



## Safeguarding Policy

Review Date – September 2020



To provide the very best education for all pupils and the highest level of support for our tutors to ensure that every student we work with feels safe and are enabled to reach their full potential.

We promise to do everything we can to give children the very best education whilst in our care that gives them the best opportunity to succeed in life.

## Our Commitment

We are committed to taking positive action in the light of the Equality Act 2010 with regard to the needs of people with protected characteristics.

These are age, disability, pregnancy and maternity, religion and belief, race, sex, sexual orientation, gender reassignment and marriage and civil partnership.

# Introduction

## Purpose and Aims

The purpose of Impress Education's Safeguarding Policy is to provide a secure framework for all members of our business to use in safeguarding and promoting safeguarding to those who we work with through the schools/academies that we work with.

The policy aims to ensure that:

- All pupils are safe and protected from harm
- Other elements of provision and policies are in place to enable pupils to feel safe and adopt safe practices
- Staff, tutors, pupils and schools/academies are aware of the expected behaviours and Impress the Examiners legal responsibilities in relation to the safeguarding and promoting the welfare of all of our students that we work with.

## Ethos

Safeguarding in our business is considered everyone's responsibility and as such we aim to work with institutions in order to create the safest environment within which every pupil has the opportunity to achieve their full potential. Impress the Examiner recognises the contribution it can make in ensuring that all pupils that we work with within institutions feel that they will be listened to and appropriate action taken, particularly in ensuring procedures are in place to minimise the risk of peer-on-peer abuse. We will do this by endeavouring to work in partnership with institutions that we work with and seek to establish effective working relationships with these schools/academies in order support them in their endeavours to protect and equip students.

In safeguarding and promoting the welfare and wellbeing of children, we will act in accordance with the following legislation and guidance:

- Health and Safety Act (1974)
- The Children Act (1989 & 2004)
- Mental Health Act (amended 2007)
- Management of Health and Safety at Work Act (amended 1994)
- Human Rights Act (1998)
- Data Protection Act (1998)
- Education Act (2002) (section 175/157)
- Mental Capacity Act (1993) (amended 2005)
- The Education (Pupil Information) (England) Regulations (2005)
- Equalities Act (2010)
- Teachers' Standards (2012)
- Dealing with Allegations of Abuse Against Teachers and Other Staff (2012)
- The Local Authority Safeguarding Boards Inter-Agency Procedures



- Working Together to Safeguard Children (2018)
- Keeping Children Safe in Education (September 2019)
- What to do if you're worried a child is being abused (2015)
- Information Sharing (2018)
- Counter-Terrorism and Security Act (2015)
  
- Children Missing Education – Statutory Guidance for Local Authorities (September 2016)
- Sexual Violence and Sexual Harassment between children in schools and colleges (December 2017)
- Disqualification under the Childcare Act 2006 (revised 31st August 2018)

## Safeguarding Contacts within Impress the Examiner

Designated Safeguarding Lead: Tamara Budhan Caldwell

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## 1. Responsibilities and Expectations

### 1. Impress the Examiner Responsibilities

We will:

- 1.1 Be responsible for ensuring that our tutors are aware of our safe-guarding policy and their responsibilities when representing Impress the Examiner within schools/academies.
- 1.2 We recognise the possibility that adults working for our business may harm children. Any concerns about the conduct of teachers working with Impress the Examiner within schools/academies should be taken to the Designated Safeguarding Lead (DSL) without delay;
- 1.3 Amend the policy as safeguarding requirements change as directed by government guidance and legislation.

### 2. Impress the Examiner will:

- 2.1 Be responsible for monitoring the implementation of the safeguarding policy and procedures and ensure that our tutors comply with them.
- 2.2 Ensure all tutors working with us are aware of their duty to raise concerns where they exist.
- 2.3 Ensure that the policy is made available to all schools/academies (if requested) and that all staff are properly vetted to make sure they are safe to work with pupils who attend our sessions.
- 2.4 Ensure that proper procedures are in place for managing allegations of abuse against pupils (see Child Protection Policy and Procedure).
- 2.5 Ensure that there is a Designated Safeguarding Lead (DSL). In the case of an allegation against a member of staff, the DSL will deal with any such allegations.

### 3. The Designated Safeguarding Lead must:

- 3.1 Update their safeguarding training every two years and keep up to date with safeguarding developments as they arise.
- 3.2 Ensure that all safeguarding issues raised are effectively responded to, recorded and referred to the appropriate agency. The Designated Safeguarding Lead will keep secure, accurate records.
- 3.3 Ensure teachers working with students understand the difference between a 'concern' and 'immediate danger or at risk of harm'.

3.4 Monitor/Arrange safeguarding training for all tutors who work with ItE

3.5 Ensure that ItE tutors have had Safe-Guarding training regularly (annually)

3.6 Ensure that the Designated Safeguarding Lead has the relevant training.

#### 4. Duties:

4.1. All child protection concerns need to be acted upon immediately. If a teacher working with Impress the Examiner is concerned that a pupil may be at risk or is suffering abuse, they should tell the Designated Safeguarding Lead immediately. All concerns should be reported to the Designated Safeguarding Lead as soon as possible so they can carry out their duties.

4.2. All adults, including the Designated Safeguarding Lead, have a duty to refer all known or suspected cases of abuse to children's social care or the police. It is the responsibility of Impress the Examiner teachers or the DSL to formally report the disclosure to the Designated Safeguarding Lead of the institution that we are working in, in the first instance.

#### 5. Recognising concerns, signs and indicators of abuse

5.1. Safeguarding is not just about protecting children and young people from deliberate harm. For ItE, it includes such things as:

- Pupil safety
- Bullying (including cyber-bullying)
- Racist abuse
- Harassment
- Educational visits
- Intimate care
- Pupils missing education
- Neglect
- Internet safety etc.
- Upskirting

5.2. The witnessing of abuse can have a damaging effect on those who are a party to it, as well as young people subjected to the actual abuse, and in itself will have a significant impact on the health and emotional well-being of the young person. Abuse can take place in any family, institution or community setting, by telephone or on the internet. Abuse can often be difficult to recognise as children may behave differently or seem unhappy for many reasons, as they move through the stages of childhood or their family circumstances change. However, it is important to know the indicators of abuse and to be alert to the need to consult further.

5.3. The following indicators listed under the categories of abuse are not an exhaustive list.

5.3.1. **Physical Abuse** – this can involve hitting, shaking, throwing, poisoning, punching, kicking, scalding, burning, drowning and suffocating. It can also result when a parent or carer deliberately causes the ill health of a child or young person in order to seek attention through fabricated or induced illness. This was previously known as Munchausen’s Syndrome by Proxy.

5.3.2. **Emotional Abuse** – Emotional abuse is where a child or young person’s need for love, security, recognition and praise is not met. It may involve seeing or hearing the ill- treatment of someone else such as Domestic Violence or Domestic Abuse. A parent, carer or authority figure is considered emotionally

abusive when they are consistently hostile, rejecting, threatening or undermining towards child or other family members. Peer-to-peer emotional abuse, including gender related abuse may be face-to-face or via social media. It can also occur when children are prevented from having social contact with others or if appropriate expectations are placed upon them. Symptoms that indicate emotional abuse include:

- Excessively clingy or attention seeking
- Very low self-esteem or excessive self-criticism
- Withdrawn behaviour or fearfulness
- Lack of appropriate boundaries with strangers; too eager to please
- Eating disorders or self-harm.

5.3.3. **Sexual Abuse** – this involves forcing or enticing a child or young person to take part in sexual activities, whether or not the young person is aware of what is happening. This may include physical contact both penetrative and non-penetrative, viewing pornographic material including through the use of the internet and upskirting. Indicators of sexual abuse include:

- Allegations or disclosures
- Genital soreness
- Injuries
- Sexually transmitted diseases
- Inappropriate sexualised behaviour (including words, play or drawings).

5.3.4. **Neglect** – is the persistent failure to meet a youngster’s basic physical and/or psychological needs which can significantly harm their health and development. Neglect can include inadequate supervision (being left alone for long periods of time), lack of stimulation, social contact or education, lack of appropriate food, shelter, appropriate clothing for conditions and medical attention and treatment when necessary.

5.3.5. **Serious violence**- factors that indicate that a child is at risk from, or is involved with, serious violent crime, including those associated with gun/ knife crime, homicide and ‘County lines’.

## 6. Procedures – What to do if you are concerned

6.1. Please discuss any concerns with the Designated Safeguarding Lead. Please follow

the guidelines below:

#### 6.2. Receive

- Listen to what is being said, without displaying shock or disbelief
- Take what is said seriously
- Note down what has been said.

#### 6.3. Reassure

- Reassure the pupil, as far as is possible
- Don't promise confidentiality, you have a duty to refer
- Reassure and alleviate guilt
- Reassure the child that information will only be shared with those who need to know.

#### 6.4. React

- React to the pupil only as far as is necessary for you to establish whether or not you need to refer this matter, but don't 'interrogate' for full details
- Do not ask 'leading' questions, for example, "Did he/she...", such questions may invalidate your evidence (and the child's) in any later prosecution
- Ask open questions, like "Anything else you would like to say?"
- Do not criticise the perpetrator; the pupil may have an affection for him/her
- Do not ask the pupil to repeat it all for another member of staff
- Explain what you have to do next and who you have to talk to.

#### 6.5. Record

- Make some brief notes at the time on any paper, which comes to hand. Write notes up as 'add incident' on CPOMS as soon as possible and pass a copy to the Designated Safeguarding Lead
- Do not destroy your original notes; attach these to the safeguarding form. Record the date, time, place, any noticeable non-verbal behaviour and the words used by the child. Record the actual words used by the child
- Record statements and observable things, rather than your 'interpretations' or assumptions.

#### 6.6. Remember

- Follow Impress the Examiner and the specific schools guidelines and consult as appropriate
- Procedures require the Designated Teacher (staff) to make appropriate records to Social and Health Care.

#### 6.7. Reflect

- Try to get some support for yourself if you need it. This support should be available through your Designated Teacher.

#### 6.8. If you are concerned that a member of staff or adult in a position of trust poses a danger to a child or young person or that they might be abusing a child or young

person you should report your concerns to the DSL in the first instance.

## 7. Current Safeguarding issues

7.1. Some members of our communities hold beliefs that may be common with particular cultures, but which are against the law of England. Impress the Examiner does not condone practices that are illegal, and which are harmful to children.

7.1.1. **Forced Marriage** – Impress the Examiner does not support the idea of forcing someone to marry without their consent and will follow procedures to refer any child and young person immediately to Children’s Social Care.

7.1.2. **Honour Based Violence** – ‘A crime or incident, which has or may have been committed to protect or defend the honour of the family and/or community’. It is important to be alert to signs of distress and indications such as:

- Self-harm
- Absence from academy and truancy
- Isolation from peers
- Being monitored by family
- Not participating in academy activities
- Unreasonable restrictions at home
- Forced marriage

Where it is suspected that a child/young person is at risk of honour-based violence the academy will report those concerns to the appropriate agency in order to prevent this form of abuse taking place.

7.2. **Radicalisation and Extremism** – Extremism is defined as vocal or active opposition to fundamental British Values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. Radicalisation is the process by which an individual or a group come to adopt extremist views. Children can be exploited by people seeking to involve them in terrorism or in activity in support of terrorism, through radicalisation. All pupils are educated on fundamental British Values including the importance of mutual respect and tolerance. Where it is suspected that a child/young person is at risk from radicalisation, the Designated Safeguarding Lead will follow local procedures.

### 7.3. Recognising Extremism and Radicalisation

Early indicators of radicalisation or extremism may include:

- Showing sympathy for extremist causes
- Glorifying violence, especially to other faiths or cultures
- Making remarks or comments about being at extremist events or rallies outside of school
- Evidence of possessing illegal or extremist literature
- Advocating messages similar to illegal organisations or other extremist groups
- Out of character changes in dress, behaviour and peer relationships (but there

are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent)

- Secretive behaviour
- Online searches or sharing extremist messages or social profiles
- Intolerance of difference, including faith, culture, gender, race or sexuality
- Graffiti, art work or writing that displays extremist themes
- Attempts to impose extremist views or practices on others
- Verbalising anti-Western or anti-British views
- Advocating violence towards others

For non-urgent concerns, the local police can be called on 101.

Dedicated telephone helpline for extremism:

Telephone: 020 7340 7264

Email: [counter.extremism@education.gsi.gov.uk](mailto:counter.extremism@education.gsi.gov.uk)

**7.4. Female Genital Mutilation (FGM)** – The partial or total removal of female genitalia for non-medical reasons; it is also known as female circumcision, cutting or sunna and has been a criminal offence in the UK since 1985. Section 5B of the 2003 Act introduces a mandatory reporting duty which requires regulated health and social care professionals and teachers in England and Wales to report ‘known’ cases of FGM in under 18s which they identify in course of professional work, to the police. The duty applies from 31 October 2015 onwards. ‘Known’ cases are those where either a girl informs the person that an act of FGM – however described – has been carried out on her, or where the person observes physical signs on a girl appearing to show that an act of FGM has been carried out and the person has no reason to believe that the act was, or was part of, a surgical operation within section 1(2)(a) or (b) of the FGM Act (2003). It is important to be alert to the signs, such as:

- Having difficulty walking, standing or sitting
- Spending longer than usual in the toilet
- Displaying unusual behaviour after an absence from the academy
- Being particularly unwilling to undergo normal medical examinations
- Asking for help but not being explicit about the problem

It is illegal for someone to arrange for a child to go abroad with the intention of having her circumcised. If any member of staff has any concerns, they must personally report to the police, after informing the Designated Safeguarding Lead.

**7.5. Child Sexual Exploitation (CSE)** – This involves exploitive situations, contexts and relationships where young people receive something (for example, food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in ‘consensual’ relationships where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitive relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying, including cyber-bullying and grooming. However, it is also important

to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse. There are three main types of child sexual exploitation, they are as follows:

- 7.6. **Inappropriate relationships** - Usually this involves just one abuser who has inappropriate power - physical, mental or financial – or control over a young person. The young person may believe they have a genuine friendship or loving relationship with their abuser.
- 7.7. **Boyfriend/Girlfriend** - The abuser grooms the victim by striking up a normal relationship with them, giving them gifts and meeting in cafés or shopping centres. A seemingly consensual sexual relationship develops but later turns abusive. Victims may be required to attend parties and sleep with multiple men/women and threatened with violence if they try to seek help.
- 7.8. **Organised exploitation and trafficking** - Victims are trafficked through criminal networks – often between towns and cities – and forced or coerced into sex with multiple men and/or women. They may also be used to recruit new victims. This serious organised activity can involve the buying and selling of young people.
- 7.9. **Trafficked Children** – Child trafficking involves moving children across or within national or international borders for the purposes of exploitation. Exploitation includes children being used for sex work, domestic work, restaurant/sweatshop, drug dealing, shoplifting and benefit fraud. Where is Impress the Examiner is made aware that a child is suspected of, actually has been or is at risk of being trafficked/exploited, concerns will be reported to the appropriate agency. This is against the law yet for some communities it is considered a religious act and cultural requirement. It is illegal for someone to arrange for a child to go abroad with the intention of having her circumcised. If any of the above areas of concern is brought to the attention of those concerned will be reported to the appropriate agency in order to prevent this form of abuse taking place.
- 7.10. **Ritualistic Abuse** – Some faiths believe that spirits and demons can possess people (including children). What should never be considered in the use of any physical or psychological violence to get rid of the possessing spirit. This is abusive and will result in the criminal conviction of those using this form of abuse even if the intention is to help the child.
- 7.11. **Sexually Active under eighteen-year olds** – It is acknowledged by those working with young people that most young people under the age of 18 will have an interest in sex and sexual relationships. The Local Authority Protocol for Sexually Active Young People under 18 years old has been designed to assist those working with children and young people to identify where these relationships may be abusive, and the children and young people involved may need to provision and protection or additional services. If sexual activity in pupils is brought to the attention of the Impress the Examiner, Local Authority Protocol will be followed.
- 7.12. **Domestic Abuse** – The Government defines domestic abuse as ‘any incident of threatening behaviour, violence or abuse (psychological, physical, sexual, financial or emotional) between adults who are or have been intimate partners or family

members, regardless of gender or sexuality'. Children may suffer both directly and indirectly if they live in households where there is domestic violence. Domestic abuse is likely to have a damaging effect on the health, development and welfare of children, and it will often be appropriate for such children to be regarded as Children in Need under the Children Act (1989). Where there is evidence of domestic violence, Impress the Examiner will report concerns to the appropriate agency including Children's Social Care and the police in order to prevent the likelihood of any further abuse taking place.

**7.13. Upskirting-** The government defines upskirting typically involving 'take 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'. Upskirting is a criminal offence. Where teachers working with Impress the Examiner witness or become aware of upskirting incidences they will report this to the DSL who will report the concerns to the DSL with the specific school/academy.

**7.14. Private Fostering –** An arrangement made between the parent and the private foster carer, who then becomes responsible for caring for the child in such a way as to safeguard and promote his/her welfare. A privately fostered child means a child under the age of 16 (18 if a disabled child) who is cared for and provided with accommodation for more than 28 days and where the care is intended to continue by someone other than:

- A parent
- A person who is not a parent but has parental responsibility
- A close relative
- A Local Authority

It is a statutory duty for Impress the Examiner to inform the Local Authority when made aware of a child or young person who may be subject to private fostering arrangements.

## 8. Safeguarding children who may be disabled or have a special educational need

8.1. Disabled children have exactly the same human rights, as non-disabled children, to be safe from abuse and neglect, to be protected from harm and to achieve the very best they can.

8.2. Disabled children and those with a special educational need do however, require additional action. This is because they experience greater risks and 'created vulnerability' as a result of negative attitudes about disabled children and unequal access to services and resources, and because they may have additional needs relating to physical, sensory, cognitive and/or communication impairment (Safeguarding Children, DCSF, July 2009). Impress the Examiner will ensure that disabled pupils are listened to and responded to appropriately where they have concerns regarding abuse.

8.3. Pupils with a special educational need may be especially vulnerable because of the difficulties related to communication skills, empathy with others or understanding the

consequences of their actions.

8.4. Impress the Examiner will work with school/academy SENCos (where appropriate) to ensure that our teachers are aware of how to support pupils with these difficulties ensuring that tutors have an awareness that:

- Behaviour, mood and injury may relate to possible abuse and not just their SEN or disability
- There is a higher risk of peer group isolation
- There any be a disproportionate impact of bullying
- Additional pastoral support should be considered.

## 9. Bullying

9.1. Children may be bullied for a number of reasons including the protected characteristics:

- Gender reassignment
- Marital or civil partnership status
- Disability
- Pregnancy or maternity
- Race or colour
- Nationality, ethnicity or national origin
- Religion of belief
- Sex or sexual orientation

9.2. As a business we do not support any form of bullying. All incidents of noticed bullying are to be reported to the DSL.

9.3. We understand that bullying may take on different forms and may include racist and homophobic behaviour. Any incidents of sexual violence and sexual harassment (peer-to-peer abuse) will be reported to the DSL and we expect all staff to be vigilant.

## 10. Child Exploitation and E-Safety

10.1. Children and young people can be exploited and suffer bullying through their use of modern technology such as the internet, mobile phones and social networking sites. Many children and young people have unlimited and unrestricted access to the internet via 3G and 4G. In order to minimise the risks to children and young people, Impress the Examiner will work with institutions in line policies in order to ensure that there are appropriate measures in place such as security filtering, and an acceptable use policy linked to the E-Safety Policy.

10.2. **Peer on Peer Abuse includes:**

- Bullying (including Cyber-Bullying)
- Physical Abuse
- Sexual Violence and Sexual Harassment
- Sexting

- Initiation ceremonies.

## 11. Sexual Violence & Sexual Harassment

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

## 12. Sexual Violence

12.1. For the purpose of this policy, when referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as outlined below:

- Rape
- Assault by Penetration
- Sexual Assault

## 13. Sexual Harassment

For the purpose of this policy, when referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

For more information, further clarification and definitions, please refer to the Sexual Violence and Sexual Harassment between children in schools and colleges DfE document. Contact details for local services/support can be found in the academy's Child Protection Policy and Procedures.

## 14. County Lines

County Lines is the police term for urban gangs supplying drugs to suburban, market and coastal areas/towns using dedicated mobile phone lines or 'deal lines'. It involves Child Criminal Exploitation (CCE) as gangs use children and vulnerable people to move drugs and money. Gangs establish a base in the market location, typically by taking over the homes of vulnerable adults by force or coercion in a practice referred to as 'Cuckooing'.

## 15. Other Safeguarding Issues

15.1. The above list is not exhaustive and as new policy guidance and legislation develops within the remit of Safeguarding, the policy will be renewed and updated as appropriate and in line with the Local Safeguarding # Children Board and Local

Authority to ensure the academy is safe place in which to learn and work.

## 2. Education

Educating pupils about current safeguarding issues is essential in equipping pupils with the knowledge and skills to identify risks and take appropriate action. All pupils are taught about safeguarding, including online, through various teaching and learning opportunities, as part of providing a broad and balanced curriculum.

## 3. Safer Recruitment and Selection

3.1 It is a requirement for all agencies to ensure that all staff recruited to work with children and young people are properly selected and checked. All tutors will be appropriately qualified and have the relevant employment history and checks to ensure they are safe to work with children and young people in compliance with the Key Safeguarding Employment Standards. (Impress the Examiner Safer Recruitment Policy)

3.2 Tutors working with Impress the Examiner are subject to a satisfactory enhanced Disclosure and Barring Service (DBS) check (with barred check list where appropriate), carried out before taking working within institutions.

As the proprietor Impress the Examiner must always be contacted when an allegation has been made against a Tutor.

The contact details for Impress the Examiner is outlined below:

Tamara Budhan Caldwell [tcaldwell@impresstheexaminer.com](mailto:tcaldwell@impresstheexaminer.com) 07714216803