

Infant Jesus Academy



Safeguarding Policy

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1. Introduction

Safeguarding

In a school, the term 'safeguarding' refers to the corporate effort of the organization to protect learners from maltreatment, to prevent impairment of their health or development, to ensure learners are growing up in circumstances consistent with the provision of safe and effective care, and to take action to enable all learners to have the best outcomes. The Infant Jesus Academy takes seriously its responsibility to safeguard the welfare of children and young people in its care: the safeguarding of learners is of fundamental importance to our School.

This Safeguarding policy forms part of a suite of documents and policies which relate to the safeguarding responsibilities of the school.

In particular, this policy should be read in conjunction with:

- the behaviour policy;
- the staff Code of Conduct;
- the safeguarding response to children who go missing from education; and
- the role of the Designated Safeguarding Lead.

There are three main components to our Safeguarding policy:

- Creating a positive school atmosphere through the teaching, and pastoral support offered to learners.
- Ensuring staff are trained and supported to respond appropriately and sensitively to child safeguarding concerns.
- Identifying and supporting learners who may have been abused.

Copies of policies, including this document, will be provided to staff at induction.

Aims

The Infant Jesus Academy recognizes that high self-esteem, confidence, supportive friends and clear lines of communication with a trusted adult all help to prevent abuse. Through our Safeguarding policy and practice, it is our aim as a school to:

1. Establish and maintain an environment where learners feel safe and secure and are encouraged to talk and are also listened to.

2. Outline the systems and processes we all take to ensure learners remain safe at school.
3. Raise awareness to all staff of child safeguarding issues and define their roles and responsibilities in reporting possible cases of abuse.
4. Include in the curriculum activities which equip learners with the skills they need to stay safe from abuse.

In pursuance of these aims, all school staff will receive appropriate safeguarding training, which is to be repeated at least biennially, so that they are knowledgeable and aware of their role in early recognition of the indicators of abuse or neglect and of the appropriate measures to follow. Training will include contextually-relevant material from 'Keeping Children Safe in Education (Part 1, Annex A) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/912593/Keeping_children_safe_in_education_part_1_Sep_2020.pdf. In addition, all members of staff should receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard learners affectively.

Temporary staff and volunteers will be made aware of the safeguarding policies and procedures by the Designated Safeguarding Lead – including the Safeguarding Policy and staff Code of Conduct.

Purpose of this policy

The purpose of this Safeguarding policy is to have clear guidelines and provide direction to staff and others about expected behaviour when dealing with safeguarding issues and reporting cases (or suspected cases) of abuse, including neglect, physical abuse, emotional abuse, or sexual abuse.

This policy is designed to ensure staff and adult members of the school community:

- Are aware of their responsibilities in relation to the safeguarding of learners.
- Know what procedures should be followed if they have a cause for concern.
- Fully support the school's commitment to safeguarding and child protection.

The policy also promotes the sensitive and professional handling of all Safeguarding concerns, referrals and monitoring, so that the needs of the child are appropriately supported. It seeks to:

- Establish and maintain an ethos and culture in which children feel secure and are encouraged to talk and are listened to and responded to when they have a worry or concern.
- Establish and maintain an ethos and culture where school staff and volunteers feel safe, are encouraged to talk and are listened and responded to when they have concerns about the safety and well-being of a learner.

- Ensure learners know there are adults in the school whom they can approach if they are worried.
- Ensure learners who have additional/unmet needs are supported appropriately. This could include referral to external agencies if they have been (or are at risk of being) abused and/or neglected.
- Consider how learners may be taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum.

Members of staff are advised to maintain an attitude that 'it could happen here' and that 'it could be happening to this child,' where safeguarding is concerned. When worried about the welfare of a learner, it is a professional expectation that staff will always act in the interests of the learner. Staff who do so will always be supported by the school.

Implementation and monitoring

This policy will be reviewed at least annually by the governing body. It will be implemented through the school's induction and training programme and as part of day-to-day practice. Compliance with the policy is monitored by the Designated Safeguarding Lead and through staff performance measures. Where appropriate, the failure of a member of staff to comply with the policy will be addressed as a matter of professional development, in the first instance. Where this is not appropriate, non-compliance will be addressed professional misconduct and will attract due sanction.

2. The Designated Safeguarding Lead

Purpose and identity

The governing body should ensure an appropriate senior member of staff, from the Senior Leadership Team (SLT), is appointed to the role of Designated Safeguarding Lead. The Designated Safeguarding Lead should be assisted by at least one Deputy, who may be drawn from the staffing body beyond SLT. These appointments should be based upon the recommendation of the Principal.

During term time, the Designated Safeguarding Lead and/or Deputy Designated Safeguarding Lead (hereinafter, together called “the DSL”) will always be available during school hours for staff in the school to discuss any safeguarding concerns. Concerns out of hours or out of term time should be emailed to the DSL at safeguarding@ijaasaba.com.

The Designated Safeguarding Lead at the Infant Jesus Academy is:

Mr Nosa IGBINIDU, Assistant Principal

The Deputy Designated Safeguarding Lead, in the absence or unavailability of Mr Nosa, is:

Mrs Amaka UZOMAH, School Counsellor

Aside from the Principal, these are the only members of staff with the authority to investigate a Safeguarding disclosure.

The broad areas of responsibility for the DSL are:

- Managing Safeguarding Contacts (ie: contact made with external agencies able to give support) and Safeguarding cases.
- Contacting appropriate outside agencies when advice is needed regarding Safeguarding concerns that possibly meet the threshold for statutory intervention.
- Managing contact with the relevant authorities in all cases of suspected abuse or neglect where there is significant risk of harm to the learner, including Police where a crime may have been committed, and to other relevant authorities where there is a radicalization concern.
- Liaising with the Principal to inform them of issues, especially ongoing enquiries under any relevant legislation, and police investigations.
- Acting as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a Safeguarding Contact by liaising with the relevant external agencies.

- Sharing information with appropriate staff in relation to a child's looked after (CLA) status (whether they are looked after by someone other than their parents) and contact arrangements with birth parents or those with parental responsibility.
- Ensuring they have details of any professionals involved in securing the care and wellbeing of the CLA.

Training

The DSL will undertake specialist training (refreshed every two years) to ensure they are well-informed on issues relating to safeguarding and child abuse in an educational context, including contextually relevant elements of 'Keeping Children Safe in Education' (Part 1, Annex A) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/912593/Keeping_children_safe_in_education_part_1_Sep_2020.pdf. In addition to this training, their knowledge and skills should be refreshed (for example, via e-bulletins, meeting other DSL, or taking time to read and digest safeguarding developments), at least annually, to:

1. 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.
2. Ensure each member of staff has access to and understands the school's safeguarding procedures, especially new and part time staff.
3. Be alert to the specific needs of children in need, those with special educational needs or disabilities (SEND) and those who are young carers (that is, those who, in their home setting are responsible for administering care to adults in any way beyond the reaches of normal expectation).
4. Be able to provide advice and support to staff on protecting learners from indoctrination or radicalization.
5. Understand the unique risks associated with online safety and be confident they have the relevant knowledge and up-to-date capability required to keep learners safe whilst they are online at school.
6. Assist them in recognizing the additional risks that learners with special educational needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalization and to ensure they are confident and competent in supporting SEND learners in staying safe online.
7. Be supported in keeping detailed, accurate, secure written records of concerns, safeguarding contacts and other referrals.

8. Obtain access to resources and attend any relevant refresher training courses.
9. Help them encourage a culture of listening and responding to learners and taking account of their feelings, among all staff, in any measures the school may put in place to protect them.

Raising awareness

The DSL is to:

- Ensure the school's Safeguarding policy, and other policies to which it is related, are known, understood and used appropriately.
- Work with the governing body to ensure the school's Safeguarding policy is reviewed annually and the procedures and implementation are updated and reviewed regularly.
- Ensure the Safeguarding policy is available publicly and that parents and carers are aware that advice regarding safeguarding concerns could be sought from the relevant authorities and that safeguarding contacts about abuse or neglect may be made in support of the safety and wellbeing of learners.
- Ensure parents and carers are aware of the role of the school should relevant authorities be contacted or safeguarding contacts be made.
- Make sure staff are aware of training opportunities and the latest thinking and current practices related to safeguarding; and that they are kept informed of safeguarding responsibilities and procedures through induction, briefings and awareness training.
- Ensure that members of staff are aware of the need to be alert to signs of abuse and know how to respond to a learner who may disclose abuse.
- Provide training for staff so that they know their personal and professional responsibility, including under the relevant parts of 'Keeping Children Safe in Education' (Part 1, Annex A) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/912593/Keeping_children_safe_in_education_part_1_Sep_2020.pdf; the agreed local procedures, the need to be vigilant in identifying cases of abuse; and how to support a child who discloses abuse.
- Work to develop effective links with relevant agencies and cooperate as required with their enquiries regarding safeguarding matters.
- Keep written records of concerns about learners (noting the date, event and action taken) even where there is no need to refer the matter to local authority immediately.

- Ensure that all records are kept secure and in locked locations.
- Ensure that, when a learner leaves the school, any safeguarding files linked to the learner are sent to any new school as soon as possible but are transferred separately from the main learner file. The file should not be sent until the learner is physically attending the new institution.
- Obtain confirmation that the new school setting has received the safeguarding file for any learner transferring and then destroy any information held on the learner in line with data protection regulations.
- Consider whether it would be appropriate to share any information with the new institution in advance of a learner leaving. For example, information that would allow the new institution to continue supporting victims of abuse and have that support in place for when the learner arrives.

3. The Governing Body

Compliance

Governing bodies in any school are to ensure they comply with their duties under legislation. They should also have due regard to published guidance, such as this, to ensure that the policies, procedures and training in their schools are effective and comply with the law and any relevant regulatory frameworks at all times. Governing bodies are also responsible for ensuring there is a nominated Governor who is responsible for Safeguarding.

The governing body of the Infant Jesus Academy (Asaba) recognizes its responsibilities in these areas.

The nominated Governor for Safeguarding is:

The nominated Governor for Safeguarding is:

Mrs Lolita Ejiofor (l.ejiofor@ijaasaba.com)

The second-named Governor for Safeguarding, in the absence or unavailability of Mrs Ejiofor, is:

Miss Jewel Okwechime (j.okwechime@ijaasaba.com)

Responsibilities

The responsibilities placed upon the Board of Governors include:

- Their contribution to any inter-agency working, which includes providing a coordinated offer of early help when additional needs of learners are identified.
- Ensuring that an effective Safeguarding policy is in place, together with a staff Code of Conduct.
- Ensuring staff are provided with literature linked to any frameworks by which the school's safeguarding arrangements are regulated (eg: Part One of Keeping Children Safe in Education) and are aware of specific safeguarding issues.
- Ensuring staff induction is in place with regards to safeguarding.
- Appointing an appropriate member of SLT to act as the DSL.
- Ensuring that the DSL undergoes formal Safeguarding training biennially and receives annual refreshers (for example, via e-bulletins, meeting other DSLs, or taking time to read and digest

safeguarding developments), so they understand their role and responsibilities (including working to develop effective links with relevant agencies and cooperate as required with their enquiries regarding safeguarding matters; keeping written records of concerns about learners (noting the date, event and action taken) even where there is no need to refer the matter to local authorities immediately; and ensuring all records are kept secure and in locked locations).

- Prioritizing the welfare of learners and creating a culture where staff are confident to challenge senior leaders and governors on any safeguarding concerns.
- Ensuring learners are taught about safeguarding, including online safety, with this being taught as part of a broad and balanced curriculum.
- Ensuring appropriate filters and appropriate monitoring systems are in place to safeguard children from potentially harmful and inappropriate online material.
- Nominating a member of the governing body to take responsibility for the school's safeguarding arrangements.

Additional information to support the governing body in discharging its responsibilities under appropriate and effective safeguarding arrangements is available in Annex C of 'Keeping Children Safe in Education' (DfE 2019).

4. When to be Concerned

Introduction

If staff have any concerns about a learner's welfare, then they should act on them immediately, using this policy to guide them, and logging their concerns either in an email, to safeguarding@ijaasaba.com, or in a written record submitted directly to the DSL. Concerns should be made known to the DSL as promptly as possible. The DSL is most likely to have a more complete safeguarding picture and will therefore be the most appropriate persons to advise on the response to a safeguarding concern.

Any member of staff can raise a safeguarding concern with the DSL. Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping learners safe. Staff should be mindful that early information sharing with the DSL is vital for effective identification, assessment and allocation of appropriate support and service provision. After submitting a report to safeguarding@ijaasaba.com, or to the DSL in writing, staff should feel that they can ask the DSL about whether appropriate action was taken as a follow-up.

Options for appropriate follow-up

These may include, but are not limited to:

- Managing any support for the learner internally, via the school's pastoral support processes;
- Establishing a safeguarding contact with local authority services if, for example, the learner is in need or is suffering (or is likely to suffer) significant harm from abuse or neglect.

Contextual Safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside of school and/or can occur between learners outside the school. This is particularly so for day school learners. All staff, but especially the DSLs should be considering the context within which such incidents and/or behaviours occur. This is known as 'contextual safeguarding,' which simply means assessments of learners should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

A learner-centered and coordinated approach to safeguarding

Safeguarding and promoting the welfare of children and young people is everyone's responsibility. To fulfil this responsibility effectively, each professional should ensure their approach is learner-centered. This means they should consider, at all times, what is in the best interest of the learner

involved. The reputations and interests of the adults concerned are not the concern, as these persons are legally responsible for themselves while children and young people are not.

Learners who may require early help

It is important that children and young people receive the right help at the right time to address risks and prevent issues escalating. This also includes staff monitoring the situation and feeding back to the DSL any ongoing/escalating concerns so that due consideration can be given in any further interventions made or support given if the child's situation does not appear to be improving.

If early help is appropriate, the DSL will generally lead on liaising with agencies able to support its provision.

Any learner may benefit from early help, but staff should be particularly alert to the potential need for early help for a learner who:

- Is disabled and/or has specific additional needs;
- Has special educational needs;
- Is a young carer;
- Shows signs of being drawn into antisocial or criminal behaviour, including gang involvement and association with organized crime groups;
- Is frequently missing or goes missing from care, school boarding or home;
- Is misusing drugs or alcohol themselves;
- Is at risk of modern-day slavery, trafficking or exploitation;
- Is in a family circumstance presenting challenges for them, 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 or neglect;
- Is at risk of being radicalized or exploited;
- Is a privately fostered child, with no formal legal arrangements in place to support this fostering.

All staff should be aware of the main categories of maltreatment: **physical abuse, emotional abuse, sexual abuse** and **neglect**. They should also be aware of the indicators of maltreatment and specific safeguarding issues, so that they are able to identify cases of learners who may be in need of help or protection.

Information on specific safeguarding issues can be found in Appendix A of 'Keeping Children Safe in Education'.

Learners with special educational needs and disabilities

Additional barriers can exist when recognizing abuse and neglect among SEND learners.

These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's impairment without further exploration;
- Assumptions that children with SEND can be disproportionately impacted by things like bullying without outwardly showing any signs;
- Communication barriers and difficulties;
- Reluctance to challenge carers (professionals may over empathize with carers because of the perceived stress of caring for a disabled child);
- Increased risk of the learner's exposure to abusive behaviour due to their reliance upon a wide network of carers to meet their basic needs;
- The learner's own understanding of what constitutes abuse;
- Lack of choice or participation;
- Isolation.

Peer-on-peer abuse

Schools play an important role in assessing and managing the risk a learner may pose to themselves and others in the education setting.

If one learner causes harm to another, this should not necessarily be dealt with as abuse. In judging if behaviour is abusive, it is important to consider whether:

- There is a large difference in power (through age, size, ability, or development, for example)

- The perpetrator has repeatedly tried to harm one or more other learners; or
- There are concerns about the intention of the alleged perpetrator.

All staff should be aware that safeguarding issues can manifest themselves via peer-on-peer abuse. This is most likely to include, but may not be limited to:

- Bullying (including cyberbullying);
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- Sexual violence, such as rape, assault by penetration and sexual assault;
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- ‘Upskirting’ – taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- ‘Sexting’, also known as youth-produced sexual imagery; and
- Initiation or hazing type violence and rituals.

All staff should be aware that abuse is abuse; and peer-on-peer abuse will not be tolerated or passed off as banter, a joke, or “just part of growing up”. Furthermore, staff should recognize the gendered nature of peer-on-peer abuse (ie: that it is more likely girls will be victims and boys will be perpetrators), but that, at the Infant Jesus Academy, all peer-on-peer abuse is unacceptable and will be taken seriously.

To minimize the risk of peer-on-peer abuse, the school shall:

- Maintain a curriculum (including its Spiritual, Moral, Social and Cultural) offer, to develop learners’ understanding of acceptable behaviour and keeping themselves safe;
- Use assemblies and the pastoral system to support this;
- Operate systems to support learners in raising concerns with staff, knowing they will be listened to, believed and valued, and that their concerns will be handled appropriately by the staff concerned;
- Observe policy and procedure to ensure victims, perpetrators and any other child affected by peer-on-peer abuse is given the support they need, whether through internal or external provision;

- Use of risk assessment, where appropriate, to lend further effectiveness and efficiency to action taken;
- Maintain and keep under review all relevant policies supporting our intention to eliminate this (and all types) of abuse.

Guidance on what to do to in cases where there is an allegation of concern that a learner has sexually abused others may be found in Part Five of Keeping Children Safe in Education: <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>.

Serious violence

All staff should be aware of indicators, which may signal that learners are at risk from (or are involved with) serious violent crime. These may include:

- Increased absence from school or lessons;
- Changes in friendships or relationships with older persons or groups;
- A significant decline in performance;
- Signs of self-harm or a significant change in wellbeing;
- Signs of assault or unexplained injuries
- Unexplained gifts/new possessions

5. Dealing with a Disclosure

Introduction

A learner who reports that they have been abused, or who reports a behaviour that may be regarded as abuse (even if the child does not know that this is what it is called), is said to have made a “disclosure”.

What to do

The member of staff to whom the learner makes the disclosure MUST:

- At an appropriate time tell the learner that, in order to help them, you must pass the information on to someone who is able to give that help.
- Allow the learner to speak freely.
- Remain calm and avoid overreacting – the learner may stop talking if they feel they are upsetting you.
- Give reassuring nods or words of comfort – ‘I want to help’, ‘You are doing the right thing by talking to me’, ‘This is not your fault.’ It takes a lot of courage for an abused person to make a disclosure. They may feel ashamed, particularly if the abuse is sexual. The abuser may have threatened what will happen if they tell. They may have lost all trust in adults, or believe, or have been told, that the abuse is their fault.
- Not be afraid of silences – the child must speak at their pace and not that of the member of staff.
- Make a note to the DSL immediately, by emailing safeguarding@ijaasaba.com or by presenting a written note in person.
- Ensure that the email or written note is clear in its use of terminology and its record of the time, date, place and people involved.
- Record the learner’s responses in the exact way they were said, as far as possible (remember, notes from this discussion may be used in any subsequent court proceedings).

The member of staff MUST NOT:

- Promise to keep the disclosure a secret – If a child talks to you about any risks to their safety or wellbeing you will need to let them know that you will need to pass the information on to those who are able to help ensure they receive the support they need. You are not permitted to keep secrets. The exact point at which you tell the learner this is a matter for your

professional judgement, but it is generally recommended that you do so before a disclosure is made. In certain circumstances, jumping in immediately could result in the child thinking that you do not want to listen. In other circumstances, if you leave it until the very end of the conversation, the child may feel that you have misled them into revealing more than they otherwise might have done.

- Make any promises it may not be possible to keep.
- Under any circumstance, ask investigative questions – such as how many times this has happened, whether it happens to siblings too, or what their parents or carers think about all of this.
- Automatically offer any physical touch as comfort, even though this may feel like the natural thing to do – it may be anything but comforting to a child who has been abused.
- Admonish the child or young person for not disclosing earlier. Saying ‘I do wish you had told me about this when it started’ or ‘I can’t believe what I’m hearing might’ be your way of being supportive, but the learner may interpret it to mean they have done something wrong.
- Discuss the disclosure with anyone other than the DSL, except by the DSL’s guidance.

The member of staff MAY:

- Ask questions to clarify their understanding of what is being said.

Support

Dealing with a disclosure can be stressful. The member of staff should therefore consider seeking support for themselves and discuss this with the DSL.

6. Record Keeping

Data protection

The way information pertaining to a disclosure is kept and shared is subject to the Nigerian Data Protection Regulation (NDPR), which is itself a partner to the extremely tight regulations of the European Union's General Data Protection Regulations (GDPR) of 2016 – regulations by which bodies such as the Council of British International Schools (to whom the Infant Jesus Academy is positioning itself to apply for membership), are governed.

Under GDPR, information arising from a safeguarding disclosure is treated as 'special category personal data'. All concerns, discussions and decisions made and the reasons for those decisions must therefore be recorded in writing.

Reporting

When a learner has made a disclosure, the member of staff should:

- Submit their written record (their "referral" or "report") to the DSL immediately.
- Include in their report a record the date, time, place and any noticeable non-verbal behaviour and the words used by the learner.
- Indicate the position of any injuries.
- Record statements and observations, rather than interpretations, assumptions, or opinions.

As far as reporting is concerned, the responsibility of the member of staff ends here. However, it is possible that they may have a future role in supporting or monitoring the child, contributing to assessments, or implementing safeguarding plans where necessary.

Once an allegation has been referred to the DSL, an enquiry into the details then follows in connection with the learner. The parents of the learner(s) involved may then be notified to come into school to meet with the DSL. In extreme cases or frequent occurrences, the DSL may involve the Local authorities. The report must therefore be recorded by the DSL and kept in a safe and locked location, so it can be accessed for such use.

7. Professional Confidentiality

Introduction

Confidentiality is an issue which must be fully understood by all those working with children, particularly in the context of child safeguarding. This is not only out of respect for the child and staff involved but also to ensure that evidence is not compromised by information being released into the public domain.

A member of staff must never guarantee to keeping secrets with a learner. Where a learner makes a disclosure, this must be reported to the DSL and may require further investigation by appropriate authorities.

Professional expectations

It is expected of all staff of the Infant Jesus Academy that:

- They share relevant information about the protection of a learner with the DSL and that they only share this with other professionals at the behest of same. Cases of staff who are found to have been privy to information that was not then shared with the DSL will be addressed as cases of professional misconduct.
- If approached by a learner requesting that they keep a secret, they tell the learner in a manner appropriate to their age or stage of development that they cannot promise complete confidentiality. The member of staff is to explain that they may need to pass information to someone who can help keep the learner (or other learners) safe.
- Information received is shared only within appropriate contexts and is transmitted using school email addresses or in hard copy. Personal or private email addresses and/or mobile technology (including WhatsApp) must NOT be used for this purpose. Where information is transmitted by email, the subject line should NOT include the names of any learners involved and use initials and class information instead (eg: "AK (7W)"). Information passed in hard copy should be presented in a sealed envelope, or on a sheet of paper stapled closed to maintain confidentiality.

Feedback on a safeguarding case

Staff will be informed of relevant information in respect of individual cases regarding safeguarding. However, this information will be given on a "need to know basis" only. Any information shared with a member of staff in this way must be held confidentially to themselves.

8. School Procedures

If any member of staff is concerned about a learner, then they must inform the DSL in the ways outlined in this policy. The DSL will decide whether the concerns should be raised with the relevant external agencies. If it is decided that this is necessary, this will be discussed with the parents or carers of the learner, unless doing so would place them at further risk of harm.

Any member of IJA staff discovering, during the course of their work, that an act of female circumcision has been carried out – or is planned to be carried out – on any learner under the age of 18, must report this to the DSL immediately.

If an allegation is raised against other learners, then the school will follow the processes outlined in this policy concerning peer-on-peer abuse.

The member of staff must record information regarding their safeguarding concerns immediately. The record must be a clear, precise, factual account of the observations.

Particular attention will be paid to the attendance and development of any learner about whom the school has concerns, or who has been identified as being the subject of a safeguarding plan and a written record will be kept.

Once an allegation has been referred to the DSL, it is then for the DSL to investigate. The parent(s) or carer(s) of the learner(s) involved may then be notified to come into school to meet with the DSL. In extreme cases or frequent occurrences, the DSL may involve the Local authorities. The report must therefore be recorded by the DSL and kept in a safe and locked location, so it can be accessed for such use.

If a learner who is (or has been) the subject of a safeguarding plan changes school, the DSL will transfer the appropriate records to the DSL at the receiving school, in a secure manner and separately from the learner's academic file.

The DSL is responsible for making SLT aware of trends in behaviour that may affect the welfare of learners. If necessary, training will be arranged.

9. Communication with Parents and Carers

The Infant Jesus Academy will ensure this Safeguarding policy is available publicly via the school website.

In determining if (and when) to inform parents and carers of a safeguarding concern relating their child, the possibility of such contact placing the learner at increased risk of significant harm will be taken into account. This will include considerations around whether the contact is likely to:

- Prompt further abusive behaviours – for example, a learner being subjected to abuse, maltreatment or threats; or a learner being forced to remain silent if the alleged abuser is informed;
- Result in unreasonable delay;
- Risk the loss of evidential material.

The school may also consider not informing parents or carers where this would place a member of staff at risk.

Any complaint by a parent or carer that their child is, or may be, bullied will be fully investigated by the DSL and action will be taken to protect the child. A parent or carer raising concerns about bullying will have a personal response from the DSL, giving feedback on the processes underway, within two working days of the complaint being received. This supersedes the 'next working day acknowledgement and 10 working day feedback' protocol that applies to other complaints.

The school shall also ensure parents and carers have an appropriate understanding of our responsibilities around the safeguarding of learners; and that they are advised of more than one emergency contact number for their child(ren).

10. Allegations Involving Staff

An allegation involving staff includes any information which indicates a member of staff may have:

- Behaved in a way that has, or may have, harmed a child;
- Possibly committed a criminal offence either against, or in relation to, a child
- Behaved towards a child, or children, in a way that indicates they would pose a risk of harm, if they work regularly or closely with children.

This applies to any child with whom the member of staff has contact within their personal, professional or community life.

If an allegation is made against a member of staff, set procedures must be followed. It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events can and do happen. A child or young person may also make an allegation against an innocent party because they are too afraid to name the real perpetrator. Even so, we accept that some adults do pose a serious risk to the welfare and safety of children and young people and that we must therefore act upon every allegation made.

All members of staff should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding arrangements. The school will keep its whistleblowing procedures under review to ensure they enable such concerns to be raised with SLT. Staff can discuss their concerns with the DSL, if appropriate. Allegations against SLT can be reported to the Principal. Allegations against the Principal should be reported to the governing body.

Staff who are the subject of an allegation – from whichever source – have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. Suspension is not mandatory, nor is it automatic but, in some cases, staff may be suspended where this is deemed to be the best way to ensure that our children are safeguarded and that the allegation can be addressed quickly and fairly.

The person to whom the allegation is first reported will not investigate or ask leading questions, if seeking clarification. Assumptions are not to be made, confidentiality is not to be promised, and the person should be advised that the concern will be shared on a 'need to know' basis only.

Actions to be taken include making an immediate written record of the allegation using the informant's words – including the time, date and place where the alleged incident took place, and brief details of what happened, what was said and who was present. This record should be signed and dated and immediately passed on to the Principal.

The recipient of an allegation must NOT unilaterally determine its validity; and failure to report it in accordance with procedures is a potential disciplinary matter.

In line with local arrangements, the Principal shall seek the guidance from the Office of the Chief Inspector of Education for Oshimili South before investigating the allegation or taking written or detailed statements. If the allegation meets any of the three criteria set out at the start of this section, guidance from this office should be sought without delay.

The Principal, as soon as possible, following briefing from the Office of the Chief Inspector of Education for Oshimili South, will inform the subject of the allegation.

Code of conduct

All school staff are valued members of the school community. Everyone is expected to set and maintain the highest standards for their own performance, to work as part of a team and to be an excellent role model for our children. To achieve this, and to reduce the risk of allegations, all staff should be aware of safer working practices and should therefore be familiar with the guidance contained in the following Code of Conduct.

All school staff should:

- Place the safety and welfare of learners above all other considerations.
- Treat all members of the school community, including learners, parents and carers, colleagues and members of the governing body with consideration and respect.
- Adhere to the principles and procedures contained in all school policies, including and especially those relating to Safeguarding and Learning & Teaching.
- Treat each learner as an individual and adjust to meet their individual needs.
- Demonstrate a clear understanding of and commitment to non-discriminatory practice.
- Recognize the power of imbalances between learners and staff, and different levels of seniority of staff and ensure that power and authority are never misused.
- Understand that school staff are in a position of trust and that sexual relationships with a learner may be an offence.
- Be alert to, and report appropriately, any behaviour that may indicate a learner is at risk of harm.
- Encourage all learners to reach their full potential.
- Avoid condoning inappropriate behaviour by learners or staff.

- Take responsibility for their own continuing professional development and not simply rely upon the school to source or direct it.
- Refrain from any action that would bring the school into disrepute.
- Value themselves and seek appropriate support for any issue that may have an adverse effect on their professional practice.

Other policies and practices around appropriate staff behaviours will be guided by the minimum standards in best practice outlined in the 'Guide for Safer Working Practice' located at www.saferrecruitmentconsortium.org. This document seeks to ensure the responsibilities of school leaders towards learners and staff are discharged by raising awareness of questionable, unsafe, unprofessional and unwise behaviour. This includes guidelines for staff on positive behavior management, in line with the Infant Jesus Academy's ban on corporal punishment, which are also reflected in the school's behaviour policy.

Appendices:

Appendix 1: Recognizing A Safeguarding Concern

Training and support

Members of staff will undertake appropriate safeguarding awareness training to equip them to carry out their responsibilities for child safeguarding effectively. This is kept up-to-date by biennial training, in the first instance, and with refresher courses that are delivered at least annually. All new members of staff will undertake safeguarding training with the DSL during the induction period. Regular staff training will include matters such as recognizing and responding to signs of abuse and neglect, lines of reporting within school, online safety and any other salient matters. It must also include information on the relevant parts of 'Keeping Children Safe in Education' (Part 1, Annex A) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/912593/Keeping_children_safe_in_education_part_1_Sep_2020.pdf.

The following guide is designed to give a working understanding of the matters that such training should cover.

Recognizing safeguarding concerns

Safeguarding refers to the process of protecting children from abuse and maltreatment; preventing harm to their health or development; ensuring that they grow up with the provision of safe and effective care; and taking action to enable them have the best outcomes.

Child protection is the core element of safeguarding. Child protection is understood as *the responsibility to protect children who are suffering from harm because of abuse or neglect*. To ensure our learners are protected from harm, we need to understand what types of behavior constitute abuse and neglect.

Understanding 'abuse' and 'neglect'

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone, or leaving knives or matches within reach of an unattended toddler.

The different categories of abuse are:

Category	May involve
1. Physical abuse	<ul style="list-style-type: none">• Burning or scalding• Drowning• Hitting• Poisoning

	<ul style="list-style-type: none"> • Shaking • Suffocating • Throwing • Otherwise causing physical harm, including through so-called 'honour' based violence
2. Psychological abuse (including emotional abuse)	<ul style="list-style-type: none"> • Conveying to a young person that they are worthless or unloved, inadequate, or valued only because they meet the needs of another person • Abuse based on race, tribal identity, sex, gender, religion, disability, size, age, gender or marital status • Not giving the young person opportunities to express their views, deliberately silencing them or making fun of what they say or how they communicate • Imposing expectations that are inappropriate to the age or development of the young person (especially where there are additional areas of vulnerability; for example, a learning disability) or preventing them from taking part in normal social interaction • Seeing or hearing the ill-treatment of someone else • Serious bullying*, including cyberbullying, which causes the young person to frequently feel frightened, intimidated or in danger
3. Sexual abuse	<ul style="list-style-type: none"> • Physical contact, including assault by penetration (eg: rape or oral sex) or non-penetrative acts (eg: masturbation, kissing, rubbing and touching outside of clothing) • Non-contact activities, such as involving young people in looking at or producing sexual images, watching sexual activities, or encouraging young people to behave in sexually inappropriate ways, or grooming a young person in preparation for sexual exploitation – including via the internet • Sexting** is when someone shares sexual, naked or semi-naked images or videos of themselves or others or sends sexually explicit messages
4. Neglect	<ul style="list-style-type: none"> • A parent or carer (which, for boarders, includes the school) failing to provide adequate food, clothing and shelter • Excluding the young person from home or abandoning them • Failure to protect a young person from physical and emotional harm or danger • Failure to ensure access to appropriate health, education or social care services • Being unresponsive to a young person's basic needs • Deliberately withholding information about a person's rights or entitlements • Theft or exploitation in financial matters or transactions • The misuse or misappropriation of possessions or financial entitlements

Notes:

* The Infant Jesus Academy considers ALL types of bullying to be highly distressing and damaging. Consequently, NO bullying – of ANY kind – is tolerated. Staff are to be vigilant at all times to the possibility of bullying occurring, and must take immediate steps to stop it from happening and to protect and reassure the would-be or actual victims concerned. Parents and carers of all children involved will be personally contacted immediately after a bullying incident (see also school's Behaviour policy).

** Sexting is when someone shares sexual, naked or semi-naked images or videos of themselves or others or sends sexually explicit messages. Sexting may also be referred to by students as trading nudes, dirties or pic for pic. There are many reasons why a student may want to send a naked or semi-naked picture, video or message to someone else. These might include:

- Joining in because they think everyone is doing it
- Boosting their self-esteem
- Flirting with others
- Exploring their sexual feeling
- To get attention and connect with new people on social media
- Finding it difficult to refuse if somebody asks for an explicit image

Abuse may fall clearly into one category. Threatening to spread information about a young person's sexual orientation on social networking sites until money is handed over, for example, constitutes psychological abuse. However, in many cases, the abused person may be suffering from several forms of abuse at the same time. For example, constantly threatening and then expelling a young person out of the family home will incorporate both psychological abuse and neglect.

The impact of abuse

When children and young people experience abuse, it can have very serious and long-lasting effects. It can create a lack of self-confidence and self-esteem that is carried over into all areas of their lives and it can have a negative impact that will affect the young person's study and work, their relationships and, later, the way they parent their own children. It is also known that abuse, in whatever form it takes, is a major contributing factor in both self-harm and suicide.

Indicators of abuse and what you might see

Some types of abuse are characterized by physical signs – for example, bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorize injuries into 'accidental' or 'deliberate' with any degree of certainty. For these reasons it is vital that staff are aware of the range of behavioural indicators of abuse and that they report any concerns to the DSL.

It is the responsibility of ALL staff to report their concerns. Investigating, however, is the responsibility of the DSL only. Failure to observe these general principles may be treated as professional misconduct.

In general, a learner who is being (or who has been) abused and/or neglected may:

- Have bruises, bleeding, burns, fractures or other injuries.
- Show signs of pain or discomfort.
- Keep arms and legs covered, even in warm weather.
- Look unkempt and uncared for.
- Change their eating habits.
- Have difficulty in making or sustaining friendships.
- Appear fearful.
- Be reckless about their own safety or that of others.
- Self-harm
- Frequently miss (or arrive late to) school or lessons.

- Show signs of not wanting to go home.
- Display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn
- Challenge authority beyond age-related expectation.
- Become uninterested in their schoolwork.
- Be constantly tired or preoccupied.
- Be wary of physical contact.
- Be involved in, or particularly knowledgeable about drugs or alcohol.
- Display sexual knowledge or behaviour beyond that normally expected for their age.

In isolation, individual indicators listed above will rarely provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSL decide how to proceed. However, it is imperative that staff understand their duty is to report *concerns* – they do *not* need ‘absolute proof’ that the learner is at risk.

Signs of specific types of abuse are:

Physical abuse	
A form of abuse that may involve Burning or scalding, drowning, hitting, poisoning, shaking, suffocating, throwing, or otherwise causing physical harm, including through so-called ‘honour’ based violence. Physical abuse may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child or young person.	
Child	
Bite marks – site and size	Admission of punishment which appears excessive
Bruises – shape, grouping, site, repeat or multiple	Aggression towards others, emotional and behaviour problems
Burns and scalds – shape, definition, size, depth, scars	Fabricated or induced illness
Improbable, conflicting explanations for injuries or unexplained injuries	Fractures
Injuries on parts of the body where accidental injury is unlikely	Frequently absent from school or lessons
Repeated or multiple injuries	Withdrawal from physical contact
Untreated injuries	
Parent or carer	Family/environment
Evasiveness or aggression towards child(ren) or others	History of mental health, alcohol or drug misuse or domestic violence
Excessive chastisement of child(ren)	Marginalized or isolated by the community
Explanation inconsistent with injury	Past history in the family of childhood abuse, self-harm, symptoms of pain or discomfort defying medical explanation, or false allegations of physical or sexual assault
Fear of medical help / failure to seek necessary medical help	Physical or sexual assault or a culture of excessive chastisement of any kind

Parent or carer with injuries	
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Psychological abuse (including emotional abuse)

The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a young person that they are worthless or unloved, inadequate, or valued only because they meet the needs of another person. It may include abuse based on race, tribal identity, sex, gender, religion, disability, size, age, or marital status. It may feature the imposition of expectations that are inappropriate to the age or development of the young person (especially where there are additional areas of vulnerability; for example, a learning disability) or preventing them from taking part in normal social interaction. Some psychologically abused children or young people may be denied opportunities to express their views, deliberately silencing them or making fun of what they say or how they communicate. They may have been made to see or hear the ill-treatment of someone else, or may themselves have been subjected to serious bullying (including cyberbullying) which causes them to frequently feel frightened, intimidated or in danger. Some level of emotional abuse is involved in all types of maltreatment of a child or young person, though it may occur alone.

Child	
Chronic running away	Abnormal or indiscriminate attachment
Compulsive stealing	Depression
Developmental delay	Desperate attention-seeking behaviour
Drugs/solvent abuse	Extremes of passivity or aggression
Makes a disclosure	Low self-esteem
Neurotic behaviour (eg: rocking, hair twisting, thumb sucking)	Over-reaction to mistakes / inappropriate emotional responses
Self-harm	Social isolation – being withdrawn, a 'loner', having a frozen watchfulness
Parent or carer	Family/environment
Cold and unresponsive to the child or young person's emotional needs	History of childhood abuse, self-harm, medically unexplained illness, or false allegations of physical or sexual assault
History of abuse or mental health problems	History of mental health, alcohol or drug misuse or domestic violence
Intensely involved with their child(ren), providing obstacles to the work of others responsible for their child(ren)'s care	History of unexplained death or illness, or multiple surgery in parents and/or siblings of the family
Mental health, drug or alcohol difficulties	Lack of support from the family
Observed to be aggressive towards child(ren) or others	Marginalized or isolated by the community
Overly critical of their child(ren)	Physical or sexual assault or a culture of excessive chastisement
Previous domestic violence	

Sexual abuse

Forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, irrespective of whether the child is aware of what is happening and regardless of whether they perceive themselves to have given consent. These activities might include physical contact, including assault by penetration (eg: rape or oral sex) or non-penetrative acts (eg: masturbation, kissing, rubbing and touching outside of clothing). They may involve non-contact activities, such as involving young people in looking at or producing sexual images, watching sexual activities, or encouraging young people to behave in sexually inappropriate ways, or grooming a young person in preparation for sexual exploitation – including via the internet or sexting (sharing sexual, naked or semi-naked images or videos of themselves or others or sends sexually explicit messages). Sexual abuse is not solely perpetrated by adult males: it is also possible for women and other children and young people to commit acts of sexual abuse.

Child	
Inexplicable changes in behaviour, such as becoming aggressive or withdrawn	Inappropriate sexualized conduct

Pain, bleeding, bruising, or itching in genital and/or anal area	Poor attention or concentration (especially if they appear to be in a world of their own)
Pregnancy	Poor self-perception, perhaps evidenced by self-harm or self-hatred
Reluctance to undress for Physical Education, or sporting activities, or shower routines (for boarders)	Sexual knowledge or behaviour inappropriate to age or stage of development, or that is unusually explicit
Running away from home	Sudden changes in schoolwork habits (becoming truant, for example)
Self-harm – eating disorders, self-mutilation and suicide attempts	Withdrawal, isolation or excessive worrying
Parent or carer	Family/environment
Comments made by the parent or carer about the child or young person	Grooming behaviour
Conviction for sexual offences	History of childhood abuse, self-harm, medically unexplained illness, or false allegations of physical or sexual assault
Displaying inappropriate behaviour towards the child	History of mental health, alcohol or drug misuse or domestic violence
Excessive (or possessive) interest in the child or young person	History of unexplained death or illness, or multiple surgery in parents and/or siblings of the family
History of sexual abuse	Marginalized or isolated by the community
Lack of sexual boundaries	Physical or sexual assault or a culture of excessive chastisement

Neglect

The persistent failure to meet a child's or young person's basic physical and/or psychological needs, likely to result in the serious impairment of the child/young person's health or development. Neglect may occur during a pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food, clothing and shelter, or excluding the young person from home or abandoning them. Abuse under this category may also involve parents or carers failing to: protect a young person from physical and emotional harm or danger, ensure access to appropriate health, education or social care services, or respond to a young person's basic needs. May also manifest in deliberately withholding information about a person's rights or entitlements, in theft or exploitation in financial matters or transactions, or in the misuse or misappropriation of possessions or financial entitlements.

Child

Dirty and unkempt condition	Abnormal voracious appetite
Dry skin or dry sparse hair	Constant tiredness
Failure to thrive – being underweight or small in stature	Disturbed peer relationships
Inadequately clothed	Frequent lateness or non-attendance at school or lesson
Marks, spots or smears of colour in skin, particularly on the hands and feet	Inadequate social skills and poor socialization
Swollen limbs with sores that are slow to heal	Low self-esteem
Untreated medical problems	Self-harming behaviour
Parent or carer	Family/environment
Failure to meet the child/young person's basic essential needs, including health needs	Dangerous or hazardous home environment, including failure to use home safety equipment; risk from animals
Failure to provide adequate caretakers	History of childhood abuse, self-harm, medically unexplained illness, or false allegations of physical or sexual assault
Inability to meet the child/young person's emotional needs	History of mental health, alcohol or drug misuse or domestic violence
Keeping an unhygienic, dangerous or hazardous home environment	History of unexplained death or illness, or multiple surgery in parents and/or siblings of the family
Leaving a child alone for periods of time unusual for age	Lack of age-appropriate opportunities for the child/young person to play and learn

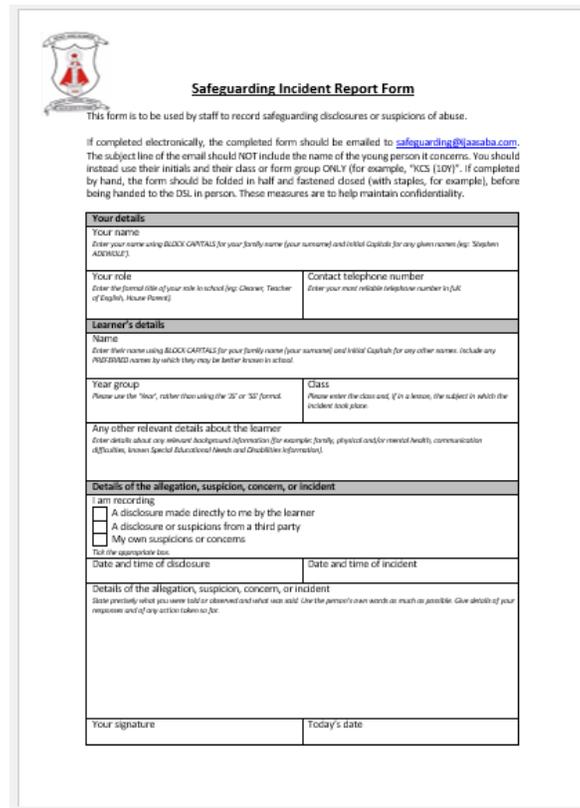
Mental health, alcohol or drug difficulties	Marginalized by the community
Unkempt presentation	

Appendix 2: Acting Upon A Safeguarding Concern

Taking action

Key points to remember for taking action are:

1. Report your concern to a DSL via email (safeguarding@ijaasaba.com), or present your written report to them in person. Whether sent by email or submitted as a written report, your concerns should be presented on the Incident Report Form.



Safeguarding Incident Report Form

This form is to be used by staff to record safeguarding disclosures or suspicions of abuse.

If completed electronically, the completed form should be emailed to safeguarding@ijaasaba.com. The subject line of the email should NOT include the name of the young person it concerns. You should instead use their initials and their class or form group ONLY (for example, "KCS (10Y)". If completed by hand, the form should be folded in half and fastened closed (with staples, for example), before being handed to the DSL in person. These measures are to help maintain confidentiality.

Your details	
Your name <small>Enter your name using BLOCK CAPITALS for your family name (your surname) and initial Capitals for any given names (eg: Stephen ANDREW).</small>	
Your role <small>Enter the formal title of your role in school (eg: Cleric, Teacher of English, House Parent)</small>	Contact telephone number <small>Enter your most reliable telephone number in UAE</small>
Learner's details	
Name <small>Enter their name using BLOCK CAPITALS for your family name (your surname) and initial Capitals for any other names. Include any PREFIXED names by which they may be better known in school.</small>	
Year group <small>Please use the 'Year', rather than using the '3rd' or '3rd' format.</small>	Class <small>Please enter the class and, if in a lesson, the subject in which the incident took place.</small>
Any other relevant details about the learner <small>Enter details about any relevant background information (for example, family, physical and/or mental health, communication difficulties, known Special Educational Needs and Disabilities information).</small>	
Details of the allegation, suspicion, concern, or incident	
I am recording <input type="checkbox"/> A disclosure made directly to me by the learner <input type="checkbox"/> A disclosure or suspicions from a third party <input type="checkbox"/> My own suspicions or concerns <small>Tick the appropriate box.</small>	
Date and time of disclosure	Date and time of incident
Details of the allegation, suspicion, concern, or incident <small>State precisely what you were told or observed and what was said. Use the person's own words as much as possible. Give details of your response and of any action taken so far.</small>	
Your signature	Today's date

Figure 1: The Safeguarding Incident Report Form – Where staff have an official work email address, a copy is sent to the that addresses at the start of each term. Printed copies are available from the school office.

2. Do not start your own investigation.
3. Share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family.

If you suspect a child is at risk of harm

There will be occasions when you suspect that a learner may be at serious risk, but you have no 'real' evidence. The learner's behaviour may have changed; their artwork could be bizarre or you may have

noticed other physical but inconclusive signs. In these circumstances, you should try to give the learner the opportunity to talk. The signs you have noticed may be due to a variety of factors and it is fine to ask them whether they are alright or if you can help in any way.

If, following your conversation, you remain concerned, you should discuss your concerns with the School Counsellor.