



Cabella International
Sahaja School

CHILD PROTECTION POLICY

10 June 2024

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1. Executive Summary

Audience

All staff (teaching and non-teaching) must read and abide by the contents of this policy. This policy must be posted on the school website.

Key Points

This policy covers:

- a) The procedures for spotting and reporting child protection concerns which are detailed in full in this policy document;
- b) The role of the Designated Safeguarding Leads (DSLs) and Designated Governor for Safeguarding;
- c) The response of the school to an allegation against a member of staff along with advice for employees of the school to minimise the risks of them being subject to a false allegation;
- d) The procedures for notifying parents and external agencies following a child protection concern;
- e) The actions that the school will take in response to an instance of peer-on-peer abuse of any type;
- f) The support that the school will provide to pupils who are subject to a child protection referral;
- g) The procedure for ensuring that all staff appointed have gone through the safer recruitment process.

2. Introduction

Background

Cabella International Sahaja School (CISS) is a small international boarding school of approximately 50 children of primary school age from all over the world. Our approach to education is inspired by the teachings of Shri Mataji Nirmala Devi and the practice of Sahaja Yoga meditation. We believe that children will thrive if they are provided with a safe, loving learning environment in which their dignity, innocence and sense of self are respected and allowed to flourish.

Policy Statement

This policy, therefore, puts the safety and well-being of children at the heart of the work of CISS. It gives clear guidance to staff and others about the appropriate response to child protection issues.

It has been developed in accordance with the UN Convention on the Rights of the Child (CRC), and with provisions in Italian law relevant to children's rights.

It applies the recommendations of the International Task Force on Child Protection, led by the Council of International Schools (CIS).

Aims

This policy aims to ensure that:

- a) Child protection procedures are clear, concise and easy to follow;
- b) Child protection procedures are well understood by all staff at the school (including senior leaders, teaching staff and non-teaching staff, supply staff, governors and volunteers);
- c) Child protection concerns and referrals are handled sensitively, professionally and in ways that support the needs of the child.

3. Safeguarding Practice

Principles

At CISS we recognise that child protection sits within our broader responsibility to safeguard and promote the safety, health and welfare of the young people entrusted to our care. This policy, therefore, considers child protection in three dimensions:

- a) *Prevention* through the promotion of a positive school atmosphere and the provision of careful and vigilant teaching, pastoral support and supervision at all times;
- b) *Protection* by following agreed procedures and ensuring that all staff are appropriately recruited and then trained and supported to respond sensitively to child protection concerns;
- c) *Support* for any pupils who may have been abused.

Preventative Measures

We recognise that high self-esteem, confidence, supportive friends and clear lines of communication with a trained and trusted adult will help to protect our pupils against potential abuse. We, therefore:

- a) Maintain an ethos, based on a *robust pastoral system*, in which young people feel secure and know that their concerns will be taken seriously;
- b) Ensure pupils know that there are *adults in school who can be approached* if they are worried or are in any kind of difficulty;
- c) Include within the *broader school curriculum* elements that will help our pupils to gain an awareness of the issues involved in promoting their own safety, developing healthy, positive relationships and building a strong sense of belonging to a community;

4. Responsibilities

The Designated Safeguarding Lead (DSL)

The DSL is responsible for creating a culture of safeguarding within the school where children are protected from harm. This includes:

- Ensuring that safer recruitment procedures are followed in the appointment of staff;
- Ensuring all staff receive an effective induction and ongoing training to support them to recognise and report any concerns;
- Ensuring children receive the right help at the right time;
- Being the designated point of contact for staff to be able to discuss and share their concerns;
- Being available to staff and outside agencies during school hours and term time for consultation on safeguarding concerns raised;
- Contributing effectively to multi agency working, for the safeguarding and promotion of the welfare of children;

The DSL makes sure all safeguarding concerns are followed up. This includes:

- Ensuring referrals to partner agencies are made and followed up as required;
- Referring immediately to the Police for any cases where a criminal offence may have been committed or risk of harm is imminent.

The DSL is responsible for all record keeping related to Child Protection. This includes:

- Maintaining the record of staff safeguarding training;
- Establishing and maintaining a safe and secure system for recording safeguarding and child protection records;
- Ensuring all child protection files are held separately from pupils' educational records;

The DSL reports on Child Protection matters and works towards improving relevant procedures by:

- Providing the Principal (if the Principal is not the DSL), with an annual report for the Governing Body, detailing how school delivers on its safeguarding responsibilities and any child protection issues within the school;
- Meeting at least once a term with the Nominated Governor to share oversight of the safeguarding provision within the setting, monitor performance and develop plans to rectify any gaps in policy or procedure;

In order to fulfil their role, the DSL keeps up to date with knowledge and attends relevant training.

All staff, supply staff, volunteers, visitors, governors and contractors

All staff, supply staff, volunteers, visitors, governors and contractors understand safeguarding children is everyone's responsibility.

Any person who receives a disclosure of abuse, an allegation or suspects that abuse may have occurred must report it immediately to the Designated Safeguarding Lead (DSL). In the absence of the DSL, concerns will be brought to the attention of the most senior member of staff on site.

If there are concerns that issues are not being progressed in an expedient manner, concerns should be escalated to the Servizi Sociali Locali (Social Services) or the Tribunale dei Minori (Juvenile Court). Where a criminal offence may have been committed or risk of harm to a child is imminent, they should make a report to the Polizia di Stato or Carabinieri (the Police).

The Governing Body

The Governing Body understands and fulfils its safeguarding responsibilities to:

- Ensure that the Principal and (when not the Principal) the DSL creates and maintains a strong, positive culture of safeguarding within the school;
- Ensure that procedures are in place to manage safeguarding concerns of allegations against staff, supply staff, governors, volunteers, visitors or contractors where they could pose a risk of harm to children;
- Ensure that this policy reflects the unique features of the community we serve and the needs of the pupils attending our school. This policy will be reviewed at least annually;
- Monitor and evaluate the effectiveness of this Child Protection Policy;
- Ensure that through curriculum content and delivery children understand to keep themselves safe;
- Appoint a Designated Safeguarding Lead (DSL), who is a member of the Senior Leadership Team (SLT) and has the required level of authority;
- Ensuring the DSL has sufficient time, training, skills and resources to be effective;
- Ensure safe and effective recruitment policies and disciplinary procedures are in place;
- Ensure that all staff complete safeguarding training;
- Ensure staff have due regard to the relevant data protection principles which allow them to share or withhold personal information when it is necessary to safeguard any child.
- Appoint a Nominated Safeguarding Governor;
- Ensure the DSL completes an Annual Safeguarding Report for Governors;
- Ensure measures are in place for the governing body to have oversight of how the school's safeguarding responsibilities are exercised and evidenced;
- Ensure structures are in place to challenge the Principal where there are any identified gaps in practice or procedures are not followed;
- Ensure resources are allocated to meet the needs of pupils requiring child protection or early intervention;

The Chair of Governors

It is the duty of the Chair of Governors to liaise with relevant agencies if any allegations are made against the Principal.

The Nominated Safeguarding Governor (NSG)

The NSG is responsible for child protection issues and is briefed about any critical incidents that have arisen by the Designated Safeguarding Lead (DSL). The NSG meets with the DSL each term and undertakes an annual review of the Child Protection policies and procedures and of the efficiency with which related duties have been discharged. This is reported to governors as part of the overall reporting on student welfare, undertaken in conjunction with the Designated Safeguarding Lead. An annual child protection report to governors is delivered by the Designated Safeguarding Lead. Child protection is a standing item on all main Board of Governors meeting agendas.

5. Working with Other Agencies

Schools do not operate in isolation. Child protection is the responsibility of all adults, especially those who work with young people. CISS will help to protect the children in its care by working consistently and appropriately with child protection agencies, primarily Servizi Sociali Locali (Social Services) . These agencies provide locally agreed inter-agency procedures which we are bound by law to follow. In more serious cases a referral may be made to the police Tribunale dei Minori (Juvenile Court). Where a criminal offence may have been committed or risk of harm to a child is imminent, a report will also be made to the Polizia di Stato or Carabinieri (the Police).

6. Procedures for Reporting a Concern

Key Points

Key points for staff to remember for taking action are:

1. In an emergency take the action necessary to help the child, for example, call the Police on 112;
2. Fill in a Cause for Concern Report form and contact the DSL as soon as possible (**Appendix F**);
3. Do not start your own investigation;
4. Share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family.

Early Concerns

There will be occasions when staff may suspect that a pupil may be at risk: the pupil's behaviour may have changed or physical but inconclusive signs may have been noticed. In these circumstances, staff should try to give the pupil the opportunity to talk.

Staff should use the Cause for Concern Report form (see Appendix F) to record early concerns.

If the pupil does begin to reveal that they are being harmed, staff should follow the advice laid out in Section 9. Following an initial conversation with the pupil, if the member of staff remains concerned, they should discuss their concerns with the DSL.

The key here is that if in doubt Staff must make the referral.

Possible barriers to reporting

Staff have a responsibility to report any concerns they have about a child who they believe to be at risk of harm and must be mindful of the subjective factors that can influence decision-making in this situation. These include:

- reluctance to accept teachers, professionals or those in higher socio-economic groups can perpetrate abuse or neglect;
- reluctance to accept someone could masquerade as a Sahaja yogi in order to perpetrate abuse or neglect;

- concerns that the report is a breach of trust (when a child has disclosed something of concern in confidence, for example);
- concerns that the report will not be taken seriously;
- fear of getting it wrong;
- anxieties that the report will lead to significant upset for the family or for the alleged perpetrator if the concern is proved unfounded;
- over-identification with the alleged perpetrator and making excuses for and/or justifying potentially abusive behaviour;
- the normalisation of a form of abusive behaviour or neglect because it has become usual practice in a particular situation such as, for example, neglect of physical care, the use of sarcasm, punishment that inflicts unreasonable stress or duress on a child, failure to recognise or respond to special needs, etc.;
- being reassured by an abuser they have or will change (known as disguised compliance);
- wish to retain professional autonomy and manage the situation;
- over-optimism about a situation: seeing it as a one-off or accident;
- fear of the person knowing they reported them;
- fear of actual or perceived threats or reprisals from the family and or community;
- not wanting to be seen as a ‘troublemaker’;
- a lack of understanding of procedure and policy.

It is essential therefore, that staff reflect on the way in which these subjective factors may be influencing decision-making, particularly any decisions not to report.

If in any doubt, staff should contact the Designated Safeguarding Lead and/or Principal.

Notifying Parents

The school will discuss any concerns about a pupil with their parents, as long as doing so would not put the child at further risk of harm. It is the responsibility of the Principal (and in his absence the DSL) to make contact with the parents in the event of a concern, suspicion or disclosure.

The school follows a consent-based model when reporting concerns to outside agencies. This means that when dealing with suspected child neglect, abuse or need for support, it will be open and honest with parents about concerns about a child or children, and always aim to work in partnership with the parents.

Referral to the Authorities

In Italy, the mandate to investigate allegations of abuse rests with the Police and local Social Services.

The DSL will make a referral to the Police and local Social Services if it is believed that a pupil is suffering or is at risk of suffering ‘significant harm’. The pupil (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.

Significant Harm

We define ‘harm’ as the ill treatment or the impairment of the health or development of the child. Seeing or hearing the ill-treatment of another person is also to be considered a form of harm.

Harm can be determined 'significant' by comparing a child's health and development with what might be reasonably expected of a similar child.

There is no absolute criteria for determining whether or not harm is 'significant'. In case of doubt, the DSL will seek the advice of local authorities such as social services, the police and education and/or health agencies to reach a decision based on their combined professional judgement and the evidence available.

International Children

As an international boarding school, CISS looks after many students whose parents are not resident in Italy. The question therefore arises of how to deal with situations where no crime has been committed on Italian soil but there is, nevertheless, a concern for the safety or wellbeing of a child if they were to return home to their country. In such cases, depending on the level of concern, the DSL may also decide to refer the matter to the child's embassy for advice, in addition to consulting with the local Italian authorities.

Sahaja Yoga Collective

The DSL will report any member of staff who has been convicted of a crime against children to the leadership of the Sahaja Yoga in the country where they are from or are resident. If permitted by law, The DSL will report to the relevant Sahaja Yoga leadership any member of staff that they have dismissed who they believe may pose a threat to the safety and wellbeing of children within the Sahaja Yoga community.

Staff Sharing Concerns Directly with the Authorities

Staff will normally follow the reporting procedures outlined in this policy. However, they may also share information directly with Tribunale dei Minori or police if:

- a) The situation is an emergency and the designated safeguarding person, the Principal and the chair of governors are all unavailable;
- b) They are convinced that a direct report is the only way to ensure the pupil's safety.

7. Record-Keeping and Retention of Records

When a disclosure of abuse or an allegation against a member of staff or volunteer has been made, no matter how low level, the school must have a record of this.

These records are maintained in a way that is confidential and secure, in accordance with *Data Protection Legislation*.

Records include:

- a clear and comprehensive summary of the concern;
- a clear, detailed and robust chronology;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome.

The school will pass any child protection records to the pupil's next school upon request of the new school.

If the transfer school is unknown, or a pupil is going to be electively home educated, any child protection files will remain at the school in a secure location. Child protection files will only be destroyed when the pupil reaches their 18th birthday.

8. Confidentiality

We recognise that all matters relating to child protection are confidential.

The Principal or Designated Safeguarding Lead must only disclose personal information about a pupil to other members of staff on a need to know basis.

Staff must not keep duplicate or personal records of child protection concerns. All information must be reported to the Designated Safeguarding Lead and securely stored in the designated location within the school, separate from the pupil records.

All staff are aware they cannot promise a child to keep secrets which might compromise the child's safety or well-being or that of another as they have a duty to share. Staff must, however, reassure the child that information will only be shared with those people who will be able to help them and therefore need to know.

We will always undertake to obtain parental consent before we refer a child to Social Services (or other external agency), unless to do so could put the child at greater risk of harm or impede a criminal investigation.

We recognise that data protection legislation must not be a barrier for sharing information on a needs to know basis, as required to effectively manage a specific safeguarding concern.

9. Receiving a Disclosure from a Pupil

In the event of a child disclosing abuse, staff must:

- listen to the child, allowing the child to tell what has happened in their own way and at their own pace. Staff must not interrupt a child who is freely recalling significant events. Remain calm. Be reassuring and supportive, endeavouring not to respond emotionally.
- not ask leading questions. Staff are reminded to ask questions only when seeking clarification about something the child may have said or to gain sufficient information to know that this is a safeguarding concern.
- make an accurate record of what they have seen/heard using the school's record keeping processes, recording; times, dates or locations mentioned, using as many words and expressions used by the child, as possible. Staff must quote body part names as used by the child and must not replace these with anatomically correct names.
- reassure the child that they did the right thing in telling someone.

- explain to the child what will happen next and the need for the information to be shared with the DSL.

In the unlikely event the DSL is not available, staff are aware they must share their concerns with the most senior member of staff.

If there is immediate risk of harm to a child, staff will NOT DELAY and will ring 112 and ask for the police.

The child will be monitored/accompanied at all times following a disclosure, until a plan is agreed as to how best they can be safeguarded.

10. Recognising Abuse

To ensure that our pupils are protected from harm, we need to understand what types of behaviour constitute abuse and neglect. Teaching and Boarding Staff and Governors participate in annual Safeguarding and Child Protection refresher training led by the DSLs and regular safeguarding updates and training is shared regularly through the school via bulletins and staff training days to support them in being confident in recognising the main areas of abuse (as outlined in Appendix D) and the procedures for responding to concerns or disclosures.

11. Supporting Pupils at Risk

We recognise that children who are abused or who witness violence may find it difficult to develop a sense of self-worth and to view the world in a positive way. The school may be the only stable, secure and predictable element in the lives of the children at risk. It is possible that such children might exhibit challenging and defiant behaviour and their circumstances will influence the way in which these behavioural issues are resolved.

We also recognise that some children who have experienced abuse may in turn abuse others. Such situations will require a considered and sensitive approach so that appropriate help and support can be given. We will endeavour to support all our pupils through:

- a) The development of self-esteem and self-motivation;
- b) The school ethos which promotes a positive, supportive and secure environment and which gives all pupils and adults a sense of being respected and valued;
- c) The consistent implementation of the school's behaviour policy by all staff so that, whilst poor behaviour is effectively challenged, the pupil's sense of self-worth is not damaged;
- d) Regular consultation with other professionals and agencies who support pupils and their families;
- e) The commitment to develop supportive and constructive relationships with parents;
- f) The development and support of a knowledgeable and experienced group of key staff trained to respond appropriately to child protection situations.

12. Supporting Staff

We recognise that staff becoming involved with a child who has suffered harm, or appears to be likely to suffer harm, could find the situation stressful and upsetting. We will support such staff by providing an opportunity to talk through their anxieties with the DSL and to seek further support if necessary. This could be provided by the Principal or another trusted colleague, Occupational Health, and/or a representative of a professional body, as appropriate.

13. Missing Child Procedures

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. It should be noted that a missing child could potentially be at risk of abuse or neglect. We are alert to that possibility and will notify all relevant authorities if it is deemed necessary.

If a child was found to be missing, we would immediately carry out the following actions (with a record kept of each action):

1. Inform the Principal and other members of the Management Team on site.
2. Check the register in order to ensure that all the other children are present.
3. Check the records of the missing child for any relevant details that might have a bearing on the situation (e.g. the medical condition of the child etc.)
4. Ask adults (at the school but also within the wider community of the World Foundation) if they have seen or heard from the child recently.
5. Ask the children in the missing child's class, calmly, if they can say when they last remember seeing the child and whether the child was happy or unhappy.
6. Occupy all of the other children in their classroom as normal.
7. At the same time, arrange for as many staff as possible to carry out a thorough search, both inside and out, carefully checking all spaces, including cupboards and toilets where a child might hide.
8. If the child is still missing after 30 minutes:
 - a. The Principal will ring the child's parents and explain what has happened, and what steps have been set in motion.
 - b. If the child is still missing after contacting the parents, the Principal/ Designated Safeguarding Lead will notify the Police and take advice.
 - c. The Head of School will arrange for a further search of the rest of the School premises and grounds and call on staff and volunteers of the World Foundation to help with a wider search of the area.

Actions to be followed by staff if a child goes missing on a school trip or journey:

1. Carry out an immediate head count in order to ensure that all the other children are present.
2. Search the immediate vicinity and retrace the steps to the last place where the child was seen, the remaining children staying in one place with the other staff.
3. If the child is not located, immediately inform the Principal.
4. After 30 minutes of the child being missing, the Principal will ring the child's parents and explain what has happened, and what steps have been set in motion.
5. If the child is still missing after contacting the parents, the Principal/DSL will contact the Police.

Actions to be followed by staff once the child is found:

1. The Principal will contact the parents and any emergency services involved.
2. Talk to, take care of and, if necessary, comfort the child.
3. Speak to the other children to ensure they understand why they should not leave the premises/separate from a group on an outing.
4. The Principal will speak to the parents to discuss events and give an account of the incident..
5. All concerned will provide written statements and the DSL will write a report detailing: time, place, purpose of the outing, numbers of staff and children, when the child was last seen, what appears to have happened, the length of time that the child was missing and how she/he appears to have gone missing, lessons for the future.

14. Safer Recruitment

Robust procedures are in place in order to prevent and deter people who are unsuitable to work with children, from applying or being employed by the school, outlined in the school's **Safer Recruitment policy**. As a minimum, we will:

- a) Inform candidates of the School's commitment to safeguarding those in its care.
- b) Carefully plan the recruitment process timeline to ensure that there is enough time to thoroughly vet each candidate.
- c) Make sure applicants know they will have to undergo strict vetting procedures before appointment, referencing all the checks you will carry out.
- d) Carry out pre-employment checks, including police checks, qualification checks, reference checks and identity checks.
- e) Ensure staff members are appropriately trained for their duties.

15. Allegations against staff, volunteers and contractors (including Governors)

Allegations made about another member of staff should be raised directly with the Principal immediately or in his absence the Designated Safeguarding Lead.

In the specific case of a suspicion being raised against any of the Designated Safeguarding Leads, this should be shared with the Principal immediately or in his absence the Chair of the Board of Governors.

In the specific case of a suspicion being raised against the Principal, this should be shared with the Chair of the Board of Governors immediately. The Chair of the Board of Governors will keep a careful confidential record of all aspects of the disclosure.

In general, teachers and other members of staff must protect themselves and Staff should bear in mind that even innocent actions or comments can sometimes be misconstrued. All Staff should be familiar with the **Staff Code of Conduct**. By giving a detailed reference for standards and behaviour to be maintained within the School, it supports staff to establish safe practices and reduce the risk of false accusations or improper conduct.

The Harm Threshold

The Principal/DSL/Chair of Governors must decide, in the case of an allegation against an adult, if the 'harm threshold' has been met. In other words, has a member of staff, a member of supply staff, a governor, a volunteer or a contractor:

- Behaved in a way that has harmed a child, or may have harmed a child;
- Possibly committed a criminal offence against or related to a child;
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children;
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes behaviours both inside and outside of school.

If so, the Principal/DSL/Chair of Governors must immediately discuss the content of the allegation with the Social Services and Police and;

- Follow their advice throughout the investigation process, including how to manage the staff member, supply staff member, governor, volunteer or contractor against whom the allegation is made, as well as supporting other staff, supply staff members, governors, volunteers and contractors within the workplace.
- Follow their advice given relating to supporting the child making the allegation, as well as other children connected to the school.
- Provide them with the outcome of any internal investigations.

Suspension of the member of staff against whom an allegation has been made needs careful consideration and, if necessary, CISS will consult with the Social Services (or other relevant authority) in making this decision. Guidance will also be sought from our HR consultant.

‘Low-level Concerns’ and ‘Self-reporting’

A low-level concern is any concern, no matter how small and even if no more than a 'nagging doubt', that an adult may have acted in a manner inconsistent with the CISS Staff Code of Conduct or simply – even if not linked to a particular act or omission – a sense of unease as to the adult's behaviour, particularly towards or around children. From time to time an individual may find him/herself in a situation which might appear compromising to others or which could be misconstrued.

Equally, an individual may, for whatever reason, have behaved in a manner which on reflection he/she considers falls below the standard set out in the Staff Code of Conduct. Self-reporting in these circumstances is encouraged as it demonstrates both awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived. As such, CISS sees self-reporting of low-level concerns as an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

Reporting

Low-level concerns should be reported to the DSL as soon as reasonably possible and in any event within 24 hours of becoming aware of it (where the concern relates to a particular incident).

The DSL will in the first instance check that it is a low-level concern and should not be reclassified as an ‘allegation’ and dealt with accordingly.

The circumstances in which a low-level concern might be reclassified as an ‘allegation’ are where:

- a) the ‘harm threshold’ is met (see above)
- b) there is a pattern of low-level concerns which collectively amount to an ‘allegation’ or
- c) there is other information which, when taken into account, leads to an ‘allegation’.

Where the DSL is in any doubt whatsoever, advice will be sought from the Social Services and/or the Police, if necessary on a no-names basis.

Having established that the concern is low-level, the DSL as appropriate will discuss it with the individual who has raised it, and will take any other steps to investigate it as necessary. Most low-level concerns by their very nature are likely to be minor and will be dealt with by means of management guidance, training etc.

What records will be kept?

Where a low-level concern has been communicated, a confidential record will be kept in a central file which logs all low-level concerns. This is necessary to enable any patterns to be identified. However, no record will be made of the concern on the individual's personnel file (and no mention made in job references).

16. Whistleblowing

We have a Whistleblowing Policy which staff are required to familiarise themselves with during their induction period.

All staff must be aware of their duty to raise concerns about the attitude or actions of colleagues and report their concerns to the Principal or Chair of Governors.

17. Physical intervention

Our policy on physical intervention/positive handling by staff is set out separately, as part of our **Staff Code of Conduct**.

18. Anti-Bullying

Anti-Bullying is referenced within the **Anti Bullying Policy** and measures are in place to prevent and respond to all forms of bullying, which acknowledges that to allow or condone bullying may lead to consideration under child protection procedures.

19. Discriminatory Incidents

Our **Equal Opportunities Policy** addresses all forms of discriminatory incidents.

20. Online Safety

All staff are aware of the school's **Online-Safety Policy** which sets out our expectations relating to:

- Creating a safer online learning environment,
- Giving everyone the skills, knowledge and understanding to help children stay safe on-line, question the information they are accessing and support the development of critical thinking,
- Inspiring safe and responsible use of mobile technologies, to combat behaviours on-line which may make pupils vulnerable, including the sending or receiving nude or semi-nude images, or other age-inappropriate imagery.
- Use of camera equipment, including smart phones.
- What steps to take if there are concerns and where to go for help.
- Staff use of social media as set out in the Staff Code of Conduct.

Cyber-bullying by children, via texts, social media and emails, will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures, as set out in our **Anti Bullying Policy**.

CISS is aware of the risks posed by children in the online world; in particular non-age appropriate content linked to self-harm, suicide, grooming and radicalisation.

Pupils, staff and parents/carers are supported to understand the risks posed by:

- the CONTENT accessed by pupils
- their CONDUCT on-line
- who they have CONTACT within the digital world
- COMMERCE - risks such as online gambling, inappropriate advertising, phishing and or financial scams.

CISS has online filtering and monitoring systems in place to ensure children are safeguarded from potentially harmful online material. These systems are regularly monitored, at least annually, by the DSL, IT provider and nominated governor.

We have a separate **Mobile Phone and Electronic Devices Policy** which sets out the acceptable use of mobile technologies by pupils whilst onsite.

Staff use of mobile technology whilst on site is set out in the **Staff Code of Conduct**.

All staff receive online awareness training in order to understand the risks children are exposed to, on induction and at least once per academic year.

21. Child-on-Child Abuse

CISS believes that all children have a right to attend school and learn in a safe environment free from harm by both adults and other pupils. We recognise that some safeguarding concerns can occur via child-on-child abuse.

All staff operate a zero-tolerance policy to child-on-child abuse and will not pass off incidents as 'banter' or 'just growing up'.

All staff recognise that child-on-child issues may include, but may not be limited to:

- Bullying (including cyber bullying)
- Racial abuse
- Physical abuse, such as hitting, hair-pulling, shaking, biting or other forms of physical harm
- Sexual violence and sexual harassment
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party (Harmful Sexual Behaviour HSB)
- Abuse related to sexual orientation or identity
- Sending nude or semi-nude images (consensual & non-consensual)
- Upskirting and initiation/hazing type violence and rituals
- Emotional abuse
- Abuse within intimate partner relationships

All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. Incidents of child-on-child abuse must be reported to the DSL, who will refer to the appropriate agencies as required.

The following will be considered when dealing with incidents:

- Whether there is a large difference in power between the victim and perpetrator i.e. size, age, ability, perceived social status or vulnerabilities, including SEND
- Whether the perpetrator has previously tried to harm or intimidate pupils
- Any concerns about the intentions of the alleged perpetrator
- How to best support and protect the victim and alleged perpetrator as well as any other children who may have been involved or impacted.

In order to minimise the risk of child-on-child abuse taking place, as a school we:

- Teach pupils about how to keep safe and understanding what acceptable behaviour looks like, as part of the curriculum
- Ensure that pupils know that all members of staff will listen to them if they have concerns and will act upon them
- Have systems in place for any pupil to be able to voice concerns
- Develop robust risk assessments if appropriate
- Refer to any other relevant policies when dealing with incidents, such as the **Behaviour Policy** and/or the **Anti Bullying Policy**.

We recognise that sexual violence and sexual harassment can occur between two children of any age and sex. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. This can occur online, face to face (both physically and verbally) and can take place inside or outside of school. All staff are trained to maintain an attitude of 'it could happen here' and it is never acceptable.

All staff have a responsibility to address inappropriate behaviour in a timely manner, however seemingly insignificant it may appear.

All victims will be reassured that they are being taken seriously and that they will be supported and kept safe. No child will ever be made to feel ashamed for making a report or that they are creating a problem for our school.

Support will be given to both victims and perpetrators as required.

22. Cultural Issues

As a school we are aware of the cultural diversity of the community around us and work sensitively to address the unique culture of our pupils and their families as they relate to safeguarding and child protection. This includes children at risk of harm from abuse arising from culture, ethnicity, faith and belief on the part of their parent, carer or wider community.

Staff must report concerns about abuse linked to culture, faith and beliefs in the same way as other child protection concerns.

23. Serious Violence

All staff are aware of signs and indicators which may signal that children are at risk from, or are involved with, serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or significant change in well-being or signs of assault or unexplained injuries. Staff are aware that unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

At CISS we are aware of the range of risk factors which increase the likelihood of involvement in serious violence such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending such as theft or robbery. The school will take appropriate measures to manage any situations arising.

24. Domestic Abuse

All staff recognise that children can witness and be affected by domestic abuse that occurs within their home between family members. They may also experience abuse within their own intimate relationships, referred to as 'teenage relationship abuse', and can suffer long lasting emotional and psychological effects. Staff will report any concerns using the school's safeguarding procedures.

25. Mental Health

CISS understands that those working or volunteering with children and young people have an important role to play in supporting the mental health and wellbeing of the children.

Short term anxiety and stress is a normal part of life and important in helping to build a child's resilience to day-to-day situations. But if a child goes through extended periods of anxiety or stress or experiences other mental health problems without the correct support then there can be a long-term impact.

At CISS we are also aware that mental health problems can be an indicator that a child has suffered or may be at risk of suffering abuse, neglect, or exploitation.

Staff will report any mental health concern that is linked to a safeguarding concern to the DSL.

Where there are concerns for a child's mental health, CISS will inform the parents and work with them to seek advice from a trained professional, who would be able to make a diagnosis of a mental health problem. Based on this, the school will assess whether it has the resources to best support the student and advise parents accordingly.

Allegations against pupils

If an allegation is made against a pupil, the school will follow the procedures in the Behaviour Policy with regards to sanctions that may need to be applied.

Where there is a risk of significant harm, a child-on-child referral will be made to Social Services or the police for either victim, perpetrator or both. The school will be open and honest about its concerns with the parents of the child/children and always seek their consent before making a referral. However, the school reserves the right not to inform the parents if, by doing so, the child/children would be placed at greater risk.

If it is necessary for a child to be interviewed by the Police, or other authorities, the school will ensure that the child is supported by an appropriate adult during the interview. The safety and welfare of the child will always be carefully considered by school.

Appendix A

Types of Abuse

Everyone who works with children has a duty to safeguard and promote their welfare. They should be aware of the signs and indicators of abuse and know what to do and to whom to speak if they become concerned about a child or if a child discloses to them.

The following is intended as a reference for school staff and parents/carers if they become concerned that a child is suffering or likely to suffer significant harm.

Abuse, for the purposes of this policy, is defined as when a child is suffering or is likely to suffer 'significant harm'. Harm means ill treatment or the impairment of health or development.

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

There are four main categories of abuse:

1. Physical Abuse

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

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

3. Sexual Abuse

Involves forcing or enticing a child to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take

place online and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

4. Neglect

The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- a) provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- b) protect a child from physical and emotional harm or danger
- c) ensure adequate supervision (including the use of inadequate caregivers)
- d) ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Exploitation

Exploitation can involve one or more of the four categories of abuse. It is a type of child abuse and may take a number of forms:

1. Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

2. Drugs and Criminal Networks

Gangs and organised criminal networks export illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as nationally - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

3. Extremism

Extremism is the vocal or active opposition to the fundamental values of a free, liberal society, such as democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces. **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

4. Harmful sexual behaviour (HSB)

Children's sexual behaviour ranges, from normal and developmentally expected to inappropriate, problematic, abusive and violent. The inappropriate, problematic, abusive and violent behaviour can cause developmental damage and is referred to as "Harmful Sexual Behaviour" (HSB).

Appendix B

Key Contacts

School contacts

Role	Contact Details
Headteacher/Principal	(Name, email and contact number)
Designated Safeguarding Lead (DSL)	(Name, email and contact number)
Nominated Safeguarding Governor	(Name)
Chair of the Steering Committee	(Name)
Chair of Governors	(Name and contact email)

Contacts in the Local Authority

Role	Contact Details
Assistente Sociale (Social Worker) The name and contact details of the social worker (or team) that the school can contact for advice and guidance on safeguarding concerns.	
Servizi Sociali Locali (Social Services) Servizi Sociali Locali processes all new referrals to social care. Referrals are assessed by the team to check the seriousness and urgency of the concerns and to help decide what agencies to involve and what support to put in place.	
Tribunale dei Minori (Juvenile Court) The Tribunale dei Minori is responsible for more serious allegations, in particular the management of all allegations against adults in a position of trust who work with children.	
Polizia di Stato or Carabinieri (the Police) Where a criminal offence may have been committed or risk of harm to a child is imminent.	

Appendix C

Linked Policies

This policy should be read in conjunction with the following policies and other policies you feel it would be useful to refer to:

- Anti-bullying
- Attendance
- Behaviour
- Complaints
- Drugs and Alcohol
- Equal Opportunities
- GDPR (Data protection)
- SEND
- Trips and Visits
- Health & Safety
- First Aid
- E-Safety (including use of mobile/electronic devices)
- Staff Code of Conduct
- Visitors
- Whistleblowing
- Safer Recruitment

Appendix D

Legislation and Guidance

This policy has been developed in accordance with provisions in Italian law relevant to children's rights and applies the recommendations of the International Task Force on Child Protection, led by CIS and COBIS.

Article 10 of the Italian Constitution states that "[t]he Italian legal system conforms to the generally recognised principles of international law." In practice, this provision gives precedence to ratified treaties, including the Convention on the Rights of the Child (CRC), over national law, and Italian courts can and do cite the CRC where relevant.

Constitution

Part I of the Italian Constitution grants civil, social, economic, and political rights to all citizens, including children, and also contains a number of provisions that make specific reference to the rights of the child:

- Article 3 places full responsibility on the State "to remove those obstacles of an economic or social nature which constrain the freedom and equality of citizens, thereby impeding the full development of the human person."
- Article 30 establishes the responsibility of parents and of the State to support, raise and educate children.
- Article 31 orders that the State assist in the formation of families through economic and other benefits, and places a duty on the State to protect mothers and children by adopting necessary provisions.
- Article 37 states that "working conditions must allow women to fulfil their essential role in the family and ensure appropriate protection for mother and child." It goes on to refer to the minimum age for paid labour established by law, and mandates that working children be protected by special provisions and guaranteed equal pay for equal work.

Legislation

There is no comprehensive children's act in Italian legislation; rather, provisions relevant to children's rights are found throughout various laws. Relevant legislation includes, but is by no means limited to:

- Law 977/1967, 'Protection of children and adolescent child workers'
- Law 176/1991, 'Ratification and execution of the CRC'
- Law 451/1997, 'Institution of a Parliamentary Commission for Children and a National Observatory for Children'.
- Law 285/1997, 'Provisions for the promotion of rights and opportunities for children and adolescents'.
- Law 38/2006 concerning the fight against the sexual exploitation of children and child pornography and via the internet
- Law 269 /1998, 'Norms against the exploitation of minors for prostitution, pornography and sexual tourism'.
- Law 54/2006 on provisions on the separation of parents and shared custody of children
- Law 40/1998, 'Regulation of Immigration and norms on the condition of migrants'
- Law 476/1998, 'Ratification and execution of the Convention on the Protection of Minors and cooperation in international adoption (Aja, 1993)'

- Law 148/2000, 'Ratification and execution of Convention No.182 relative to the prohibition of the worst forms of child labour and to the immediate action for abolition'.
- Law 2/2001, 'Abrogation of article 3 of Law 191/1975 on the enrolment of minors in military service'.
- Ministerial Directive Fioroni 2007 n. 6 decrees that bullying must be systematically dealt with by schools, involving students and ensuring the rules and related sanctions are known by all.
- Act No. 62/2011 on the protection of the relationship between mothers in prison and their minor children
- Law on the establishment of a National Ombudsperson for Childhood and Adolescence, July 2011.
- Law 71/2017 makes provision for the prevention and the response to the phenomenon of cyberbullying.

Appendix E

Reporting a Concern

Stage	Action
A Child discloses information that makes you concerned for their wellbeing or that they may be suffering abuse	<ul style="list-style-type: none">✓ Explain to the child that you may have to pass on your concerns to appropriate professionals who will seek to help.✓ Make detailed notes of what the child says on the Cause for Concern Report form, ensuring dates, times and specific language used by the child are all included.✓ Record on the same day and refer to DSL as soon as possible. If you are unable to locate the relevant DSL please report to any member of the Management Team.✓ In an emergency take the action necessary to ensure the child is safe and free from further harm, for example, call 112.
A Child exhibits signs that make you concerned for their wellbeing or that they may be suffering abuse	<ul style="list-style-type: none">✓ Make detailed notes of your concern.✓ Use the Cause for Concern Report form to report to the DSL✓ If you are unable to locate the relevant DSL please report to any member of the Management Team✓ In an emergency take the action necessary to ensure the child is safe and free from further harm, for example, call 112.
Role of the DSL	<ul style="list-style-type: none">✓ Reviews all concerns, formal or informal✓ Monitors and observes – ensures safeguarding is on the agenda of all meetings✓ Ensures a range of support measures in place to support child/family.✓ Monitors the support offered children and regularly assesses the possible need for external agency support.✓ Coordinates with external agencies, attend relevant meetings and follow case in line with the school's Child Protection policy:✓ Informs and refers to other Professionals on a 'need to know' basis
Low Level Concerns	<ul style="list-style-type: none">✓ Referrals and self-referrals logged in Low-level Concerns folder, with due respect for the privacy of the individuals concerned.

Concerns involving an allegation against an adult	✓ Should be referred to the Principal or in his absence the DSL
Concerns involving an allegation against the DSL	✓ Should be shared with the Principal immediately or in his absence the Chair of Governors
Concerns involving an allegation against Principal	✓ Should be shared with the Chair of Governors

Appendix F

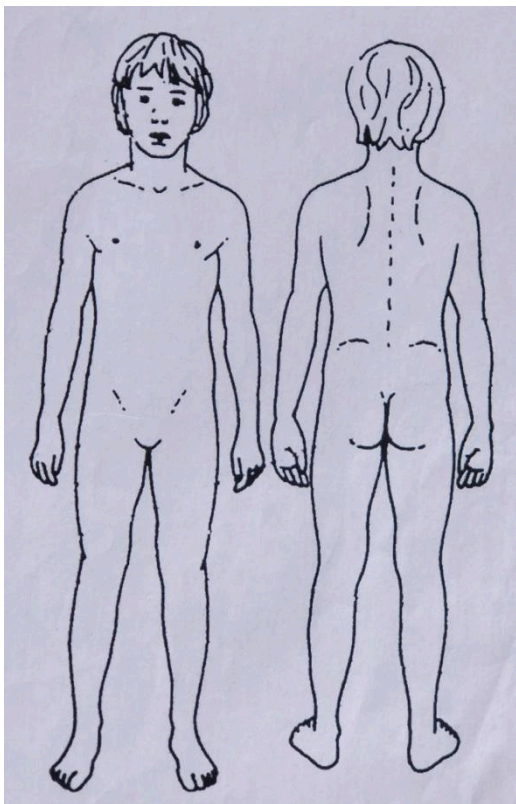
Cause for Concern Report

Logging a concern about a child's safety and welfare

Child's Name: Name of any siblings at CISS and their Year group:	Date of Birth: Year group: Class teacher/Tutor:
Date and Time of Incident: Type of Concern: <i>Tick relevant type(s)</i> <input type="checkbox"/> Physical <input type="checkbox"/> Emotional <input type="checkbox"/> Neglect <input type="checkbox"/> Sexual	Name of person completing this form: Job title: Signature: Date and Time (of writing):
Note your reason(s) for recording the incident: 	

Please record your concerns as factually as you can taking note of the following:

- Who is involved?
- What happened? (*Try to use the child's own words if this is a verbal disclosure*)
- Where did this take place?
- When?
- Any witnesses?
- You can make use of the Body Chart



Please note actions, including names of anyone to whom your information was passed

Any other relevant information (distinguish between fact and opinion).

Check to make sure your report is clear to someone else reading it. Please pass this form to your
Designated Safeguarding Lead.