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1. Introduction

Safeguarding is the action that is taken to promote the welfare of children and protect them from harm.

Safeguarding means:

- protecting children from abuse and maltreatment
- preventing harm to children’s health or development
- ensuring children grow up with the provision of safe and effective care
- taking action to enable all children and young people to have the best outcomes.

Child protection is part of the safeguarding process. It focuses on protecting individual children identified as suffering or likely to suffer significant harm. This includes child protection procedures which detail how to respond to concerns about a child.

Safeguarding children and child protection guidance and legislation applies to all children up to the age of 18.

Sections of this policy are published, in appropriate language, and displayed around the school site. All aspects of safety, including safeguarding, are also explored in PSHE lessons and staff training days.

Our policy applies to all staff and volunteers working in the school community because we recognise that a variety of people who come into contact with a child can be a first point of disclosure, including: Proprietors, class teachers, parent volunteers, workaways, supply teachers or visiting speakers, learning support assistants, administration staff and maintenance staff.

The whole school safeguarding policy provides clear direction to staff and others about expected codes of behaviour in dealing with safeguarding issues. The policy also makes explicit the school’s commitment to the development of good practice and sound procedures. The purpose of the policy is, therefore, to ensure that Safeguarding concerns and referrals are handled sensitively, professionally and in ways that support the needs of the child’s wellbeing. Gloucestershire International School (GIS) is committed to safeguarding and promoting the welfare of all of its students. Each student’s welfare is of paramount importance. We recognise that some children may be especially vulnerable to abuse. We recognise that children who are abused or neglected may find it difficult to develop a sense of self-worth and to view the world in a positive way. Whilst at school, their behaviour may be challenging and some children who have experienced abuse may harm others.

We will always take a considered, personalised and sensitive approach in order that we can support all of our students. Where a child is suffering significant harm, or is likely to do so, action will be taken to protect that child in accordance with the Gloucestershire Safeguarding Children’s Board (GSCB).

Action will also be taken to promote the welfare of children in need of additional support, even if they are not suffering harm or are at immediate risk. Our Early Help offer, available on the school website and in the Team Drive, sets out our commitment to helping families deal with specific issues before a safeguarding issue arises. We are committed to supporting young people and their families through our links with the community and local support bodies.

Everyone working in or for our school shares an objective to help keep children and young people safe by contributing to:

- providing a safe environment for children and young people to learn and grow
- identifying children and young people who are suffering or likely to suffer significant harm
- taking appropriate action with the aim of making sure they are kept safe both at home and in our school.

This policy applies to all adults, including volunteers, working at the school, including those who are:

- working directly for the school
- working on behalf of the school
- working with the school

The school believes that its responsibilities to the care and safety of students extend beyond the school gates and takes steps to ensure that where adults from other organisations are supervising students in school activities, they have been appropriately checked (see “Visitors and Security Procedures”).

2. Safeguarding Team

Designated Safeguarding Lead (DSL)	Miss Sally Richards	sally@iveuk.com
Deputy Designated Safeguarding Lead	Mrs Nasim Bhula	nasim@iveuk.com

(Dep. DSL)		
Proprietor	Dr Daniel Sturdy	daniel.sturdy@iveuk.com

3. School Procedures

3.1. Definition of safeguarding

Safeguarding and promoting the welfare of the child is defined as:

- protecting children from maltreatment
- preventing impairment of children's health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care, such as:
 - taking action to enable all children to have the best outcomes
 - children's health and safety
 - the use of reasonable force
 - meeting the needs of children with medical conditions
 - providing first aid
 - educational visits
 - intimate care
 - internet or e-safety
 - appropriate arrangements to ensure school security

3.2. Specific safeguarding issues

- child missing from education
- child missing from home or care
- child sexual exploitation (CSE)
- bullying including cyberbullying
- domestic violence
- drugs
- fabricated or induced illness
- faith abuse
- female genital mutilation (FGM)
- forced marriage
- gangs and youth violence
- gender-based violence/violence against women and girls
- mental health
- private fostering
- preventing radicalisation
- sexting
- teenage relationship abuse
- trafficking
- Peer on peer abuse

3.3. Identifying children and young people who may be suffering significant harm

Teachers and other adults in school are well placed to observe any physical, emotional or behavioural signs which indicate that a child may be suffering significant harm. The relationships between staff, students, parents and the public which foster respect, confidence and trust can lead to disclosures of abuse, and/or school staff being alerted to concerns.

School staff, and the specific groups referred to in the introduction, should be particularly aware of the potential need for early help intervention for a child who:

- is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory education, health and care plan);
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;

- is frequently missing/goes missing from care or from home;
- is misusing drugs or alcohol themselves;
- is at risk of modern slavery, trafficking or exploitation;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- has returned home to their family from care;
- is showing early signs of abuse and/or neglect;
- is at risk of being radicalised or exploited;
- is a privately fostered child.

3.4. Definitions

As in the Children Acts 1989¹ and 2004², a child is anyone who has not yet reached his/her 18th birthday.

All staff at GIS are aware of the following types of abuse and refer to the NSPCC website (link below) for further information:

- **Physical Abuse**
- **Sexual Abuse**
- **Emotional Abuse**
- **Neglect**
- **Domestic Abuse**
- **Online Abuse**
- **Bullying and Cyberbullying**
- **Trafficking**
- **Grooming**

<https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/>

Other areas of specific concern see:

- **Appendix B** – Children Missing from Education
- **Appendix C** – Child Sex Exploitation
- **Appendix D** – Female Genital Mutilation
- **Appendix E** – Preventing Radicalisation
- **Appendix F** – Peer on Peer Abuse

3.5. Responding to Disclosure

All staff follow the school's procedures which are consistent with 'Working Together to Safeguard Children 2018'³ and 'Keeping Children Safe in Education 2018'⁴.

It is not the responsibility of the school staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All staff, however, have a duty to recognise concerns and maintain an open mind. Accordingly, all concerns regarding the welfare of students will be recorded and discussed with the designated safeguarding lead (or the deputy safeguarding leads or proprietor in the absence of the designated person) prior to any discussion with parents.

3.6. Staff Reporting

Staff must immediately report the following:

- any suspicion that a child is injured, marked, or bruised in a way which is not readily attributable to the normal knocks or scrapes received in play
- any explanation given which appears inconsistent or suspicious
- any behaviours which give rise to suspicions that a child may have suffered harm (e.g. worrying drawings or play)
- any concerns that a child may be suffering from inadequate care, ill-treatment, or emotional maltreatment
- any concerns that a child is presenting signs or symptoms of abuse or neglect

¹ www.legislation.gov.uk/ukpga/1989/41

² www.legislation.gov.uk/ukpga/2004/31

³ www.gov.uk/government/publications/working-together-to-safeguard-children--2

⁴ www.gov.uk/government/publications/keeping-children-safe-in-education--2

- any significant changes in a child's presentation, including non-attendance;
- any hint or disclosure of abuse from any person
- any concerns regarding person(s) who may pose a risk to children (e.g. living in a household with children present)
- and any suspicion that a child or children may be abusing another child

Disclosures or information may be received from students, parents or other members of the public. The school recognises that those who disclose such information may do so with difficulty, having chosen carefully to whom they will speak.

All of our staff will handle disclosures with sensitivity. Such information cannot remain confidential and staff will immediately communicate what they have been told to the designated person.

3.7. Principles for Handling a Disclosure

Staff will not investigate but will, wherever possible, elicit enough information to pass on to the Designated Safeguarding Lead (DSL) in order that she can make an informed decision of what to do next. Staff should wherever possible record what the child said and in particular make a note of unusual or specific language the child uses (use the "Safeguarding Incident Form").

3.8. Staff Obligations

- listen to and take seriously any disclosure or information that a child may be at risk of harm
- try to ensure that the person disclosing does not have to speak to another member of school staff
- clarify the information
- try to keep questions to a minimum and of an 'open' nature
e.g. 'Can you tell me what happened?' rather than 'Did x hit you?'
- try not to show signs of shock, horror or surprise
- not express feelings or judgments regarding any person alleged to have harmed the child
- explain sensitively to the person that they have a responsibility to refer the information to the senior designated person
- reassure and support the person as far as possible
- explain that only those who 'need to know' will be told
- explain what will happen next and that the person will be involved as appropriate
- inform the designated person and write a report

3.9. Action by the Designated Safeguarding Lead (or other senior person in their absence)

Following any information raising concern, the designated senior person will consider:

- any urgent medical needs of the child
- making an enquiry to find out if the child is subject to a Child Protection Plan
- discussing the matter with other agencies involved with the family
- consulting with appropriate persons e.g. Safeguarding partners
- the child's wishes unless the child requests no action

Then decide:

- wherever possible, to talk to parents, unless to do so may place a child at risk of significant harm, impede any police investigation and/or place the member of staff or others at risk
- whether to make a child protection referral to Social Care because a child is suffering or is likely to suffer significant harm and if this needs to be undertaken immediately. This would also be the case for children who have abused others within the legal thresholds described above.

or

- not to make a referral at this stage
- talk with parents/young person
- seek advice from professionals working with the family
- if further monitoring is necessary
- if it would be appropriate to undertake an assessment (e.g. CAF) and/or make a referral for other services

All information and actions taken, including the reasons for any decisions made, will be fully documented and recorded in the child's individual safeguarding file. All referrals to social care will be followed up in writing within 24 hours using a standard referral form. All referrals will be documented on the child's chronology form in their Safeguarding file and used in any further investigation to avoid missing connected events.

3.10. Action following a child protection referral

The DSL or other appropriate member of staff will:

- make regular contact with the Social Worker involved to stay informed;
- wherever possible, contribute to the Strategy Discussion;
- provide a report for, attend and contribute to any subsequent Child Protection Conference;
- if the child or children are made the subject of a Child Protection Plan, contribute to the Child Protection Plan and attend Core Group Meetings and Review Conferences
- where possible, share all reports with parents prior to meetings; and
- where a child subject to a child protection plan moves from the school or goes missing, immediately inform the key worker in Social Care.

3.11. Recording and monitoring

Accurate records will be made as soon as practicable and will clearly distinguish between observation, fact, opinion and hypothesis. All records will be signed and dated, any information given will be recorded verbatim where possible and a note made of the location and description of any injuries seen.

All Child Protection documents will be retained in a 'Child Protection' file, separate from the child's main file. This will be locked away and only accessible to the Principal, Designated Safeguarding Lead and Deputy DSL. These records will be copied and transferred to any school or setting the child moves to, clearly marked '*Child Protection, Confidential, for attention of Designated Person Child Protection.*' If the child goes missing from education or is removed from roll to be educated at home, then any Child Protection file should be copied and the copy sent to the Local authority. Original copies will be retained until the child's 25th birthday.

3.12. Supporting the child and partnership with parents

The school recognises that the child's welfare is paramount; however, good child protection practice and outcome relies on a positive, open and honest working partnership with parents. Whilst we may, on occasion, need to make referrals without consultation with parents, we will make every effort to maintain a positive working relationship with them whilst fulfilling our duties to protect any child.

- We will provide a secure, caring, supportive and protective pastoral relationship with the child
- Children will be given a proper explanation (appropriate to age & understanding) of what action is being taken on their behalf and why
- We will endeavour always to preserve the privacy, dignity and right to confidentiality of the child and parents. The DSL will determine which members of staff "need to know" personal information and what they "need to know" for the purpose of supporting and protecting the child.

4. Allegations regarding person(s) working in or on behalf of the school (including volunteers)

(see also: Procedure for Reporting Concerns About an Adult and "Whistleblowing Policy")

Where an allegation is made against any person working in or on behalf of the school that he or she has:

- 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; or
- has behaved towards a child or children in a way that indicates he or she would pose a risk of harm if they work regularly or closely with children

We will apply the same principles as in the rest of this document and we will always follow the Gloucestershire Local Safeguarding Children Board⁵ procedures. Detailed records will be made to include decisions, actions taken, and reasons for these. All records will be retained securely.

Whilst we acknowledge such allegations (as all others) may be false, malicious or misplaced, we also acknowledge they may be founded. It is, therefore, essential that all allegations are investigated properly and in line with agreed procedures.

4.1. Initial Action

- The person who has received an allegation or witnessed an event will immediately inform the DSL (see [Safeguarding Team](#)), and make a record.
- The DSL will take steps, where necessary, to secure the immediate safety of children and any urgent medical needs

⁵ www.gscb.org.uk

- The member of staff will not be approached at this stage unless it is necessary to address the immediate safety of children.
- The DSL will inform the Proprietor of any allegation
- **In the event of concerns/allegations about the headteacher, where the headteacher is also the sole proprietor of an independent school, allegations should be reported directly to the designated officer(s) at the local authority.**
- The Principal may need to clarify any information regarding the allegation, however no person will be interviewed at this stage.
- The Principal will consult with the Safeguarding Advisor and/or Local Authority Designated Officer (LADO) immediately and at least within one working day, in order to determine if it is appropriate for the allegation to be dealt with by school or if there needs to be a referral to social care and/or the police for investigation.
- Consideration will be given throughout to the support and information needs of students, parents and staff.

4.2. Subsequent Action

If the LADO advises that the school should investigate the allegation internally then the school will carry out an investigation in line Disciplinary Procedures and, if appropriate, Whistleblowing Policy.

If the LADO recommends that the matter requires further investigation by outside agencies, e.g. police or social care, then the school will act as directed by the LADO, whilst also bearing in mind its duty of care to all students and staff.

At the stage when the school is advised or believes that the allegation might constitute a serious offence, the Proprietor will consult and seek the advice of the LADO.

4.3. Reporting an Allegation to the DBS and NCTL

Where an adult is dismissed or would have been dismissed had they not resigned or leaves the school under a settlement agreement as the result of an allegation made against them, and there is evidence of gross professional misconduct and/or the possibility of a criminal prosecution or a conviction at any time for a relevant offence, in line with ‘Keeping children safe in education 2016’⁶, we will also report the matter to the DBS⁷ and NCTL⁸.

5. Safer Recruitment and Selection

See also “Safer Recruitment Policy”.

GIS pays full regard to current Department for Education (DFE) guidance, ‘Keeping Children Safe in Education 2018’. We ensure that all appropriate measures are applied in relation to everyone who works in the school who is likely to be perceived by the children as a safe and trustworthy adult, including volunteers and staff employed by contractors. Safer recruitment practice includes:

- scrutinising applicants
- verifying identity
- verifying academic or vocational qualifications
- obtaining professional references
- checking previous employment history, and
- ensuring that a candidate has the health and physical capacity for the job.

In line with statutory changes, underpinned by regulations, the following roles and responsibilities will apply:

5.1. Proprietors

The proprietors should ensure that the school operates safe recruitment practices and procedures and that all appropriate checks are carried out on staff and, where required, volunteers.

5.2. Principal

The Principal is responsible for:

- ensuring that all new appointments to the school’s workforce are DBS checked and are not barred from working with children;
- ensuring that identity checks are carried out on all appointments to the school workforce;
- ensuring the school keeps a single central record detailing the range of checks carried out on their staff;

⁶ www.gov.uk/government/publications/keeping-children-safe-in-education--2

⁷ www.gov.uk/government/organisations/disclosure-and-barring-service

⁸ www.gov.uk/government/organisations/national-college-for-teaching-and-leadership

- ensuring that appointments recruited from overseas or those who have lived and worked outside the UK have a DBS disclosure and further checks as appropriate if the DBS disclosure is not sufficient for the purpose of assessing their suitability for the post;
- ensuring that employment history is fully explored, any gaps explained and at least 2 references taken up;
- ensuring that all supply staff have undergone the necessary checks to assess their suitability for the post including seeking appropriate verification from any agency that the necessary checks have been undertaken;
- deciding whether a member of staff can start work pending receipt of a DBS disclosure by undertaking an appropriate assessment of the risk and putting additional safeguarding measures in place if necessary; and
- deciding whether the portability policy can apply regarding the DBS check;
- the school workforce who have lived outside the UK being subject to additional checks as appropriate.

The level of DBS check required, and whether a prohibition check is required, will depend on the role and duties of an applicant to work within our school.

For most appointments, an enhanced DBS check with barred list information will be appropriate as the majority of staff will be engaging in regulated activity. A person will be considered to be in ‘regulated activity’ if as a result of their work they:

- will be responsible, on a regular basis, in any setting for the care or supervision of children; or
- will regularly work at our school at times when children are on school premises (where the person’s work requires interaction with children, whether or not the work is paid (unless they are a supervised volunteer), or whether the person is directly employed or employed by a contractor).

In school a supervised volunteer who regularly teaches or looks after children is not in regulated activity. The Department for Education (DfE) has published separate statutory guidance on supervision and regulated activity which we will have regard to when considering which checks should be undertaken on volunteers.

Under the Prevent duty⁹ visiting speakers are supervised by at least one member of staff who will complete the “Visiting Speaker Checklist” prior to the visit. The speaker can only visit once the checklist has been signed off by a member of the SLT (usually the DSL or Principal).

6. Responsibilities of Adults in the School

The Proprietors will ensure that GIS complies with all safeguarding duties under legislation. With regard to ‘Keeping Children Safe in Education 2018’¹⁰ guidance they will ensure that the policies, procedures and training in school are effective and comply with the law at all times.

6.1. The responsibilities placed on the proprietors include:

- their contribution to inter-agency working, which includes providing a coordinated offer of early help when additional needs of children are identified
- ensuring that an effective child protection policy is in place, together with a staff behaviour policy and appointing a Designated Person who should undergo child protection training every two years;
- prioritising the welfare of children and young people and creating a culture where staff are confident to challenge senior leaders over any safeguarding concerns; and
- making sure that children are taught about how to keep themselves safe.

6.2. The Proprietors will prevent people who pose a risk of harm from working with children by:

- adhering to statutory responsibilities to check staff who work with children
- taking proportionate decisions on whether to ask for checks beyond that which is required
- ensuring that volunteers are appropriately supervised
- making sure that at least one person on any appointment panel has undertaken safer recruitment training
- ensuring there are procedures in place to handle allegations against members of staff and volunteers (also see “Whistleblowing Policy”).
- making sure that there are procedures in place to handle allegations against other children (“Anti-Bullying Policy”).
- putting in place appropriate safeguarding responses to children who go missing from education settings, particularly on repeat occasions (“Missing Pupils Procedure”).

The Proprietors ensure that allegations against members of staff and volunteers are referred to the Local Authority Designated Officer (LADO). There must be procedures in place to make a referral to the Disclosure and Barring Service if a person in

⁹ www.gov.uk/government/publications/prevent-duty-guidance

¹⁰ www.gov.uk/government/publications/keeping-children-safe-in-education--2

regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned. This is a legal duty and failure to refer when the criteria are met is a criminal offence. For example, it is a criminal offence for an employer: to take on an individual in a DBS regulated activity (such as schools or childcare) who has been barred from such an activity; or to fail to make a referral to DBS in the circumstances described above.

The Proprietors appoint a designated teacher to promote the educational achievement of children who are looked after and ensure that this person has appropriate training. The Counselling teacher has this responsibility. The Proprietors ensure that staff have the skills, knowledge and understanding necessary to keep looked after children safe.

6.3. The Proprietors will ensure that:

- the school contributes to inter-agency working in line with statutory guidance ‘Working Together to Safeguard Children 2018’¹¹. This includes providing a coordinated offer of early help when additional needs of children are identified and contributing to interagency plans to provide additional support to children subject to child protection plans. All schools and colleges should allow access for children’s social care from the host local authority and, where appropriate, from a placing local authority, for that authority to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment;
- the school’s safeguarding arrangements take into account the procedures and practice of Gloucester local authority as part of the inter-agency safeguarding procedures set up by the Gloucestershire Safeguarding Children Board¹²;
- the Proprietor, will liaise with the local authority and/or partner agencies on issues of child protection,
- there is an effective Safeguarding Policy (this policy) in place together with the Safeguarding Code of Conduct and these are provided to all staff, including temporary staff and volunteers on induction. The Safeguarding Policy should describe procedures which are in accordance with government guidance and refer to locally agreed inter-agency procedures put in place by the GSCB¹³, are updated annually, and are available publicly via the school website¹⁴.

6.4. The Principal will ensure that:

- the policies and procedures adopted by the Proprietors, particularly concerning referrals of cases of suspected abuse and neglect, are followed by all staff;
- they appoint members of staff of the school’s leadership team to the role of designated safeguarding lead (see [Safeguarding Team](#)). This should be explicit in the role-holder’s job description. This person should have the appropriate authority and be given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings – and/or to support other staff to do so – and to contribute to the assessment of children;
- they will consider how children may be taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum. This may include covering relevant issues through personal, social health and economic education (PSHE);
- the school has a child protection policy (this policy) and procedures (see [§3 “School Procedures”](#)) in place that are in accordance with local authority guidance and locally agreed inter-agency procedures, and the policy is made available to parents on request; and
- the school operates safe recruitment procedures and makes sure that all appropriate checks are carried out on staff and volunteers who work with children; and that any panel involved in the recruitment of staff has at least one member who has undertaken Safer Recruitment Training.
- that adequate IT filtering systems are in place to keep children safe when accessing the internet at school.

6.5. Our Designated staff (Safeguarding Team) will ensure that:

- the policies and procedures adopted by the Proprietors are fully implemented, and followed by all staff;
- they will liaise with the local authority and work with other agencies in line with ‘Working Together to Safeguard Children 2018’¹⁵;
- sufficient resources and time are allocated to enable the designated person and other staff to discharge their responsibilities including taking part in strategy discussions and other inter-agency meetings and contributing to the assessments of children;
- all staff and volunteers feel able to raise concerns about poor or unsafe practice in regard to children, and such concerns are addressed sensitively and effectively in a timely manner in accordance with agreed whistle blowing policies; and
- if, at any point, there is a risk of immediate serious harm to a child a referral should be made to Social Care immediately. Anybody can make a referral.

¹¹ www.gov.uk/government/publications/working-together-to-safeguard-children--2

¹² www.gscb.org.uk/

¹³ www.gscb.org.uk/

¹⁴ gloucestershireinternationalschool.co.uk

¹⁵ www.gov.uk/government/publications/working-together-to-safeguard-children--2

7. Managing referrals

The broad areas of responsibility for the Designated Person are:

- to refer all cases of suspected abuse to the local authority Children's Social Care
- to refer all cases of child protection which concern staff members to the Local Authority Designated Officer (LADO);
- to refer to the Disclosure and Barring Service¹⁶ (cases where a person is dismissed or left due to risk/harm to a child); and/or Police (cases where a crime may have been committed);
- to liaise with the Principal to inform him or her of issues especially ongoing enquiries under 'section 47 of the Children Act 1989'¹⁷ and police investigations;
- to act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.

7.1. Training

The Designated Person receives appropriate training carried out every two years in order to:

- understand the assessment process for providing early help and intervention - for example through locally agreed common and shared assessment processes, such as early help assessments;
- have a working knowledge of how local authorities conduct a child protection case; conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- ensure each member of staff has access to and understands the school's or college's child protection policy and procedures, especially new and part time staff;
- be alert to the specific needs of children in need, those with special educational needs and young carers;
- be able to keep detailed, accurate, secure written records of concerns and referrals;
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and any measures the school or college may put in place to protect them.

7.2. Raising Awareness

The Designated Person should:

- Ensure the school policies are known and used appropriately.
- Ensure the school child protection policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with proprietors regarding this.
- Ensure the child protection policy is available publicly (school website¹⁸) and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in managing concerns.
- Link with the local Safeguarding Board and safeguarding services to make sure staff are aware of training opportunities and the latest local policies on safeguarding.
- Where children leave the school or college ensure their child protection file is copied for any new school or college as soon as possible but transferred separately from the main student file.

7.3. Staff and volunteer obligations

All staff and volunteers are provided with the school policies in order that they abide by the following:

- fully comply with the school's policies and procedures;
- attend appropriate training; and
- inform the designated person of any concerns.

8. Safe Practice and Training

8.1. All school

Staff and volunteers are expected to abide by the "Safeguarding Code of Conduct". They will be reminded of the need to maintain appropriate professional boundaries in their dealings with students and should clearly understand the need to maintain such boundaries. They will be provided with guidance as to the behaviours expected of them and which, if followed, should help prevent them becoming vulnerable to allegations of abuse.

¹⁶www.gov.uk/government/organisations/disclosure-and-barring-service

¹⁷www.legislation.gov.uk/ukpga/1989/41/section/47

¹⁸gloucestershireinternationalschool.co.uk

Safe working practice ensures that students are safe and that all staff:

- are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions;
- aware of their professional responsibilities when using social media;
- work in an open and transparent way;
- work with other colleagues where possible in situations open to question;
- discuss and/or take advice from school management over any incident which may give rise to concern;
- record any incidents or decisions made (“Safeguarding Incident Form”);
- apply the same professional standards regardless of gender or sexuality;
- be aware of confidentiality policy; and
- are aware that breaches of the law and other professional guidelines could result in criminal or disciplinary action being taken against them.

Safeguarding information forms part of each termly whole staff briefing and additional training is provided both formally and informally to staff from time to time as the need arises.

The school’s DSL and deputies undertake basic child protection training and training for Designated Staff which will be refreshed at 2 yearly intervals. The DSL has completed the two day training to enable them to provide training for others.

The Head and all other school staff, including non-teaching staff, undertake appropriate induction training to equip them to carry out their responsibilities for child protection effectively, which is kept up to date by annual refresher training. All school staff are required to attend whole school safeguarding training which is refreshed every 3 years.

All staff (including temporary staff and volunteers) receive induction training from the DSL and are provided with the school’s:

- “Safeguarding Policy”
- “Code of Conduct”
- Procedure For Reporting a Concern About an Adult
- Whistleblowing Policy, and
- Part 1 of “Keeping children safe in education (2018)”¹⁹

and are informed of the school’s child protection arrangements. In addition the induction training will cover the risks of radicalisation and how to identify children and young people at risk from other forms of abuse including FGM and CSE.

ALL staff have been given and been briefed on Part 1 of “Keeping children safe in education (2018)”. Staff are supported by the Senior Management Team, and professional associations. The Designated Safeguarding Lead is supported by two Deputy Designated Leads and the Proprietor.

9. Safeguarding Information for students

All students in our school are aware of a number of staff who they can talk to and this is also outlined on the student information site. The school is committed to ensuring that students are aware of behaviour towards them that is not acceptable and how they can keep themselves safe. All students know that we have a Designated Person with responsibility for Safeguarding and know who this is. We inform students of whom they might talk to, both in and out of school, their right to be listened to and heard and what steps can be taken to protect them from harm.

The school places increasing emphasis on good mental health and emotional wellbeing and recognises that this has an important part to play in protecting students from harm through championing resilience, removing the stigma of poor mental health and encouraging students and their families to talk to us as soon as they feel they are in need. In doing this we seek to empower students to build resilience to the risks of radicalisation and other forms of grooming.

At GIS we ensure that through our school vision, values, rules, diverse curriculum and teaching we promote tolerance and respect for all cultures, faiths and lifestyles. The Proprietor also ensures that this ethos is reflected and implemented effectively in school policy and there are effective risk assessments in place to safeguard and promote students’ welfare.

We recognise we have a duty to prepare our children for life in Britain and to keep them safe including from threats of radicalisation through the Prevent strategy.

Students who attend our school have the right to learn in safety. We do not tolerate bullying of any kind and will challenge derogatory language and behaviour towards others. We raise students’ awareness of these and other safety issues through the curriculum, support from staff and helpful information around school.

¹⁹www.gov.uk/government/publications/keeping-children-safe-in-education--2

9.1. Partnership with Parents and others

The school shares a purpose with parents to educate and keep children safe from harm and to have their welfare promoted. We are committed to working with parents positively, openly and honestly. We ensure that all parents are treated with respect, dignity and courtesy. We respect parents' rights to privacy and confidentiality and will not share sensitive information unless we have permission or it is necessary to do so in order to protect a child.

- We will share with parents any concerns we may have about their child unless to do so may place a child at risk of harm.
- We encourage parents to discuss any concerns they may have with staff in school.
- We make parents aware of our policies and approach through newsletters, briefings, formal and informal communication and the school website.

The school recognises that it is essential to establish positive and effective working relationships with other agencies who are partners in the Gloucestershire Safeguarding Children Board²⁰. There is a joint responsibility for agencies to share information to ensure the safeguarding of all children.

9.2. Student Information

GIS will endeavour to keep up to date and accurate information in order to keep children safe and provide appropriate care for them. The school requires accurate and up to date information regarding:

- names and contact details of persons with whom the child normally lives
- names and contact details of all persons with parental responsibility (if different from above)
- emergency contact details (if different from above)
- details of any persons authorised to collect the child from school (if different from above)
- any relevant court orders in place including those which affect any person's access to the child (e.g. Residence Order, Contact Order, Care Order, Injunctions etc.)
- if the child is or has been on a Child Protection Plan or subject to a Care Plan
- name and contact detail of G.P.
- any other factors which may impact on the safety and welfare of the child

9.3. Confidentiality

GIS has regard to the government document "Information sharing Advice for practitioners providing safeguarding services to children, young people, parents and carers"²¹ published July 2018.

The school will have regard to the above guidance and is aware:

- when information must be shared with Police and Social Care where the child/young person is/may be at risk of significant harm;
- when the student's and/or parent's confidentiality must not be breached; and
- that information is shared on a need to know basis.
- of the GDPR regulations which is not a barrier to justified information sharing but provides a framework to ensure that personal information about living individuals is shared appropriately.

Appendix A – Suspect child at risk action to take

Channels of communication should be quick and clear:

1. Identified concern: Consult with Designated Person or Nominated Deputy
2. Together clarify concern and decide whether further action is needed
3. If it is, then Designated Person to make enquiry to Children's Services - Social Care Department, followed up in writing. The DP can also ring on a "What if" basis to find out in more general terms what the guidance would be before commencing formal proceedings.

²⁰www.gscb.org.uk

²¹www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice

Appendix B - Further information on a Child Missing from Education

All children, regardless of their circumstances, are entitled to a full time education which is suitable to their age, ability, aptitude and any special educational needs they may have. Local authorities have a duty to establish, as far as it is possible to do so, the identity of children of compulsory school age who are missing education in their area.

A child going missing from education is a potential indicator of abuse or neglect. School and college staff should follow the school's or college's procedures for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future.

Schools should put in place appropriate safeguarding policies, procedures and responses for children who go missing from education, particularly on repeat occasions. It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, FGM and forced marriage.

The law requires all schools to have an admission register and, with the exception of schools where all students are boarders, an attendance register. All students must be placed on both registers.

All schools must inform their local authority of any student who is going to be deleted from the admission register where they:

- have been taken out of school by their parents and are being educated outside the school system e.g. home education;
- have ceased to attend school and no longer live within reasonable distance of the school at which they are registered;
- have been certified by the school medical officer as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither he/she nor his/her parent has indicated the intention to continue to attend the school after ceasing to be of compulsory school age;
- are in custody for a period of more than four months due to a final court order and the proprietor does not reasonably believe they will be returning to the school at the end of that period; or,
- have been permanently excluded.

The local authority must be notified when a school is to delete a student from its register under the above circumstances. This should be done as soon as the grounds for deletion are met, but no later than deleting the student's name from the register.

All schools must inform the local authority of any student who fails to attend school regularly, or has been absent without the school's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the school and the local authority (or in default of such agreement, at intervals determined by the Secretary of State).

Appendix C - Child Sexual Exploitation

The following list of indicators is not exhaustive or definitive but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of sexual exploitation.

Signs include:

- underage sexual activity
- inappropriate sexual or sexualised behaviour
- sexually risky behaviour, 'swapping' sex
- repeat sexually transmitted infections
- in girls, repeat pregnancy, abortions, miscarriage
- receiving unexplained gifts or gifts from unknown sources
- having multiple mobile phones and worrying about losing contact via mobile
- having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs)
- changes in the way they dress
- going to hotels or other unusual locations to meet friends
- seen at known places of concern
- moving around the country, appearing in new towns or cities, not knowing where they are
- getting in/out of different cars driven by unknown adults
- having older boyfriends or girlfriends
- contact with known perpetrators
- involved in abusive relationships, intimidated and fearful of certain people or situations

- hanging out with groups of older people, or anti-social groups, or with other vulnerable peers
- associating with other young people involved in sexual exploitation
- recruiting other young people to exploitative situations
- truancy, exclusion, disengagement with school, opting out of education altogether
- unexplained changes in behaviour or personality (chaotic, aggressive, sexual)
- mood swings, volatile behaviour, emotional distress
- self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders
- drug or alcohol misuse
- getting involved in crime
- police involvement, police records
- involved in gangs, gang fights, gang membership
- injuries from physical assault, physical restraint, sexual assault.

Appendix D - Female Genital Mutilation (FGM)

It is essential that staff are aware of FGM practices and the need to look for signs, symptoms and other indicators of FGM.

What is FGM?

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM.

Why is it carried out?

Belief that:

- FGM brings status/respect to the girl – social acceptance for marriage
- Preserves a girl's virginity
- Part of being a woman / rite of passage
- Upholds family honour
- Cleanses and purifies the girl
- Gives a sense of belonging to the community
- Fulfils a religious requirement
- Perpetuates a custom/tradition
- Helps girls be clean / hygienic
- Is cosmetically desirable
- Mistakenly believed to make childbirth easier

Is FGM legal?

FGM is internationally recognised as a violation of human rights of girls and women. It is illegal in most countries including the UK.

Circumstances and occurrences that may point to FGM happening

- Child talking about getting ready for a special ceremony
- Family taking a long trip abroad
- Child's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leone, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afghani, Kurdistan, Indonesia and Pakistan)
- Knowledge that the child's sibling has undergone FGM
- Child talks about going abroad to be 'cut' or to prepare for marriage

Signs that may indicate a child has undergone FGM

- Prolonged absence from school and other activities

- Behaviour change on return from a holiday abroad, such as being withdrawn and appearing subdued
- Bladder or menstrual problems
- Finding it difficult to sit still and looking uncomfortable
- Complaining about pain between the legs
- Mentioning something somebody did to them that they are not allowed to talk about
- Secretive behaviour, including isolating themselves from the group
- Reluctance to take part in physical activity
- Repeated urinal tract infection
- Disclosure

Actions

If staff have a concern they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children’s social care. Mandatory reporting commenced in October 2015 and these procedures will remain when dealing with concerns regarding the potential for FGM to take place. Where a teacher discovers that an act of FGM appears to have been carried out on a girl who is aged under 18, there is a statutory duty upon that individual to report it to the police.

Mandatory Reporting Duty Section 5B of the Female Genital Mutilation Act 2003²² (as inserted by section 74 of the Serious Crime Act 2015²³) places a statutory duty upon teachers, along with social workers and healthcare professionals, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining students, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies.

Mandatory reporting duty commenced in October 2015. Teachers must report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they must consider and discuss any such case with the school’s Designated Person and involve children’s social care as appropriate.

The national helpline is 0800 028 3550 and fgmhelp@nspcc.org.uk

Appendix E – Preventing radicalisation

The Counter Terrorism and Security Act 2015²⁴ places a duty on schools to prevent people being drawn into terrorism. This duty applies to all schools, whether publicly-funded or independent, and organisations covered by the Early Years Foundation Stage²⁵ framework.

Schools Leaders must:

- Establish or use existing mechanisms for understanding the risk of extremism
- Ensure staff understand the risk and build capabilities to deal with it
- Communicate and promote the importance of the duty
- Ensure staff implement the duty effectively

Other duties on schools include:

- Effective partnership working with other local agencies, e.g. GSCB²⁶, police, health, etc.
- Information sharing
- Maintaining appropriate records
- Assessing local risk of extremism (including Far Right and Far Left extremism)
- Demonstrating they are protecting children
- Developing clear protocols for visiting speakers

²²www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/female-genital-mutilation-fgm/legislation-policy-and-guidance

²³www.legislation.gov.uk/ukpga/2015/9/section/74/enacted

²⁴www.legislation.gov.uk/ukpga/2015/6/contents/enacted

²⁵www.gov.uk/early-years-foundation-stage

²⁶www.gscb.org.uk

- Safeguarding policies that take account of GSCB policies and procedures
- Training staff to give them knowledge and confidence
- Ensuring there are robust ICT protocols that filter out extremist materials
- School buildings must not be used to give a platform to extremists

Understanding and recognising risks and vulnerabilities of radicalisation

Children and young people can be drawn into violence or they can be exposed to the messages of extremist groups by many means.

These can include through the influence of family members or friends and/or direct contact with extremist groups and organisations or, increasingly, through the internet. This can put a young person at risk of being drawn into criminal activity and has the potential to cause significant harm.

The risk of radicalisation is the product of a number of factors and identifying this risk requires that staff exercise their professional judgement, seeking further advice as necessary. It may be combined with other vulnerabilities or may be the only risk identified.

Potential indicators include:

- Use of inappropriate language;
- Possession of violent extremist literature;
- Behavioural changes;
- Advocating violent actions and means;
- Association with known extremists;
- Seeking to recruit others to an extremist ideology.

Protecting children from the risk of radicalisation should be seen as part of schools' wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people.

As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include making a referral to the Channel programme.

Prevent

From July 2015 specified authorities, including all schools as defined in the summary of this guidance, are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 ("the CTSA 2015")²⁷, in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty. It applies to a wide range of public-facing bodies. Bodies to which the duty applies must have regard to statutory guidance issued under section 29 of the CTSA 2015 ("the Prevent guidance")²⁸. Paragraphs 57-76 of the Prevent guidance²⁹ are concerned specifically with schools (but also cover childcare). It is anticipated that the duty will come into force for sixth form colleges and FE colleges early in the autumn.

The statutory Prevent guidance summarises the requirements on schools in terms of four general themes: risk assessment, working in partnership, staff training and IT policies. All staff of GIS are expected to complete regular online training on the Prevent duty and follows local guidance laid out by Gloucestershire Safeguarding Children's Board www.gscb.org.uk.

As part of wider safeguarding responsibilities school staff will be alert to:

- Disclosures by pupils of their exposure to the extremist actions, views or materials of others outside of school, such as in their homes or community groups, especially where pupils have not actively sought these out.
- Graffiti symbols, writing or art work promoting extremist messages or images

²⁷www.legislation.gov.uk/ukpga/2015/6/section/26/enacted

²⁸www.legislation.gov.uk/ukpga/2015/6/section/29/enacted

²⁹www.gov.uk/government/publications/prevent-duty-guidance

- Pupils accessing extremist material online, including through social networking sites
- Parental reports of changes in behaviour, friendship or actions and requests for assistance
- Partner schools, local authority services, and police reports of issues affecting pupils in other schools or settings
- Pupils voicing opinions drawn from extremist ideologies and narratives
- Use of extremist or ‘hate’ terms to exclude others or incite violence
- Intolerance of difference, whether secular or religious or, in line with our equalities policy, views based on, but not exclusive to, gender, disability, homophobia, race, colour or culture
- Attempts to impose extremist views or practices on others
- Anti-Western or Anti-British views

GIS will closely follow any locally agreed procedure as set out by the Gloucestershire Safeguarding Children Board’s agreed processes and criteria for safeguarding individuals vulnerable to extremism and radicalisation. In the event of concerns about a person becoming radicalised consideration will be given to using the LA Channel process. Channel is a bespoke panel which meets to address issues of individuals who have been identified as being at risk of radicalisation but have not committed any terrorism offence. The Channel Panel meets when a referral has been made and referrals can be made by anyone.

Teaching Approaches

We will all strive to eradicate the myths and assumptions that can lead to some young people becoming alienated and disempowered, especially where the narrow approaches children may experience elsewhere may make it harder for them to challenge or question these radical influences. In our school this will be achieved by good teaching, primarily via PSHE but also by adopting the methods outlined in the Government’s guidance ‘Teaching approaches that help build resilience to extremism among young people’ DfE 2011³⁰.

We will ensure that all of our teaching approaches help our pupils build resilience to extremism and give pupils a positive sense of identity through the development of critical thinking skill. We will ensure that all of our staff are equipped to recognize extremism and are skilled and confident enough to challenge it.

We will be flexible enough to adapt our teaching approaches, as appropriate, so as to address specific issues so as to become even more relevant to the current issues of extremism and radicalisation. In doing so we will apply the ‘key ingredients’ for success as set out in the Table at Page 15 of that document, and we will apply the methodologies set out in that document following the three broad categories of:

- Making a connection with young people through good [teaching] design and a pupil centred approach.
- Facilitating a ‘safe space’ for dialogue, and
- Equipping our pupils with the appropriate skills, knowledge, understanding and awareness for resilience.

Therefore this approach will be embedded within the ethos of our school so that pupils know and understand what safe and acceptable behaviour is in the context of extremism and radicalisation. This will work in conjunction with our school’s approach to the spiritual, moral, social and cultural (SMSC) development of pupils as defined in Ofsted’s School Inspection Handbook and will include the sound use of assemblies to help further promote this rounded development of our pupils. Our goal is to build mutual respect and understanding and to promote the use of dialogue not violence as a form of conflict resolution. We will achieve this by using a curriculum that includes:

- Citizenship programmes
- Open discussion and debate
- Work on anti-violence and a restorative approach addressed throughout curriculum
- Focussed educational programmes

We will also work with local partners, families and communities in our efforts to ensure our school understands and embraces our local context and values in challenging extremist views and to assist in the broadening of our pupil’s experiences and horizons. We will help support pupils who may be vulnerable to such influences as part of our wider safeguarding responsibilities and where we believe a pupil is being directly affected by extremist materials or influences we will ensure that that pupil is offered mentoring. Additionally in such instances our school will seek external support from the Local Authority and/or local partnership structures working to prevent extremism. At GIS we will promote the values of Democracy, Individual liberty, Rule of law, mutual respect and Tolerance (‘D.I.R.T.’) for those with different faiths and beliefs. We will teach and encourage pupils to respect one another and to respect and tolerate difference, especially those of a different faith or no faith. It is our most fundamental responsibility to keep our pupils safe and prepare them for life in modern multi-cultural global society.

The Department for Education has also published advice for schools on the Prevent duty. The advice is intended to complement the Prevent guidance and signposts other sources of advice and support.

³⁰www.gov.uk/government/publications/teaching-approaches-that-help-to-build-resilience-to-extremism-among-young-people

Channel

School staff should understand when it is appropriate to make a referral to the Channel programme. Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual’s engagement with the programme is entirely voluntary at all stages. Section 36 of the CTSA 2015³¹ places a duty on local authorities to ensure Channel panels are in place. The panel must be chaired by the local authority and include the police for the relevant local authority area. Following a referral, the panel will assess the extent to which identified individuals are vulnerable to being drawn into terrorism, and, where considered appropriate and necessary consent is obtained, arrange for support to be provided to those individuals. Section 38 of the CTSA 2015³² requires partners of Channel panels to co-operate with the panel in the carrying out of its functions and with the police in providing information about a referred individual. Schools and colleges which are required to have regard to ‘Keeping Children Safe in Education 2016’³³ are listed in the CTSA as partners required to co-operate with local Channel panels.

Anyone can report concerns about children becoming radicalised to Police on their direct number 101.

Appendix F – Peer on Peer Abuse

Children can abuse other children. This is generally referred to as peer on peer abuse and can take many forms. This can include (but is not limited to) bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals.

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable.

It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

Revision Control Table	
Drawn up by	N Shaw
Date	19/09/17
Review schedule	Annual
Reviewed	28/08/18 SR
Next review	28/08/19

³¹www.legislation.gov.uk/ukpga/2015/6/section/36/enacted

³²www.legislation.gov.uk/ukpga/2015/6/section/38/enacted

³³www.gov.uk/government/publications/keeping-children-safe-in-education--2