Child Protection and Safeguarding Policy

an Orbital Education School

Approved by:	Mirlinda Boshnjaku	Date:
Last reviewed on:	September 2023	
Next review due by:	August 2024	

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Any abuse involving students with SEND will require close liaison with the DSL (or deputy) and the SENCO.

15. Training

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Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Head of School	Mirlinda Boshnjaku	mirlinda.boshnjaku@wat.al
Designated Safeguarding Lead (DSL)	Gladiola Dona	gladiola.dona@wat.al
Deputy DSL	John Jaques	john.jaques@wat.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, forced marriage, or radicalisation.

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 such as forced marriage 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) and Deputy DSL, the Behaviour Policy, the Online Safety policy and other 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, radicalisation 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;

- the fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBTQ+) can be targeted by other children;

- 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 Gladiola Dona (Head of Administration)**. The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety and understanding our filtering and monitoring processes on school devices and school networks to keep students safe online.

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 gladiola.dona@wat.al.

When the DSL is absent, the **Deputy DSL, John Jaques (Dean of Students and Faculty)** 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 fulfil 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;

- reviewing the [DfE's filtering and monitoring standards](#), and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards;

- make sure:

  - the DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support;

  - online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies;

  - the DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place;

  - 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;

- overseeing the safe use of technology, mobile phones and cameras in the setting;

- 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

WAT'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 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;
  - consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities;

- 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 of Lunder police (069 410 0876) 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.
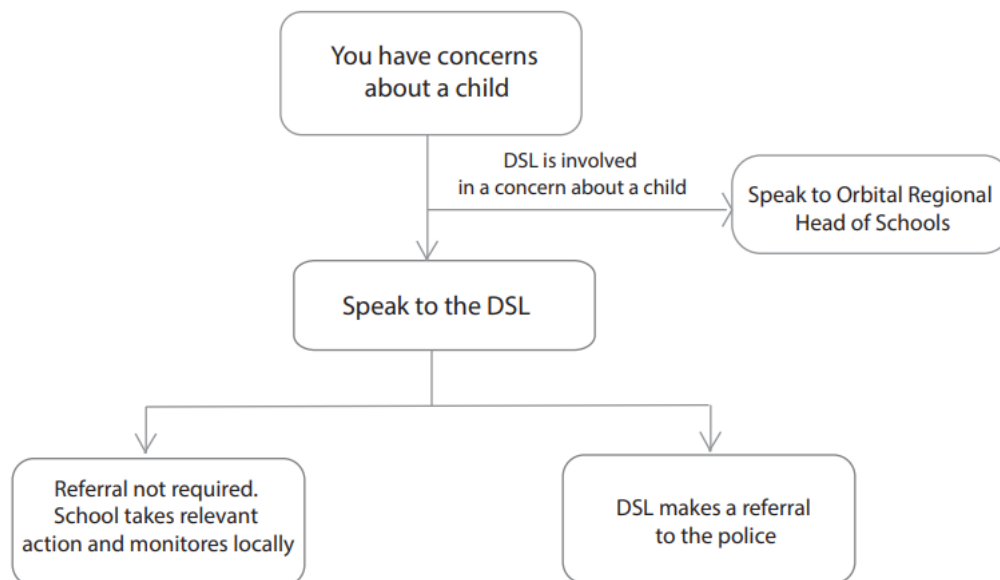
7.3 If you have concerns about a child.

(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)*:

You have concerns about a child

Speak to the DSL

DSL is involved in a concern about a child → Speak to Orbital Regional Head of Schools

Referral not required. School takes relevant action and monitores locally

DSL makes a referral to the police

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. Allegations of abuse made against other students.

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "just having a laugh" or "part of growing up," as this can lead to a culture of unacceptable behaviours and an unsafe environment for students.

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of students hurting other students will be dealt with under our school's Behaviour Policy, but this Child Protection and Safeguarding Policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- is serious, and potentially a criminal offence;
- could put students in the school at risk;
- is violent;
- involves students being forced to use drugs or alcohol;
- involves sexual exploitation, sexual abuse or sexual harassment (such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)).

7.5.i Procedures for dealing with allegations of child-on-child abuse.

If a student makes an allegation of abuse against another student:

- you must record the allegation using an Incident Report Form and tell the DSL, but do not investigate it;

- the DSL will contact the RHoS and, if the allegation involves a potential criminal offence, the police;

- the DSL will put a risk assessment and support plan into place for all children involved (including the victim[s], the child[ren] against whom the allegation has been made, and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator[s].

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator[s]. We will ask the police if we have any questions about the investigation.

7.5.ii Creating a supportive environment in school and minimizing the risk of child-on-child abuse.

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images;

- be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to boys;

- ensure our curriculum helps to educate students about appropriate behaviour and consent;

- ensure students are able to easily and confidently report abuse using our reporting systems (as described in Section 7.10 below);

- ensure staff reassure victims that they are being taken seriously;

- be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners;

- support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed;

- consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment;

- ensure staff are trained to understand:

- how to recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports;

- that even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of "it could happen here";

- that if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:

  - children can show signs or act in ways they hope adults will notice and react to;

  - a friend may make a report;

  - a member of staff may overhear a conversation;

  - a child's behaviour might indicate that something is wrong;

- that certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation;

- that a student harming a peer could be a sign that the child is themselves being abused, and that this would fall under the scope of this policy;

- the important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it;

- that they should speak to the DSL if they have any concerns;

- that social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side.

The Head of School will take the lead role in any disciplining of the alleged perpetrator[s]. We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations (e.g. by the police) are going on. The fact that another body is investigating or has investigated an incident does not prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the RHoS and police to determine this;

- there are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing.

7.6 Sharing of nudes and semi-nudes ('sexting').

This approach is based on guidance from the Council for Internet Safety for [all staff](#) and for [DSLs and senior leaders](#).

7.6.i Your responsibilities when responding to an incident.

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

- view, copy, print, share, store or save the imagery yourself, or ask a student to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL);
- delete the imagery or ask the student to delete it;
- ask the student[s] who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility);
- share information about the incident with other members of staff, the student[s] it involves or their, or other, parents and/or carers;
- say or do anything to blame or shame any young people involved.

You should explain that you need to report the incident and reassure the student[s] that they will receive support and help from the DSL.

7.6.ii 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 the image(s) has been shared widely and via what services and/or platforms (this may be unknown);
- 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;
- there is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to SEN);
- what the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage or are violent;
- the imagery involves sexual acts and any student in the images or videos is under 14;
- 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.

7.6.iii 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.iv 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.v 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.vi 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.

7.6.vii Curriculum coverage

Students are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our pastoral care programme. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- what it is;
- how it is most likely to be encountered;

- the consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment;
- issues of legality;
- the risk of damage to people's feelings and reputation.

Students also learn the strategies and skills needed to manage:

- specific requests or pressure to provide (or forward) such images;
- the receipt of such images.

This policy on the sharing of nudes and semi-nudes is also shared with students so they are aware of the processes the school will follow in the event of an incident.

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. Online safety and the use of mobile technology

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

Our approach to online safety and mobile technology use is to ensure the maximum amount of protection is provided without having an undue effect on educational activities:

- students from KG to Grade 10 are not permitted to bring mobile phones to school. Students in Grades 11 and 12 may have mobile devices   but may only use them in the DP Lounge.

- students may not, at any time, use personal devices (including laptops, tablets, etc. as well as mobile phones) to take pictures, videos, or audio recordings of community members;

- any staff member taking photos/videos of educational activities for documentation purposes on personal devices must transfer the files to a school computer and delete them from the personal device within 24 hours.

- filters are used to prevent access to inappropriate content for students and staff, including social networks, porn sites categrized as "Adult", VPN applications.

- monitoring of internet use is carried out regularly by the school's IT, at least 2 - 3 times a week, in order for us to update the blocklist and whitelist, to support the safety and wellbeing of our community;

- all members of the WAT community must read and sign a statement that they fully understand the Responsible Use of IT policy before gaining access to the network.

For full details about our school's policies in these areas, please refer to the Responsible Use of IT policies, which can be found on our website [insert hyperlinks].

To address this, our school aims to:

- have robust processes (including filtering and monitoring systems on school devices and the school network) in place to ensure the online safety of students, staff, volunteers and board members;

- protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones');

- set clear guidelines for the use of mobile phones for the whole school community;

- establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate.

8.1 The four key categories of risk.

Our approach to online safety is based on addressing the following categories of risk:

- **Content** – being exposed to illegal, inappropriate, or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalization, and extremism.

- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as

children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g., consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying.

- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

8.2 To meet our aims and address the risks above, we will:

- educate students about online safety as part of our curriculum. For example:
  - the safe use of social media, the internet and technology;
  - keeping personal information private;
  - how to recognise unacceptable behaviour online;
  - how to report any incidents of cyber-bullying, ensuring students are encouraged to do so, including where they are a witness rather than a victim;

- train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year;

- educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings/ information sessions. We will also share clear procedures with them so they know how to raise concerns about online safety;

- make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
  - Staff are allowed to bring their personal phones to school for their own use but will limit such use to non-contact time when students are not present;
  - Staff will not take pictures or recordings of students on their personal phones or cameras. If it is necessary to take a photo or video of students for documentation purposes, files must be moved to the designated shared drive within 24 hours.;

- make all students, parents/carers, staff and volunteers aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology;

- explain the sanctions we will use if a student is in breach of our policies on the acceptable use of the internet and mobile phones;

- make sure all staff, students and parents/carers are aware that staff have the power to search students' devices (including phones), as set out in the [DfE's guidance on searching, screening and confiscation](#);

- put in place robust filtering and monitoring systems to limit children's exposure to the four key categories of risk (described above) from the school's IT systems;

- carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community;

- provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively;

- review the Child Protection and Safeguarding Policy, including online safety, annually, and ensure the procedures and implementation are updated and reviewed regularly.

9. 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.

10. 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 disproportionally 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.

12. 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.

13. Complaints and concerns about school safeguarding policies

13.1 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).

13.2 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 WAT, 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.

14. 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.

15. Training

15.1 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.

15.2 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).

15.3 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.

15.4 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.

15.5 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.

16. 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.

17. Links with other policies

This policy links to the following policies and procedures:

- Behaviour Policy
- Staff Code of Conduct
- Community Handbook (complaints procedures)
- Emergency Response Plan (first aid)
- Attendance Policy
- Responsible Use of IT
- Curriculum (Academic Integrity, Assessment, Language, Inclusion, and Admissions)
- Staff Handbook

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 (including cyber-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.