

# Child Protection & Safeguarding Policy & Procedures

Approved by:	The Directors'
Last reviewed:	September 2022
Next review due by:	September 2023

## 1. Aims

INTUEDUCATION aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare.
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues

## 2. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance, <u>Keeping Children Safe in Education</u> and <u>Working Together to Safeguard Children</u>, and the <u>Governance Handbook</u>. We comply with this guidance and the procedures set out by our local safeguarding children board.

This policy is also based on the following legislation:

- Part 3 of the schedule to the <u>Education (Independent Home school provision Standards) Regulations 2014</u>, which places a duty on academies and independent home school provisions to safeguard and promote the welfare of pupils at the home school provision
- <u>The Children Act 1989</u> (and <u>2004 amendment</u>), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the <u>Serious Crime Act</u> 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- <u>Statutory guidance on FGM</u>, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- <u>The Rehabilitation of Offenders Act 1974</u>, which outlines when people with criminal convictions can work with children
- Schedule 4 of the <u>Safeguarding Vulnerable Groups Act 2006</u>, which defines what 'regulated activity' is in relation to children
- Statutory <u>guidance on the Prevent duty</u>, which explains home school provisions' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The <u>Childcare (Disqualification) Regulations 2009</u> and <u>Childcare Act 2006</u>, which set out who is disqualified from working with children

This policy also meets requirements relating to safeguarding and welfare in the <u>statutory framework for the Early</u> <u>Years Foundation Stage</u>.

## 3. Key Contacts

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Position	Name	Contact Details (email/phone)
Designated Safeguarding Lead	Mohammed Imran Ali	complaints@intueducation.org 0208 087 0678
Designated Safeguarding Lead	Sher Mohammed Ali	complaints@intueducation.org
Lead		0208 087 0678
Locality Early Help Advisor	Lucy Paton	Earlyhelp@croydon.gov.uk
Single Point Of Contact (SPOC)	Consultation Line	Tel: 0208 726 6464
Local Authority Designated	Steve Hall	lado@croydon.gov.uk
Officer (LADO)	Adam Fearon-Stanley (Assistant LADO)	Tel: 0208 726 6000, Ext 84322 or 63860
Single Point Of Contact (SPOC) Education Officer	Bronwyn Rich	Tel: 0208 604 7456
Head of Quality	Gavin Swann	Gavin.swann@croydon.gov.uk
Assurance and		Tel: 0208 726 6000
Safeguarding Service,		
Children's Social Care		
Accessing Early		spacecroydon.co.uk/supportassessment/is-
Help Assessment	it-for-me-caf/	
and guidance		
online		
Making a SPOC Safeguarding Referral	<u>https://my.croydon.gov.u</u> <u>&amp;qServiceRef=ChildRef</u>	<u>ık/ChildReferrals?qWname=New</u> <u>erral</u>

## 4. Equality statement

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs or disabilities
- Are young carers
- · May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- · Are asylum seekers

## 5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff and volunteers.

**5.1 All staff** All staff will read and understand part 1 and Annex A of the Department for Education's statutory safeguarding guidance, <u>Keeping Children Safe in Education</u>, and review this guidance at least annually.

All staff will be aware of:

- Our systems which support safeguarding, including the staff the role of the designated safeguarding lead (DSL), the behaviour policy, and the safeguarding response.
- The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), FGM and radicalisation

Section 12 and appendix 4 of this policy outline in more detail how staff are supported to do this.

#### 5.2 The designated safeguarding lead (DSL)

Our DSL persons are Mr. M Imran Ali and Hamza Ali. The DSL takes lead responsibility for child protection and wider safeguarding. The DSL persons will be available during the after home school provision club for staff to discuss any safeguarding concerns.

When the DSL is absent, the appointed manager will act as cover.

The DSL will:

• Provide advice and support to other staff on child welfare and child protection matters

- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly.

The DSL will also keep the Headteacher informed of any issues, and liaise with local authority case managers and designated officers for child protection concerns as appropriate.

in the event that an allegation of abuse is made against the DSL of INTUEDUCATION (see appendix 3).

#### 5.3 The Directors

The directors of INTUEDUCATION are responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers are informed of this policy as part of their induction
- Communicating this policy to parents when their child joins the after home school provision club
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)

## 6. Confidentiality

Please refer to our Data protection policy which refers to the GDPR legislation.

- Timely information sharing is essential to effective safeguarding
- Information must only be shared on a 'need-to-know' basis, but you do not need consent to share information if a child is suffering, or at risk of, serious harm
- Staff should never promise a child that they will not tell anyone about an allegation, as this may not be in the child's best interests
- Confidentiality is also addressed in this policy with respect to record-keeping in section 11, and allegations of abuse against staff in appendix 3

## 7. Recognising abuse and taking action

Staff, volunteers and visitors must follow the procedures set out below in the event of a safeguarding issue.

#### 7.1 If a child is in immediate danger

Make a referral to children's social care and/or the police **immediately** if a child is in immediate danger or at risk of harm. **Anyone can make a referral.** 

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

- All cases must be filed

- DSLs should take decision to contact agencies such as LADO when case may need involvement of external agencies. <u>https://www.gov.uk/report-child-abuse-to-local-council</u>

#### 7.2 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

- · Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral using the "Multi Agency Referral Form (MARF)" (see 7.1), and tell the DSL as soon as possible that you have done so
- Once complete, the MARF should be emailed to the

SPOC: childreferrals@croydon.gov.uk or childreferrals@croydon.gcsx.gov.uk

#### 7.3 If you discover that FGM has taken place or a pupil is at risk of FGM

The Department for Education's Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs". FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4.

Any teacher who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

The duty above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures.

Any member of staff who suspects a pupil is *at risk* of FGM, must speak to the DSL and follow our local safeguarding procedures.

#### 7.4 If you have concerns about a child (as opposed to a child being in immediate danger)

Figure 1 (below) illustrates the procedure to follow if you have concerns about a child's welfare and the child is not in immediate danger.

Where possible, speak to the DSL first to agree a course of action. Alternatively, make a referral to local authority children's social care directly and inform DSL after.

You can also contact the charity NSPCC on 0808 800 5000 if you need advice on the appropriate action.

#### Early help

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If early help is appropriate, the DSL will support you in liaising with other agencies and setting up an interagency assessment as appropriate.

The DSL will keep the case under constant review and the organisation will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

#### Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded. If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must contact the local authority and make sure the case is reconsidered to ensure the concerns have been addressed and the child's situation improves.

#### 7.5 If you have concerns about extremism

If a child is not at immediate risk of harm, where possible, speak to the DSL first to agree a course of action. Alternatively, make a referral to local authority children's social care directly if appropriate (see 'Referral' above).

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include <u>Channel</u>, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

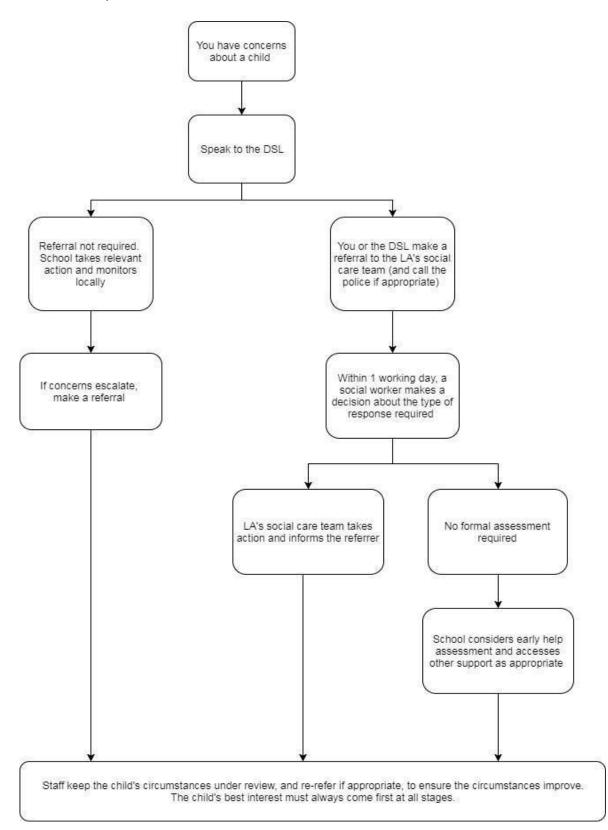
The Department for Education also has a dedicated telephone helpline, 020 7340 7264, to raise concerns about extremism with respect to a pupil. You can also email <u>counter.extremism@education.gov.uk</u>. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- · Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- · See or hear something that may be terrorist-related

#### Figure 1: procedure if you have concerns about a child's welfare (no immediate danger)

Home school provision refers to INTUEDUCATION



#### 7.6 Concerns about a staff member or volunteer

If you have concerns about a member of staff or volunteer, speak to the Directors. If you have concerns about the Directors, speak to the headteacher.

You can also discuss any concerns about any staff member or volunteer with the DSL. The DSL will then follow the procedures set out in appendix 3, if appropriate.

Where appropriate, the home school provision will inform Ofsted of the allegation and actions taken, within the necessary timescale (see appendix 3 for more detail).

#### 7.7 Allegations of abuse made against other pupils

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter" or "part of growing up".

Most cases of pupils hurting other pupils will be dealt with under our home school provision's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put pupils in the home school provision at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol

• Involves sexual exploitation or sexual abuse, such as indecent exposure, sexual assault, or sexually inappropriate pictures or videos (including sexting)

If a pupil makes an allegation of abuse against another pupil, each case will be dealt with on an individual basis. The home school provision will decide whether to manage the case internally, seek early help with a multi agency approach, refer to children's social care or report the case to the police.

- You must tell the DSL and record the allegation, but do not investigate it
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence

• The DSL will put a risk assessment and support plan into place for all children involved – both the victim(s) and the child(ren) against whom the allegation has been made – with a named person they can talk to if needed

• The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate We will

minimise the risk of peer-on-peer abuse by:

- · Challenging any form of derogatory or sexualised language or behaviour
- Being vigilant to issues that particularly affect different genders for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- · Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent

• Ensuring pupils know they can talk to staff confidentially by reinforcing this through posters informing pupils of DSLs and their function, assemblies and proactive engagement with students who display signs of issues they may be going through.

• Ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

## 8. Notifying parents

Where appropriate, we will discuss any concerns about a child with the child's parents. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents about any such concerns following consultation with the DSL.

If we believe that notifying the parents would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved.

## 9. Mobile phones and cameras

Staff are allowed to bring their personal phones to home school provision for their own use, but will limit such use to noncontact time when pupils are not present. Staff members' personal phones will remain in their pockets, bags or cupboards during contact time with pupils.

Staff will not take pictures or recordings of pupils on their personal phones or cameras.

We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the club activity.

INTUEDUCATION follows the policy of the home school provision, however if not mentioned in the home school provisions' policy the following applies;

- I am permitted to bring my phone to the club
- Phones must be switched off during the club
- pupils can hand their phones to the teacher if they wish to
- These restrictions on electronic devices extend to tablets

## 10. Complaints and concerns about home school provision safeguarding practices

#### 10.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).

## 11. Record-keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the club.

In addition:

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- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks
- Appendix 4 sets out our policy on record-keeping with respect to allegations of abuse made against staff.

## 12. Training

## 12.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistleblowing procedures, to ensure they understand the home school provision's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect.

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas. The induction process of new staff will include the behaviour and safeguarding policy as well as the identity of the DSL and any deputies and their role.

Staff will also receive regular safeguarding and child protection updates (for example, through emails, ebulletins and staff meetings) as required, but at least annually.

Volunteers will receive appropriate training, if applicable.

## 13. Monitoring arrangements

This policy will be reviewed annually Mr. M. Ali and Mr. S. M. Ali.

## 14. Links with other policies

This policy links to the following policies and procedures:

- Behaviour
- Staff behaviour/code of conduct
- Complaints
- Health and safety
- First aid
- GDPR

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.

## Appendix 1: types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

**Physical abuse** 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.

**Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse 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
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- 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
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

**Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:

• Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing

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 (including via the internet)

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

**Neglect** is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy 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 (including exclusion from home or abandonment)
- · Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

## Appendix 2: safer recruitment and DBS checks – policy and procedures

We will record all information on the checks carried out in the organisations single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

#### Appointing new staff

When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list
  information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of
  this for longer than 6 months
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- · Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent
- Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the secretary of state
- Ask for written information about previous employment history and check that information is not contradictory or incomplete

We may seek references on all short-listed candidates, and resolve any concerns before confirming appointments.

Regulated activity means a person who will be:

- Responsible, on a regular basis in a home school provision or college, for teaching, training, instructing, caring for or supervising children
- Carrying out paid, or unsupervised unpaid, work regularly in a home school provision or college where that work provides an opportunity for contact with children
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not.

#### **Existing staff**

If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

We will refer to the DBS for anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult:

- Where the 'harm test' is satisfied in respect of the individual (i.e. that no action or inaction occurred but the present risk that it could was significant)
- Where the individual has received a caution or conviction for a relevant offence
- If there is reason to believe that the individual has committed a listed relevant offence, under the <u>Safeguarding</u> <u>Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions)</u> Regulations 2009

If the individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

#### Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

#### Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity

Obtain an enhanced DBS check without barred list information for all volunteers who are not in regulated activity, but who have an opportunity to come into contact with children on a regular basis, for example, supervised volunteers

Carry out a risk assessment when deciding whether to seek an enhanced DBS check for any volunteers not engaging in regulated activity

• Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the Childcare Disqualification (Regulations) 2009 and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

## Appendix 3: allegations of abuse made against staff

This section of this policy applies to all cases in which it is alleged that a current member of staff or volunteer has:

- · Behaved in a way that has harmed a child, or may have harmed a child, or
- · Possibly committed a criminal offence against or related to a child, or
- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children

It applies regardless of whether the alleged abuse took place in the home school provision. Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the police.

We will deal with any allegation of abuse against a member of staff or volunteer very quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

Our procedures for dealing with allegations will be applied with common sense and judgement.

#### Suspension

Suspension will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. In such

cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the club so that the individual does not have direct contact with the child or children concerned
- Redeploying the individual to alternative work so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted

#### Definitions for outcomes of allegation investigations

- Substantiated: there is sufficient evidence to prove the allegation
- Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- False: there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

#### Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the Directors will take the following steps:

- Immediately discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the home school provision is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- If immediate suspension is considered necessary, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact and their contact details
- If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- If it is decided that further action is needed, take steps as agreed with the designated officer to initiate the appropriate action and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and consider what other support is appropriate. For example trade union representatives, or a named colleague

- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not
  already know (following agreement with children's social care services and/or the police, if applicable). The case
  manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations
  made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to
  have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

If the home school provision is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the National College for Teaching and Leadership.

Where the police are involved, wherever possible the Directors will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the home school provision's disciplinary process, should this be required at a later point.

#### Timescales

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, we will institute appropriate action within 3 working days

• If a disciplinary hearing is required and can be held without further investigation, we will hold this within 15 working days

#### **Specific actions**

#### Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

#### Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the home school provision ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the home school provision's personnel adviser will discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the case manager and personnel adviser will discuss with the designated officer whether to refer the matter to the NCTL to consider prohibiting the individual from teaching.

#### Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the DSLs will consider how best to facilitate this.

The DSLs will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the club.

#### Unsubstantiated or malicious allegations

If an allegation is shown to be deliberately invented, or malicious, the Director's, or other appropriate person in the case of an allegation against the Director's, will consider whether any disciplinary action is appropriate against the pupil(s) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a pupil.

#### Confidentiality

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The home school provision will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The Director's will take advice from the local authority's designated officer, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

#### **Record-keeping**

The DSL will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. Such records will include:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved

• Notes of any action taken and decisions reached (and justification for these, as stated above) If an allegation or concern is not found to have been malicious, the home school provision will retain the records of the case on the individual's confidential personnel file, and provide a copy to the individual. We will retain these records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

#### References

When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

#### Learning lessons

After any cases where the allegations are *substantiated*, we will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the organisations procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- · Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

## Appendix 4: specific safeguarding issues

#### Child sexual exploitation

Child sexual exploitation (CSE) is a form of sexual abuse where children are sexually exploited for money, power or status.

This can involve violent, humiliating and degrading sexual assaults, but does not always involve physical contact and can happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam.

Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Indicators of sexual exploitation can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Having older boyfriends
- Suffering from sexually transmitted infections or becoming pregnant
- Displaying inappropriate sexualised behaviour
- Suffering from changes in emotional wellbeing
- Misusing drugs and/or alcohol
- · Going missing for periods of time, or regularly coming home late
- Regularly missing home school provision or education, or not taking part in education

#### FGM

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- · A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- · Having difficulty walking, sitting or standing, or looking uncomfortable

Finding it hard to sit still for long periods of time (where this was not a problem previously)

- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Having frequent urinary, menstrual or stomach problems
- Avoiding physical exercise or missing PE
- Being repeatedly absent from home school provision, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

Potential signs that a pupil may be at risk of FGM include:

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- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues.
- Having a mother, older sibling or cousin who has undergone FGM
- Having limited level of integration within UK society
- Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- Talking about FGM in conversation for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
- Being unexpectedly absent from home school provision
- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

#### Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

• Speak to the pupil about the concerns in a secure and private place

• Activate the local safeguarding procedures and refer the case to the local authority's designated officer

Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk

Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or home school provision counsellor, as appropriate

#### **Preventing radicalisation**

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs.

Home school provisions have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our home school provision being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding children board and local police force.

We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at home school provision and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

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The government website <u>Educate Against Hate</u> and charity <u>NSPCC</u> say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- · Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- · Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- · An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- · Increased levels of anger
- · Increased secretiveness, especially around internet use
- · Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

Further information on the home school provision's measures to prevent radicalisation are set out in other home school provision policies and procedures.

#### Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign the visitors' book and wear a visitor's badge.

All visitors to our setting, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the home school provision any speaker who is known to disseminate extremist views, and will carry out

appropriate checks to ensure that any individual or organisation using home school provision facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

#### **Referral Advice Croydon**

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If you are unsure about whether or not to make a referral, or which service will best help the family and safeguard the child, please refer to the Croydon Continuum of Need on the <u>Croydon Children Safeguarding Children Board website</u> and speak to your designated safeguarding lead within your organisation. If you are then still unsure you can telephone the CSC Single Point of Contact (SPOC) consultation line for a consultation with the social worker or early help consultant on the numbers below:

Daytime hours:	(Monday to Friday 9am to 5pm) 0208 726 6400 main council number (Monday to Friday 9am to 5pm) 0208 255 2888 for <b>urgent child protection matters</b> that require the same day intervention from a SPOC social worker;
SPOC Consultation:	(Monday to Friday 9am to 5pm) 0208 726 6464 where professionals with safeguarding responsibilities can <b>consult</b> early help consultants or social workers in the SPOC for advice on <b>non-urgent cases</b>
Out of hours:	5pm - 9am Monday- Friday, 24 hours Saturday, Sunday and bank holidays 0208 726 6400

#### **Local Authority Contacts**

Croydon Council LADO			
The Local Authority D	esignated Officers are:		
Steve Hall or Adam F	earon-Stanley		
Steve Hall	Steve.hall@croydon.gov.uk	020 8239 4322	
Adam Fearon-Stanley	adam.fearon-stanley@croydon.gov.uk	020 8726 6000 ext 63860	

4th Floor, Zone F

Bernard Weatherill House

8 Mint Walk Croydon

CR0 1EA

- LADO@croydon.gov.uk
- ➤ Tel: 020 8726 6000 (x84322)

#### General contact for child protection concerns:

Department of Children, Families and Learning

> Telephone: 0208 726 6400 (24 hours)

Email: childreferrals@croydon.gov.uk

Director of Children Paul Greenhalgh

- > Paul.greenhalgh@croydon.gov.uk 020 8726 6000 (x65787) Urgent child protection matters only:
- > MASH on 020 8239 4307

Along with the above the home school provision will work with the following partners, a clinical commissioning group and the chief of police.

#### In an emergency, or if you believe a child is at immediate risk of harm call the police on 999.

#### For urgent calls out of hours (17:00 - 09.00) please contact 020 8726 6400 and ask to speak to the out of hours team.

Contact in case of an Extremism issue If you have any concerns relating to extremism please contact at: 020 7340 7264 Or send an email at: counter.extremism@education.gsi.gov.uk

Please see link for DfE Statutory guidance for home school provisions and colleges https://www.gov.uk/government/uploads/system/uploads/attachment\_data/file/550511/Keeping\_children\_sa\_fe\_in\_education.pdf

## Appendix 5: MARF

## Early Help (intensive/targeted need) & Children's Social Care Referral Form

This form should be used to refer a child and family for one of the two following services:

- 1. An **Early Help Best Start Family Solutions service (intensive/targeted need)**, where you are concerned for a child's wellbeing and the family has asked for support that cannot be addressed by one or more organisation.
- 2. A Children's Social Care (CSC) service where you are worried about the safety of a child.

If you are unsure about whether or not to make a referral, or which service will best help the family and safeguard the child, please refer to the Croydon Continuum of Need on the <u>Croydon Children Safeguarding Children Board website</u> and speak to your designated safeguarding lead within your organisation. If you are then still unsure you can telephone the CSC Single Point of Contact (SPOC) consultation line for a consultation with the social worker or early help consultant on the numbers below:

Daytime hours: (Monday to Friday 9am to 5pm) 0208 726 6400 main council number

(Monday to Friday 9am to 5pm) 0208 255 2888 for **urgent child protection matters** that require the same day intervention from a SPOC social worker;

SPOC Consultation: (Monday to Friday 9am to 5pm) 0208 726 6464 where professionals with safeguarding responsibilities can **consult** early help consultants or social workers in the SPOC for advice on **non-urgent cases** 

Out of hours: 5pm - 9am Monday- Friday, 24 hours Saturday, Sunday and bank holidays 0208 726 6400

If you are worried about an immediate risk of significant harm to a child, it is essential that you share your concerns by telephone and the referral, if appropriate will be accepted over the telephone and you will need to follow this up by completing the online referral form within 24 hours.

## E-Safety

ICT in the 21<sup>st</sup> Century is seen as an essential resource to support learning and teaching, as well as playing an important role in the everyday lives of children, young people and adults. Consequently, home school provisions need to build in the use of these technologies in order to arm our young people with the skills to access life-long learning and employment.

Information and Communication Technology covers a wide range of resources including, web-based and mobile learning. It is also important to recognize the constant and fast paced evolution of ICT within our society as a whole. Currently the internet technologies children and young people are using both inside and outside of the classroom include:

Ø Websites

- Ø Email and Instant Messaging
- Ø Chat Rooms and Social Networking
- Ø Blogs, Wikis and Tweeters
- Ø Podcasting
- Ø Video Broadcasting
- Ø Music Downloading
- Ø Gaming
- Ø Mobile/ Smart phones with text, video and/ or web functionality
- Ø iPads
- Ø Other mobile devices with web functionality.

Whilst exciting and beneficial both in and out of the context of education, much ICT particularly web- based resources, are not consistently policed. All users need to be aware of the range of risks associated with the use of these internet technologies.

#### Mobile Phone Policy

The home school provision recognises that mobile phones and technology is part of the modern world we live in and is to some an essential facet of their lives. Parents use it to keep in touch with their children and the home school provision takes no issue on such matters. However, with regards to the learning environment, mobile phones can severely disrupt the education of other students.

Any parent wishing to communicate with their child should do so by contacting the reception of the home school provision or email into <u>info@intueducation.org</u> bearing in mind that they may not be able communicate their messages to their child immediately.

If a pupil is found in possession of using a mobile phone during the club activity, it will automatically be confiscated until the end of the lesson.

The home school provision reserves the right to search pupils for anything which has been banned, including a mobile phone. This policy is non-negotiable and is in line with other home school provisions.

#### Social Media Policy

The home school provision is aware and acknowledges that increasing numbers of adults and children are using social networking sites. The two with the widest use are Facebook and Twitter.

The widespread availability and use of social networking application bring opportunities to understand, engage and communicate with audiences in new ways. It is important that we are able to use these technologies and services effectively and flexibly. However, it is also important to ensure that we balance this with our reputation.

This policy and associated guidance is to protect staff on how to deal with potential inappropriate use of social networking sites. For example, our use of social networking applications has implications for our duty to safeguard children, young people and vulnerable adults. The policy requirements in this document aim to provide this balance to support innovation whilst providing a framework of good practice.

#### Purpose

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The purpose of this policy is to ensure:

- That the organisation is not exposed to legal risks
- That the reputation of the organisation is not adversely affected
- That our users are able to clearly distinguish where information provided via social networking applications is legitimately representative of the organisation.

#### Personal use of social media

Social Networking applications

- Must not be used to publish any content which may result in actions for defamation, discrimination, breaches of copyright, data protection or other claim for damages. This includes but is not limited to material of an illegal, sexual or offensive nature that may bring the organisation into disrepute.
- Must not be used in an abusive or hateful manner
- Must not be used for actions that would put representatives in breach of codes of conduct or policies relating to staff.
- Must not breach the organisations misconduct, equal opportunities or bullying and harassment policies
- Must not be used to discuss or advise any matters relating to the organisations matters, staff, pupils or parents

• References should not be made to any staff member, pupil, parent or club activity / event unless prior permission has been obtained and agreed with the Directors.

Staff at INTUEDUCATION will not invite, accept or engage in communications with parents or children from the home school provision community in any personal social media. Any communication received from children on any personal social media sites must be reported to the designated persons for Child Protection. If any member of staff is aware of any inappropriate communications involving any child in any social media, these must immediately be reported as above. All email communication between staff and parents are to be made only by the organisations official email account.

Guidance/protection for Pupils on using social networking

- No pupil under 13 should be accessing social networking sites. This is the guidance from both Facebook and MSN. There is a mechanism on Facebook where pupils can be reported via the Help screen; at the time of time of writing this policy the direct link for this is: <u>http://www.facebook.com/help/contact.php?show\_form=underage</u>
- No pupil may access social networking sites during the club
- All mobile phones must be switched off. Please refer to our Mobile Phone Policy for full details.
- No pupil should attempt to join a staff member's areas on networking sites. If pupils attempt to do this, the member of staff is to inform the DSLs. Parents will be informed if this happens.
- Please report any improper contact or cyber bullying to your teacher in confidence as soon as it happens.
- We have a zero tolerance to cyber bullying

#### **Cyber Bullying**

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By adopting the recommended no use of social networking sites on home school provision premises, INTUEDUCATION protects themselves from accusations of complicity in any cyber bullying through the provision of access. Parents should be clearly aware of the policy of access to social networking sites.

Where a disclosure of bullying is made, Ofsted registered organisations have the duty to investigate and protect, even where the bullying originates outside the home school provision. Once disclosure is made, investigation will have to involve the families. This should be dealt with under the home school provision's adopted anti bullying policy. If parents / carers refuse to cooperate with our policy and bullying continues, it can be referred to the police as harassment. This guidance can also apply to text and mobile phone cyber bullying.

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#### Computer Use:

#### Safe Use of Images Taking of Images and Film

Digital images are easy to capture, reproduce and publish and, therefore, misused. We must remember that it is not always appropriate to take or store images of any member of the home school provision community or public, without first seeking consent and considering the appropriateness.

 $\cdot$  With the written consent of parents (on behalf of pupils) and staff, the organisation permits the appropriate taking of images by staff and pupils with home school provision equipment.

 $\cdot$  Pupils are not permitted to use personal digital equipment, including mobile phones and cameras, to record images of the others. However, with the express permission of the Directors, images can be taken provided they are transferred immediately and solely to the organisations network and deleted from the pupils device.

### Consent of adults who work at the home school provision

 $\cdot$  Permission to use images of all staff who work at the home school provision is sought on induction and a copy is located in the personnel file.

### Publishing pupil's images and work

All parents/guardians will be asked to give permission to use their child's work/photos in the following ways:

- $\cdot$  on the web site
- $\cdot$  printed publications that the organisation may produce for promotional purposes
- $\cdot$  recorded/ transmitted on a video or webcam
- $\cdot$  in display material that may be used in the home school provision's communal areas
- $\cdot$  in display material that may be used in external areas, i.e. exhibition promoting the organisation
- $\cdot$  general media appearances, e.g. local/ national media/ press releases sent to the press highlighting an activity (sent using traditional methods or electronically).

This consent form is considered valid for the entire period that the child attends this club unless there is a change in the child's circumstances where consent could be an issue, e.g. divorce of parents, custody issues, etc. Parents/ carers may withdraw permission, in writing, at any time. Consent has to be given by both parents in order for it to be deemed valid. Pupils' names will not be published alongside their image and vice versa. E-mail and postal addresses of pupils will not be published. Pupils' full names will not be published. Before posting student work on the Internet, a check needs to be made to ensure that permission has been given for work to be displayed. Only the Directors have the authority to upload to the site.

### **Storage of Images**

- $\cdot$  Images/ films of children are stored with INTUEDUCATION
- · Rights of access to this material are restricted to the teaching staff and pupils

#### **Social Networking**

The home school provision recognises that many staff will actively use Facebook, Twitter and other such social networking sites, blogging and messaging services. Staff must not post material (including text, video, audio or images) which damages the reputation of the organisation or which causes concern about their suitability to work with children. Staff must recognise that it is not appropriate to discuss issues relating to children or other staff via these networks. Those who post material, which could be considered as inappropriate, could render themselves vulnerable to criticism or allegations of misconduct.

It is never permissible to accept a friendship request from pupils, as in almost all cases, children of primary age using such networks will be breaching terms and conditions of use of those networks. It is also extremely inadvisable to accept ex-pupils who are still in education. If a parent seeks to establish contact, the member of staff should exercise their professional judgment. Under no circumstances should pupils be accepted as on-line friends of members of staff. Any policy breach will be subject to the disciplinary policy and code of conduct.

The General Teaching Council for England revised the 'Code of Conduct and Practice' in 2009. The revision of the code focuses on professional boundaries and although there is no direct reference to social networking sites specifically, it requires teachers to establish and maintain appropriate relationships with children and young people. There is also a requirement to maintain reasonable standards of behaviour that enable teachers to maintain an effective learning environment and also to 'uphold public trust and confidence in the profession'.

#### **Misuse and Infringements Complaints**

Complaints relating to e-Safety should be made to <u>complaints@intueducation.org</u> and to the DSLs. . Facebook, BBM, IM, email and text can be used to insult, verbally attack and harass causing unacceptable stress and upset for members of staff as well as pupils in such circumstances. All incidents must be reported to enable full investigation as well as support to the victim of such behaviour.

#### **Inappropriate material**

 $\cdot$  All users are aware of the procedures for reporting accidental access to inappropriate materials. The breach must be immediately reported to the DSLs.

 $\cdot$  Deliberate access to inappropriate materials by any user will lead to (depending on the seriousness of the offence; investigation by the DSLs will be instigated and the involvement of the Police may be considered when a breach of this policy deemed

 $\cdot$  Users are made aware of sanctions relating to the misuse or misconduct

#### Equal Opportunities Pupils with additional needs

The organisation endeavours to create a consistent message with parents for all pupils and this in turn should aid establishment and future development of the organisations e-safety rules. However, staff are aware that some pupils may require additional teaching including reminders, prompts and further explanation to reinforce their existing knowledge and understanding of e-Safety issues. Where a pupil

has poor social understanding, careful consideration is given to group interactions when raising awareness of e-Safety.

#### **Parental Involvement**

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 $\cdot$  Parents / careers and pupils are actively encouraged to contribute to adjustments or reviews of the home school provision e-Safety policy in writing.

 $\cdot$  Parents / careers are asked to read through and sign acceptable use agreements on behalf of their child on admission to home school provision.

 $\cdot$  Parents / careers are required to make a decision as to whether they consent to images of their child being taken / used in the public domain (e.g., on organisations website)

#### **Review Procedure**

There will be an on-going opportunity for staff to discuss with concerns that relate to the e - Safety. This policy will be reviewed every 12 months and amended if new technologies are adopted or Central Government change the orders or guidance in any form.

# N.B - In the absence of the Directors, the person who is designated in overall charge in their absence, will undertake the responsibilities.

Any questions about this policy should be directed to the directors.