ensure that the policy procedures are subsequently followed;
  - Supreme Education shall have mechanisms in place to ensure that the school maintains adequate and appropriate records of concerns about students, whether the matter shall be referred or not.

- Supreme Education shall have adequate processes in place (refer also to the **Data Protection Policy**) to ensure that safeguarding and child protection records are kept securely, electronically and/or in confidential hardcopy files, which are separate from the students' main files in locked locations. The Designated Safeguarding Lead shall be responsible for ensuring that the safeguarding and child protection files are maintained and stored securely and confidentially.
- All Staff members of Supreme Education are encouraged to raise any concerns they may have around safeguarding and child protection relating to students. Staff members who raise a concern in good faith shall be immune from retribution or disciplinary action for 'whistle blowing' in good faith.

## 5. Responsibilities

- ☒ It is critical that all members of the school community are alert to the signs of abuse and/or neglect and that such members understand the school's procedures in relation to reporting concerns.
- ☒ Due to their day-to-day contact with students in a safe environment, Staff members are:
  - Uniquely placed to observe and detect changes in a student's behavior, including such that may be indicative of abuse; and
  - More likely to be viewed as trusted adults when a student is at risk.
- ☒ The following key personnel have been identified as part of Supreme Education's safeguarding endeavors:
  - **Designated Safeguarding Lead for Safeguarding and Child Protection is:**  
**Name:** Giselle Stubbs  
**Email address:** [safeguarding@supremeeducation.org](mailto:safeguarding@supremeeducation.org), **Tel No.:** 0330 320 2161
  - **The Deputy Designated Safeguarding Leads for Safeguarding and Child Protection are:**  
**Head:** Giselle Stubbs **Contact Details:** 0330 320 2161  
**Deputy Head:** Geoffrey Opoku **Contact Details:** 0330 320 2161

For postal address please contact the school office.

  - **The Safeguarding Team** for Supreme Education shall consist of 3 (three) Staff members. The members of the Safeguarding Team shall be available to Staff members to discuss concerns at any time.
  - **The Safeguarding Partners:**  
Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017) identifies 3 (three) safeguarding partners for Supreme Education. The school, together with the safeguarding partners shall work together to safeguard and promote the welfare of local children and students, including identifying and responding to their needs. The 3 (three) Safeguarding Partners, in addition to Supreme Education shall be:
    - The local authority;
    - A clinical commissioning group for an area within the local authority;
    - The chief officer of police for the local police area.

- ☐ The Designated Safeguarding Lead's contact details shall be available to Staff members attending residential trips and out of school time visits.

### *5.1 Legal Responsibilities*

- ☐ Supreme Education has a moral and a legal obligation to safeguard and promote the welfare of its students.
- ☐ The school's legal obligations are entrenched in legislation, including but not necessarily limited to:
  - Section 175 of the Education Act 2002 – Supreme Education has a statutory duty to 'promote and safeguard the welfare of children, and have due regard to guidance by issued by the Secretary of State.';
  - Section 157 of the Education Act 2002 and the Education (Independent Schools Standards) (England) Regulations 2014 which requires proprietors of independent schools to have arrangements in place to safeguard and promote the welfare of children who are students at the school.

### *5.2 The Role of the DSL and Proprietor*

- ☐ The role of Supreme Education is to ensure that the school has:
  - A DSL who shall be responsible for maintaining the school's Safeguarding and Child Protection Policies;
  - Appoint a Designated Safeguarding Lead (DSL) who shall be responsible for the day-to-day safeguarding and child protection measures and initiatives within the school.
  - Adequate and appropriate safeguarding and child protection policies in place in line with all applicable legislative and regulatory requirements. Furthermore, to ensure that the policies are reviewed and updated annually (as appropriate) and available to all parents/guardians on the school's website and upon request;
  - Adequate and appropriate procedures in place for dealing with any allegations of abuse that may be made against a Staff members, including any such allegations that may be made against the Head;
  - Recruitment measures in place that promote the safe and responsible recruitment of Staff members, including fulfilling the requirements for statutory checks on Staff members to ensure suitability to work with children;
  - Appropriate onboarding training for new Staff members, as well as regular refresher training for all Staff members that includes the required safeguarding and child protection training. The school shall also maintain a training record that sets out all relevant information related to the training provided, dates, and Staff members who attended. The school may provide annual safeguarding and child protection training but not longer than 3 (three) year intervals.
  - Ensure that there are adequate arrangements in place for all temporary Staff members and volunteers to be made aware of Supreme Education's arrangements for safeguarding and child protection;

- **Geoffrey Opoku or Chris Enoh** (where most appropriate) to be responsible for liaising with the local authority and other agencies in the event of an allegation being made against the Head.

### *5.3 The Designated Safeguarding Lead*

- ☒ The role of the Designated Safeguarding Lead (DSL) is to:
  - Be the first point of contact in all matters relating to safeguarding and child protection for parents, students, Staff members (teaching and non-teaching), external agencies and any other stakeholders, as applicable, except in instances of allegations against the DSL (the process for this shall be further outlined in this policy).
  - Provide advice, support, and expertise on all matters relating to safeguarding and child protection within the school.
  - Encourage a culture of listening to students within the school and taking into account the wishes and feelings of the students. This culture should be fostered across the school environment, among all Staff members and in any measures the school may introduce to protect the students.
  - Have regular meetings with school's Head, SENCO, and other Staff members to promote students' outcomes by sharing relevant information about their welfare. This may include matters regarding the students' safeguarding and child protection issues, students with a social worker, etc.
  - Engage weekly with pastoral meetings with relevant Staff members to discuss any educational and welfare needs of students and any support that they may need.
  - Be available to discuss safeguarding concerns and arrange adequate and appropriate cover for any out of hours/out of term activities to ensure that the DSL or, in the absence of the DSL, the deputy DSL shall be accessible (e.g. skype, telephone call, etc.) during any off-site activities to provide the appropriate safeguarding support.
  - The DSL may delegate any number of these responsibilities to other suitable and capable Staff members, however, the DSL remains ultimately responsible for all safeguarding and child protection matters.
- ☒ The DSL shall be a member of the senior leadership team who shall be required to have undertaken basic child protection training and training in inter-agency working. This training shall be renewed every 2 (two) years.

### *5.4 Deputy Designated Safeguarding Lead*

- ☒ In the absence of the DSL, the deputy DSL shall be accessible (e.g. skype, telephone call, etc.) during any off-site activities to provide the appropriate safeguarding support.
- ☐ In the absence of the DSL, the deputy DSL shall carry out those safeguarding and child protection functions necessary to ensure the ongoing safety and protection of students. In the event of the long-term absence of the DSL, the deputy DSL shall assume the functions of the DSL.

- ☐ The deputy DSL shall be a member of the senior leadership team and shall be required to have undertaken basic child protection training and training in inter-agency working. This training shall be renewed every 2 (two) years.

### 5.5 The Head

- ☐ The Head shall support the DSL, as and when required.
- ☐ The Head shall, furthermore, ensure that (under the guidance of the DSL):
  - The Safeguarding and Child Protection policy and procedures are duly implemented and followed by all Staff members;
  - Allocate sufficient resources and time to enable the DSL and deputy DSL to fulfill roles and responsibilities effectively. This shall include supporting and assessing students and attendance at strategy discussions and any other such necessary meetings;
  - Ensure that all Staff members feel confident about raising any concerns they may have about poor or unsafe practice/s and that such concerns are handled sensitively and in accordance with the relevant whistleblowing procedures.

### 5.6 All Staff members

- ☐ All Staff members are responsible for keeping a look out for any safeguarding and/or child protection issues that should be raised.
- ☐ All Staff members are required to report any concerns related to safeguarding and/or child protection measures.
- ☐ All Staff members shall undergo the required child protection training as and when required, but no longer than every 3 (three) years.

## 6. The School Safeguarding and Child Protection Methodology

### 6.1 Guidelines:

- ☐ The school has developed standards of practice which shall be adhered to, insofar as such is possible, in relation to safeguarding and child protection matters within the school to promote that the school is meeting and maintaining its responsibilities towards its students:
  - Treat students with respect;
  - Staff members shall act as good role models;
  - Involve students in decisions that may affect them;
  - Encourage positive, respectful and safe behaviour among students;
  - Be good listeners and being alert to any changes in a student's behaviour;
  - Recognise and understand that that challenging behaviour may be an indicator of abuse • reading and understanding the school's Safeguarding Including Child Protection policy and guidance documents on wider safeguarding issues, for example bullying, behaviour, physical contact and

information-sharing • asking the pupil's permission before initiating physical contact such as assisting with dressing, physical support during PE or, administering first aid • maintaining appropriate standards of conversation and interaction with and between pupils and avoiding the use of sexualised or derogatory language • being aware that the personal and family circumstances and lifestyles of some pupils lead to an increased risk of abuse • applying the use of reasonable force only as a last resort after numerous preventative measures and de-escalation methods have been exhausted and in compliance with school and BWSCP procedures. However, in line with the Use of Reasonable Force (Education and Inspections Act 2006) if a pupil is perceived to be at imminent risk of harming themselves, others or property, the use of reasonable force can be deployed.

## 6.2 Transparency

- ☐ Supreme Education shall be transparent about its safeguarding and child protection endeavours.
- ☐ Supreme Education shall include a copy of the current Safeguarding and Child Protection policy, together with all other such relevant policies and procedures pertaining to safeguarding and child protection, on the school website.
- ☐ The school encourages any parent, guardian, and/or student to take up any issues or concerns regarding safeguarding and/or child protection with the school.
- ☐ The school will deal with any issues relating to safeguarding and/or child protection concerns consistently and in accordance with the provisions of this policy, as applicable.

## 6.3 Abuse of Trust

- ☐ Supreme Education's Staff members are fully aware that any inappropriate behaviour towards students is wholly unacceptable. Staff members' conduct towards students and in general must be beyond reproach.
- ☐ Staff members shall, furthermore, be made aware that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where such person is in a position of trust, even if the relationship is consensual.

## 6.4 Safer Recruitment

- ☐ Supreme Education shall comply with the Government's recommendations for the safer recruitment and employment of Staff members working with young people (refer also to the school's **Recruitment, Selection and Disclosures Policy**) and acts, at all times, in compliance with the Independent School Standards Regulations.
- ☐ All Supreme Education staff, volunteers, and/or contractors shall be subject to the relevant statutory checks, as per the relevant school policy.
- ☐ Supreme Education endeavours to ensure that the school employs 'safe' Staff members by following the guidance set out in:
  - Keeping Children Safe in Education September 2023;
  - Local authority guidelines;

- Then Working Together to Safeguard Children (2018) document; and
  - Supreme Education’s own policies and procedures.
- ☐ Safer recruitment at Supreme Education may require applicants to comply with a number of requirements which may include, but shall not necessarily be limited:
- Completing an application form;
  - Providing 2 (two) referees, including at least one who can comment on the applicant’s suitability to work with young people, confirming the veracity of such, by telephone, when received electronically;
  - Providing evidence of identity and qualifications;
  - Being checked in accordance with the Disclosure and Barring Service regulations, as appropriate to their role;
  - Being subject to further checks regarding medical fitness; overseas checks, as appropriate, including EEA professional sanctions; right to work in the UK; and prohibition from teaching and from management (where applicable);
  - Being interviewed where applicants will be asked about gaps in employment, or where the applicant has changed employment or location frequently;
  - Being questioned regarding any potential areas of concern to determine the applicant’s suitability to work with young people; and
  - Recording all information considered and decisions made.
- ☐ Supreme Education shall ensure that it has sufficient and relevant Staff members who are appropriately trained in safer recruitment processes and practices. The Designated Safeguarding Lead shall, furthermore, undergo Prevent training in order to provide advice and support to other Staff members on safeguarding and child protection matters, including protecting students from the risk of radicalisation.

### 6.5 Disqualification

- ☐ As part of Supreme Education’s recruitment processes, and ongoing review of Staff members, the school shall carry out the appropriate checks on Staff members to ensure that such persons have not been disqualified from working with young people under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.
- ☐ The school may consider not carrying out such checks if the individual falls outside of the scope of these regulations. This will be decided on a case by case basis and in accordance with the relevant policy. Supreme Education shall retain records of the relevant assessment on the Staff member’s personnel file, including an evaluation of the risks and any relevant control measures put in place, and any advice sought.
- ☐ Staff members will be disqualified from working with young people if:
- Such Staff member has been cautioned for, or convicted of, certain violent and sexual criminal offences against children, young people, and/or adults;
  - There are grounds relating to the care of children or young people, including where an order is made in respect of a child or young person’ under the person’s care;

- The Staff member has had registration refused, or cancelled, in relation to childcare or children's homes or have been disqualified from private fostering.
- ☒ All Supreme Education Staff members shall be required to provide the following information about themselves:
- Details of any order (e.g. care order), determination, conviction, or other such grounds for disqualification from registration under the applicable Regulations;
  - The date of the order, determination or conviction, or the date when the other ground for disqualification arose;
  - Information about the body or court that made the order, determination or conviction, and any sentence imposed;
  - A certified copy of the relevant order (in relation to an order or conviction).
- ☒ During recruitment, any applicant who has been disqualified from working with young people, as per the relevant regulations shall have their application rejected.
- ☒ Any existing Staff member who is disqualified shall be suspended. The disqualification may be sufficient grounds for dismissal either as a breach of a statutory enactment and / or some other substantial reason. Supreme Education shall follow a fair procedure and appropriate protocol.
- ☒ Supreme Education has a duty to, and shall, refer any person to the DBS who has harmed, or poses a risk of harm, to a child, young person, or vulnerable adult where the school believes:
- The individual has engaged in relevant conduct; or
  - 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
  - The 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
  - The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left.

### *6.6 Raising Awareness*

- ☒ **Giselle Stubbs** is the DSL for child protection issues at Supreme Education.
- ☒ The DSL shall conduct an annual review of Supreme Education's safeguarding measures, including the Safeguarding and Child Protection Policy and procedures, with day-to-day issues being delegated to the Head and the DSL.

### *6.7 Helping Students to Keep Themselves Safe*

- ☒ Supreme Education shall make a concerted effort to teach its students to understand and manage risk through the school's personal, social, health and economic (PSHE) and relationships, sex and health (RSHE) education lessons and through all other aspects of school life.



- ② Supreme Education's approach shall be designed to help students consider risks they may encounter and with help Staff members consider how these risks may be overcome.
- ② The school's approach shall include engaging in discussions with students about risk and promote sensible behaviour.
- ② Students shall be advised on how to conduct themselves and how to behave in a responsible manner, both online and in real life.
- ② Supreme Education shall continue to promote its ethos of openness, transparency, and respect for young people. Students shall be encouraged to speak to a Staff member about any concerns or questions they may have in relation to safeguarding and/or child protection concerns.
- ② The school shall provide details of where they can go for support which information shall be prominently displayed throughout the school, including confidential help lines and web addresses.
- ② Supreme Education shall conduct workshops for students and parents/guardians on e-safety issues, including cyberbullying.

### *6.8 Vulnerable Young People*

- ② Some young people are at an increased risk of abuse which may be as a result of societal attitudes and assumptions, and child protection procedures that fail to acknowledge young people's diverse circumstances, rather than the individual young person's personality, impairment or circumstances.
- ② There are a wide range of factors that may contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and a reluctance on the part of some adults to accept that abuse can occur.
- ② Supreme Education aims to be alert to the potential need for early help for a young person who:
  - Is disabled with specific additional needs;
  - Has special educational needs;
  - Is a young carer;
  - Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
  - Is frequently missing/goes missing from care or from home;
  - Is misusing drugs or alcohol;
  - Is at risk of modern slavery, trafficking or exploitation;
  - Is in a family circumstance presenting challenges for the young person, e.g., substance abuse, adult mental health problems, domestic abuse;
  - Has returned home to their family from care;
  - Is showing early signs of abuse and/or neglect;
  - Is at risk of being radicalised or exploited;
  - Is privately fostered;
  - Has a social worker assigned to them or their family;
  - Has their own mental health difficulties;

- Has their own health conditions;
- Has a family member in prison or is affected by parental offending;
- At risk of honour-based abuse, e.g., forced marriage or FGM;
- Persistent absences from education

☒ This list is not exhaustive.

### 6.9 Safeguarding, Child Protection and the Curriculum

☒ Supreme Education shall aim to ensure that the school's curriculum development meets the following objectives (typically through the PSHE, RSHE and citizenship curriculum):

- Developing the students' self-esteem;
- Developing good physical and mental health and overall wellbeing;
- Developing good communication skills;
- Informing about all aspects of risk;
- Developing strategies for self-protection;
- Developing a sense of the boundaries between appropriate and inappropriate behaviour in adults;
- Promoting and encouraging non-abusive behaviour between students.;
- Developing an understanding of coercive relationships.

☒ Supreme Education shall adopt a balanced approach to teaching matters relating to safeguarding and child protection. Staff members shall aim to exercise sensitive professional judgements in order to balance the need for young people to be able to protect themselves and the risks of causing anxiety and mistrust of any relationships.

## 7. Recognising Abuse

### 7.1 Possible Signs of Abuse:

☒ At Supreme Education, our aim is to protect young people from harm. In order to achieve this, Staff members need to understand what types of behaviour constitute abuse and neglect, and how to recognise possible signs of abuse and/or neglect.

☒ All Staff members should be aware that technology may also play a significant role in many safeguarding and wellbeing issues.

☒ Young people are at risk of online abuse, face-to-face abuse, or both forms concurrently.

☒ Abuse and neglect are forms of maltreatment. A young person may be abused or neglected by someone inflicting harm on them, e.g., hitting them, failing to act to prevent harm.

☒ There are four categories of abuse (refer to the **Definitions** section):

- Physical Abuse;
- Emotional Abuse;
- Sexual Abuse;
- Neglect.

☒ Staff members are required to report any concerns they may have relating to safeguarding and/or child protection issues.

- ☐ Staff members are prohibited from conducting any investigations into allegations or suspicions of safeguarding and/or child protection issues.
- ☐ A young person who is being abused or neglected may:
  - Present with bruises, bleeding, burns, fractures or other injuries;
  - Show signs of pain or discomfort;
  - Keep arms and legs covered, even in warm weather;
  - Be concerned about changing for PE or swimming;
  - Look unkempt, dirty, and uncared for;
  - Change their eating habits;
  - Have difficulty in making or sustaining friendships;
  - Appear fearful;
  - Be reckless with regard to their own or other's safety;
  - Self-harm;
  - Frequently miss school or arrive late;
  - Show signs of not wanting to go home;
  - Display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn;
  - Challenge authority;
  - Become disinterested in their school work;
  - Be constantly tired or preoccupied;
  - Be wary of physical contact;
  - Be involved in, or particularly knowledgeable about drugs or alcohol;
  - Display sexual knowledge or behaviour beyond that normally expected for their age.
- ☐ Individual indicators in isolation are unlikely to provide conclusive evidence of abuse. It is therefore important for Staff members to report any concerns they may have.

### *7.2 Possible Signs of Grooming*

- ☐ The signs of grooming are not necessarily obvious. Groomers typically go to great lengths not to be identified. Some actions associated with young people being groomed in school may include:
  - Meeting students secretly, or without seeking authorisation from the Head;
  - Collusive behaviour designed to cultivate dependency, e.g.:
    - unprofessional conversations about other Staff members;
    - Breaking school rules by supplying students with alcohol; and
    - 'friending' students on social media platforms, contrary to school policies;
- ☐ Students who are being groomed at school, or elsewhere, may appear:
  - Secretive, including about what they are doing online;
  - To have unexplained absences;
  - To have older friends;

- To go to unusual places to meet friends;
  - To have new belongings, e.g., clothes, mobile phone, etc, with no explanation;
  - To have access to drugs and alcohol
- ☒ Signs of grooming in older students may be misconstrued as 'typical' teenage behaviour.

## 8. Support for those involved in Child Protection Matters at School

- ☒ Supreme Education shall exercise a duty of care of all involved in safeguarding and child protection issues within the school, including Staff members.
- ☒ The school shall offer and provide support to Staff members involved in a child protection issue.
- ☒ Supreme Education shall provide support to students, their family, and the school's Staff members by:
- Taking all disclosures and suspicions seriously;
  - Nominating a link person who shall be responsible for keeping all parties informed, as required, and be the central point of contact;
  - In the event that a Staff members is implicated by a student, the school will appoint 2(two) link persons to avoid any conflict of interest between the student and the Staff member;
  - Responding sympathetically to any request from students or Staff members for time out to deal with distress or anxiety, as required;
  - Maintaining confidentiality by sharing information on a need-to-know basis only with such relevant individuals and agencies, as required;
  - Storing records securely;
  - Providing and offering details of helplines, counselling or other avenues of external support;
  - Following the procedures as set out in the school's whistleblowing, complaints and disciplinary procedures;
  - Co-operating with relevant statutory agencies, as required.

## 9. Procedure to Protect Young People

- ☒ Supreme Education shall follow specific procedures to protect young people who are suffering harm or at risk of suffering harm as a result of physical, sexual, and/or emotional abuse or neglect in accordance with Section 157 of the Education Act 2002.
- ☒ If there is a report of any incident or there is a strong suspicion of physical, emotional or sexual child abuse or neglect (including attempts to radicalise or coerce students to hold extreme political or religious views) occurring inside or outside of school and linked to Staff members or student/s of Supreme Education, families or to a student of the school at home or outside the school, this shall be immediately reported (the same day the person becomes aware of this) to Supreme Education's DSL, **Giselle Stubbs** Should the DSL be unavailable, the immediate report should be made to one of Supreme education's Deputy DSLs (**Geoffrey Opoku, Chris Enoh**).

- ❑ In the event the allegation or suspicion relates to a Staff member, the matter shall be reported to the Head. In the event the allegation or suspicion relates to the Head, the matter shall be reported to the DSL or directly to Children's Services (01628 683150), without the need to inform the Head.
- ❑ Staff members, and any other members of the school community, are expected to report any abuse of a student they become aware of (or suspect), including any abuse that occurs online. This may include possible abuse of a student by a Staff member or another adult, abuse at home or perpetrated on their family members, abuse by a stranger, and abuse of a student/students by another student or group of students.
- ❑ Stakeholders should be aware that safeguarding incidents and/or risk associated behaviours may be associated with factors outside of Supreme Education and occur between young people outside of the school environment. All Staff members should consider whether young people are at risk of abuse or exploitation in situations outside the school
- ❑ Extra familial harm can take a variety of different forms including, but not necessarily limited to, parental/guardian neglect, inadequate supervision, sexual exploitation, criminal exploitation and/or serious youth violence.
- ❑ Staff members of Supreme Education, including the DSL and the Head, shall not investigate reports of abuse themselves. Alleged victims, perpetrators, those reporting abuse and others involved should not be interviewed by Staff members of Supreme Education beyond the point at which it is clear that there is an allegation of abuse.
- ❑ Should a Staff member be informed about an allegation of physical, sexual, emotional abuse or neglect, such Staff member shall follow the procedures stated herein and record in writing all concerns, discussions and decisions (together with the reasons), further to these procedures. Supreme Education has created a **Disclosure Form (Appendix A)** which can be used for this purpose, and should include the following information:
  - Date;
  - Time and place of the conversation;
  - Details of what was said and by whom;
  - Details of what was said and by whom;
  - Any witnesses;
  - Signature of the person writing and submitting the form.
- ❑ Staff members should not assume that a report will be submitted by a colleague as failure to disclose may lead to disciplinary proceedings.

## 10. Concerns About a Student

- ❑ Supreme Education has created distinct categories for concerns about a student, as follows:
  - **Early Help:** Some students may benefit from early help. Staff members are expected to try to identify such students, where possible. Early help shall mean providing support as soon as the problem emerges at any point in a student's life. Early help should be discussed with the DSL who will consider

the appropriate action to be taken in accordance with the applicable referral thresholds. The DSL shall, furthermore, liaise with the relevant external agencies and professionals in an inter-agency assessment, as appropriate. If early help is appropriate, this shall be arranged by Children's Services who will allocate an Early Help worker to the student and may intervene using local processes.

Any student may benefit from early help, but Staff members should be particularly alert to the potential need for early help for students who:

- o are disabled and have specific additional needs;
  - o have special educational needs (whether or not they have a statutory education, health and care plan);
  - o was a young carer, or who has siblings who have taken on the primary carer role;
  - o shows signs of being drawn in to anti-social or criminal behaviour, including gang involvement or association with organised crime groups;
  - o are frequently missing;
  - o are misusing drugs or alcohol;
  - o are at risk of modern slavery, trafficking or exploitation;
  - o are from a family where circumstances are presenting challenges for the student, e.g., substance abuse, adult mental health problems, domestic abuse or a family member in prison;
  - o previously in care;
  - o showing early signs of abuse and/or neglect;
  - o at risk of being radicalised or exploited; or
  - o a privately fostered child.
- **A Child in Need:** This refers to a student whose circumstances may require them to have extra support to enable them to live a life that will enable the, to fulfil their potential. These students will be referred to Children's Services and will benefit from additional support which should be put in place as soon as an issue is identified. Supreme Education or the local Children's Services team may also refer the matter to external agencies for further advice and/or support.
  - **A Child at Risk:** A student who is or may be at risk of significant harm (which may or may not be abuse). Such instances will be referred to Children's Services immediately, in accordance with the procedures outlined in this policy. The local Children's Services thresholds will determine the level of support the student may require.

### *10.1 Students at Risk of Immediate Harm*

- ☒ When a student may be or is at risk of immediate harm, an immediate referral should be made to children's social care and/or the Police. This referral can be made by anyone and must be made immediately, or at least within 24 (twenty-four) hours (one working day) of you becoming aware of the risk. Parental consent is not needed for referrals to statutory agencies such as the police and children's

social care. If anyone other than the DSL makes a referral, you should inform the DSL as soon as possible that a referral has been made.

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

## 10.2 Radicalisation

- ☐ A child at risk may include students who are at risk of radicalisation. Supreme Education is committed to safeguarding and promoting the welfare of all our students. All Staff members of Supreme Education should recognise that safeguarding against radicalisation and extremism is no different to safeguarding against any other vulnerability.

- ☐ **Radicalisation:** The process by which a person comes to support terrorism and extremist ideologies typically associated with terrorist groups.

**Extremism:** 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.

- ☐ **Signs of Radicalisation:** There is no one specific way of identifying an individual who is likely to be susceptible to radicalization through extremist ideology. There may be background factors which may contribute to a student's vulnerability, often combined with influences such as family, friends or online, and with particular needs for which an extremist or terrorist group may appear to provide an answer. As with managing other safeguarding and child protection risks, Staff members should be alert to changes in students' behaviour which may be an indicator of radicalisation. Staff members should use their professional judgement to identify students who may be at risk of radicalisation and act proportionately. Instances of radicalisation may involve a referral to children's social care, depending on the level of risk.

The school recognises that some students may be in danger of being drawn into extremism or terrorism or other forms of extremism. The DSL shall arrange for the appropriate risk assessments to be carried out which may include consulting with local partners (e.g., the police), about the potential risk in the local area. Such risk assessments shall be discussed between the Head, the DSL and Deputy DSLs to ensure that the school's safeguarding arrangements are sufficiently robust to protect the school's students from being drawn into extremism or terrorism. Any risk assessments carried out in respect of radicalization shall be regularly revisited and reviewed.

Supreme Education shall provide regular and updated training around safeguarding and child protection issues. The school's DSL and Deputy DSLs shall undertake the Prevent awareness training and shall be available to provide advice and support to other Staff members in relation to the risk of radicalization and protecting students from this.

- ☐ **IT:** Supreme Education has incorporated suitable filtering on the school network, which shall be reviewed periodically, designed to keep students safe from terrorist and extremist material in school.

- ☐ **Procedures:** Concerns that a student is being exposed to radicalisation shall be reported to the DSL, who shall follow the safeguarding procedures set out in this policy.

Further information about extremism: Contact the DfE on their dedicated telephone helpline: **020 7340 7264** or through their mailbox: [counterextremism@education.gsi.gov.uk](mailto:counterextremism@education.gsi.gov.uk) for non-emergency advice for Staff members.

### 10.3 *Students Missing from Education*

- ☐ A student who is missing from education may be an indicator of abuse.
- ☐ Supreme Education shall maintain an attendance register, in accordance with the Department for Education requirements.
- ☐ Each Staff member who is a form teacher is responsible for promptly registering any unexplained absences and, for any students who are not accounted for, shall be reported to the Head.
- ☐ If there are concerns about a student, these concerns should be reported to the DSL.

### 10.4 *Child Exploitation*

#### 10.4.1 **Criminal Exploitation:**

- ☐ **Child Criminal Exploitation (CCE):** Where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity either in exchange for something the victim needs or wants, and/or for the financial or other advantage for the perpetrator and/or through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not have to include physical contact, it can also occur through the use of technology. The most prolific form of CCE is where children are exploited and coerced to carry drugs or other contraband from urban areas to suburban and rural areas ('county lines').
- ☐ Indicators that a students may be at risk from or involved with CCE may include:
  - Increased absences;
  - A change in friendships or relationships with older individuals;
  - A significant decline in performance;
  - Signs of self-harm;
  - A significant change in wellbeing; or
  - Unexplained gifts or new possessions.
- ☐ Any concerns about child exploitation should be reported to the DSL.
- ☐ Staff members can find additional information in [Preventing Youth Violence and Gang Involvement](#) and [Criminal Exploitation of Children and Vulnerable Adults: County Lines](#).

#### 10.4.2 **Sexual Exploitation:**

- ☐ **Child Sexual Exploitation (CSE):** Where young people are sexually abused or coerced into sexual activity in the context of exploitative relationships by a person/persons of any age, including another young person.



- ☐ A child can be a victim of CSE even if the sexual activity appears consensual.
- ☐ CSE does not have to include physical contact, i.e., CSE may occur through the use of technology.
- ☐ CSE can affect any child or young person under the age of 18, including 16 and 17 year olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the young person's immediate knowledge (e.g. through others copying images they have created and posted on social media).
- ☐ Indicators that a students may be at risk from or involved with CSE may include:
  - Increased absences;
  - A change in friendships or relationships with older individuals;
  - A significant decline in performance;
  - Signs of self-harm;
  - A significant change in wellbeing;
  - Unexplained gifts or new possessions; or
  - Students who have older partners or suffer from sexually transmitted infections.
- ☐ Any concerns about child exploitation should be reported to the DSL.

#### **10.4.3 Modern Slavery:**

- ☐ Modern Slavery may include human trafficking and slavery, forced or compulsory labour, or servitude.
- ☐ Exploitation can take a number of different forms, including but not necessarily limited to:
  - Sexual exploitation;
  - Forced labour;
  - Slavery;
  - Servitude;
  - Forced criminality; and
  - The removal of organs.

#### **10.5 Child on Child Abuse**

- ☐ Abuse can take place between students and can be physical, sexual or emotional in nature. It may include, but is not necessarily limited to:
  - Bullying (including cyber bullying, transgender bullying, or homophobic bullying);
  - Gender-based violence;
  - Sexual assaults;
  - Sexual harassment;
  - Initiations; and
  - Sexting.
- ☐ Supreme Education has zero tolerance for child on child abuse.

- ② Child on Child abuse should be reported to the DSL or the Head. If the threshold does not reach the level to constitute a safeguarding investigation, perpetrators will be dealt with in accordance with the school's **Bullying Policy**.
- ② Child on Child abuse can take the form of harmful sexual behaviour.
- ② Supreme Education aims to promote healthy and respectful relationships through its PSHE and RSE programmes.
- ② Any allegations of sexual misconduct will be taken very seriously and may require the involvement of the police.
- ② Any reports of instances of rape, assault by penetration or other forms of sexual assault (including 'upskirting') are crimes and shall be reported to the police.
- ② Child on Child abuse can be facilitated online, either partially or wholly.
- ② Child on Child abuse may take on a number of different forms including, but is not necessarily limited to:
  - **Upskirting:** Taking a picture under a person's clothing without their knowledge, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Upskirting is classed as a criminal offence.
  - **Bullying:** Any behaviour repeated over time with the intention of hurting another student or group of students physically or emotionally. Bullying can either take place directly or online (social media, mobile phones, text messages, etc) and always involves an imbalance of power. Bullying has the potential to have long lasting psychological effects. Bullying which amounts to Child on Child abuse shall be deemed to be bullying of a serious or sexual nature between persons of a similar age resulting in or with the potential to cause significant harm.
  - **Physical abuse:** This may include hitting, kicking, biting, slapping, shaking, etc that causes physical harm to another young person.
  - **Harmful Sexual Behaviour:** Any young person, under the age of 18, who demonstrates behaviour outside of their normative parameters of development.
  - **Serious Youth Crime (including sexual assault):** This may include crimes of a serious nature, e.g., murder, rape, and gross bodily harm carried out on or between young people under 18.
  - **Sexting:** Sending sexually explicit texts, images or videos or pressuring someone into sending a nude or sexually explicit texts. Possessing or distributing indecent images of a person under 18 is a crime under the Sexual Offences Act 2003.
  - **Sexual harassment:** Unwanted conduct of a sexual nature that may take place either online or offline. Sexual harassment can violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and create a hostile, offensive or sexualised environment. Sexual harassment may include, but is not necessarily limited to:
    - Sexual comments, e.g., telling sexual stories, making sexual remark or lewd comments;
    - Sexual "jokes" or taunting;
    - Physical behaviour, e.g., deliberately brushing up against someone, interfering with someone's clothes or displaying pictures, photos or drawings of a sexual nature;

- o Upskirting;
  - o Online sexual harassment.
- ☒ In the event of the police having to be notified regarding any Child on Child abuse, Supreme Education shall, at the advice of the Local Authority Designated Officer (LADO), inform the parents of the student informed as soon as possible and ensure that the student/s is/are supported during the interview by an appropriate adult, as appropriate.

### 10.6 *Online Safety*

- ☒ Supreme Education shall ensure that the school network is appropriately filtered.
- ☒ Students and Staff members shall be guided in the acceptable use of the school network and the internet in general.
- ☒ Students shall be required to sign an Acceptable Use Agreement.
- ☒ Students will further be guided regarding e-Safety in the school's PSHE and RSE courses.
- ☒ In the event that a student appears to be at risk online, a report should be made to the DSL.
- ☒ Staff members shall receive regular training around online safety as part of the school's regularly updated safeguarding training.

### 10.7 *Safeguarding SEND Students*

- ☒ Students with special educational needs and disabilities (SEND) may be particularly vulnerable and face additional safeguarding challenges.
- ☒ There may be a number of factors that may make recognising abuse or neglect in this group of students challenging, e.g.:
- Signs of possible abuse, e.g., behaviour, mood and injury, relate to the student's disability without further exploration;
  - Students with special educational needs and disabilities may be disproportionately impacted by bullying; and
  - Communication barriers.
- ☒ Staff members should report any concerns to the DLS, even if they are not sure that what they are witnessing is a safeguarding issue.

### 10.8 *Safeguarding and Mental Health*

- ☒ Mental health concerns may be an indicator that a student is/has suffered or is at risk of suffering abuse, neglect or exploitation.
- ☒ Staff members shall not make a diagnosis about mental health but may identify behaviour that is an indicator of a mental health problem.
- ☒ Any mental health concerns should be reported to the DSL immediately.

### *10.9 Student Reporting Honour-Based Abuse (HBA)*

- ☐ HBA may include incidents or crimes which have been committed to protect or defend the 'honour' of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing.
- ☐ Any evidence of HBA should be reported immediately to the DSL.
- ☐ FGM carried out on a girl aged under the age of 18 is a reportable crime. There is a statutory duty to report this to the police.

### *10.10 Child Abduction*

- ☐ Child Abduction is the unauthorised retention or removal of a minor from a parent or anyone with legal responsibility for the child.
- ☐ Child abduction can be committed by parents or other family members; by people known but not related to the victim, e.g., neighbours, friends and acquaintances; or by strangers.
- ☐ Reports of child abduction should be made to the DSL immediately who will contact the police, as appropriate.

### *10.11 Allegations of Abuse Made Against a Student*

- ☐ Should an allegation of abuse be made against a student of Supreme Education, the DSL shall inform Children's Services and the Local Authority Designated Officer (LADO).
- ☐ The threshold for dealing with an issue of student behaviour under the safeguarding policy is when there is a reasonable cause to suspect that a student is suffering, or likely to suffer, significant harm.
- ☐ The DSL shall take advice from the LADO on the investigation process for such an allegation and take appropriate action to ensure the safety and welfare of all Students involved, including the student accused of abuse.
- ☐ Should the threshold for referral not be reached or Children's Services or the police decide not to intervene, the school may still pursue the matter in accordance with the relevant school policy.

## **11. Concerns About a Staff Member**

- ☐ The welfare of students is of paramount importance. All Staff members of Supreme Education have a duty to report any safeguarding and/or child protection concerns as soon as possible.
- ☐ Staff members who raise concerns or allegations of safeguarding and/or child protection concerns in good faith shall be protected from retaliation.
- ☐ Staff members can report any concerns of poor practice or possible safeguarding and/or child protection issues by colleagues to the Head.

- Should the safeguarding and/or protection concerns involve the Head, the Staff member may report their suspicions directly to the Designated Safeguarding Lead and LADO.
- Staff members shall also be made aware of the NSPCC Whistleblowing Helpline – 0800 028 0285.

### 11.1 Allegations that meet the Harms Threshold

- When an allegation is made against a Staff member, including supply staff, volunteers or contractors that such has:
  - Behaved in a way that has harmed a young person, or may have harmed a young person, and/or
  - Possibly committed a criminal offence against or related to a young person, and/or
  - Behaved towards a young person or young people in a way that indicates that they may pose a risk of harm to young people, and/or
  - Behaved or may have behaved in a way that indicates that they may not be suitable to work with young people, which behaviour may have been displayed either inside or outside of school.
- Supreme Education undertakes to deal with all safeguarding and/or child protection allegations swiftly, fairly, and consistently.
- The Head shall act as the 'case manager' to lead any investigation into an allegation. If the Head is the subject of the allegation, the DSL shall be the appointed 'case manager' who will lead the investigation into the allegation, as appropriate.

#### 11.1.1 Definitions

- The following definitions have been included for ease of reference and shall apply to the content of this policy, as appropriate and as the content and context dictates:
  - **Substantiated:** There is sufficient evidence to prove an allegation;
  - **Malicious:** There is sufficient evidence to disprove an allegation AND there is sufficient evidence to suggest that the allegation was a deliberate act to deceive, or to cause harm to the subject of the allegation;
  - **False:** There is sufficient evidence to disprove the allegation;
  - **Unsubstantiated:** There is insufficient evidence to either prove or disprove the allegation which does not necessarily imply guilt or innocence;
  - **Unfounded:** There is no evidence or proper basis which supports the allegation made.

#### 11.1.2 Suspension of the Accused

- Suspension of an accused is not the school's default position, however, it is the policy of Supreme Education to suspend any Staff member who is accused of any safeguarding and/or child protection violations where such allegation meets the harms threshold and there is no safe alternative, i.e.:
  - Where there is reason to suspect that a young person or young people is/are at risk of harm, or
  - The case is of a sufficiently serious nature that there might be grounds for dismissal.
  
- The school may, of appropriate, consider alternatives to suspension, e.g.:
  - Redeployment within the school with no direct contact with the students;
  - Providing an assistant who will be present when the individual has contact with young people;
  - Redeployment within the school where they will have no unsupervised access to students;
  - Moving young people to classes where they will have no contact with the individual, in consultation with parents/guardians.
  
- Supreme Education shall have alternative options available in cases where the accused is not directly employed by Supreme Education, i.e., a supply teachers or contracted staff. In addition to Supreme Education's standard procedures in these instances, the school may:
  - The school's proprietors will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation;
  - Supreme Education will involve the agency fully, but the school shall take the lead in conducting the investigation, as appropriate, collecting the necessary information, and feeding the information back to the appropriate agencies and authorities;
  - Supreme Education shall address such issues as confidentiality and information sharing, to ensure any previous concerns or allegations known to the agency are considered, e.g., as part of the allegations management meeting or by liaising directly with the agency;
  - When using an agency, Supreme Education shall inform them of the school's process for managing allegations.

### **11.1.3 Procedure for Dealing with Allegations**

- In the event that an allegation meets the harms threshold, as stated in Section 2 above, the school's case manager shall take the following steps:
  - Conduct initial enquiries, as per the school's procedures, to establish the facts and determine the veracity of the allegation before conducting any further investigations;
  - Discuss the allegation with the LADO. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police before

consulting the Local Authority's Designated Officer for child protection (LADO), e.g., if the accused individual is deemed to pose an immediate risk to young people or there is evidence of a possible criminal offence in which case the case manager shall contact the police before making contact with the local authority;

- Inform the accused that a concern or allegation has been made and the likely course of action;
- In the event the police and/or children's social care services are involved, the case manager shall take direction from such agencies in regard to the information that will be shared with the accused;
- Supreme Education shall consider where there are grounds for suspension pending the outcome of the investigation. The case manager may, as required, seek advice from the LADO, police and/or children's social care services, as appropriate;
- Should the case manager have concerns about the welfare of other children in the community or the individual's family, the case manager shall discuss these concerns with the DSL and make a risk assessment of the situation. The DSL may make a referral to children's social care, if required;
- Should immediate suspension be deemed necessary, the case manager shall agree and record this decision with the LADO. The record shall include information around the alternatives to suspension that were considered and rejected, and the reason for the rejection;
- The case manager shall issue the accused with written confirmation of their suspension within 1 (one) working day. The accused shall be provided with the details of a contact at Supreme Education;
- Following the investigation, should it be decided that no further action shall be taken regarding the concern or allegation raised, the case manager shall record this decision and the reason for the decision. The case manager shall also agree with the LADO what information shall be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation. Should it be decided that further action is needed, further steps shall be taken, as agreed with the LADO, to initiate the appropriate action in school and/or liaise with the police and/or children's social care services, as appropriate.
- Supreme Education shall provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. Staff members of Supreme Education may consider contacting a member of their union or another colleague for support;
- Supreme Education shall inform the parents/guardians of the young person/people involved following agreement with children's social care services and/or the police, as applicable;
- The case manager shall inform the parents/guardians of the confidentiality requirement regarding any allegations made against teachers, as applicable, while investigations are ongoing;
- Supreme Education shall keep the parents/guardians of the young person/people involved with the allegation involved informed of the progress of the case only insofar as such relates to their child/charge. Supreme Education shall not share any information regarding the Staff member with the parent/guardian;

- As appropriate, the case manager shall make a referral to the DBS if the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a young person, or if the individual otherwise poses a risk of harm to a child;
- Supreme Education shall inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after young people at the premises, whether such allegations relate to harm or abuse committed on the premises or elsewhere, and any action taken in respect of the allegations. This notification shall be made as soon as reasonably possible but within 14 (fourteen) days of the allegations being made;
- In the event of the secretary of state making an interim prohibition order in respect of an individual, Supreme Education shall immediately suspend the individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency. Where the police are involved, and wherever possible, the school shall ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later stage.

### 11.2 *Allegations that do not Meet the Harm Threshold*

- ☐ Low level concerns are allegations and/or concerns that do not meet the harm threshold, e.g., inappropriate language with students, being over-friendly, showing favouritism, etc.
- ☐ Supreme Education intends to foster a culture of openness and transparency, therefore low level concerns should be reported to the DSL.
- ☐ Reporting will enable the school to identify concerning, problematic or inappropriate behaviour early, identify training needs, minimise the risk of abuse, and ensure that Staff members establish clear professional boundaries.
- ☐ Staff members may also self-refer a low level concern should they find themselves in a situation which could be misinterpreted.
- ☐ All low level concern reports will be handled proportionately and sensitively that will aid and support individuals to correct behaviour at an early stage.
- ☐ All low level concerns that have been reported will be recorded. The record will include details of the concern, the date of the concern, the context in which the concern arose, the action taken, and the name of the individual sharing the concerns.
- ☐ All records will be kept confidential and stored securely in compliance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

### **Procedure:**

- ☐ All Staff members of Supreme Education shall follow the direction of the policy. Should any Staff member be in any doubt about how the policy informs the procedure, such Staff member must immediately seek advice from the Head Teacher.





## Appendix 1 – Disclosure Form

### Disclosure Form

This Disclosure Form can be completed by a Staff member if they wish to record a disclosure made to them by a student.

When completing the form, remember:

- Ask "open" questions and not leading questions, i.e., a question which suggests its own answer
- Listen carefully and keep an open mind;
- Do not take a decision as to whether or not the alleged abuse or neglect has taken place
- Submit this form to the Designated Safeguarding Lead (DSL)

Please type or complete in black ink	
Date	
Time	
Place	
Member of Staff present and position	
Full name of student/s	
<p><b>Ask the student to explain their concern or allegation and record the details of the matter in the space below. Do not interpret the information (write down only what the student has said). Use a separate sheet, if necessary, and attach to this form</b></p>	
<p>A non-exhaustive list of the details included:</p> <ul style="list-style-type: none"> <li>● What was said or done, by whom, to whom and in whose presence</li> <li>● When the incident took place and where</li> <li>● Whether the student wishes their parent/guardian to be informed</li> </ul>	

**Any additional evidence or comments**

Details may include, for example, any concerns you may have about signs of physical abuse, emotional abuse, sexual abuse or neglect from outside of School.  
Please also include a note of any other evidence, for example, written notes, items of clothing or mobile phone messages relating to the matter.

Signed by:

Print name:

Date: