

COGNITA

International Safeguarding Policy

Including required processes
and knowledge base

Royal Grammar School Guildford Dubai



Middle East

United Arab Emirates

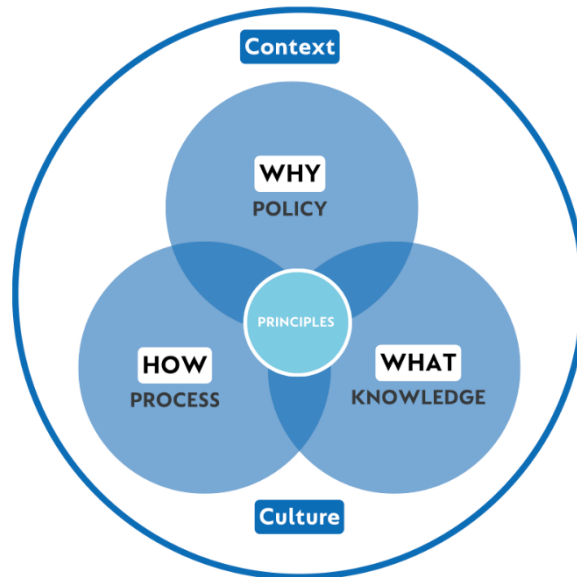
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Introduction

Establishing a strong culture of care for our children is our number one priority. This safeguarding policy provides the framework for this to be lived and is divided into three main parts (see visual).



WHY – Policy

Our commitment and guiding principles to safeguarding.

WHAT – Knowledge

The knowledge we need to know to effectively engage with our safeguarding processes.

HOW – Process

The processes required to ensure effective safeguarding in our schools.

Whilst these areas provide the basis for our work, there are two other essential elements to consider: context and culture.

Context

Each school serves a distinctive community. Whilst there are universal principles and processes in safeguarding, an individual school community may also have specific contextual features that impact the safeguarding risks and considerations for children. These will in turn influence a school's approach to the implementation of policy.

Culture

School culture is the collection of values, expectations and practices that guide and inform the work of all members of a school community. Language, actions and behaviours tell you about the culture in a school. The safeguarding policy is important, but only when actively lived every day in the culture of the school. Safeguarding is a shared responsibility for every member of the school community. Creating a strong safeguarding culture is essential to providing the most effective environment for children to thrive in all aspects of their development.

Document contents and navigation

The structure of this document is outlined below. The intention is to allow for swift and easy access to the information you might need.

[Part 1: Safeguarding Policy](#)

- Our school's commitment to safeguarding and child protection
- Safeguarding commitment and principles
- Scope
- Definitions
- Safeguarding is everyone's responsibility and information sharing
- Review
- Governance
- Legal and contextual considerations
- Related documentation
- Safeguarding key contacts

Part 2: Processes

Procedures and guidance that support schools to implement effective and successful safeguarding:

- 2.1 [Accountabilities and responsibilities](#)
- 2.2 [Recording and reporting a concern about a child](#)
- 2.3 [Recording and reporting a concern about an adult](#)
- 2.4 [Training](#)
- 2.5 [Curriculum](#)
 - Link to regional Safer Recruitment Policy

Part 3: Knowledge Base

Key documents that contain knowledge required by staff:

- 3.1 [Types and signs of abuse – physical, emotional, sexual, domestic and neglect](#)
- 3.2 [Adverse childhood experiences / Mental health](#)
- 3.3 [Vulnerable children](#)
- 3.4 [Child on child abuse](#)
- 3.5 [Contextual safeguarding](#)
- 3.6 [Sexual harassment, sexual violence and harmful sexual behaviour](#)
- 3.7 [Online safety](#)
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- 3.9 [Child Exploitation](#)
- 3.10 [Forced marriage and female genital mutilation](#)
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- 3.12 [Low-Level Concerns and Self-Reports](#)
- 3.13 [Allegations](#)

[Glossary and Definitions](#)

Part 1: Safeguarding Policy

1.1 Safeguarding commitment and principles

Safeguarding commitment

We are committed to promoting the welfare of each child. It is our responsibility to ensure that all children have equal rights to be protected from harm and abuse and the right to feel safe. We create and maintain a safe, supportive and inclusive environment where each child may thrive and develop physically, socially, emotionally and academically.

Safeguarding principles

Our principles of safeguarding are universal and apply to all Cognita schools. They have been developed by the Cognita Safeguarding Specialist Team and take account of the International Taskforce for Child Protection, the United Nations Rights of the Child and globally leading practice.

1. Everyone has a responsibility to support the protection of children.
2. Educate all staff in understanding the categories of abuse and the consequent duty of care they hold to notice any potential harm to children.
3. Empower all staff to act in the best interests of the child to protect them from harm or abuse and take appropriate actions if any concerns arise.
4. Know our children well and offer timely support to those who have experienced, or are at risk of experiencing, an adverse childhood experience.
5. Empower all children to be able to voice their opinion and to share their thoughts and beliefs within the safe environment of the school.
6. Educate and raise awareness in children of how to manage risk, identify harmful behaviours and seek help when needed.
7. Ensure that every adult who works with or for the school is safe to do so.

1.2 Scope – who the policy applies to

This policy and the processes within apply to all children and adults in the school, including those in the Early Years.

This policy applies to all teaching, non-teaching, residential, pastoral, support, peripatetic, contract staff and ancillary staff, agency/supply staff, volunteers, non-school based Cognita staff and any other adults working at the school.

Throughout the document, the term DSL is used for the Designated Safeguarding Lead.

This safeguarding policy applies to all children and adults in the school, including when being educated off-site and undertaking an educational visit. It also applies to children who are on an exchange and being hosted by the school.

1.3. Definitions

Definition of safeguarding

Safeguarding and promoting the welfare of children is defined for the purposes of this policy as:

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

Definition of child protection

Child protection is defined as:

Protecting individual children identified as suffering or likely to suffer significant harm. Child protection is part of the safeguarding process. Each school will have child protection procedures which detail how to respond to concerns about a child.

Definition of child and children

Children includes everyone 18 and under or those over the age of 18 who remain in full-time education.

1.4 Safeguarding is everyone's responsibility

In our school, safeguarding is everyone's responsibility. Everyone who encounters children and their families has a role to play. To fulfil this responsibility effectively, all professionals should make sure their approach is child centred. This means that they should consider, always, what is in the best interests of the child. No single professional can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who encounters them has a role to play in identifying concerns, sharing information and taking prompt action.

All staff have the following responsibilities:

- Contribute to providing a safe environment in which all children can learn and flourish.
- Know what constitutes abuse and what to do if a child tells you that he or she is being abused, harmed, or neglected.
- Know what to do if you are concerned about the behaviour or conduct of an adult in the school.
- Manage the requirement to maintain an appropriate level of confidentiality.
- Refer any concern to the Designated Safeguarding Lead (DSL) or the Deputy DSL (DDSL) or in their absence the Regional Safeguarding Lead (RSL)
- Refer any safeguarding concern about the Principal to the Regional Chief Executive Officer (CEO).
- Be aware of our child protection process and your role in it.
- Read and understand this policy including all knowledge base documents.

Information sharing

Information sharing is vital in identifying and tackling all forms of abuse and neglect. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of children. Data protection does not prevent the sharing of information for the purposes of keeping children safe. School staff should, therefore, be proactive in sharing information with the DSL as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to have child protection concerns. This includes the sharing of information by the DSL and Principal without parental consent where there is good reason to do so, i.e., the risk of harm to the child will be increased.

Review

This policy is updated annually, drawing on feedback from staff, and is informed by the Group Policy Safeguarding Governance and Oversight. It is shared with all staff through the annual safeguarding declaration.

1.5 Governance

Governance is undertaken on behalf of the Cognita Board (Cognita Holdings Limited). Group-wide arrangements are in place and these are outlined in the separate document, 'Group Policy Safeguarding Governance and Oversight.' The Group Chief Education Officer holds responsibility for these arrangements. The above policy outlines clear lines of accountability and responsibility for all aspects of safeguarding. This is executed and reported in the following five ways:

School

- Reviews in individual schools by Independent Safeguarding Reviewer

Region

- Safeguarding reporting from each school to the regional team
- Regional Safeguarding Assurance Board Meetings

Group

- Regional Mid-Year safeguarding 'check-in' session
- Regional Annual Safeguarding Report and Annual Safeguarding Governance Meeting

1.6 Legal and contextual considerations

Our safeguarding and child protection policies, processes and knowledge base are built upon and support the 1989 international legal framework - the United Nations Convention on the Rights of the Child.

Specific legal and local context

The policy is in line with Federal Law No. 3 of 2016 regarding the Child Rights Law (Wadeema's Law), Cabinet Resolution No 52 of 2018 regarding the implementing regulation of Wadeema's Law and the guidance provided in the Ministry Of Education (MOE) 'National Child Protection Policy in Educational Institutions in United Arab Emirates'

Related documentation

This policy should be read in relation to the most recent version of the following hyperlinks:

- MOE National Child Protection Policy in Educational Institutions in United Arab Emirates
- Cognita Group Policy: Safeguarding Governance and Oversight

- Cognita Whistleblowing Policy

Safeguarding key contacts

School contacts	
Designated Safeguarding Lead (DSL)	Angela Sutherland
Deputy Designated Safeguarding Lead (Deputy DSL)	Clare Turnbull, Charlotte Grieves, Beckie Bennett
Any other staff trained to DSL level	Joseph Creal, James Sheriff, Nicholas Radborne
Designated Practitioner with responsibility for safeguarding in early years	Angela Sutherland
Deputy Designated Practitioner with responsibility for safeguarding in early years	Beckie Bennett
Mental Health Lead	Charlotte Grieves
Mental Health first aiders	Tereza Panash Yehia May Ann Angeles Farida Fanda Charo Malanzo
Principal	Clare Turnbull

Cognita contacts	
Regional Safeguarding Lead	Lizzie Varley lizzie.varley@cognita.com
Regional Director of Education	Ian Wallace ian.wallace@cognita.com
Group Chief Education Officer	Dr Simon Camby simon.camby@cognita.com

Local Child Protection Services / Government contacts	
Our school follows the safeguarding protocols and procedures of:	The CHILD PROTECTION CENTRE, MINISTRY OF INTERIOR ; offering a child abuse reporting system, confidentiality and advice. http://www.moi-cpc.ae/en/default.aspx
Local child protection services referral team(s)	The CHILD PROTECTION CENTRE, MINISTRY OF INTERIOR HOTLINE: Phone: 116111 Website: www.moi-cpc.ae

Police	
Local police emergency	911
Local police non-emergency	Al Barsha Station 04609 6299

Location of safeguarding and child protection documents in school	
<i>List the documents – from statutory/ external agencies and school documents</i>	All documentation is stored securely on our internal safeguarding platform CPOMS or with the Principal. Requests about children joining with concerns are kept securely and DSL and DDSL contact the previous schools for more information this is then stored on CPOMS if a concern is raised.
Relevant safeguarding organisations	
CHILD PROTECTION SECTION, COMMUNITY DEVELOPMENT AUTHORITY; offering confidentiality and advice	800988 Website: www.cda.gov.ae
THE CHILD PROTECTION UNIT, MINISTRY OF EDUCATION offering a child abuse reporting system, confidentiality and advice	80085 Website: CPU@moe.gov.ae
AL AMEEN SERVICE ; offering confidential communication between the public and the State Security Service in Dubai	800-4-888
KDHA - Knowledge and Human Development Authority	Afra Al Qamzi +971 (4) 3643672 afra.alqamzi@khda.gov.ae
Latifa Hospital Child Welfare Unit	Tel: 04 219 3000 PO Box 4115 Dubai, UAE

Part 2: Safeguarding Processes

2.1 Accountability and Responsibilities

Safeguarding principles

Principle 1: Everyone has a responsibility to support the protection of children.

Essential points

- Everyone is responsible for safeguarding
- Some staff have specific responsibilities
- There is a difference between being responsible and accountable for safeguarding

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- A. Specific staff accountabilities and responsibilities
- B. The role of the DSL and DDSL

A. Specific staff accountabilities and responsibilities

All staff have the following responsibilities:

- Contribute to providing a safe environment in which all children can learn and flourish.
- Know what constitutes abuse and what to do if a child tells you that he or she is being abused, harmed or neglected.
- Know what to do if you are concerned about the behaviour or conduct of an adult in the school.
- Manage the requirement to maintain an appropriate level of confidentiality.
- Refer any concern to the Designated Safeguarding Lead (DSL) or the Deputy DSL (DDSL) or in their absence the Regional Safeguarding Lead (RSL)
- Refer any safeguarding concern about the Principal to the Regional Chief Executive Officer.
- Be aware of our child protection process and your role in it.
- Read and understand this policy including all key factual awareness documents.

The **Designated Safeguarding Lead (DSL)** is the key person in school responsible for leading and managing the safeguarding of children. They must have the authority in school to make key decisions.

The **Principal** at each Cognita school, is accountable for the standards of safeguarding and child protection at their school.

The **Regional Safeguarding Lead (RSL)** is responsible for promoting the highest standard of safeguarding and child protection within a region, advising and supporting schools to adopt a self-improving approach to safeguarding practice.

The **Regional Human Resources Director (HRD)** promotes (in relation to safeguarding) the highest standard of safer recruitment practice within a region.

The **Regional Chief Executive Officer (Regional CEO)** is accountable for the standards of safeguarding in their region. The Regional CEO is responsible for overseeing safeguarding arrangements within their region, including the effective implementation of policies and practices across all Cognita schools in their region.

B. The role of the DSL and DDSL

The Designated Safeguarding Lead (DSL) is the key person in school responsible for leading and managing the safeguarding of children. They must have the authority in school to make key decisions.

Deputy DSL

The school can appoint several Deputy DSLs (DDSL) including an Early Years DSL (EYDSL). Their role is to support the DSL in their safeguarding role. Whilst the activities of the DSL can be delegated to DDSLs, the ultimate lead responsibility for child protection must remain with the DSL. This lead responsibility must not be delegated. The Deputy DSL are trained to the same level as the DSL and their duties are reflected explicitly in their job descriptions.

Inter-agency working and working with others.

The DSL and Deputy DSLs are expected to:

- liaise with statutory agencies and work in partnership with other agencies in the best interests of children in the school
- liaise with the Principal to inform him or her of issues, especially child protection cases, child protection services and police investigations
- as required, act as, or liaise with the 'case manager' in relation to allegations against adults
- liaise with all staff (including pastoral support staff, Wellbeing/Mental Health Lead, school nurses, IT technicians, additional learning support staff and counsellors) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies
- act as a source of support, advice and expertise for all staff
- promote supportive engagement with parents and/or carers in safeguarding and the welfare of children, including where families may be facing challenging circumstances.

Training

The DSL (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out their role, including inter-agency working. This will be provided by the Regional Safeguarding Lead, external specialists and through recognised bodies, for example, the Council of International Schools. DSLs should undergo some form of additional specialist training at least every two years to maintain and strengthen a strong skill and knowledge base.

Support for DSL

The DSL will be given the time, funding, training, resources, support and supervision to provide advice and support to other staff on child welfare and child protection matters, to take part in all relevant meetings and/or to support other staff to do so, and to contribute to the assessment of children.

There are four key elements to the DSL role. They will:

- manage referrals
- work with others
- train staff in relation to safeguarding
- raise awareness of safeguarding within the school staff group.

Raise awareness.

The DSL should:

- ensure that the school's safeguarding and child protection policies are known, understood and used appropriately
- ensure that online safety training is provided as part of regular staff updates
- ensure that the school's Safeguarding and Child Protection Policy is reviewed annually and that the procedures and implementation are updated and reviewed regularly
- help promote educational outcomes by sharing necessary information about the welfare, safeguarding and child protection issues that children are experiencing, or have experienced, with teachers and school leadership staff. The DSL's role could include ensuring that their staff know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.

Availability

During term time the DSL (or a deputy) will always be available (during school hours) for staff in the school to discuss any safeguarding concerns. Whilst the DSL (or deputy) will normally be available in person, the Principal will define what 'available' means and whether in exceptional circumstances availability is via work phone and/or Microsoft Teams. It is the responsibility of the Principal and DSL to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

2.2 Recording and reporting a concern about a child

Safeguarding principles

Principle 1: Everyone has a responsibility to support the protection of children.

Principle 3: Empower all staff to act in the best interests of the child to protect them from harm or abuse and take appropriate actions if any concerns arise.

Principle 4: Know our children well and offer timely support to those who have experienced, or are at risk of experiencing, an adverse childhood experience.

Essential points

- All staff must report any concerns, however small, to the Designated Safeguarding Lead
- Staff should be confident in how to manage a disclosure or a concern about a child.
- All concerns must be recorded in a timely and comprehensive manner.
- Case management is a key skill known and displayed by the safeguarding team.
- Confidentiality is essential.

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- B. Managing a disclosure
- C. Confidentiality
- D. Photos of abuse
- E. Recording a disclosure or a concern you have about a child
- F. Following a cause for concern
- G. Escalation to statutory services or to external specialist services
- H. Passing on safeguarding records when a child leaves the school

A. Importance of reporting

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

If a child is in immediate danger or at risk of harm, a referral should be made to the MOI Child Protection Centre and/or the police immediately, if possible. This referral would be made by the DSL, in consultation with the Principal. The school must always inform the Regional Safeguarding Lead (RSL).

Safeguarding and promoting the welfare of children is everyone's responsibility. All staff should know what to do when a child discloses abuse to them, they have concerns about a child's welfare or when children or staff raise concerns about a child to them. The knowledge base in this document will outline how and where you do this in our school.

B. Managing a disclosure

The points below support all adults in a situation where a child tells a member of staff that they know about or have been a victim of abuse or neglect.

- Listen carefully and allow the child to speak freely and remain calm. Do not interrupt the child or be afraid of silences.

- Provide reassuring nods and words such as, "I am so sorry this has happened", "You are doing the right thing in talking to me." Avoid saying things like, "I wish you had told me about this earlier" or "I cannot believe what I am hearing."
- Questioning of the child about what they are saying should not be extensive as the DSL will lead any investigation. Limit questioning to the minimum necessary for clarification using *What, When, How and Where*. Avoid leading questions such as, "Has this happened to your siblings?" Do *not* use questions beginning with *Why* as this can apportion feelings of guilt within a child.
- If the child discloses abuse, then it is appropriate to ask whether any other adults were present and observed the abuse and whether the abuse has happened before.
- At an appropriate time, tell the child that the matter will be referred in confidence.
- Tell the child what will happen next. The child may want to accompany you to see the DSL, otherwise let the child know that someone will come to see them before the end of the day.

C. Confidentiality

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

Staff who become aware of a safeguarding issue within the scope of this policy should only ever report to the appropriate person as specified in this policy. Issues should not be discussed with anyone else internally (including the person or persons against whom the allegations have been made) or externally including, but not limited to, the media.

D. Photos of abuse

If a child discloses physical abuse, self-harm or attempts to take their life, staff should never take photos of their injuries. On exceedingly rare occasions, you may be directed by child protective services or the police to take a photo of a child's injury and send it to them for their assessment of risk. The school must record who has asked this to be done and note their role and contact. Any photo subsequently taken by staff, preferably nursing staff, on a school device must have a witness present. Images must be deleted from school devices as soon as the statutory agency confirms receipt of the images.

E. Recording a disclosure or a concern that you have about a child

How and where to record

If a disclosure of abuse has been made by the child, staff should immediately discuss the concerns verbally with the DSL, Deputy DSL or Principal prior to writing up the record so that immediate action can be considered. If the DSL is not available then this should not delay appropriate action being taken and staff should speak to the DDSL, Principal or, failing that, another member of the SLT/Regional Safeguarding Lead.

All other concerns need to be recorded on CPOMS. Staff should make a written record of any conversation with the child as soon as possible.

Records of incidents should include:

Content of a Cause for Concern

A Cause for Concern should include the following content:

- 1 Precise and accurate factual notes (including date and time of incident and full names of those involved) made as soon as possible after an observation or disclosure
- 2 Quotations of actual words used by the child, shown as direct speech
- 3 If necessary, an attached body map
- 4 A reminder to give or notify the DSL of the incident immediately
- 5 Confirmation of who to notify of the incident

F. Following a cause for concern

Following a cause for concern, the DSL and their team will consider the necessary course of action to support the child.

They may call a Team around the Child meeting (TAC) which will include the staff who know the child or student the best to gather a full contextual picture to support decision making. [\(See Knowledge Base 3.5 for more information on contextual safeguarding\)](#).

The Threshold of Need flow chat – below – will be used to assess the level of need. If a child or student meets the criteria for Tier 2 or Tier 3 provision a safeguarding file will be opened. Decisions on actions to be taken will always be taken by the DSL and at least one other member of the safeguarding team.

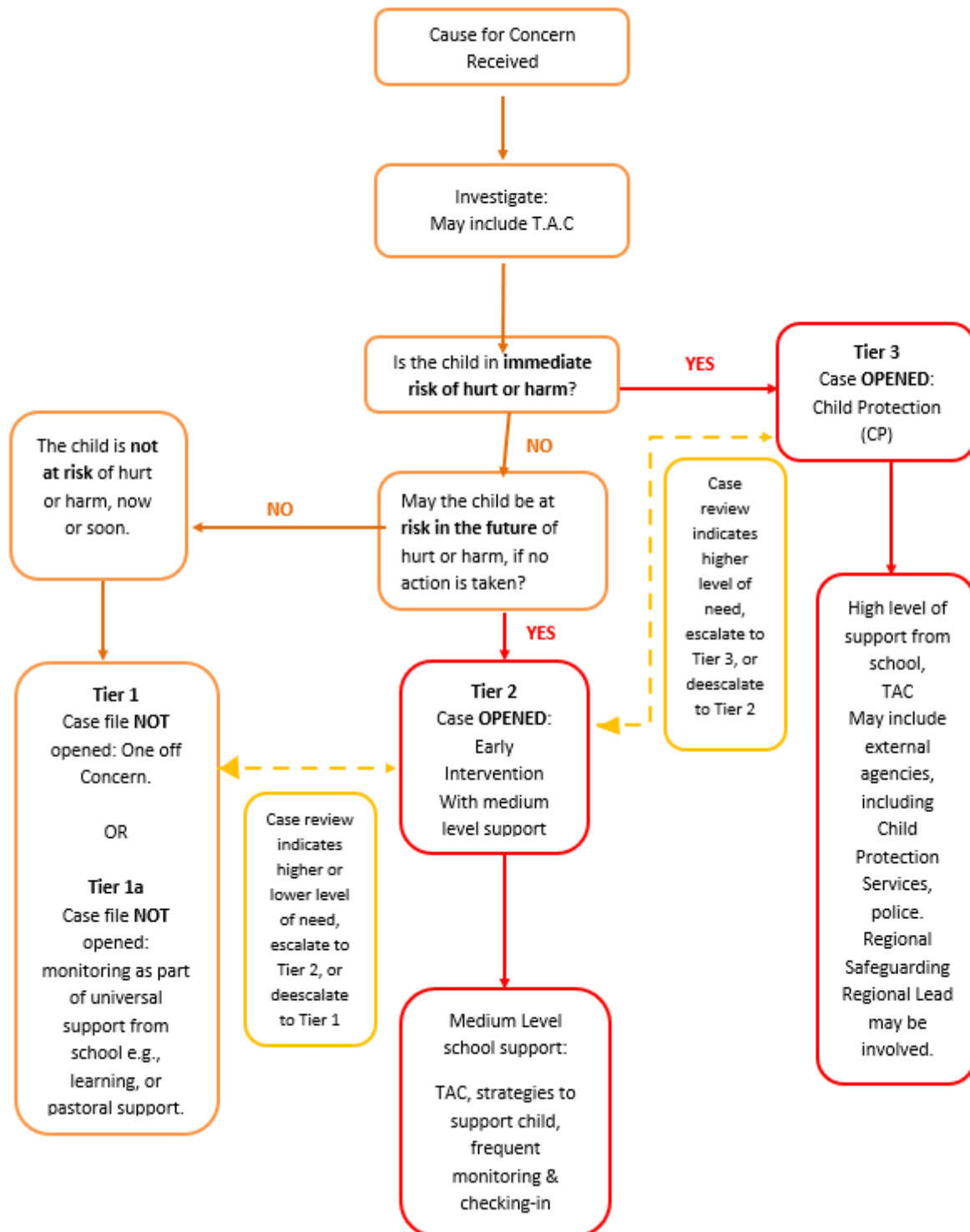
The rationale for each action will be explained. Each action will be assigned to a named member of staff who will be responsible for completing the task and recording all aspects of the process and the subsequent intended impact or outcome for the child or student. Any action plans will be shared on a need-to-know basis.

Each file will be closely monitored and reviewed at least once each six weeks (within school term time).

The DSL will oversee the effective management of all open child protection files.

All safeguarding files will be kept on CPOMS and access must be limited on a need-to-know basis.

Threshold of Need Flow Chart



G. Escalation outside of our school

If a child is being harmed or is at significant risk of harm:

When a child is thought to be at risk of harm or is likely to be at risk of harm, after full consideration, a referral should be made to the MOI Child Protection Centre, or the Police if a criminal act is thought to have occurred. The referral will be made by the DSL (MOI Child Protection Centre) or the Principal (Police), after approval from the regional office. Any concern that is externally referred will also require the completion of a SIRF.

The RSL is required to approve all Child Protection Centre referrals. The CEO is required to approve all Police referrals. The school does **not** require parental consent for referrals to be made to the authorities. Consent to do this must **not** be obtained from the parents if to gain consent would put the child's safety at risk or to do so could jeopardise any investigation by partner agencies. See above re ensuring that a context is gathered prior to making any referral to external agencies.

If a child has unmet needs:

When a child is not considered at risk of harm, but still has unmet needs that could mean they require Early Help intervention, a referral may still be needed to the MOI Child Protection Centre in some instances. These concerns should be discussed with the parents and any subsequent referral made transparently with the parent's knowledge unless to do so would place the child at heightened risk.

Confidentiality

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

H. Passing on safeguarding records when a child leaves the school

Information sharing is vital in identifying and tackling all forms of abuse.

If we have concerns about a child's safety, we have a duty to notify the relevant authorities. However, we should not share safeguarding information with a new school, until we have notified the authorities and obtained guidance from the authorities on whether we can share the safeguarding information with the new school. We should also carefully consider the information shared with the new school and take advice from the Regional Safeguarding Lead before doing so.

Upon approval from the authorities, we may need to share the safeguarding information with the new school. However, the child's place at the new school should be confirmed and the child should be enrolled at the school before the information is shared.

2.3 Reporting and recording concerns about an adult

Safeguarding principle

Principle 1: Everyone has a responsibility to support the protection of children.

Principle 7: Ensure that every adult that works with or for the school is safe to do so.

Essential points

- Everyone is responsible for safeguarding
- Some staff have specific responsibilities
- There is a difference between being responsible and accountable for safeguarding

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A. Expectations of adults

The safety and wellbeing of children in our school is dependent on the vigilance of all our staff. Their prompt communication to the DSL, DDSL or Principal of any concerns, no matter how small, regarding the conduct by an adult which causes them to doubt that adult's suitability to work with or have access to children is paramount.

All references in this section to "adult" should be interpreted as meaning any adult, staff members, agency/supply staff, self-employed, contractors, volunteers and visitors, unless otherwise stated. The school is conscious of its duty of care to children and will always act. This includes the possibility of abuse arising from situations or persons outside the school setting if alerted to this.

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

All staff must behave responsibly and professionally in all dealings with children and specifically with pupils for whom they have a duty of care. All staff must follow the procedures set out in our 'Staff Code of Conduct.'

Staff should always avoid behaviour which might be misinterpreted by others. As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people are in positions of trust in relation to the young people in their care. A relationship between a member of staff and a pupil cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people. All members of staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification. A position of trust could arise even if the member of staff does not teach the child.

B. Low-Level Concerns, including self-reports

What is a low-level concern, including those that are self-reports?

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school may have acted in a way that is not in line with the code of conduct.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

Low- Level Concerns about an adult

From time to time, an individual may notice behaviour, statements or actions in others which leave them concerned. These are behaviours or actions which fall short of a formal allegation of abuse.

These tend to be behaviours which indicate that our Code of Conduct has not been met. Any such concerns can be dealt with as a low-level concern.

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

- being over friendly with children;
- having favourites;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door;
- using inappropriate sexualised, intimidating behaviour (including shouting or being verbally aggressive); and/or
- offensive language (including the belittling of children on their own or in front of peers).

What to do if you have a low-level concern?

Where a low-level concern exists, it should be reported to the DSL or Principal within 24 hours. Such report will be treated confidentiality to the extent possible and only disclosed, whether internally or externally, on a need to know basis.

Self-reporting

From time to time, an individual may find him/herself in a situation which might appear compromising to others or which could be misconstrued.

Equally, an individual may, for whatever reason, have behaved in a manner which on reflection he/she considers falls below the standard set out in the Code of Conduct/other Cognita policy, falls below the expected professional standards or breaches this policy. Self-reporting in these circumstances is encouraged. This demonstrates both awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived.

As such, the school sees self-reporting as an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

What to do if you have a self-report?

Where a self-report exists, it should be reported to the DSL or to the Principal within 24 hours. Such report will be treated confidentiality to the extent possible and only disclosed, whether internally or externally, on a need to know basis.

For further detailed information about Low Level Concerns and Self-Reports, [please see Knowledge base 3.12.](#)

C. Allegations

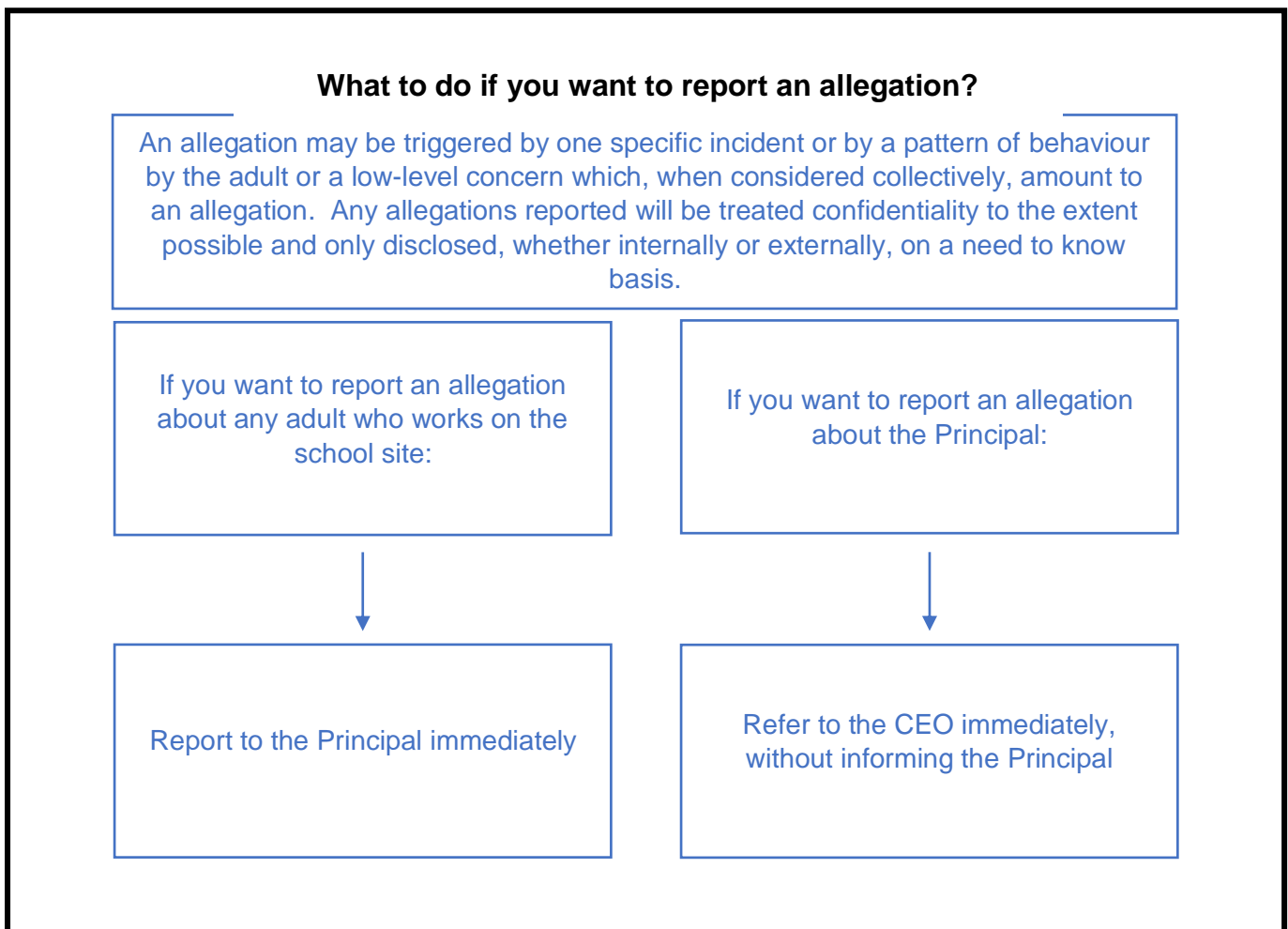
What is an allegation?

Allegations represent situations that might indicate a person may/would pose a risk of harm to children if they continue to work in regular or close contact with children in their present position or in any capacity.

This policy applies to all adults in the school if it is alleged that they have:

- behaved in a way that has harmed a child or may have harmed a child
- possibly committed a criminal offence against or related to a child
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (potential transferable risk).

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



For further detailed information about Allegations, [please see Knowledge base 3.13](#).

D. Whistleblowing

You should use the whistleblowing policy when you suspect wrongdoing.

Wrongdoing may include:

- actions which endanger the Health and Safety of others or the environment
- concerns about poor or unsafe practice, including in relation to the care and protection of a pupil or pupils
- conduct which suggests extremism or radicalisation of other staff or pupils
- allegations against adults
- bribery or corruption
- criminal activity
- fraud or other financial irregularities
- failure to comply with any legal or professional obligation or regulatory requirements
- conduct likely to damage the reputation of the School/Cognita
- misuse of sensitive or confidential information
- miscarriages of justice

- breaches of our internal policies and procedures
- any activity or situation within the School/Cognita or anywhere in our supply chain which amounts to modern slavery and
- deliberate attempts to conceal any of the above.

If you have any concerns about wrongdoing, you should contact the Whistleblowing Officer:

Jayne Pinchbeck - Email: whistleblowingofficer@cognita.com

Staff are strongly encouraged to reach out at an early stage.

No member of staff will be disciplined or otherwise suffer any detriment from their employer or Cognita for raising a genuine concern about unsafe practice, if they do so in good faith and follow the whistleblowing procedures.

2.4 Training

Safeguarding principle

Principle 2: Educate all staff in understanding the categories of abuse and the consequent duty of care they hold to notice any potential harm to children.

Essential points

- Training enables staff to fulfil their duty to safeguard children

Contents

- A. Training
- B. Induction

A. Training

All staff employed in school should receive annual safeguarding and child protection training from the DSL, usually at the commencement of the academic year. For new staff, this is in addition to their basic safeguarding awareness training completed during induction.

All staff will also receive safeguarding and child protection updates/training, including online safety training, regularly throughout the year. This is provided by the DSL or designated specialist. This will ensure that all staff have the relevant skills and knowledge to safeguard children effectively. Topics covered may include information related to knowledge base documents. Principals and those in senior roles must complete advanced safeguarding and subsequent refresher training. All staff actively involved in the recruitment process must complete safer recruitment training and subsequent refresher training.

B. Induction

At the point of induction, all new employed staff, including those with governance oversight, must be trained by the DSL or DDSL. This includes an expectation to read and understand:

- The Safeguarding and Child Protection Policy and Procedure
- UAE Code of Conduct
- Whistleblowing policy
- Health and Safety policy

At the point of induction, new staff must be informed of the names and role of the Designated Safeguarding Lead and Deputy DSLs. Likewise, all agency/supply/substitute staff must be informed of those with these roles, and of the school processes for raising concerns about children or adults in the school. All new staff must be made aware of, if applicable, the acceptable use policy which includes the use of personal mobile phones when on the school site. Staff and visitors are required to wear an identity lanyard.

2.5 Curriculum

Safeguarding principle

Principle 5: Empower all children to be able to voice their opinion and to share their thoughts and beliefs within the safe environment of the school.

Principle 6: Educate and raise awareness in children of how to manage risk, identify harmful behaviours and seek help when needed.

Essential information

- Children are empowered through the opportunity to acquire knowledge, skills and attitudes.
- Empowered children can voice their opinions and know how to identify and manage risk.

Contents

- A. Curriculum provision to keep children safe
- B. Children raising concerns

A. Curriculum provision to keep children safe

The school is committed to proactively teaching children about safeguarding, including online safety, as part of our approach to offering a broad, balanced and inclusive curriculum. Through ongoing work with the children, we aim to build resilience so that every child knows that we are a 'telling school' and that speaking up about any concern is valued and actively promoted. This includes raising a concern about themselves or about another.

The safeguarding curriculum is taught across the school this is taught both through specific lessons, for example Online Safety and is integrated into whole school Assemblies, for example behaviour expectations.

B. Children raising concerns

We actively promote the view that children should feel able to raise any concerns that they may have. This includes when they have a concern about a friend or peer. We take the following measures to ensure that children know how to raise a concern:

- All areas around the school have posters detailing photos of the key personal who have a responsibilities for safeguarding and are shared with pupils by their form teachers and in assemblies.
- As part of our continued development for wellbeing and safeguarding, children are reminded of who they can contact should they wish through assemblies and form time.
- All classrooms have a "things I wish my teacher knew" which allows them to share both positives and concerns to staff.
- Our PSHE and MSC curriculum covers how to report concerns and what to do if worried
- Effective relationships between staff and pupils are formed from the start and that trust is formed to allow opportunities for pupils should they need to raise a concern.
- Our annual Voice of the Pupil survey and PASS surveys allow us to gain feedback from students in regards to their safety.
- School council meet regularly and is another forum for raising whole school concerns.

Part 3: Knowledge Base

3.1 Types and signs of abuse – Physical, emotional, sexual, domestic and neglect

Essential points

- The four main types of abuse are: physical, emotional, sexual and neglect.
- Domestic violence is abuse even if a child is not directly involved.
- Some groups of children maybe more vulnerable to abuse than others
- Signs of abuse may be visual but more often signs of abuse are shown in slight changes in mood and behaviour.

Contents

- A. What is abuse?
- B. Physical abuse
- C. Emotional abuse
- D. Domestic abuse
- E. Sexual abuse
- F. Neglect
- G. Behaviour signs of abuse and neglect

A. What is abuse?

The term 'abuse' is often used as an umbrella term. All staff should be aware of indicators of abuse and neglect so that they are able to identify cases of children who may need help or protection. Abuse and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff can identify cases of children who may be in need of help or protection.

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

B. Physical abuse

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

Signs of physical abuse can include:

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

C. Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only as far as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Signs of emotional abuse tend to be behavioural rather than physical (see below).

D. Domestic abuse

Children can be victims of domestic abuse. They may see, hear or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). Domestic violence and abuse may be a single incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or sexual abuse regardless of gender or sexuality. The abuse can encompass but is not limited to psychological, physical, sexual, financial or emotional. Exposure to domestic abuse and/or violence can have a serious, detrimental and long-term impact on a child's health, wellbeing, development, and ability to learn. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

E. Sexual abuse

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

Signs of sexual abuse displayed by children may include:

- pregnancy
- sexually transmitted infection/diseases
- pain/itching/bleeding/bruising/discharge to the genital area/anus/mouth
- urinary infections
- difficulty walking, sitting or standing
- persistent sore throats
- stomach-ache
- behavioural signs set out in section G below.

F. Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, because 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); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Signs of possible neglect include the child being:

- underweight or is small for their age, or their weight deteriorates
- very overweight for their age
- poorly clothed, with inadequate protection from the weather
- often absent from school for no apparent reason; or persistently arrive late
- regularly left alone, or in charge of younger brothers or sisters.

G. Behavioural signs of abuse and neglect manifested by children

'All behaviour is communication.'

If a child is being abused, their behaviour may change in several ways. For example, they may:

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

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

Signs may include:

- places unrealistic expectations on the child, i.e., demands a level of academic or physical performance of which they are not capable
- offers conflicting or unconvincing explanation of any injuries to the child
- delays seeking medical treatment for the child's mental/physical health
- appears indifferent to, is emotionally unavailable, or overtly rejects, the child
- denies existence of or blames the child for the child's behaviours at home or at school
- sees and describes the child as entirely worthless, burdensome or in another negative light.
- refuses offers of support to meet the child's need
- refuses to consent to referrals to external agencies to meet their child's needs/does not engage as expected.

What should I do if I suspect that a child may be at risk?

Report your concern to the DSL without delay.

3.2 Adverse Childhood Experiences / Mental Health

Essential points

- An adverse childhood experience (ACE) is a stressful event that can have a lasting impact on mental health, behaviour and education.
- Good mental health is important to build strong, resilient and proactive children.

Contents

- A. Adverse childhood experiences
- B. Mental health

A. Adverse childhood experiences

Adverse children experiences are stressful events that occur in childhood, such as being a victim of abuse, neglect or growing up in a household in which alcohol or substance misuse, mental ill health, domestic violence or criminal behaviour are present.

This can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that all staff are aware of how these children's experiences can impact on their mental health, behaviour and education. All staff should also be aware that deteriorating emotional wellbeing and escalation of mental health problems can, in some cases, be an indicator that there is a safeguarding concern, for example, a child has suffered or is at risk of suffering abuse, neglect, bullying/cyberbullying or exploitation.

Please note, however, that only appropriately trained health professionals should attempt to make a diagnosis of a mental health problem.

Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. If staff have a mental health concern about a child that is also a safeguarding concern. Immediate action should be taken - talk to the DSL.

B. Mental health

Our children are supported by specialist staff and resources to proactively support their mental health and wellbeing. School counsellors are available to offer crisis, and short- and long-term support to children. Access to support is via the referral systems in place in the school.

However, as stated above, it is the responsibility of all adults to recognise when a child show signs of distress or presents with mental health concerns which needs the intervention of the DSL.

Schools will seek therapeutic support for the most vulnerable and adopt, when appropriate, a multi-agency approach to the care of the child.

What should I do if I suspect that a child may be at risk?

Report your concern to the DSL without delay.

3.3 Vulnerable children

Essential points

- Some children are potentially at greater risk of harm and early help and support is required.

Contents

- A. Vulnerable children
- B. Additional learning needs and/or disabilities

A. Vulnerable children

Whilst all children should be protected, it is important that staff recognise that some groups of children are potentially at greater risk of harm (including online harm). For example, this vulnerable group includes, but is not limited to those children with additional learning needs and/or disabilities, young carers, those in guardianship, and those living in homes characterised by domestic abuse and/or parental acrimony.

B. Additional learning needs and/or disabilities

Children with additional educational needs (ALN) and/or disabilities are statistically more vulnerable to child abuse, including child-on-child abuse. Additional barriers can exist when recognising abuse and neglect in this group of children. These include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- that children with ALN and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs
- communication barriers and difficulties in overcoming these challenges.

[What should I do if I suspect that a child may be being at risk?](#)

Report your concern to the DSL without delay.

3.4 Child-on-child abuse

Essential points

- A child/children can abuse another child/children.
- Child-on-child abuse can take all forms that you see in adult-to-child abuse.
- Abusive behaviour is not a normal part of growing up, 'banter' or 'having a laugh'.

Contents

- A. Child-on-child abuse
- B. What is child-on-child abuse
- C. When does behaviour become abusive?
- D. How can I identify victims of child-on-child abuse?
- E. Are some children particularly vulnerable to abusing or being abused by another child?
- F. How prevalent is child-on-child abuse?
- G. What should I do if I suspect either that a child(ren) may be being abused, or that a child(ren) may be abusing others?
- H. How will the DSL respond to concerns of child-on-child abuse?
- I. How does the school raise awareness of, and reduce the risk, of child-on-child abuse?

A. Child-on-child abuse

All staff should be alert to the risk of child-on-child abuse and understand their role in preventing, identifying and responding to it. All staff should understand that even if there are no reports in their school it does not mean it is not happening, it may be the case that it is just not being reported. Staff should know that children can abuse their peers and other children, and that abuse can occur in intimate personal relationships between peers and other children. They should never dismiss abusive behaviour as a normal part of growing up, 'banter' or 'just having a laugh' and should not develop high thresholds before acting. Abuse is abuse and child-on-child abuse must be taken as seriously as abuse by an adult.

B. What is child-on child-abuse?

Child-on-child abuse is any form of abuse perpetrated by a child towards another child. It can take many different forms, including, but not limited to:

- serious bullying (including cyber-bullying)
- relationship abuse
- domestic violence
- child sexual exploitation
- youth and serious youth violence
- 'upskirting'
- gender-based violence
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- sexual violence (such as rape, assault by penetration and sexual assault; this may include an online element which facilitates, threatens and/or encourages sexual violence).
- sexual harassment (including sexual comments, remarks, jokes, and online sexual harassment, which may be standalone or part of a broader pattern of abuse)
- consensual and non-consensual sharing of nudes and semi-nude images and or videos (previously known as sexting or youth produced sexual imagery).

These categories of abuse rarely take place in isolation and often indicate wider safeguarding concerns. For example, a teenage girl may be in a sexually exploitative relationship with a teenage boy who is himself being physically abused by a family member or by older boys. Equally, while children who abuse may have power over those who they are abusing, they may be simultaneously powerless to others. Staff should be aware that there may be multiple perpetrators and/or victims and not consider that only one child abuses another in isolation.

Sharing nudes/semi nudes via imagery/videos can, but does not always, constitute abusive behaviour. All incidents should be responded to in accordance with this policy.

C. When does behaviour become abusive?

It can be difficult to distinguish between abusive behaviour, which should be dealt with in accordance with the procedure set out below, and behaviour which does not constitute abuse. This could be low-level bullying or cyber bullying (where the school's Anti-Bullying Policy should be followed) or age-appropriate sexual experimentation within the norms of sexual development.

Factors which may indicate that behaviour is abusive include

- a) where it is repeated over time and/or where the perpetrator(s) intended to cause serious harm
- b) where there is an element of coercion or pre-planning
- c) where there is an imbalance of power, for example, because of age, size, social status or wealth.

This list is not exhaustive, and staff should always use their professional judgment and discuss any concerns with the DSL, who in turn should seek guidance from the Regional Safeguarding Lead.

D. How can I identify victims of child-on-child abuse?

Identifying child on child abuse can be achieved by being alert to children's well-being and to general signs of abuse. Signs that a child(ren) may be suffering from child-on-child abuse overlap with those relating to other types of abuse.

Signs can include:

- failing to attend school, disengaging from classes, or struggling to carry out school related tasks to the standard you would ordinarily expect
- physical injuries
- having difficulties with their mental health and/or emotional wellbeing
- becoming withdrawn, shy, experiencing headaches, stomach aches, anxiety, panic attacks, suffering from nightmares or lack of sleep or sleeping too much
- drugs and/or alcohol use
- changes in appearance and/or starting to act in a way that is not appropriate for the child's age including sexualised behaviours
- change in health needs, including sexually transmitted infections and unwanted pregnancy.

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

E. Are some children particularly vulnerable to abusing or being abused by another child?

Any child can be affected by child-on-child abuse and staff should be alert to signs of such abuse amongst all children. Research suggests that:

- Child-on-child abuse is more prevalent amongst children aged 10 and older, although it also affects younger children, including by way of harmful sexual behaviour.
- Children who are particularly vulnerable to abuse or to abusing others include those who have:

- a) witnessed or experienced abuse or violence themselves
 - b) suffered from the loss of a close family member or friend or
 - c) experienced considerable disruption in their lives.
- Children with SEN/D are particularly vulnerable to both abuse and child-on-child abuse, often in the form of bullying (both direct and online).

F. How prevalent is child on child abuse?

Recent research suggests that child-on-child abuse is one of the most common forms of abuse affecting children.

- Worldwide some 200,000 murders occur among youths 10–29 years of age each year, which is 43% of the total number of murders globally each year.
- 42% of students report being subjected to harassment by peers in secondary school (India).
- 9% of young people have received sexual threats online from people their age in the last year (Australia).
- 29% have witnessed people their age making sexual threats, for example unwanted sexual behaviour or violence, in the last year (Denmark, Hungary and the UK (United Kingdom)).
- In Australia, evidence suggests that between 20% and 25% of child sexual abuse is committed by other children. In the UK, this figure is closer to 35%.
- 10% of female higher education students in a partnered relationship report experiencing intimate partner violence (United States)

G. What should I do if I suspect either that a child(ren) may be being abused, or that a child(ren) may be abusing others?

If a member of staff thinks for whatever reason that a child(ren) may be at risk of abuse from another child or young person, or a group of perpetrators, or that a child(ren) may be abusing others, the member of staff should report their concern verbally to the DSL without delay in accordance with this policy, recording their concern after this. If a child(ren), whether they are the alleged victim or perpetrator is in immediate danger, or at risk of harm, the DSL will take appropriate action immediately. This may include reporting to child protective services or the police. Both perpetrators and victims should have a referral.

H. How will the DSL respond to concerns of child-on-child abuse?

In some situations, a child will make a direct disclosure of child-on-child abuse, or their peers may report something has occurred. Alternatively, a staff member may raise a concern having witnessed or been told about an incident. The DSL will discuss the behaviour with the member of staff raising the concern and will in all situations, take any immediate steps to ensure the safety of the victim(s) or any other child(ren) including the perpetrator. Where the DSL considers or suspects that the behaviour might constitute abuse, the DSL will act in the best interests of the child. The DSL may discuss the incident with child protective services and/or within a safeguarding team meeting and agree on a course of action, which may include (a) taking any steps to ensure the safety and wellbeing of any children affected; (b) further investigation; (c) referral to other agencies such as the police or specialist external services.

Any response should:

- investigate the incident and the wider context and assess and mitigate the risk posed by the perpetrator(s) to the victim(s) and to other children (a written risk assessment will be completed after initial practical steps are completed)
- whilst the school establishes the facts of the case, the alleged perpetrator(s) should be removed from any classes they share with the victim. The school should also carefully consider how best to keep the victim and alleged perpetrator(s) a reasonable distance apart on school premises (including during any before or after school-based activities) and on transport to and from the school, where appropriate. These actions

are in the best interests of all children involved and should not be perceived to be a judgment on the guilt of the alleged perpetrator(s)

- consider that the abuse may indicate wider safeguarding concerns for any of the children involved
- treat all children (whether perpetrator or victim) as being at risk - while the perpetrator may pose a significant risk of harm to other children, they may also have considerable unmet needs and be at risk of harm themselves
- consider the complexity of child-on-child abuse and of children's experiences and consider the interplay between power, choice and consent. While children may appear to be making choices, if those choices are limited, they are not consenting
- take appropriate action in respect of the perpetrator – any action should address the abuse, the causes of it, attitudes underlying it and the support that may be needed if the perpetrator is at risk. Factors to consider include: the risk the perpetrator(s) poses and will continue to pose to other children, their own unmet needs, the severity of the abuse and the causes of it. Disciplinary action, i.e., sanctions, in line with the Behaviour Policy may be appropriate, including (a) to ensure that the perpetrator takes responsibility for and realises the seriousness of his or her behaviour; (b) to demonstrate to the perpetrator and others that abuse can never be tolerated; and (c) to ensure the safety and wellbeing of the victim and other children in the school. Permanent exclusion will only be considered as a last resort and only where necessary to ensure the safety and wellbeing of the victim(s) and other children in the school
- provide on-going support to victim(s) including by:
 - a) ensuring their immediate safety
 - b) responding promptly and appropriately to the abuse
 - c) assessing and addressing any unmet needs
 - d) following the procedures set out in this safeguarding policy to assess need
 - e) monitoring the child's wellbeing closely and ensuring that s/he receives on-going support from all relevant staff members within the school
 - f) engaging with the child's parents and any external agencies to ensure that the child's needs are met in the long-term
 - g) consider the lessons that can be learnt from the abuse and put in place measures to reduce the risk of such abuse recurring. This may include, for example: gender and equalities work, work around school safety, security and supervision, awareness raising for staff, children and parents about a particular form of abuse, training for staff on handling certain types of incidents or abuse.

I. How does the school raise awareness of, and reduce the risk, of child-on-child abuse?

Staff are trained on the nature, prevalence, and effect of child-on-child abuse, and how to prevent, identify and respond to it. The school actively seeks to prevent all forms of child-on-child abuse by educating children and staff, challenging the attitudes that underlie such abuse, encouraging a culture of tolerance and respect amongst all members of the school community, and responding to all cases of child-on-child abuse and any cases of bullying or cyber-bullying promptly and appropriately. Children are educated about the nature and prevalence of child-on-child abuse. They are informed of what to do if they witness or are victims of such abuse, the effect that it can have on the victims and the possible reasons for it, including vulnerability of the perpetrator. They are regularly informed about the school's approach to such issues, including its zero-tolerance policy towards all forms of bullying and child-on-child abuse, including sexual violence and sexual harassment.

[What should I do if I suspect that a child may be at risk?](#)

Report your concern to the DSL without delay.

3.5 Contextual Safeguarding

Essential points

- Abuse can take place within or outside the family unit.
- Schools must recognise the breadth of relationships that young people form in person and online.

Contextual safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent/child relationships.

Contextual safeguarding, therefore, expands the objectives of child protection systems in recognition that young people are vulnerable to abuse beyond their front doors. This also includes the risk of abuse occurring in or outside of school.

[What should I do if I suspect that a child may be at risk?](#)

Report your concern to the DSL without delay.

3.6 Sexual Violence, Sexual Harassment, and Harmful Sexual Behaviour

Essential points

- Children have the right to feel safe and know that unwanted language, touch or violence is never acceptable.
- Staff must act and not think that unwanted language or touch is 'just part of growing up.'

Contents

- A. Sexual violence and sexual Harassment between children
- B. What is sexual violence?
- C. What is sexual harassment?
- D. Who perpetrates sexual violence and/or harassment?
- E. Handling incidents involving sexual violence and/or sexual harassment
- F. Our approach to sexual violence and/or sexual harassment
- G. Youth produced sexual imagery/Sexting
- H. Upskirting
- I. What types of incidents are covered in this policy?

A. Sexual violence and sexual harassment between children

Child-on-child abuse can include two specific forms, known as sexual violence and sexual harassment. Any response to these should fall within, and be consistent with, the school's wider approach to child-on-child abuse including those that have happened outside of the school premises and/or online. Where the report includes an online element, be aware that staff must not view or forward illegal images of a child. Take advice from the Regional Safeguarding Lead immediately.

B. What is sexual violence?

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B), B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone, touching someone's bottom/breasts/genitalia or causing someone to engage in sexual activity without consent, can still constitute sexual assault.)

All staff should be aware of the indicators which may signal children are at risk from or are involved with serious violent crime. These may include:

- increased absence from school
- a change in friendships or relationships with older individuals or groups
- a significant decline in performance
- signs of self-harm or a notable change in wellbeing
- signs of assault or unexplained injuries
- unexplained gifts or new possessions. This could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

C. What is sexual harassment?

Sexual harassment refers to 'unwanted conduct of a sexual nature.' This can occur online (including, but not limited to non-consensual sharing of images, making sexual comments on social media) and offline, including

but not limited to making sexual comments, sexual taunting or jokes and physical contact, for example, brushing against someone deliberately or interfering with their clothes.

D. Who perpetrates sexual violence and/or harassment between children?

Sexual violence and sexual harassment can:

- occur between any two children, or a group of children, against one individual or group
- be perpetrated by a child of any age against a child of any age
- be perpetrated by a child of any sexual orientation against a child of any sexual orientation
- include behaviours that exist on an often-progressive continuum and may overlap
- be online and offline (physical or verbal)
- can take place within intimate personal relationships between children.

Any report of sexual violence or sexual harassment must be taken seriously. Staff should be aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. This does not however mean that boys cannot be the victims of sexual violence or harassment or that girls cannot be perpetrators. Children with additional learning needs are potentially more vulnerable, and there may be barriers in recognising abuse in this group of children. Sexual violence and sexual abuse can happen anywhere. All staff working in the school are advised to maintain an attitude of 'it could happen here,' assume that it is happening, and act accordingly. All staff should understand that even if there are no reports in their school, it does not mean it is not happening. It may be the case that it is just not being reported.

E. Handling incidents involving sexual violence and/or sexual harassment

There are four scenarios that schools will need to manage:

1. **Internally:** For example, for one-off incidents of sexual harassment, the school may take the view that it would be appropriate to handle the incident internally, perhaps through utilising their behaviour policy, by providing pastoral support and recording it as a safeguarding concern. Whatever the response, it should be underpinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment, it is never acceptable and will not be tolerated. All concerns, discussions, decisions and reasons for decisions must be recorded (written or electronic).

2. **Early help/Intervention:** In line with the above, the school may decide that the children involved do not require referral to statutory services but may benefit from early help/ intervention. Early help means providing support as soon as a problem emerges, at any point in a child's life. Providing early help is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address non-violent harmful sexual behaviours (HSB) and may prevent escalation of sexual violence.

3. **Child protection:** Where a child has been harmed, is at risk of harm, or is in immediate danger, schools should hold an immediate team around the child/crisis meeting. This may lead them to consider making a referral to child protective services. At the point of decision-making, schools will generally inform parents or carers unless there are compelling reasons not to (if informing a parent or carer is going to put the child at additional risk). Schools should not wait for the outcome (or even the start) of a child protective services investigation before protecting the victim and other children in the school.

4. **Criminal offence:** Where a criminal offence is likely to have occurred informing the police / MoI Child Protection Centre must be considered (there is a positive duty to report to the police where you have knowledge that a crime has occurred). The DSL and/or Principal will lead the school's response to any incident with support from the Regional Safeguarding Lead. Reporting will be in line with local legal requirements and in the best interests of the child.

F. Our approach to sexual violence and sexual harassment

The school will apply the principles set out in the above document when considering their approach to sexual violence and sexual harassment between children. Schools should:

- not accept or tolerate sexual violence and sexual harassment
- not downplay or consider that these types of behaviours are 'banter,' an 'inevitable part of growing up' or hold the view that 'boys will be boys,' knowing that to do so may normalise inappropriate behaviours and may create an unsafe culture where children feel less able to come forward with concerns
- encourage early intervention to avoid potential escalation
- challenge inappropriate physical behaviour (potentially criminal in nature), such as grabbing bottoms, breasts, and genitalia, pulling down trousers, flicking bras and lifting skirts
- challenge inappropriate verbal behaviour, such as making sexist comments, innuendo or taunting
- align with their behaviour policy with regards to imposing sanctions for inappropriate behaviour
- embed training and education on these issues within a strong pastoral system
- adopt a planned and sequenced RSE programme across the whole curriculum including age-appropriate content around: consent, gender roles, stereotyping and equality, healthy relationships and power imbalances in relationships
- develop and encourage forums that enable children to talk about issues openly
- have clear and accessible systems in place for children to confidently report abuse, knowing their concerns will be treated seriously
- act in the best interests of all children involved, reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment
- manage any disclosure, either from the child who has suffered abuse or from other children, giving the victim(s) as much control as is possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will, however, need to be balanced with the school's duty and responsibilities to protect them and other children
- carry out a risk and needs assessment for children affected by sexual violence or sexual harassment, including both the victim and alleged perpetrator- this may be informed by risk assessments completed by external services
- engage with both the victim's and the alleged perpetrator's parents or carers when there has been a report of sexual violence (in the case of sexual harassment this might not be necessary or proportional and should be considered on a case-by-case basis). The exception to this rule is if there is a reason to believe informing a parent or carer will put a child at additional risk.

G. Youth produced sexual imagery/Sexting

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

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

This guidance only covers the sharing of sexual imagery by children. Adults possessing, creating, sharing and distributing sexual photos and videos is illegal. This presents a range of risks which need careful management. On this basis, this guidance introduces the phrase 'youth produced sexual imagery' and uses this instead of 'sexting'. This is to ensure clarity about the issues this advice addresses.

What is youth produced sexual imagery?

'Youth produced sexual imagery' best describes the practice because:

- 'youth produced' includes children sharing images that they, or another child, have created of themselves

- 'sexual' is clearer than 'indecent'. A judgement of whether something is 'decent' is both a value judgement and dependent on context
- 'imagery' covers both still photos and moving videos (and this is what is meant by reference to imagery throughout the policy).

H. Upskirting

Voyeurism, which is commonly known as upskirting, is illegal in the UAE. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress, or alarm. It is a criminal offence. Anyone, of any gender, can be a victim.

I. What types of incidents are covered by this policy?

Yes:

- a child creates and shares sexual imagery of themselves with a peer
- a child shares sexual imagery created by another child with a peer or an adult
- a child is in possession of sexual imagery created by another child

No:

- the sharing of sexual imagery of children by adults as this is a criminal offence and should always be reported to the DSL who will more than likely refer to the MOI Child Protection Centre and/or the police
- children sharing adult pornography or exchanging sexual texts which do not contain imagery
- sexual imagery downloaded from the internet by a child
- sexual imagery downloaded from the internet by a child and shared with a peer or an adult

[What should I do if I am concerned about a child?](#)

Report your concern to the DSL without delay.

3.7 Online Safety

Essential points

- We teach children how to stay safe online and to understand how to protect themselves.
- Staff are responsible for keeping their digital safety skills up to date and pertinent.

Contents

- A. Online safety
- B. Areas of risk

A. Online safety

Technology often provides the platform that may facilitate harm. All staff should be aware of the unique risks associated with online safety and that technology is a significant component in many safeguarding and wellbeing issues. DSLs should be aware of online safety in their school and should, along with the specialist digital learning staff in the school, raise awareness in the staff group, including but not limited to, cyber-bullying, child sexual exploitation, radicalisation and sexual predation.

B. Areas of risk

There are four primary areas of risk:

- 1 **Content:** being exposed to illegal, inappropriate or harmful material.
- 2 **Contact:** being subjected to harmful online interaction with other users.
- 3 **Conduct:** personal online behaviour that increases the likelihood of (or causes) harm; for example, the making, sending and receiving of explicit images, or online bullying.
- 4 **Commercial:** risks such as online gambling, inappropriate advertising, phishing and or financial scams.

Whilst considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, those with governance oversight of the school will be doing all that they can to limit children's exposure to the above risks from the school's IT system. As part of this process, the school has appropriate filters and monitoring systems in place and regularly reviews their effectiveness. Whilst it is essential that schools ensure that appropriate filters and monitoring systems are in place, they should be careful that "over blocking" does not lead to unreasonable restrictions as to what children can be taught regarding online teaching and safeguarding.

The school will ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified. All staff should understand their role in preventing, identifying and responding to harm caused by its use.

The school will use parental communications to reinforce the importance of children being safe online. Parents may be supported to understand what systems the school uses to filter and monitor online use. The school will update parents regularly about what their children are being asked to do online in school. Schools will always work with parents to support them to address their child's online activity as needed.

[What should I do if I suspect that a child may be at risk?](#)

Report your concern to the DSL without delay.

3.8 Grooming

Essential points

- Grooming is the process to prepare a child to be abused
- Grooming can take place online and offline
- Grooming can be for sexual abuse but also to radicalise a child with the intent that they would be prepared to cause harm to property or people

Contents

- A. What is grooming?
- B. Who is at risk of grooming for radicalisation?
- C. Signs of grooming for radicalisation
- D. Signs of grooming manifested by sex offenders
- E. Modus operandi of grooming

A. What is grooming?

Grooming is the process by which an individual prepares a child for abuse. Children and young people can be groomed online or in the real world, by a stranger or by someone they know. Groomers may be of any gender identity or sexual orientation. They could be of any age, including another young person. Many children and young people do not understand that they have been groomed, or that what has happened is abuse. The signs that a child is being groomed are not always obvious. Groomers may also go to great lengths not to be identified.

Children may:

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

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

B. Who is at risk of grooming for radicalisation?

There are no known definitive indicators that a young person is vulnerable to radicalisation; radicalisation can happen to anyone. A unique feature of extremist ideologies is that they can speak directly to the vulnerabilities people may experience at times in their lives. Young people may be particularly vulnerable if they have experienced adverse childhood trauma, family issues, are socially isolated, bullied, have poor mental health or lack purpose.

C. Signs of grooming for radicalisation

Signs will vary – the four most common signs are:

- using new vocabulary

- declaring an intent to commit violence
- fixating on a subject
- being closed off to discussion or challenge.

Other signs include children who:

- begin to isolate themselves from family and friends
- change the way they dress.
- draw symbols, talk in an unusual way.
- talk about issues as if from a scripted speech
- have a sudden disrespectful attitude towards others
- have increased levels of anger
- show increased secretiveness, especially around internet use.

D. Signs of grooming manifested by sex offenders

It is important to remember that not all sex offenders will exhibit the signs listed below and if an individual exhibits some or all these signs, it does not mean that they are a sex offender/institutional groomer. However, the signs are listed to give guidance for decision making:

- overly affectionate behaviour with a child
- affording special attention or preferential treatment to a child
- excessive time spent alone with a child outside of the classroom/school
- frequently spending time with a child in private or isolated areas
- transporting a child to or from the school
- making friends with a child's parents and visiting their home
- acting as a particular child's confidante
- giving small gifts, money, toys, cards, letters to a child
- using texts, telephone calls, e-mails, or social networking sites to inappropriately communicate with a child
- flirtatious behaviour or making suggestive remarks or comments of a sexual nature around a child.

E. Modus operandi of grooming:

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

What should I do if I suspect that a child may be at risk?

Report your concern to the DSL without delay.

3.9 Child Exploitation

Essential points

- Children can be exploited and harmed for the gratification of others
- Children can be forced or manipulated into committing offences
- Children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals

Contents

- A. Child sexual exploitation
- B. Child criminal exploitation

A. Child sexual exploitation

Child sexual exploitation is a form of child sexual abuse and occurs where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual activity.

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator.

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

It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual. It should be noted exploitation as well as being physical can be facilitated and/or take place online.

Child sexual exploitation can affect any child or young person (male or female) under the age of 18 years. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g., through others copying videos or images they have created and posted on social media).

Indicators of child sexual exploitation may include:

- increased absence from school
- a change in friendships or relationships with older individuals or groups
- a significant decline in performance
- signs of self-harm or a notable change in wellbeing
- or signs of assault or unexplained injuries
- unexplained gifts or new possessions
- children who have older boyfriends or girlfriends
- children who suffer from sexually transmitted infections or become pregnant.

B. Child criminal exploitation

Child criminal exploitation can include children being forced or manipulated into transporting drugs or money, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity is something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be quite different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

[What should I do if I suspect that a child may be at risk?](#)

Report your concern to the DSL without delay.

3.10 Forced marriage and female genital mutilation

Essential points

- Abuse can derive from a cultural tradition that are not viewed by our school as being in the best interests of the child
- Children can be exploited and harmed for the gratification of others

Contents

- A. Forced marriage
- B. Female genital mutilation (FGM)

A. Forced marriage

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

B. Female genital mutilation (FGM)

All staff should speak to the DSL (or deputy DSL) regarding any concerns about FGM. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the DSL.

What should I do if I suspect that a child may be at risk?

Report your concern to the DSL without delay.

3.11 Guardianship

Essential points

- Safeguarding remains a priority when children are away from home being cared for by adults who are not their parents

Contents

- A. Guardianship
- B. Family hosting

A. Guardianship

Guardianship is the term used to describe when a child under the age of 18 does not live with their parents or legal carers.

Guardianship is when an adult takes on the everyday responsibility to care for, support and keep a child safe while they reside with them. A guardian is expected to take a personal interest in the progress and welfare of the young person.

All Cognita schools are committed to maintaining the highest standards of care, welfare, safety and wellbeing for all children. We recognise that children who live away from their parents may be more vulnerable to experiencing adverse childhood experiences. We know that our children learn and thrive in a safe and secure environment. Schools will endeavour to support all children who live with adults other than the parents/registered legal carers.

Schools will monitor the physical, cultural, social and emotional well-being of children in guardianship and, when appropriate, enhance provision to support child development.

Children in guardianship will be made aware of the support systems that are in place for them and child voice will play a part in shaping any additional provision offered by the school beyond the education which day children receive.

[What should I do if I suspect that a child may be at risk?](#)

Report your concern to the DSL without delay.

3.12 Low-level concerns and self-reports

Essential points

- We have a shared understanding and clear procedures for raising and dealing with concerns about adults in our school.
- We have clear expectations about the norms and standards of expected conduct.

What is a low-level concern, including those that are self-reports?

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school may have acted in a way that:

- is inconsistent with the staff Code of Conduct/other Cognita policy, including inappropriate conduct outside of work, and
- does not meet the allegations threshold.

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

- being over friendly with children
- having favourites
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating behaviour (including shouting or being verbally aggressive)
- offensive language (including the belittling of children on their own or in front of peers).

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is intended to enable abuse.

A self-report also falls under our Low-Level Concerns Policy. From time to time, an individual may find him/herself in a situation which might appear compromising to others, or which could be misconstrued.

Equally, an individual may, for whatever reason, have behaved in a manner which on reflection he/she considers falls below the standard set out in the Code of Conduct/other Cognita policy, falls below the expected professional standards, or breaches this policy.

Self-reporting in these circumstances is encouraged. This demonstrates both awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived.

As such, the school sees self-reporting as an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

Why we have a low-level concern policy.

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

- maintain a culture of openness, trust and transparency in which staff are confident and clear about expected behaviours of themselves and their colleagues, the delineation of boundaries and reporting lines

- ensure that staff feel empowered to raise any low-level concern, whether about their own or a colleague's behaviour, where that behaviour might be construed as falling short of the standards set out in our Code of Conduct or other Cognita policy and
- provide for responsive, sensitive and proportionate handling of such concerns when they are raised – maintaining on the one hand confidence that concerns when raised will be handled promptly and effectively whilst, on the other hand, protecting staff from false allegations or misunderstandings.

What to do if you have a low-level concern or self-report

Where a low-level concern (including self-reports) exists, it should be reported in writing to the DSL or to the Principal as soon as reasonably possible, within 24hrs of the incident (where the concern relates to a particular incident).

How the low-level concern is dealt with.

When the DSL receives the report, they must inform the Principal of all the low-level concerns and in a timely fashion (within the day). If the DSL and Principal are unavailable, the staff member with the concern should contact their RSL. There must be no delay.

Where a low-level concern relates to a person employed by a supply agency or a contractor to work in the school, that concern should be shared with the DSL and/or Principal. Their employer will be notified about the concern by the DSL/Principal, so that any potential patterns of inappropriate behaviour can be identified.

The DSL will discuss all low-level concerns they receive with the Principal on the same day as the concern was raised. The Principal, in collaboration with the DSL, will, in the first instance, satisfy themselves that it is a low-level concern and should not be reclassified as an *allegation* and dealt with under the appropriate 'allegations' procedure (outlined later in this document). The circumstances in which a low-level concern might be reclassified as an allegation are where:

- a) the threshold is met for an allegation
- b) there is a pattern of low-level concerns which collectively amount to an allegation or
- c) there is other information which, when considered, leads to an allegation.

The Principal is the ultimate decision maker in respect of all low-level concerns, however it is safe and best practice that they consult with the DSL and take a more collaborative decision-making approach. Where the Principal is in any doubt whatsoever, advice will be sought from the RSL. Any rationale for any decisions made and actions taken, must be recorded on the low-level concern form by the Principal.

Having established that the concern is low level, the DSL or Principal as appropriate will first discuss it with the individual who has raised it and will take any other steps to investigate it, as necessary. Most low-level concerns by their very nature are likely to be minor and will be dealt with by means of management guidance, training, etc. The person to which the low-level concern relates **must** be informed of any concern raised about them *once all risk has been identified and assessed*. The person who has raised the low-level concern about their colleague will remain anonymous.

Record keeping

Where a low-level concern has been communicated, or a self-report raised by an individual about themselves, a confidential record will be kept in a school central file which logs all low-level concerns. When staff leave the school, any record of low-level concerns which are stored about them will be kept for a period of ten years and, following this, reviewed as to whether or not that information needs to be kept. Consideration will be given to:

- (a) whether some or all the information contained within any record may have any likely value in terms of any potential historic employment or abuse claim so as to justify keeping it, in line with normal safeguarding records and practice; or

(b) if, on balance, any record is not considered to have any value, still less actionable concern, and ought to be deleted accordingly

Retention is necessary to see whether any patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school should decide on a course of action, through its disciplinary procedures.

No record will be made of the concern on the individual's personnel file unless either:

a) the concern (or group of concerns) has been reclassified as an allegation; or

b) the concern (or group of concerns) is sufficiently serious to result in formal action under the school's grievance, capability or disciplinary procedure.

c) the concern is determined to meet the threshold of an allegation when considered with any other low-level concerns that have previously been raised about the same individual.

References

Low-level concerns should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference. However, where a low-level concern (or group of concerns) has met the allegations threshold and found to be substantiated, it should typically be referred to in a reference. Any references here should be approved by the Principal.

Code of Conduct

The use of mobile phones in the UAE context is ubiquitous. We strongly discourage all staff from using personal mobile phones for work related tasks, including the capturing of images and videos of children. However, on the rare occasion a photo and/or video is captured for specific work-related tasks, it is required that this will be deleted from the device within 48 hours. There are three roles in school where the use of a mobile phone is approved, the Principal, SENCo, Marketing and ECA Co-ordinator. These members of staff are allocated a school mobile phone. Staff should refer to the Low-Level Concern procedures below, and where there is any ambiguity surrounding a staff member and their use of devices around children, this should be immediately reported to the DSL and/or Principal.

3.13 Allegations

Essential points

- We comprehensively manage allegations made about staff members, considering our duty of care to both children and employees

What is an allegation?

Allegations represent situations that might indicate a person will pose a risk of harm to children if they continue to work in regular or close contact with children in their present position, or in any capacity. This policy applies to all adults in the school if it is alleged that they have:

- behaved in a way that has harmed a child, or may have harmed a child and/or
- possibly committed a criminal offence against or related to a child, and/or
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (potential transferable risk).

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

What should I do if I have an allegation?

Allegations about staff or volunteers	Allegations about the Principal
<p>Report to the Principal immediately.</p> <p>The Principal will consult with the Regional Safeguarding Lead who will inform the Director of HR as set out below.</p> <p>The adult to whom the concern or allegation relates <u>should not be informed</u>.</p>	<p>Report to the Regional Chief Executive Officer without informing the Principal.</p> <p>The Regional CEO will consult with the Regional Safeguarding Lead and appointed others to establish a plan of action and undertake a fact-finding exercise.</p> <p>The adult to whom the concern or allegation relates <u>should not be informed</u>.</p>

Duties as an employer and an employee

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

Cognita has a duty of care to all employees. Cognita will provide effective support for anyone facing an allegation and provide the employee with a named contact if they are suspended. It is essential that any allegation of abuse made against a teacher or other member of staff or volunteer is dealt with very quickly, in a fair and consistent way that provides effective protection for the child and, at the same time, supports the person who is the subject of the allegation.

Dealing with an allegation

The procedures for dealing with allegations need to be applied with common sense and judgement. Cases may well either not meet the criteria set out above or may do so without warranting consideration of either a

police investigation or enquiries by child protective services. In these cases, local arrangements will be followed to resolve cases without delay. Where the school identifies a child has been harmed, that there may be an immediate risk of harm to a child or if the situation is an emergency, they should contact child protective services and as appropriate the police immediately.

Initial discussion

The Principal will not undertake any investigation before first speaking to the Regional Safeguarding Lead. The Principal (or CEO where there is an allegation against the Principall) should inform the Regional Safeguarding Lead of all allegations that come to the school's attention and appear to meet the criteria. The Regional Safeguarding Lead must notify the CEO of the allegation and the action taken. The CEO may appoint a member of the Executive Team.

The purpose of an initial discussion is for the Regional Safeguarding Lead, the Principal and appropriate others (school initially) to consider the nature, content and context of the allegation and agree a course of action. A case manager (who may also be called the investigating manager) will be appointed. The Regional Safeguarding Lead may ask the case manager to provide or obtain relevant additional information, such as previous history, whether the child or their family have made similar allegations previously and about the individual's current contact with children. There may be situations when the case manager will want to involve the police immediately, for example if the person is an immediate risk to children or there is evidence of a possible criminal offence. Where there is no such evidence, the case manager should discuss the allegations with the Regional Safeguarding Lead to help determine whether police involvement is necessary.

The initial sharing of information and evaluation may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern. In this case, this decision, and a justification for it, should be recorded by both the case manager and the Regional Safeguarding Lead and agreement reached on what information should be put in writing to the individual concerned and by whom. The case manager should then consider with the Regional Safeguarding Lead, what action should follow both in respect of the individual and those who made the initial allegation. The Principal should be kept informed at all stages. The involvement of HR should always be considered.

Inter-agency strategy discussion

If there is cause to suspect a child is suffering or is likely to suffer significant harm, a strategy discussion will typically be called by the case manager or the police in accordance with the local statutory guidance. If the allegation is about physical contact, the strategy discussion or initial evaluation with the police will typically consider that teachers may use reasonable force to control or restrain children in certain circumstances, including dealing with disruptive behaviour.

Where a strategy discussion is needed, or police or the Child Protection Centre need to be involved, the case manager (school) will **not** inform the accused person until those agencies have been consulted and have agreed what information can be disclosed to the accused. The case manager should only inform the accused person about the allegation after consulting the Regional Safeguarding Lead and actions have been decided. It is extremely important that the case manager provides the accused with as much information as possible at that time.

Where it is clear that an investigation by the police or the Child Protection Centre is unnecessary, or the strategy discussion or initial evaluation decides that is the case, the Regional Safeguarding Lead will discuss the next steps with the case manager. In those circumstances, the options open to the school depend on the nature and circumstances of the allegation and the evidence and information available. This will range from taking no further action to dismissal or a decision not to use the person's services in the future. Suspension should not be the default position: an individual should be suspended only if there is no reasonable alternative (see guidance on suspension, below).

Internal investigations

In some cases, further enquiries will be needed to enable a decision about how to proceed. If so, the Regional Safeguarding Lead will discuss with the case manager how and by whom the investigation will be undertaken. In straightforward cases, an internal investigation will be agreed upon and should normally be led by a senior member of school staff. Where necessary, due to lack of resource or the nature or complexity of the allegation, the allegation may require an independent investigator. The CEO will appoint an independent investigator. Depending on the severity of the case, this could be the Regional Safeguarding Lead or a specialist safeguarding consultant.

Where a safeguarding concern or allegation triggers another procedure, such as grievance or disciplinary, that procedure, conducted by Human Resources, shall only take place once the immediate safeguarding concern or allegation has been fully investigated.

Suspension of an employee

Cognita will consider carefully whether the circumstances of a case warrant a person's suspension from contact with children at the school or whether alternative arrangements may be put in place until the allegation or concern is resolved. All options to avoid suspension will be considered.

The possible risk of harm to children posed by an accused person must be evaluated. In rare cases, this will require the case manager to consider suspending the accused until the case is over. Suspension should not be an automatic response. All options to avoid suspension should be considered prior to taking that step. If the case manager is concerned about the welfare of other children in the community or the teacher's family, those concerns must be reported to the Regional Safeguarding Lead, child protective services or the police as required and if appropriate. But suspension is highly unlikely to be justified based on such concerns alone.

Within Cognita, suspension requires the authorisation of the CEO or their appointed Executive Team member. Our guidance, wherever possible is to hold a conversation with the case manager, Principal, Head of HR, and the Regional Safeguarding Lead to reach a rounded decision about whether suspension is the correct course of action.

Suspension will be considered only in a case where there is cause to suspect a child or other children at the school are at risk of harm or the case is so serious that it might be grounds for dismissal. However, a person should not be suspended automatically: the case manager will consider carefully whether the circumstances warrant suspension from contact with children at the school or until the allegation is resolved.

The case manager will also consider whether the result that would be gained by immediate suspension could be obtained by alternative arrangements. If the Regional Safeguarding Lead, the police and child protective services (where involved) have no objections to the member of staff continuing to work during the investigation, the case manager will aim to be as inventive as possible to avoid suspension.

Based on assessment of risk, the following alternatives will be considered by the case manager before suspending a member of staff:

- redeployment within the school or college so that the individual does not have direct contact with the child or children concerned
- providing an assistant to be present when the individual has contact with children
- redeploying to alternative work in the school so the individual does not have unsupervised access to children
- moving the child or children to classes where they will not meet the member of staff, making it clear that this is not a punishment and parents have been consulted or
- temporarily redeploying the member of staff to another role in a different location, for example to an alternative school
- giving permission for the staff member to work from home.

These alternatives allow time for an informed decision regarding the suspension and reduce the initial impact of the allegation. This will, however, depend upon the nature of the allegation. The case manager will consider

the potential permanent professional reputational damage to employees that can result from suspension where an allegation is found to be unsubstantiated or maliciously intended.

If immediate suspension is necessary, the rationale and justification for such a course of action should be recorded by both the case manager and the Regional Safeguarding Lead. This should also include what alternatives to suspension were considered and why they were rejected.

Where it was appropriate to suspend the person, written confirmation will be sent within one working day, giving as much detail as appropriate for the reasons for the suspension. Cognita will make clear to the suspended employee where they can obtain support. The person will be told at the point of their suspension who their named contact is within the organisation and provided with their contact details.

Child protective services or the police cannot require the case manager to suspend a member of staff or a volunteer, although the case manager will give appropriate weight to their advice. The power to suspend is vested in Cognita as proprietor of the school.

Where a strategy discussion or initial evaluation concludes that there should be enquiries by child protective services and/or an investigation by the police, the Regional Safeguarding Lead or Executive Team member should canvass police and child protective services for views about whether the accused member of staff should be suspended from contact with children to inform the school consideration of suspension. Police involvement does not make it mandatory to suspend a member of staff; this decision will be on a case-by-case basis having undertaken a risk assessment.

Support for employees

Cognita has a duty of care to their employees. Cognita will act to manage and minimise the stress inherent in the allegations process. Support for the accused individual is vital to fulfilling this duty. Individuals will be informed of concerns or allegations as soon as possible and explained the course of action unless there is an objection by the child protective services or the police. The individual will be advised to contact a colleague for support. They will also be given access to a counselling service provided by Cognita, if deemed necessary.

The case manager will appoint a named representative to keep the person who is the subject of the allegation informed of the progress of the case and consider what other support is appropriate for the individual. Care needs to be taken when employees are suspended to ensure that they are kept informed of both the progress of their case and current work-related issues. Social contact with colleagues and friends should not be prevented unless there is evidence to suggest that such contact is likely to be prejudicial to the gathering and presentation of evidence.

Parents or carers of the child or children involved will be told about the allegation as soon as possible if they do not already know of it. However, where a strategy discussion is required, or police or child protective services need to be involved, the case manager will not do so until those agencies have been consulted and have agreed what information can be disclosed to the parents or carers. Parents or carers will also be kept informed about the progress of the case and told the outcome where there is not a criminal prosecution, including the outcome of any disciplinary process. The deliberations of a disciplinary hearing, and the information considered in reaching a decision, cannot normally be disclosed but the parents or carers of the child will be told key outcome in confidence by the Principal or appropriate senior leader.

Parents and carers will also be made aware of the requirement to maintain confidentiality about any allegations made against teachers whilst investigations are ongoing.

In cases where a child may have suffered significant harm, or there may be a criminal prosecution, the DSL, Regional Safeguarding Lead, child protective services, or the police as appropriate, will consider what support the child or children involved may need. It may be appropriate to involve the school counsellor at this point.

Timescales

It is in everyone's interest to resolve cases as quickly as possible and ensure consistency with a fair and thorough investigation. All allegations will be investigated as a priority to avoid any delay. The time taken to

investigate and resolve individual cases depends on a variety of factors, including the nature, seriousness, and complexity of the allegation.

For cases where it is clear immediately that the allegation is unsubstantiated or malicious, it is aimed that they will be resolved within one week. Any concerns about safeguarding will always be discussed with the Regional Safeguarding Lead.

Confidentiality

When an allegation is made, the school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. Information will be shared with relevant parties on a need-to-know basis only. Communication messages will be agreed by the case manager with the Principal, Head of HR, Legal Counsel, and the school's Communications Manager, where relevant.

The case manager will take advice from the Regional Safeguarding Lead, police and child protective services to agree the following:

- who needs to know and, importantly, exactly what information can be shared
- how to manage speculation, leaks and gossip
- what, if any, information can be given to the wider community to reduce speculation and
- how to manage press interest if, and when, it should arise.

Oversight and monitoring

The Regional Safeguarding Lead has overall responsibility for oversight of the procedures for dealing with allegations, for resolving any inter-agency issues, and for liaison with any statutory authorities. They will provide advice and guidance to the Principal and case manager, consult with the police and other agencies and monitor the progress of cases to ensure that cases are dealt with as quickly as possible consistent with a thorough and fair process. Reviews should be conducted at fortnightly or monthly intervals, depending on the complexity of the case.

Police forces may also identify officers who will be responsible for:

- consulting with the Regional Safeguarding Lead
- taking part in the strategy discussion or initial evaluation
- subsequently reviewing the progress of those cases in which there is a police investigation and
- sharing information on completion of the investigation or any prosecution.

Following a criminal investigation or a prosecution

Once the criminal investigation process has concluded (whether through judgment at the criminal court or otherwise), the Regional Safeguarding Lead should discuss with the Principal and the case manager whether any further action, including disciplinary action, is appropriate and, if so, how to proceed. The information provided by the police and/or child protective services should inform that decision. The options will depend on the circumstances of the case and will need to consider the result of the police investigation or the trial, as well as the different standard of proof required in disciplinary and criminal proceedings.

Outcome of an allegation

The following definitions will be used when determining the outcome of allegation investigations:

- Substantiated: there is sufficient evidence to prove the allegation
- Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person subject to the allegation
- False: there is sufficient evidence to disprove the allegation
- Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence, or

- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

On conclusion of a case

There is a legal requirement for employers [Cognita] to make a referral to the relevant country child protective services or authorities where they think that an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child. If an allegation is substantiated and the person is dismissed or the employer ceases to use the person's services, or the person resigns or otherwise ceases to provide his or her services, Cognita will refer the case to the relevant authorities for consideration of whether inclusion on any barred lists is required.

Where it is decided on the conclusion of a case that a person who has been suspended can return to work, the case manager will consider how best to facilitate that. Most people will benefit from help and support to return to work after a stressful experience. Depending on the individual's circumstances, a phased return and/or the provision of a mentor to aid and support in the short term may be appropriate. The case manager will also consider how the person's contact with the child or children who made the allegation can best be managed if they are still a student at the school.

Malicious or unsubstantiated allegations

If an allegation is determined to be unsubstantiated or malicious, the Regional Safeguarding Lead may choose to refer the matter to the child protective services to determine whether the child concerned needs services or may have been abused by someone else. If an allegation is shown to be deliberately invented or malicious, the Principal will consider whether any disciplinary action is appropriate against the student who made it; or whether the police should be asked to consider if action might be appropriate against the person responsible, even if he or she were not a student.

Learning lessons

At the conclusion of a case in which an allegation is substantiated, the Regional Safeguarding Lead will review the circumstances of the case with the case manager and appropriate others to determine whether there are any improvements to be made to the school's procedures or practice to help prevent similar events in the future. This will include issues arising from the decision to suspend the member of staff, the duration of the suspension and whether suspension was justified. Lessons will also be learnt from the use of suspension when the individual is subsequently reinstated. The team will consider how future investigations of a similar nature could be conducted without suspending the individual.

Resignations and 'settlement agreements'

If the accused person resigns or ceases to provide their services, this will not prevent an allegation being followed up.

If the accused person resigns or their services cease to be used and the criteria are met, it will not be appropriate to reach a settlement/compromise agreement. Any settlement/compromise agreement that would prevent Cognita from making a referral to the relevant country authorities, even though the criteria for referral are met, is likely to result in a criminal offence being committed. This is because Cognita would not be complying with its responsibility to make the referral to the relevant authorities.

It is important that every effort is made to reach a conclusion in all cases of allegations bearing on the safety or welfare of children, including any in which the person concerned refuses to cooperate with the process. Wherever possible, the accused will be given a full opportunity to answer the allegation and make representations about it. But the process of recording the allegation and any supporting evidence and reaching a judgement about whether it can be substantiated based on all the information available, will continue even if that cannot be done or the accused does not cooperate. It may be difficult to reach a conclusion in those circumstances, and it may not be possible to apply any disciplinary sanctions if a person's

period of notice expires before the process is complete, but it is important to reach and record a conclusion wherever possible.

'Settlement agreements' (sometimes referred to as compromise agreements), by which a person agrees to resign if the employer agrees not to pursue disciplinary action, and both parties agree a form of words to be used in any future reference, should not be used in cases of refusal to cooperate or resignation before the person's notice period expires or where there is any concern that the individual may be a risk to children. Such an agreement will not prevent a thorough police or school investigation where that is appropriate.

Record keeping

Details of allegations that are found to have been malicious will be removed from personnel records.

However, for all other allegations, it is important that a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, a note of any action taken and decisions reached is kept on the confidential personnel file of the accused, and a copy provided to the person concerned.

The purpose of the record is to enable accurate information to be given in response to any future request for a reference, where appropriate. It will provide clarification in cases where future background screening checks reveal information from the police about an allegation that did not result in a criminal conviction. It will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period. The record will be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.

References

Cases in which an allegation was proven to be false, unsubstantiated or malicious will not be included in employer references.

A history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious will also not be included in any reference.

Glossary and Definitions

Child refers to a child or young person who is attending a school, even if they are over the age of statutory education

Children includes everyone under the age of 18 or those over the age of 18 who remain in full-time education

DE refers to the (Cognita) Regional Director of Education

DSL refers to the school's named Designated Safeguarding Lead

DDSL refers to the school's named Deputy Safeguarding Lead

EYDSL refers to the school's named Early Years Safeguarding Lead

HRD refers to the (Cognita) Regional Human Resources Director

PSHCE refers to personal, social, health, citizen education

RSL refers to the Regional Safeguarding Lead

Regional CEO refers to the (Cognita) Regional Chief Executive Officer

RSE refers to relationships and sex education sometimes also known as CSE – comprehensive sexuality education

SEN/D refers to special educational needs and/or disability

Team around the Child (TAC) refers to a meeting to gain a full contextual picture of the child to support decision making

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