



Safeguarding & Child Protection Policy

Contents

1. Introduction	pg.3
2. Purpose	pg.4
3. Scope	pg.4
4. Key Personal and Responsibilities	pg.4
5. The Designated Safeguarding Lead (DSL) and Deputy Designated Persons (DDP).....	pg.7
6. Safeguarding Definitions and Guidance	pg.8
6.1. Recognising Abuse	
6.2. Peer-On-Peer Abuse	
6.3. Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)	
6.4. Female Genital Mutilation (FGM)	
6.5. Mental Health	
6.6. Radicalisation	
6.7. Missing From Education	
6.8. Illegal Drugs	
6.9. Youth Produced Sexual Imagery (Sexting)	
6.10. Online Safety	
6.11. Forced Marriage	
6.12. Honour Based Abuse	
6.13. Private Fostering Arrangements	
6.14. Children with Family in Prison	
6.15. Gangs, Organised Crime	
6.16. Up Skirting	
6.17. Serious Violence	
6.18. Children and the Court System	
6.19. Opportunities to Teach Safeguarding	
7. Safeguarding and Child Protection Procedures	pg.17
7.1. Indicators of Abuse and What You Might See	
7.2. Taking Action	
7.3. If You Suspect A Child Is At Risk of Harm	
7.4. If A Child Discloses Information To You	
7.5. Notifying Parents	
7.6. The Referral Process To Outside Agencies	
8. Supporting Children	pg.20

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Safeguarding & Child Protection Policy

9. Supporting Staff	pg.22
10. If you have concerns about a colleague (including admin, supply staff and volunteers)	pg.22
11. If you have concerns about the safeguarding practices within the school or have a complaint	pg.22
12. All Allegations Against Staff (including admin, supply staff and volunteers)	pg.23
13. Allegations Against Pupils	pg.25
14. Confidentiality	pg.26
15. Physical Intervention	pg.27
16. Staff Training	pg.27
17. Safer Recruitment	pg.28
18. Use of Mobile Phones and Cameras	pg.28
19. Extended school and off-site arrangements	pg.29
20. Site Security	pg.29
21. Record Keeping	pg.29
22. Monitoring and Review	pg.30
Covid-19 Safeguarding Policy Addendum	pg.31
Appendix 1. Royal School Student Network Access Agreement	pg.35
Appendix 2. Disclosure Form	pg.38
Appendix 3. Witness Statement	pg.39
Appendix 4. Staff Witness Statement	pg.40

1 Introduction

Key Personnel

Designated Safeguarding Lead (DSL)	Anda Badita
Deputy Designated Persons (DDP)	Joe Berwick
Child Protection Officer (CPO)	Lotty Berwick
SENDCo	Mery Blaga
Local Authority Contacts	Child Protection National Agency 0264-420146, 0264-420147 Police (112)
Safeguarding Governor	Paul Bercea
Chair of Governors	Dan Dunca

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Safeguarding & Child Protection Policy

1.1 Royal School of Transylvania understands the importance of our responsibility and seriousness of safeguarding and welfare of our students, and as a school we take great care and time to ensure that we provide a safe and welcoming environment where children are respected and valued and feel safe, listened to and cared for. As well as working together as a school and team, we are also committed to working alongside other outside organisations to ensure arrangements are in place to assess, and support children who are at risk.

1.2 All staff within The Royal School have an active and key part to play in protecting and safeguarding all children within our care and that their welfare is a priority. We ensure that all teaching and non-teaching staff have the required knowledge and training in safeguarding and child protection courses, which are reviewed annually.

1.3 Our policy and training have been developed in accordance with the principles established by the following British Acts of Parliament:

The Children Acts 1989 and 2004

The Education Act 2002 and 2011

The Childcare Act 2006

The Prevent Duty 2015

Working Together to Safeguard Children 2018

Keeping Children Safe in Education 2021

Romanian Legislation:

ORDIN nr 4.343/2020 din 27 mai 2020

Privind aprobarea Normelor metodologice de aplicare a prevederilor art.7

Alin. (1[^]), art 56[^]1 si ale pct. 6[^]1 din enexa la Legea educației naționale

Nr. 1/2011, privind violența psihologică - bullying

We are actively staying in line with relevant government publications and the statutory framework for the early years foundation stage, primary and secondary education. Whilst as a school we are based in Romania, we actively and proudly follow the British Curriculum and high standards of education therein. This high standard and desire for commitment to the British system of education is also reflected in our safeguarding policy and the following of high standards laid out in the above Acts of Parliament.

2. Purpose

- Provide an environment in which children and young people feel safe, secure, valued, respected.
- Support the child's development in ways that will enrich security, confidence, independence and adaptability.
- To feel confident and know how to approach adults if they are in difficulty, knowing that they will be effectively listened to.
- Raise the awareness of all teaching and non-teaching staff of the need to take a full and active role in safeguarding and of their responsibilities in identifying and reporting possible safeguarding cases.

Safeguarding & Child Protection Policy

- Ensure all staff are aware that they have equal responsibility to act in accordance with this guidance on any suspicion or disclosure that may suggest a child is at risk of harm.
- Provide a structured and efficient way of monitoring children known or thought to be at risk of harm, and ensure we contribute to assessments of need and support plans for those children.
- The importance of the communication between all members of staff in relation to safeguarding pupils.
- Ensure that all adults within the Royal School team, who have access to children have been security checked as to their suitability, including verification of their identity and their qualifications.
- Develop and promote effective working relationships with other agencies.
- Develop a structured procedure within the school which will be followed by all members of the school community in cases of suspected abuse.
- Develop and promote effective working relationships with other agencies.

3. Scope

3.1 Safeguarding and promoting the welfare of children within The Royal School mirrors the process of protecting children from abuse or neglect, preventing the impairment of their health or development, ensuring that children grow up in circumstances consistent with the provision of safe, effective and nurturing care and undertaking that role so as to enable those children to have optimum life chances and to enter adulthood successfully.

3.2 Child protection refers to the processes undertaken to meet statutory obligations laid out in the Children Act 1989 and associated regulations and statutory guidance in respect of those children who have been identified as suffering, or being at risk of suffering harm.

3.3 Staff refers to all those working for or on behalf of the school, full time or part time, in either a paid or voluntary capacity, to which they will be required to complete mandatory training from our online course.

3.4 Child refers to all young people who have not yet reached their 18th birthday. However whilst still in education, students who are older are still safeguarded and protected by the school and staff under safeguarding and child protection for adolescents. Every single child, regardless of age, gender, ability, culture, race, language, religion or sexual identity, has equal rights to protection.

3.5 The status of parent refers to birth parents, step-parents, foster carers and adoptive parents. All variations will need to have proof of relation to the child within the school.

4. Key Personnel and Responsibilities

4.1 The DSL is responsible for maintaining and updating the Safeguarding and Child Protection policy.

Safeguarding & Child Protection Policy

4.2 The Head of School has overall responsibility for the internal management of the policy in the school.

4.3 The Chair of Governors and Nominated Safeguarding Governor will ensure that the safeguarding policy is upheld and that all appropriate and mandatory training requirements are undertaken. Any weaknesses in the policy will be rectified immediately as well as any new changes and updates in any legislation. The Chair and Safeguarding Governor will also ensure that the school operates safer recruitment procedures and has procedures in place for dealing with allegations of abuse made against staff. The Chair of Governors and Safeguarding Governor are listed at the beginning of this document. The governing body will monitor all areas of Safeguarding and Child Protection.

4.6 The name of the Designated Safeguarding Lead (DSL), and other members of staff responsible for Child Protection will be clearly advertised in the school. This is for staff and students, so they are aware of the safeguarding team and who they can go to in the event of them needing to disclose any concerns.

4.7 To meet and maintain our responsibilities towards our students, we need to agree standards of good practice for all staff.

Good practice includes:

- Being alert and aware of changes to a pupil's behaviour/ family circumstances, and recognising that changes can be an indicator/ reason for abuse.
- Reading and understanding the school's safeguarding and child protection policy and guidance documents on wider safeguarding issues such as bullying, behaviour, physical contact, and information sharing.
- Making sure that we keep an updated file in every staff room with our safeguarding and child protection policy plus the UK government document "Keeping children safe in education 2021".
- Asking a pupil's permission before initiating physical contact, such as assistance with dressing, support during PE, or administering first aid.
- Referring all concerns about a pupil's safety and welfare to the Designated Safeguarding Lead or deputy, to which if necessary, they will directly contact the relevant outsource local authority and local Children's Social Care, and follow in lines and regulations to the host country.
- Never to put a child at risk by contacting family unless instructed to do so by the DSL if in regards to any of the highlighted high risk key indicators for abuse or harm. If ever in doubt or concerned, talk to your safeguarding team.

4.8 Staff connected to the Early Years and Later Years provisions are under an ongoing duty to inform the school if circumstances change which would mean they meet any of the criteria for disqualification under the Childcare Act 2006. Staff should refer to their contract of employment in respect of their ongoing duty to update the School.

4.9 Community users, organising activities for children and any visitors that enter the building or have interaction with the students at Royal School, are aware of and understand

Safeguarding & Child Protection Policy

the need for compliance with the school's child protection guidelines and procedures, and will need to sign a declaration form in accordance with these guidelines and procedures.

4.10 Child protection concerns or allegations against adults working in the school are to be reported to the Head of School, who will then liaise with the DSL. The DSL will only support if there has been any harm or abuse that has come to a student. They may also help with gathering evidence for the investigation from students only, and this is to only be carried out after explicit instructions from The Head of School. The Head of School alongside the DSL (if needed or asked) will inform the Governors and if needed the police (contact details are listed at the beginning of this document). Any member of staff found not suitable to work with children will be reported to the Head of school who will converse with the governors, to make a decision. If the concern is about the DSL, the Head Teacher takes responsibility. Any concerns about the Head Teacher falls under the responsibility of the Safeguarding Governor. **NOTE:** International Teachers may have a different local authority to report to, due to the different outside security checks (in terms of employment at the school) However once hired they fall under the same structure as above in terms of investigation.

All teachers must complete a security background check, and International Teachers are required to have a copy of their 'International Child Protection Certificate'.

4.11 All local and outside partners and support networks details are listed at the beginning of this document. Please see section 6 relating to any specific and more informative information on any safeguarding or child protection topics. The DSL is responsible for contacting and referring any concerns about a child's safety to the relevant local authorities which are, Child Protection National Agency and the Local Police.

4.12 Parents/carers are made aware of this policy and can access a copy of this policy on the Royal Schools website.

4.13 The Child Protection National Agency helps to keep organisations responsible for Safeguarding and agree on how they will cooperate with one another to safeguard and promote the welfare of children. The main responsibilities of this outside agency is to help coordinate and assure the quality of the safeguarding and protection of children.

5 The Designated Safeguarding Lead (DSL) and Deputy Designated Persons (DDP)

5.1 The Designated Safeguarding Lead holds ultimate responsibility for Child Protection and Safeguarding in the school.

5.2 The Designated Safeguarding Lead will act as a source of support and expertise to the school community and ensure all Safeguarding records are kept up-to-date and confidential.

5.3 The Designated Safeguarding Lead will refer a child if there are concerns about possible abuse to the Child Protection National Agency and is the main point of contact for staff to discuss concerns, which are to be reported on iSAMS, unless the child is in immediate harm.

Safeguarding & Child Protection Policy

5.4 The Designated Safeguarding Lead will ensure that notifications are made when a child with a child protection plan in place is absent without explanation for two days or that a notification is made when a child on a plan changes school.

5.5 The Designated Safeguarding Lead will develop strong and important relationships with the external agencies and liaise frequently with the Nominated Safeguarding Governor and Head of School, along with reporting to governors on all areas of Safeguarding and Child Protection annually and for reviewing the policy.

5.6 The Designated Safeguarding Lead will have full regard to the Local Safeguarding Children procedures and requirements, in line with the regulations of the host country.

5.7 All staff training in relation to Safeguarding will be organised regularly and annually by the Designated Safeguarding Lead.

5.8 The Designated Safeguarding Lead will promote educational outcomes by sharing information about the welfare, safeguarding and child protection issues that children are experiencing, or have experienced, with staff. This could be done by, for example, making sure that staff know who these children are, understand their academic progress, and maintain a culture of high aspirations for them.

5.9 The Designated Safeguarding Lead will evaluate any instances regarding any of the key indicators of harm or abuse outlined by the Acts and Legislation outlined in section 1.3.

5.10 The Deputy Designated Persons will carry out the role as outlined above, if in the absence of the DSL and help to assist the DSL when needed.

5.11 If, at any point, there is a risk of immediate serious harm to a child a referral should be made to the Child Protection National Agency and potentially the police. Anyone can report to the outside agency, however it is best practice to report to the DSL and then let the DSL, DDP or Head of School report the incident.

5.12 The Designated Safeguarding Lead will undergo updated child protection training at least every 2 years, with regular refresher training to keep updated with the national and local initiatives.

6 Safeguarding Definitions and Guidance

Safeguarding, child protection and promoting the welfare of children is defined for the purposes of this policy as:

- Protecting children from harm.
- Preventing impairment of children's mental and physical health or development.
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best outcomes and feel safe.

Safeguarding & Child Protection Policy

6.1 Recognising abuse

To ensure that our students are protected from harm, we need to understand what types of behaviour constitute abuse and neglect. Abuse and neglect are forms of harm and abuse. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone, or leaving knives or matches within reach of an unattended toddler.

There are four categories of abuse:

- Physical abuse, which can 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 persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate or valued only for meeting the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the 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, 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, although it may occur alone.
- 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 penetrative and non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or 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. The sexual abuse of children by other children is a specific safeguarding issue in education (see paragraph on Child on Child Sexual Violence and Sexual Harassment Sexual violence in section 6.2).
- 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 misuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food and clothing or shelter, including exclusion from home or abandonment; failing to protect a child from physical and emotional harm or danger; failure to ensure adequate supervision, including the use of inadequate care-takers; or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

6.2 Peer-on-Peer Abuse

Safeguarding & Child Protection Policy

The school recognises that children are capable of abusing their peers, and that this abuse can include:

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

The values, ethos and behaviour policies provide the platform for staff and students to clearly recognise that abuse is abuse and it will never be tolerated or diminished in significance. It should be recognised that there is a gendered nature to peer on peer abuse i.e. that it is more likely that girls will be victims and boys perpetrators, however abuse from girls to boys can and does happen. Schools should recognise the impact of sexual violence and the fact children/young people can, and sometimes do, abuse their peers in this way. As a school: We do not tolerate instances of peer on peer abuse and will not pass it off as "banter", "just having a laugh" or "part of growing up". We will follow both national and local guidance and policies to support any children/young people subject to peer on peer abuse, including sexting (also known as youth produced sexual imagery) and gang violence. We will follow the guidance on managing reports of child-on-child sexual violence and sexual harassment in schools. We will use a Risk to Children School Safety Plan when we have concerns. We will always report episodes of 'up-skirting'.

Bullying between children is not a separate category of abuse and neglect, and it is a very serious issue that can cause considerable anxiety and distress. All incidences of bullying should be reported and will be managed through our anti-bullying procedures. If the bullying is particularly serious, or the anti-bullying procedures are deemed ineffective, the Head and Designated Safeguarding Lead will consider implementing child protection procedures.

The management of children and young people with sexually harmful behaviour is complex and the school will work with other relevant agencies to maintain the safety of the whole school community. Young people who display such behaviour may be victims of abuse themselves and the child protection procedures will be followed for both victim and perpetrator.

Child on Child Sexual Violence and Sexual Harassment Sexual violence reports from children is important. Victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment, nor should a victim ever be made to feel ashamed for making a report. Staff must inform the Designated Safeguarding Lead (or Deputy), as soon as practically possible, if the Designated

Safeguarding & Child Protection Policy

Safeguarding Lead (or Deputy) are both not available, then it is paramount that who ever the child has disclosed to, they stay with the child, **DO NOT** investigate or ask any questions, just listen, support and reassure the child until the DSL or DDP are available to proceed with the investigation. When taking down details of any harassment, the staff member devotes their full attention to the child and listens to what they are saying. When making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made. Remember never promise to keep secrets for the student, be honest about the next steps.

6.3 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

This involves exploitative situations, contexts and relationships where young people receive something as a result of engaging in sexual activities. Sexual exploitation can take many forms. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse and may not see themselves as a victim and may resent interference. However, this should not influence whether or not a referral is made. Some of the following signs may be indicators of Child Sexual Exploitation: children appear with unexplained gifts, who may have an older boyfriend or girlfriend, who misuse drugs and alcohol, who go missing for periods of time or suffer changes in their emotional well-being.

Child Criminal Exploitation (CCE) is where an individual or a group takes advantage by power to coerce, manipulate or deceive a child or young person into committing a criminal act. Child Criminal Exploitation of children/young person can involve force/enticement based methods of compliance, which can involve threats of violence or actual violence and may include:

- Travelling outside of the area they live in on public transport, committing crimes on behalf or requested by others because friends/family are being threatened with violence to settle debts or fabricated debts.
- Being forced to commit crimes so they can be part of a gang.
- Being encouraged or manipulated to commit crimes by social media.
- Receiving food, money, status in return for storing weapons or drugs.
- Participating in 'cuckooing', a form of crime in which drug dealers take over the home of a vulnerable person in order to use it as a base for drug dealing.

Some of the following signs may be indicators of Child Criminal Exploitation:

- Wearing new clothes, having money, mobile phones etc. without a reasonable excuse;
- Gang association or isolation from friends, different friends/social network;
- Exclusion or periods of absence from school; going missing from home/care without explanations;
- Receiving lots of texts or calls

Safeguarding & Child Protection Policy

The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

6.4 Female Genital Mutilation (FGM)

All staff need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. It should be noted that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

There is a statutory duty upon teachers to report to the police where they discover that FGM appears to have been carried out on a girl under 18. In addition to FGM, the African practice of “ironing” a girl’s chest with a hot stone to delay breast formation is spreading. This is a practice whereby mothers, aunts or grandmothers use a hot stone to massage across the breast repeatedly in order to “break the tissue” and slow its growth. The perpetrators, usually mothers, consider it a traditional measure which protects girls from unwanted male attention, sexual harassment and rape. Medical experts and victims regard it as child abuse which could lead to physical and psychological scars, infections, inability to breastfeed, deformities and breast cancer.

6.5 Mental Health

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation and school has an important role to play in supporting the mental health and well-being of our pupils.

Whilst only appropriately trained professionals should attempt to make a diagnosis of a mental health problem, staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children’s experiences can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the Safeguarding policy and speaking to the Designated Safeguarding Lead or a Deputy.

6.6 Radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. It is possible to prevent vulnerable people from being radicalised during this process. However, there is no single way of identifying those individuals who are vulnerable.

Authors: Safeguarding Team For the attention of all staff January 2023 41 Pages

Safeguarding & Child Protection Policy

Radicalisation can occur in many different ways including specific background factors or specific influences such as family and friends. Social media and the internet is also a major factor in the radicalisation of young people.

A Risk Assessment requires a general understanding of the risks affecting children and young people in the community and how to identify individual children who may be at risk of radicalisation.

The school ICT network will ensure that appropriate filtering is in place to block terrorist or extremist material. As with other safeguarding risks, staff should be alert to changes in behaviour which could indicate that children may be in need of support or protection. Staff should use their professional judgement and act proportionately, which may include making a referral to the DSL and DDP, who will then contact (if necessary) the Child Protection National Agency.

6.7 Missing from Education

We recognise that full attendance at school is important to the well-being of all our pupils and enables them to access the opportunities made available to them at school. Attendance is monitored closely as patterns of absence are sometimes a cause for concern. If a child has not turned up to school, and no contact from the parent or guardian has been made, then contact must be made to confirm where the child is.

A child that has gone missing from education without any contact from the family or given reason, is a safeguarding concern/risk and can be in worst case scenario a potential indicator of abuse or neglect. The Designated Safeguarding Lead will monitor unauthorised absence, particularly where children go missing on repeated occasions. However it is also the responsibility of all staff to be vigilant and report this to the safeguarding team if concerned.

Where a pupil has 2 consecutive school days of unexplained absence and all reasonable steps have been taken by the school to establish their whereabouts see below ...

Reasonable steps:

1. Telephone calls to all known contacts, followed up with an email every time a call is made without making contact.
2. Letters home (including recorded delivery).
3. Contact with other schools where siblings may be registered.
4. Possible home visits, where safe to do so.
5. Enquiries to friends, neighbours etc. through school contacts.
6. Enquiries with any other Service known to be involved with the pupil/family, and contact your local authority contact for advice

All contacts and outcomes to be recorded on the pupils file in iSAMS

If the school has no success from taking these reasonable steps, then school should make an immediate referral to your local authority contacts.

If a child has 10 absences (no reason being provided for missing school, and the child is healthy and not at risk) there will be a sanction. Every school has an internal regulation that is compliant with the national Regulamentul-cadru de organizare și funcționare a unităților de învățământ preuniversitar (ROFUIP)

Authors: Safeguarding Team For the attention of all staff January 2023 41 Pages

Safeguarding & Child Protection Policy

6.8 Illegal Drugs

When there is evidence or reasonable cause to believe that a young person is using illegal drugs appropriate action and support will be taken for the student. Any further enquiries and/or further action will be taken when the school receives reliable information about drug and alcohol abuse by a child's parents/carers (if relevant to the situation) and the school will seek advice with outside agencies.

6.9 Youth Produced Sexual Imagery (sexting)

The practice of children sharing images and videos via text message, email, social media or mobile messaging apps has become commonplace. However, this online technology has also given children the opportunity to produce and distribute sexual imagery in the form of photos and videos. Such imagery involving anyone under the age of 18 is illegal.

Youth produced sexual imagery refers to both images and videos where:

- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18.
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult.
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.

All incidents of this nature should be treated as a safeguarding concern.

There have been cases where sexual imagery of people under 18 has been shared by adults and where sexual imagery of a person of any age has been shared by an adult to a child is child sexual abuse and should be responded to accordingly. If a member of staff becomes aware of an incident involving youth produced sexual imagery they should follow the child protection procedures and refer to the DSL as soon as possible. The member of staff should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. Staff should not view, copy or print the youth produced sexual imagery. The DSL should hold an initial review meeting with appropriate school staff and subsequent interviews with the children involved (if appropriate). Parents should be informed at an early stage and involved in the process unless there is reason to believe that involving parents would put the child at risk of harm. At any point in the process if there is concern a young person has been harmed or is at risk of harm a referral should be made to the Child Protection National Agency and/or the Police as appropriate.

Immediate referral at the initial review stage should be made to Child Protection National Agency/Police if:

- The incident involves an adult.
- There is good reason to believe that a young person has been coerced, blackmailed or groomed or if there are concerns about their capacity to consent (for example, owing to special education needs).
- What you know about the imagery suggests the content depicts sexual acts which are unusual for the child's development stage or are violent.
- The imagery involves sexual acts.
- The imagery involves anyone aged 12 or under.

Safeguarding & Child Protection Policy

- There is reason to believe a child is at immediate risk of harm owing to the sharing of the imagery, for example the child is presenting as suicidal or self-harming.

If none of the above apply then the DSL will use their professional judgement to assess the risk to pupils involved and may decide, with input from the Head of School, to respond to the incident without escalation to Children's Social Care or the police.

In applying judgement the DSL will consider if:

- There is a significant age difference between the sender/receiver
- There is any coercion or encouragement beyond the sender/receiver
- The imagery was shared and received with the knowledge of the child in the imagery
- The child is more vulnerable than usual i.e. at risk
- There is a significant impact on the children involved
- The image is of a severe or extreme nature
- The child involved understands consent
- The situation is isolated or if the image has been more widely distributed
- There are other circumstances relating to either the sender or recipient that may add cause for concern i.e. difficult home circumstances
- The children have been involved in incidents relating to youth produced imagery before.

If any of these circumstances are present the situation will be escalated according to our child protection procedures, including reporting to the police or Child Protection National Agency. Otherwise, the situation will be managed within the school.

The DSL will record all incidents of youth produced sexual imagery, including both the actions taken, actions not taken, reasons for doing so and the resolution in line with safeguarding recording procedures. Youth refers to anyone under the age of 18.

6.10 Online Safety

Students are increasingly using electronic equipment on a daily basis to access the internet and share content and images via social media sites such as facebook, twitter, Instagram and snapchat. Unfortunately, some adults and other children use these technologies to harm children. The harm might range from sending hurtful or abusive texts or emails, to grooming and enticing children to engage in sexual behaviour such as webcam photography or face to face meetings. Pupils may also be distressed or harmed by accessing inappropriate material such as pornographic websites or those which promote extremist behaviour, criminal activity, suicide or eating disorders. The School has an online safety policy which explains how we try to keep pupils safe online in school and at home and how we respond to online safety incidents. Pupils are taught about online safety throughout the curriculum and all staff receive online safety training which is regularly updated. The school online safety coordinator is listed at the beginning of this document.

6.11 Forced Marriage

A forced marriage is a marriage in which one or both people do not (or in cases of people with learning disabilities cannot) consent to the marriage but are coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse. Forced marriage is an appalling and indefensible practice and is recognised in the UK and EU as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights. Since June

Safeguarding & Child Protection Policy

2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014. A forced marriage is not the same as an arranged marriage which is common in several cultures. The families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses. School staff should never attempt to intervene directly as a school or through a third party.

6.12 Honour Based Abuse (HBA)

This can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such abuse, including violence, can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.

Honour based abuse might be committed against people who; become involved with a boyfriend or girlfriend from a different culture or religion

- Want to get out of an arranged marriage
- Want to get out of a forced marriage
- Wear clothes or take part in activities that might not be considered traditional within a particular culture.

It is a violation of human rights and may be a form of domestic and/or sexual abuse. There is no, and cannot be, honour or justification for abusing the human rights of others.

6.13 Private Fostering Arrangements

A private fostering arrangement occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 or 18 if the child is disabled. Children looked after by the local authority or who are placed in residential schools, children's homes or hospitals are not considered to be privately fostered. Private fostering occurs in all cultures, including British culture and children may be privately fostered at any age. The school recognises that most privately fostered children remain safe and well but are aware that safeguarding concerns have been raised in some cases. Therefore, all staff are alert to possible safeguarding issues, including the possibility that the child has been trafficked into the country. By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's services as soon as possible. However, when a member of staff becomes aware that a pupil may be in a private fostering arrangement they will raise this with the DSL and the DSL will notify their local authority of the circumstances.

6.14 Children with family members in prison

Children with a parent or family member in prison are at risk of poverty, stigma and bullying, isolation and poor mental health. Performance at school may drop and they may have to take on extra responsibilities at home, including becoming young carers in some situations. The school is aware of which children have a parent or family member in prison, maintaining confidentiality where necessary.

6.15 Gangs, Organised Crime

A gang is typically a noticeable group of individuals that spends time in public and engages in criminal activity and violence. This includes recruiting young people to transport and sell

Safeguarding & Child Protection Policy

Class A drugs from urban areas to coastal towns. Young people are also used to transport and hide weapons. The group may also be territorial or in conflict with other gangs. Young people involved in gangs have an increased risk of experiencing violence and other types of abuse. Gang crime and serious youth violence is also often synonymous with knife crime and child criminal exploitation. Teachers have the power to search pupils without consent for 'prohibited items' such as knives and weapons, alcohol, illegal drugs, tobacco, and any item that staff reasonably suspect has been, or is likely to be, used to commit an offence, cause personal injury or damage to property. Anyone worried about a student involved in, or at risk from, gangs needs to contact the local authority.

6.16 Up Skirting Up Skirting

This is now a criminal offence. This typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.

6.17 Serious Violence

Signs of serious violence 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 a significant change in wellbeing, or signs of assault or unexplained injuries. 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.

6.18 Children and the Court System

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children.

6.19 Opportunities to teach safeguarding

Royal School will ensure that children are taught about safeguarding, including online safety, which every student and parent will sign a network agreement form please see in Appendix 1 at the end of this policy. This will be considered as part of providing a broad and balanced curriculum. This will include covering relevant issues for school through Relationships Education (for all primary pupils) and Relationships and Sex Education (for all secondary pupils) and Health Education (for all pupils in the school). These are covered in the students' PSHE session they have with their tutor. We also have wellbeing posters to encourage conversation around mental health, wellbeing and staying safe.

7 Safeguarding and Child Protection Procedures

7.1 Indicators of abuse and what you might see

Physical signs define some types of abuse, for example, bruising, bleeding or broken bones. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma. It is also quite difficult for anyone without medical

Safeguarding & Child Protection Policy

training to categorise injuries into accidental or deliberate with any degree of certainty. For these reasons it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the Designated Safeguarding Lead.

Remember, it is your responsibility to report your concerns. It is not your responsibility to investigate or decide whether a child has been abused.

A child who is being abused and/or neglected may;

- have bruises,
- bleeding,
- burns,
- fractures or other injuries,
- show signs of pain or discomfort.
- keep arms and legs covered, even in warm weather,
- be concerned about changing for PE or swimming,
- look unkempt and uncared for,
- change their eating habits,
- have difficulty in making or sustaining friendships,
- appear fearful,
- be reckless with regard to their own or other's safety,
- self-harm,
- frequently miss school or arrive late,
- show signs of not wanting to go home,
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn,
- challenge authority,
- become disinterested in their school work,
- be constantly tired or preoccupied,
- be wary of physical contact,
- be involved in, or particularly knowledgeable about drugs or alcohol, and/or
- display sexual knowledge or behaviour beyond that normally expected for their age.

Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges.

Additional barriers can exist when recognising abuse and neglect in this group of children.

These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- Being more prone to peer group isolation than other children
- The potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers.

Individual indicators rarely provide conclusive evidence of abuse, especially if it is or seems like an isolated incident. They should be viewed as part of a jigsaw, and each small piece of information will help the Designated Safeguarding Lead to decide how to proceed. It is very important that you report your concerns.

Safeguarding & Child Protection Policy

Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of this environment. All staff, but especially the Designated Safeguarding Lead (and Deputy) will consider whether children are at risk of abuse or exploitation in situations outside their families. Outside the immediate family harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

7.2 Taking action

Key points to remember for taking action are:

- In an emergency take the action necessary to help the child, for example, get a hold and report your concern to the Designated Safeguarding Lead as quickly as possible and if they are not available ensure the information is shared on iSAMS (NOT in email) in the school that day. If the child is in serious risk even in school, then you must stay with the child until the DSL or DDP can arrive and take over.
- If it is a medical emergency then call 112 and also get a hold of your DSL or DDP.
- The DSL or DDP will then ensure action is taken to report the concern. DO NOT start your own investigation, share information only on iSAMS or to the DSL or DDP only
- Do not discuss the issue with colleagues, friends or family, complete a record of concern and seek support for yourself if you are distressed.

7.3 If you suspect a child is at risk of harm

There will be occasions when you suspect that a child may be at serious risk, but you have no concrete evidence. The child's behaviour may have changed, their artwork could be bizarre or you may have noticed other physical but inconclusive signs. In these circumstances, you should try to give the child the opportunity to talk. The signs you have noticed may be due to a variety of factors and it is fine to ask the child if they are alright or if you can help in any way. Use open questions for example "You don't seem yourself today is everything alright", "I have not caught up with you in a while, how have you been" "How is your day going so far".

Ensure these concerns are reported to the Designated Safeguarding Lead. If the child does begin to reveal that they are being harmed you should follow the advice in the section (7.4) 'If a child discloses to you'. If, following your conversation, you remain concerned, you should address your concerns with the Designated Safeguarding Lead using iSAMS. The UK Department for Education has produced advice titled "What to do if you are worried a child is being abused Advice for practitioners March 2015" to help practitioners identify child abuse and neglect and take appropriate action in response, this is in the safeguarding file which there is a copy in every Teaching Room.

7.4 If a child discloses information to you

It takes a lot of courage for a child to disclose that they are being neglected or abused. They may feel ashamed, particularly if the abuse is sexual, their abuser may have threatened what will happen if they tell, they may have lost all trust in adults, or they may believe, or have been told, that the abuse is their own fault.

Safeguarding & Child Protection Policy

If a child talks to you about any risks to their safety or wellbeing you will need to let them know that you must pass the information on, you are not allowed to keep secrets. The point at which you do this is a matter for professional judgement.

During your conversation with the child allow them to speak freely. Remain calm and do not over react as the child may stop talking if they feel they are upsetting you. Give reassuring nods or words of comfort and do not be afraid of silences, remembering how hard this must be for the child. Do not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused.

Under no circumstances ask leading or investigative questions - such as how many times this has happened, whether it happens to siblings too, or what the child's mother thinks about all this.

Tell the child what will happen next. The child may agree to go with you to see the Designated Safeguarding Lead. Otherwise let them know that someone will come to see them before the end of the day. Never promise to keep a secret for the child.

Report on iSAMS to Designated Safeguarding Lead and Deputy Designated Persons and write up your conversation as soon as possible on the record of concern form (in Appendix 2 at the end of this policy) if the child has disclosed what has happened to them and attach it to the iSAMS report. Ensure you seek support if you feel distressed from the disclosure.

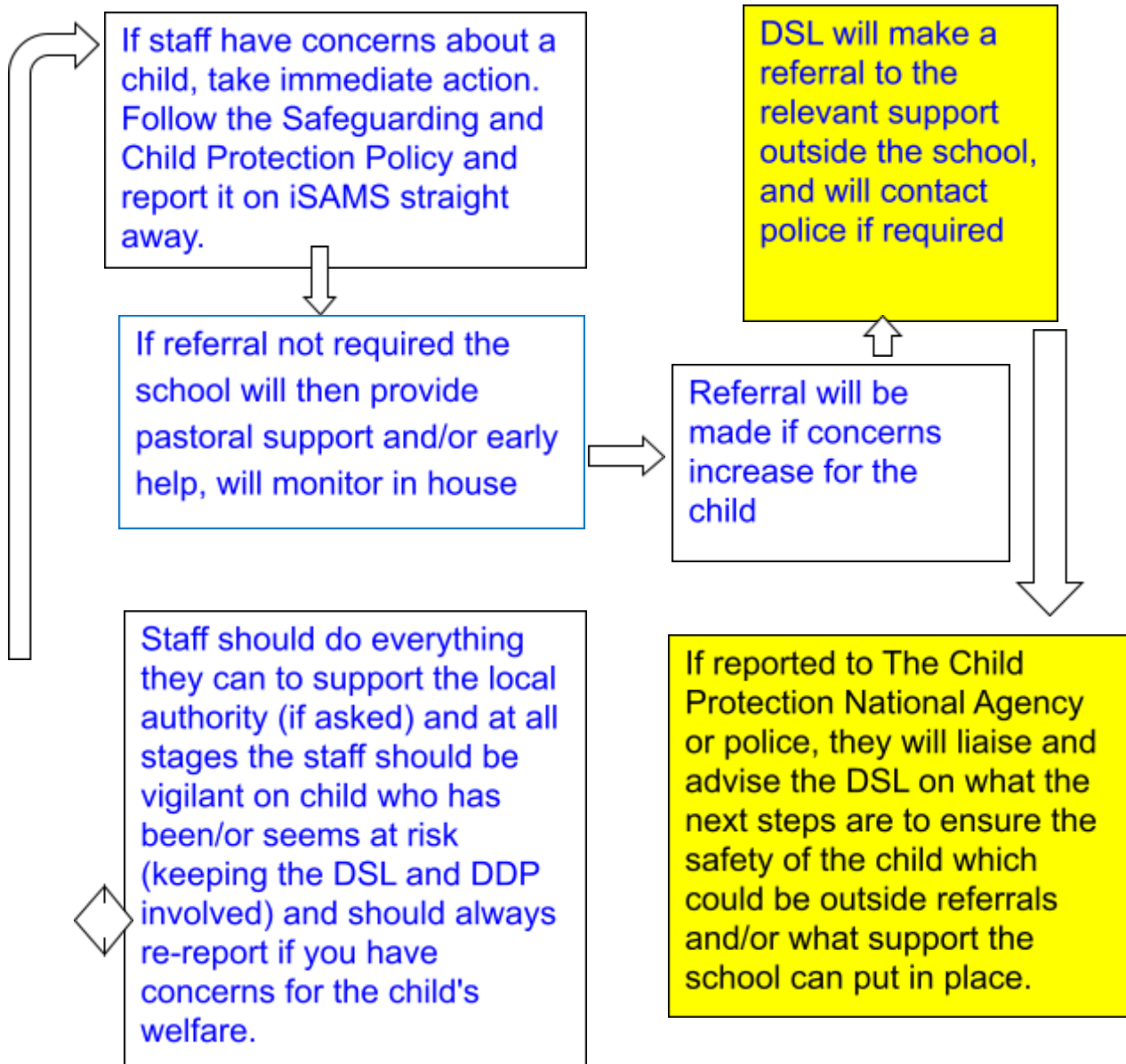
7.5 Notifying parents

The school will normally seek to discuss any concerns about a child with their parents. This must be handled sensitively and the Designated Safeguarding Lead will make contact with the parent in the event of a concern, suspicion or disclosure. However, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from outside agencies

7.6 The Referral Process To Outside Agencies

This diagram illustrates what action should be taken and who should take it where there are concerns about a child. If, at any point, there is a risk of immediate serious harm to a child a referral should be made to The Child Protection Agency immediately.

Safeguarding & Child Protection Policy



1. In cases which also involve a concern or an allegation of abuse against a staff member, see section 4.10 for guidance.
2. Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from coordinated early help, an early help inter-agency assessment should be arranged.
3. Referrals should follow the process set out in this policy and in line with regional and national guidelines in our host country.

Safeguarding & Child Protection Policy

8 Supporting Children

8.1 At Royal School we understand that by providing early help is more effective in promoting the welfare of children from the beginning of their enrollment, rather than reacting later. Early help means providing support as soon as a problem emerges at any point in a child's life, and we are particularly alert to the potential need for early if:

- Child has a specific additional or educational need, or a specific disability (whether or not they have a statutory Education, Health and Care Plan).
- Child is accompanied or requires the presence of a youth carer/paraprofessional (extra support) hired by families.
- Child is showing signs of being drawn into antisocial or criminal behaviour, including gang involvement and association with organised crime groups.
- Child is frequently missing/goes missing from care or from home and is at risk of modern slavery, trafficking or exploitation.
- Child is at risk of being radicalised or exploited.
- Child is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse.
- Child is misusing drugs or alcohol themselves.

8.2 When a child requires support in more than one area (e.g. education, health, housing, police), the school will complete and fill in observation forms, meet parents and start discussing concerns. Furthermore, complete all needed records on iSAMS. Early Help Assessment (EHA) and identify what help the child/ family requires, to prevent their needs escalating to a point where intervention via a statutory assessment under the Children Act 1989 is needed.

8.3 We recognise that a child who is abused, who witnesses violence or who lives in a violent environment may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth. We recognise that the school may provide the only stability in the lives of children who have been abused or who are at risk of harm.

8.4 Our school will support all children by:

- Encouraging the development of self-esteem and resilience in every aspect of school life, including through the curriculum
- Promoting a caring, safe and positive environment within the school
- Ensure that all children know there is an adult in the school who they can approach if they are worried or in difficulty
- Include regular consultation with children e.g. through safety questionnaires, participation in anti-bullying week, asking children to report whether they have had happy/sad lunchtimes/playtimes, get the children involved in their own wellbeing posters in their classes.
- Liaising and working together with all other support services and those agencies involved in the safeguarding of children
- Notifying local authority as soon as there is a significant concern

Safeguarding & Child Protection Policy

- Ensuring that a named teacher is designated for Looked After Children (LAC) and that an up to date list of children is regularly reviewed and updated
- Providing continuing support to a child (about whom there have been concerns) who if they leave the school and go to another we ensure that such concerns and school medical records are forwarded under confidential cover to the Head at the pupil's new school as a matter of urgency.
- Listening to a child's wishes and feelings.

8.5 Children in Early Years are encouraged to understand how to keep themselves safe and this will be developed throughout their time in Early Years. Not applicable to Secondary Schools ages.

8.6 Children potentially at greater risk of harm

Children who need outside support (social worker) (Child in Need and Child Protection Plans) may need this support due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health. Local authorities should share the fact a child has a social worker, and the Designated Safeguarding Lead should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine and all files like this should be kept locked away in the DSL office, and only the DSL and DDP should have access to these if needed to be accessed. There is a hierarchy and levels in which to share this information under existing duties on both local authorities and schools and colleges to safeguard and promote the welfare of children. Where children need support, either outside/inside the school, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

9 Supporting Staff

We understand that staff who have had a disclosure to them from a student who has suffered any form of abuse, harm, neglect or suffering from mental health, or a staff member suspects any indications of abuse, harm, neglect or mental health, that they may and can find the situation stressful and upsetting. We will support each and every staff member by making sure that the DSL or DDP checks in on them as soon as possible in the case of a serious disclosure (after it has been managed and the child is safe). On top of this all staff members can come and speak to the safeguarding team, their line manager and staff wellbeing representatives about the effect this has had on them. We highly encourage (while not speaking about the nature of the disclosure or the child involved unless it is to the DSL or DDP) for the staff members to talk about their experience and how it may have affected them, to help build a supportive network within the school. Staff members must not share any information of the disclosure or student with any staff who are not in the safeguarding team to assure confidentiality and safety for the student.

10 If you have concerns about a colleague (including admin, supply staff and volunteers)

Staff who are concerned about the conduct of a colleague (including all of the administration team, supply staff and volunteers) towards a child are without doubt placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career or it is not their place to report it. All staff must remember that the welfare of the child is paramount. All concerns of poor practice or concerns linked to the child's welfare brought about by the behaviour of colleagues should be reported to the Head through iSAMs. Complaints about a Head should be reported to the Chair of Governors. It is vital that we follow this, as this will help to promote and create a school that is and feels safe.

11 If you have concerns about the safeguarding practices within the school or have a complaint

11.1 Staff should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding procedure. Appropriate whistleblowing procedures are in place to raise such a concern with the school's management team. Please refer to the Whistleblowing Policy for full details, or refer to section 4.10 in this policy to follow correct protocol.

11.2 Our complaints procedure needs to be followed in the instance where a child or parent raises a concern about the way the procedure of safeguarding has been applied to them/her child. Complaints from staff are dealt with under the school's grievance procedures, please follow the organigramme to see the structure of your first point of contact. In the event of the next point of contact is whom the complaint is about, then proceed to the next point of contact.

12 Allegations against staff (including admin, supply staff and volunteers)

12.1 All staff (including admin, supply staff and volunteers) should take care not to place themselves in a vulnerable position with a child. It is always advisable for interviews or work with individual children or parents to be conducted in view of more than one adult as a minimum.

12.2 We understand that a pupil or parent may make an allegation against a member of staff. If such an allegation is made, the member of staff receiving the allegation or the staff member who has heard the allegation, will immediately inform the Head or the most senior teacher if the Head is not available.

12.3 If the allegation concerns the Head it should be reported to the Chair of Governors or Vice-Chair Governor. In these instances, any reference to the Head in this section should be read as referring to the Chair of Governors or Trust Chief Executive.

Safeguarding & Child Protection Policy

12.4 If the allegation meets any of the following criteria it should be reported by the Head to the relevant outside agencies (see section 4.10) as soon as possible on that day.

- Staff have behaved in a way that has harmed a child, or may have harmed a child.
- Staff have possibly committed a criminal offence against or related to a child.
- Staff behaviour towards a child or children in a way that indicates he/she may pose a risk of harm to children.
- Staff have behaved towards a child or children in a way that indicates he/she is unsuitable to work with children.

12.5 Any member of staff who believes with reasonable cause that allegations about staff are not being referred to the Head of School and/or Governors, or handled appropriately may refer the matter directly to the local authorities.

12.6 For allegations against Early Years staff, Early Years volunteers or anyone who resides at the premises, the same protocol is to happen as outlined in section 4.10.

12.7 Under no circumstances will we send a child home, pending such an investigation, unless this advice is given exceptionally, as a result of a consultation with the Child Protection National Agency.

12.8 Suspension of the member of staff, excluding the Head, against whom an allegation has been made, needs careful consideration, and the Head will consult in making this decision, alongside with the governors. In the event of an allegation against the Head, the decision to suspend will be made by the Chair of Governors with advice from the HR Advisor.

12.9 If an allegation is made directly to the police, they will coordinate with the Head of School. They will discuss with the Head and, where necessary, obtain further details of the allegation. The Head should not investigate the allegation at this stage unless instructed to do so by the police. The discussion should also consider whether there is evidence/information that establishes that the allegation is false or unfounded.

12.10 If the allegation is not definitively false and there is cause to suspect that a child is suffering or is likely to suffer significant harm, this will need to be reported to the Head of School, who will converse with the Governors on next steps.

12.11 If there is no suspicion or evidence that significant harm is an issue, but a criminal offence might have been committed, the Head will again converse with the Governors and contact the police and convene a similar discussion to decide whether a police investigation is needed. That discussion will also involve the Child Protection National Agency.

12.12 After this initial consideration, if it is decided that the allegation does not involve any criminal offence, it will be for the school to deal with. In such cases, the Head will decide if a Disciplinary process is required and if so, will handle the matter in line with the contracts signed by staff. In a case in which Child Protection National Agency has been informed or

Safeguarding & Child Protection Policy

taking any action, the Head should take account of any relevant information obtained in the course of those enquiries when considering disciplinary action.

12.13 The Child Protection National Agency, will continue to liaise with the school to monitor progress of the case and provide advice and support.

12.14 If a criminal investigation is required, the police will aim to complete their enquiries as quickly as possible consistent with a fair and thorough investigation and will keep the progress of the case under review.

12.15 If the police decide not to charge the individual with an offence, or decide to administer a caution, or a Court acquits the person, the police aim to pass all information they have which may be relevant to a disciplinary case to the school as quickly as possible after the decision. The school will then consider the matter in line with the current disciplinary policy.

12.16 If the person is convicted of an offence the police will inform the employer straight away so that appropriate disciplinary action can be taken.

12.18 Staff, parents and governors are reminded that publication of material that may lead to the identification of a teacher who is the subject of an allegation is prohibited by law. Publication includes verbal conversations or writing including content placed on social media sites.

12.19 Supply teachers.

In some circumstances the school will have to consider an allegation against an individual not directly employed by them, where its disciplinary procedures do not fully apply, for example, supply teachers provided by an employment agency. Whilst the school is not the employer of supply teachers, they should ensure allegations are dealt with properly. The school should not decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts to determine a suitable outcome. The Head should discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation. Agencies should be fully involved and co-operate in any enquiries from the School and police. The school will usually take the lead because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an allegation is made. Supply teachers, whilst not employed by the school, are under the supervision, direction and control of Royal School when working for this company. They should be advised to contact their representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the Head and governors should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the school during the investigation.

13 Allegations Against Pupils

13.1 In most instances, the conduct of pupils towards each other will be covered by the Behaviour Policy. However, some serious allegations may raise safeguarding concerns including physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is

Authors: Safeguarding Team For the attention of all staff January 2023 41 Pages

Safeguarding & Child Protection Policy

important to note that this can and does happen, any concerns you may have seen or been told report it on iSAMS.

It is likely to be considered a safeguarding allegation if the allegation:

- Is made against an older pupil and refers to their behaviour towards a younger or more vulnerable pupil.
- Is of a serious nature, possibly including a criminal offence.
- Raises risk factors for other pupils in the school.
- Indicates that other pupils may have been affected by this student.
- Indicates that young people outside the school may be affected by this student.

13.2 Examples of safeguarding issues against a student could include:

- Violence, particularly pre-planned.
- Forcing others to use drugs or alcohol.
- Blackmail or extortion.
- Threats and intimidation.
- Indecent exposure, indecent touching or serious sexual assaults.
- Forcing others to watch pornography or take part in sexting.
- Encouraging others to attend inappropriate parties.
- Photographing or videoing other children performing indecent acts.

13.3 When an allegation is made by a pupil, staff will need to consider if the complaint raises a safeguarding concern. If there is a safeguarding concern the Head and Designated Safeguarding Lead should be informed immediately. Attached in Appendix 3 of this policy is a student witness form (only to be filled out under the guidance of the DSL and/or DDP)

13.4 A factual record should be made of the allegation if disclosed to a staff member, but no attempt at this stage should be made to investigate the circumstances, everything should be handed over to the DSL or DDP.

13.5 The Designated Safeguarding Lead will contact the Local Authority to discuss the case and will follow through the outcomes of the discussion. The Designated Safeguarding Lead will make a record of the concern, the discussion and any outcome and keep a copy in the files of both pupils' files.

13.6 If the allegation indicates a potential criminal offence has taken place, the police should be contacted at the earliest opportunity and both sets of parents informed.

13.7 In some circumstances it may be appropriate to exclude the pupil being complained about for a period of time according to the Behaviour Policy.

13.8 Where neither local authority decides to investigate the complaint, a thorough school investigation should take place, with a risk assessment prepared and a supervision plan implemented for both victim and perpetrator, if required.

14 Confidentiality

Safeguarding & Child Protection Policy

14.1 All matters relating to child protection are confidential. The Head or Designated Safeguarding Lead will disclose any information about a child to other members of staff on a need-to-know basis only.

14.2 All staff must be aware that they have a professional responsibility to share information with other local authorities (see section 1) in order to safeguard children, however this will nearly in all circumstances be done through the DSL or DDP only.

14.3 All staff must be aware that they cannot promise a child to keep secrets that might compromise the child's safety or wellbeing, or that of another. It is vital that when a student is disclosing a potential safeguarding concern, you still must not pretend to keep it a secret to the child, even if you think this means they will disclose more details. It will betray the students trust not only in you but in the school itself and can be extremely damaging most importantly to the student but also to the investigation in order to help them.

14.4 Royal School will always undertake to share our intention to refer a child (if needed) to the Child Protection National Agency with their parents, unless telling the parents could put the child at greater risk of harm, or impede a criminal investigation.

14.5 All confidentiality will take into account the requirements to notify agencies of safeguarding concerns under the Children's Act 1989 and Working to Safeguard Children

14.6 GDPR DOES NOT prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information can't and should not stand in the way of the need to safeguard, promote the welfare and protect the safety of children.

15 Physical Intervention

15.1 As a school we recognise that in extreme cases, staff may have to use physical intervention as an absolute last resort, when a child is endangering him/herself or others, and that at all times it must be the minimal force necessary to prevent injury to themselves or another person. Such events have to be recorded and signed by a witness. In the unlikely event that you are the only staff member as a witness, it is important for you to stay in sight of the incident and get another student to get another adult. If possible do not intervene unless absolutely necessary (described above) until you have another staff member as a witness. Staff witness forms in Appendix 4.

15.2 We understand that physical intervention of a nature that causes injury or distress to a child could be considered to be investigated under the child protection or disciplinary procedures.

15.3 We recognise that touch is appropriate in the context of working with children, and all staff have been given 'Safe Practice' guidance to ensure they are clear about their professional boundaries.

Safeguarding & Child Protection Policy

15.4 It is up to the Designated Safeguarding Lead to ensure that every staff member in the school, that may be called upon to use physical intervention, has been appropriately supported to deal with any potential scenarios that may arise.

16 Staff Training

16.1 It is important that all staff have training to enable them to recognise the possible signs of abuse and neglect and to know what to do if they have a concern. New staff and governors will receive training during their induction. All staff will receive training that is updated annually with refreshers throughout the year. It is paramount that all staff that are hired by The Royal School (teachers, support staff and admin) who come into contact with students for any amount of time no matter how little, have to complete the mandatory training set out by the Designated Safeguarding Lead.

16.2 For all members of staff they are:

- Provided with child protection awareness information at induction so that they know who to discuss a concern with.
- Receive regular yearly refreshers in the mandatory safeguarding training. Plus will receive regular updates in e-safety and reporting concerns.
- Have child protection awareness training every year, to maintain their understanding of the signs and indicators of abuse.
- Know how to respond to a pupil who discloses abuse and the procedure to be followed in appropriately sharing a concern of possible abuse or disclosure of abuse.
- Encouraged to have read at least Section One of Keeping Children Safe in Education (which there is a copy of in every teachers/staff room).
- Have been notified of the details of the key personnel (on pg.3).

17 Safer Recruitment

17.1 Royal School will always strive to ensure that we do our utmost to employ 'safe' staff by following the guidance of Romanian and International employment law, alongside the Keeping Children Safe in Education 2021 statutory guidance.

17.2 Designated Safeguarding Lead who is involved in recruitment, along with at least one governor, will be trained in complete Safer Recruitment Training.

17.3 Anyone who is employed through a third party from the Royal School, for example cleaners. It is the schools responsibility to ensure that the company has done the correct security checks for their employees and that they have passed in order to work in the school. However we as a school are not responsible to provide training or the security checks of each individual that is hired through the third party company.

17.4 Further information on safer recruitment can be found in our safer recruitment policy.

Safeguarding & Child Protection Policy

18 Use of Mobile Phones and Cameras

18.1 Where appropriate the school may provide a camera for staff to use to record images and videos. At no time should a staff camera or mobile phone be used to record children.
Staff mobile

18.2 All recorded images should only be downloaded onto a school-based system, and should be deleted once printed.

18.3 Parental consent must be sought for the use of photographs or videos in school and outside of school, such as on school trips and for promotional reasons. If images are used with consent, only first names or anonymised titles will be used.

18.4 The school's policy on expectations of pupils regarding mobile phones and cameras. In the EYFS setting, no pupils are permitted to bring mobile devices with any form of camera facility into the premises. Our phone policy may vary between year groups, students and parents can find the mobile phone policy suited to their child in their student diaries.

18.5 Parents may bring mobile phones into school but may only take photographs of their own child/ren, during events such as plays, concerts or sporting events for personal use. Parents should be reminded that the publications of such images might be unlawful.

18.6 We are aware that children and young people use social media. We are actively committed to ensuring that young people use it correctly and appropriately and we are vigilant to new trends and update our practices accordingly.

19 Extended school and off-site arrangements

19.1 Where extended school activities are provided this policy will still apply.

19.2 When our children attend off-site activities, we will check that effective child protection arrangements are in place by:

- Making sure we have the correct ratio of Staff to Students.
- Carrying out risk assessments of all off-site activities.
- Having consent forms from parents in order for the child to attend.
- (like mentioned in 19.1) All staff still follow the procedures of the schools safeguarding policy.
- All staff have completed, and have up to date first aid training.

20 Site Security

20.1 Visitors to the school, including contractors, are expected to sign in and are given an identity (visitor) badge, which confirms they have permission to be on site. Parents who are simply delivering or collecting their children do not need to sign in. All visitors are expected to observe the school's safeguarding and health and safety regulations to ensure children in school are kept safe, and all visitors will be required to sign a declaration form. The Head

Safeguarding & Child Protection Policy

and Designated Safeguarding Lead will exercise professional judgement in determining whether any visitor should be escorted or supervised while on site.

20.2 In the Royal School we have 24hour CCTV onsite. This is for the protection of the students and staff. Limited staff have access to this footage and everyone who does will again have the proper and mandatory safeguard training as it is images and videos of minors. Only the Head of School, DSL and DDP can ask for and see recorded footage in the event of a safeguarding or child protection concern where the images could be used for evidence. Under no circumstances should any staff member see the footage who does not have the necessary training or authority. Only these members of staff: IT staff (who only monitor CCTV as part of maintenance) and DSL and DDP have the right to access the CCTV, or be able to view it.

However, if there is a circumstance where video evidence is required as part of the investigation, or an allegation against the Head of School, then and only then can the Safeguarding Governor request and see the video evidence of that individual incident. Apart from what is outlined above there should be no other circumstances where anyone other staff should be able to access any footage.

20.3 All CCTV footage is kept on file for six weeks.

21 Record Keeping

21.1 The Designated Safeguarding Lead will maintain child protection records and ensure they:

- Have details of two emergency contacts on every child's file.
- Keep clear detailed written records of concerns about children even when there is no need to refer to the matter.
- Keep records in a strict chronological order.
- Keep all records in secure and in locked locations that only the safeguarding team know of or have access to.
- Send all relevant records to the receiving school, college or education establishment when a pupil moves and to have a recorded receipt confirmation once it is received from the new school/college.

21.2 Child protection records or any records that need to be kept secure, need to be maintained independently from the pupil's school files and the school file. This will be labeled discreetly (for the knowledge of the DSL) in the students file to indicate that separate information is held. Such records will only be accessible to the Designated Safeguarding Lead and any school leader that needs to be aware.

21.3 Such records will include, in addition to the name, address and age of the child, timed and dated observations describing the child's behaviour, appearance, statements/remarks made to staff or other children and observations of interactions between the child, other children, members of staff and/ or parents/ carers that give rise to concern. Where possible and without interpretation, the exact words spoken by the child or parent/carer will be recorded. Records will be signed, dated and timed by the member of staff making the record.

Authors: Safeguarding Team For the attention of all staff January 2023 41 Pages

Safeguarding & Child Protection Policy

21.4 Child protection records are normally exempt from the disclosure provisions of GDPR, which means that children and parents do not have an automatic right to see them. If a request is received, please refer to the Head of School, who will advise them to submit a Freedom of Information request for consideration. However this does not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child.

22 Monitoring and Review

22.1 This policy is reviewed by the Royal School safeguarding team each year. Safeguarding incidents are monitored and reviewed by the team to inform any required changes to the policy.

22.2 Every year the team will also ensure any updates or changes in the 'Keeping children safe in education' and 'What to do if you're worried a child is being abused' are changed in the folders placed in each teachers/staff room.

22.3 As the Royal School grows the team will look yearly at any new positions in the safeguarding team that may need to be added in order to keep a safe and secure environment.

22.4 Our staff training set out by the Designated Safeguarding Lead, will be renewed/refreshed every year before the start of the new September term. Staff members whose start date, which is not at the beginning of the academic year, will be advised when their annual refresher training is due by the DSL.

Covid-19 Safeguarding Policy Addendum

Covid-19 School Closure arrangements for Safeguarding and Child Protection

1. Context
2. Vulnerable children
3. Attendance monitoring
4. Designated and Deputy Safeguarding Leads in our school
5. Reporting a concern
6. Safeguarding training and induction
7. Safer recruitment/volunteers and movement of staff
8. Children and online safety away from school
9. Supporting children not in school
10. Supporting children in school
11. Peer on Peer Abuse and All Safeguarding Concerns

1 Context

During this pandemic there have been occasions where parents have been asked to keep their children at home, and for schools to remain open only for the Kindergarten, Reception and Year 1 classes only. Schools and all childcare providers were asked to provide care for a

Authors: Safeguarding Team For the attention of all staff January 2023 41 Pages

Safeguarding & Child Protection Policy

limited number of children - children who are vulnerable, and children whose parents' jobs are critical to the COVID-19 pandemic and cannot be safely cared for at home.

2 Vulnerable children

This includes children with SEND needs and students who are living on their own. Each vulnerable child will be allocated to the Designated Safeguarding Lead, Deputy Designated Person, Child Protection Officer or Head of Year that they can contact. The person responsible will make phone contact with each allocated child on a regular basis to check their safety and wellbeing by speaking to the child, not just the parent/carer. The Safeguarding team will record a summary of conversations in line with the school's safeguarding procedures and protocols. Any unsuccessful contacts, as well as those that did take place will also be recorded. Any urgent safeguarding concerns will be escalated immediately, for example, through the local authority and/or the police immediately. In circumstances where a parent does not want to bring their child to an education setting, and their child is considered vulnerable, the social worker and the school will explore the reasons for this directly with the parent, and a risk assessment is made. Where parents are concerned about the risk of the child contracting COVID19, the school will talk through these anxieties with the parent/carer following the advice set out by the Romanian Government. We will encourage our vulnerable children and young people to attend a school, including remotely if needed.

3 Attendance Monitoring Online

Marking attendance while our students are working from home is extremely important. Firstly to make sure they are following and are up-to-date with the work set, secondly and most importantly to record the level of involvement and engagement. When this becomes a low percentage for a student, these risk factors on safeguarding go up. It is the role of the tutor to check in on their students on a daily basis just like normal tutor time. If a student misses 2+ days of tutor time or lessons, the tutors need to proceed to make a call home to the parents to check in with the student. If no contact was able to be made then the tutors need to report this straight to the safeguarding team via iSAMs. If a student is off ill due to contracting Coronavirus, then they must be marked in with an E on the iSAMS register. The school will agree with parents/carers whether children in need should be attending school - we will then follow up on any pupil that was expected to attend, who does not. We will also follow up with any parent or carer who has arranged care for their child/ren and the child/ren subsequently do not attend. Only students who have had both vaccinations, or have had COVID-19 within the last 180 days will be considered to come into school, in the case of a partial isolation within the school.

How will this look in our school? To support the above, we will, when communicating with parents and carers, confirm emergency contact numbers are correct and ask for any additional emergency contact numbers where they are available.

4 Designated and Deputy Designated Safeguarding Leads in our school

When the DSL/DDP/CPO is not on site, they will always be available to communicate via phone, video conference and emails. Where a trained DSL or DDP is not on site, in addition to the above, the CPO will assume responsibility for coordinating safeguarding on site. This might include updating and managing access to school's safeguarding data/information.

Authors: Safeguarding Team For the attention of all staff January 2023 41 Pages

Safeguarding & Child Protection Policy

Regulating actions and informing parents where appropriate. Staff will liaise with the offsite DSL/DDP and as required liaising with children's social workers where they require access to children in need and/or to carry out statutory assessments at the school. It is important that all our staff and volunteers have access to a trained DSL or DDP. On each day staff on site will be made aware of who the Safeguarding lead in charge is.. The DSL and DDP will continue to engage with their daily roles as part of the safeguarding team which can be done remotely.

5 Reporting a concern

Where members of staff have a concern about a child, they should continue to follow the process outlined in our school's Safeguarding Policy and share the concern with DSL or DDP via regular school safeguarding processes. Staff members are reminded of the need to report any concern immediately and without delay. Where staff members are concerned about an adult working with children in the school, they should report the concern to the DSL who will also inform the Head of School that a potential investigation may occur. If there is a requirement to make a notification to the DSL whilst away from school, this should be done by contacting the DDP who will then contact the DSL. . Concerns around the Head should be directed to the Safeguarding Governor who will inform the Chair of Governors of a potential investigation, but who then takes no further part until the investigation is complete.

6 Safeguarding training and induction

DSL training is very unlikely to take place whilst there remains a threat of the COVID-19 virus. For the period COVID-19 measures are in place, a DSL or DDP who has been trained will continue to be classed as a trained DSL or DDP even if they miss their refresher training. All existing school staff have had safeguarding training and have access to Keeping children safe in education (2020). The DSL will communicate with staff any new local arrangements so Covid-19 Safeguarding Policy Addendum. Where new members of staff are recruited, or new volunteers enter the school, they will continue to be provided with a safeguarding induction.

7 Safer recruitment/volunteers and movement of staff

If in the case of going into lockdown and online learning, Royal School will still ensure recruitment is completed in line with its safer recruitment policy.If in the case of going into lockdown and online learning, Royal Schools recruitment process will still remain the same.

8 Children and online safety away from school

It is important that all staff members who interact with children online, continue to look out for signs a child may be at risk. Any such concerns should be dealt with as per our Safeguarding Policy and where appropriate referrals should still be made to the local authority and/or the police immediately. Online teaching should follow the same principles as set out in our school's contracts.

When virtual lessons take place, below are some things to consider when delivering virtual lessons, especially where webcams are involved:

- Where it is possible no one to one sessions, teach in groups only. If there is only one student in the class and in the chosen subject, then please then have your lessons in

Safeguarding & Child Protection Policy

the teachers rooms. Where in the case if you are in isolation, make sure all lessons are recorded.

- Teachers should be in a neutral area where nothing personal or inappropriate can be seen or heard in the background.
- Staff and children must wear suitable clothing, as should anyone else in the household.
- Any computers used should be in appropriate areas, for example, not in bedrooms; and where possible be against a neutral background.
- The live class should be recorded and backed up elsewhere, so that if any issues were to arise, the video can be reviewed.
- Live classes should be kept to the scheduled time of the lesson.
- Language must be professional and appropriate, including any family members in the background
- We have risk assessed the use of live learning using webcams
- Data Controllers need to reassure themselves that any teaching/learning software and/or platforms are suitable for the age groups.

We will continue to provide a safe environment for our pupils, including online. This includes education around staying safe online, but also making sure that students know who to go to for support. This can be tutors/teachers/safeguarding team, it is the duty of every member of staff to report any concerns to the safeguarding team.

9 Supporting Children

Royal School will be ensuring the safety and wellbeing of all its children and young people. Where the DSL has identified a child who normally receives pastoral-type support in school, we will ensure that a communication plan is in place and agreed upon by the student in need of the support and their parents. Details of this plan will be recorded appropriately as will a record of contact. The communication plans can include; remote contact, phone contact, door-step visits. Other individualised contact methods can be considered and will be recorded. Our DSL will work closely with all involved to make sure the communication plan is being followed and recorded correctly. This plan will be reviewed regularly (at least once a fortnight) and where concerns arise, the DSL will consider any referrals as appropriate. The school will share safeguarding messages on its website and social media pages. We recognise that school is a protective factor for children and young people and the current circumstances can affect the mental health of pupils and their parents/carers. When setting work for our students teachers will need to keep this in mind when setting expectations of pupils' work where they are at home.

10 Supporting Children In School

In the case of their being a class/classes in temporary isolation and in the event of partial numbers of students still coming into school, we will be making sure the safety and wellbeing of these pupils are also being met in accordance with the safeguarding policy. We will continue to be a safe space for all children to attend and flourish.

11 Reporting Abuse and All Safeguarding Concerns

We recognise that during the closure a revised process may be required for managing any report of such abuse and supporting victims. When we receive a report of any safeguarding

Safeguarding & Child Protection Policy

concerns or risks to our students, we will follow the principles and guidance outlined within our Safeguarding Policy. The school will listen and work with the young person, parents/carers and any relevant local authority to ensure the safety and security of that young person.

Royal School Student Network Access Agreement

Royal School (RS) provides access to the network and Internet for the purposes of educational research and my learning. RS will monitor use of the Internet and prohibit the use of sites that are considered age inappropriate or in any other way unacceptable.

Our children are being educated for a rapidly changing world.

We believe it is important for them to learn how to use technology effectively and responsibly.

The Internet offers opportunities for students to:

- Gain access to vast stores of information around the world;
- Collect and share information;
- Communicate and collaborate with students around the world;
- Develop literacy, writing and critical thinking skills;
- Increase competencies in using computer-based technologies;
- Participate in global projects.

CODE OF CONDUCT FOR USING THE INTERNET

I understand that access to the network and Internet is for educational research and for my learning. I agree to the following conditions in order for me to have access:

In order for your child to have access to the facilities of the network and Internet you must read the following rules and indicate your commitment to abide by them by signing where indicated

- I understand that using the Internet at Royal School is for educational, research or learning purposes only.
- Before I begin to use the Internet I will ask permission of the teacher and explain my purpose.
- I will show the teacher any message before I send it.
- I will tell the teacher if I find strange or inappropriate material.

Safeguarding & Child Protection Policy

- I will refrain from accessing any newsgroups, links, chat lines, web pages or any other part of the Internet that the Headmaster or Administration consider offensive and not for educational use.
- I am personally responsible for monitoring and where necessary rejecting material, links, attachments, dialogues and information accessed or received by me.
- I will not use the Internet to play non-educational games.
- I will be courteous and use appropriate language. I will not use obscene, harassing or abusive language and I will report any use of such language to a member of staff at school.
- I accept responsibility for keeping copyrighted material from entering the school. I will not download any software, games, music, graphics or videos or text materials that to my knowledge have copyright. I will not violate any copyright laws by posting or distributing copyrighted material. The only exception to this will be where written permission has been sought, and granted, by the materials recognised Intellectual Property owner.
- I will not knowingly plagiarise any material sourced from the Internet. I will list any material that I use from the Internet as a bibliography.
- I will not download software from the Internet without permission from the teacher.
- I will not deliberately disclose my, or another's personal information, including usernames, passwords, personal names, addresses, credit card details, IP addresses, URLs or telephone numbers to a third party, unless teacher directed.
- I will not deliberately damage any Server, computer or attached device, or access any part of the computer network to which I am not explicitly authorised.
- I will not bring in to the school premises any removable storage media (USB drives, CD's, DVD's, etc.). Only removable storage media provided by the school and kept securely within the school may be used.
- I will talk to my parents and teachers about what I do on the Internet, for example social networking sites, computer games, media sharing sites, and keep to the recommended age restrictions.
- I will remember that things written on the social networking sites are published worldwide and can be seen by other users, and that therefore any posts must be polite and fair, and not lead to another person feeling demeaned, harassed or bullied
- I agree to pay for any printing costs beyond that allocated to me for my academic purposes without prior arrangement with the Administration.
- If I violate any terms of this agreement I may be denied access to the network and Internet for a period of time, determined by, and at the sole discretion of the Headmaster and the Administration and I may face disciplinary action as determined by the Headmaster.

Stay safe – don't give out any personal information;

Always tell – someone if you see something that you don't like or upsets you; and

Never meet – with someone you have only ever met before online

Safeguarding & Child Protection Policy

Student Name: _____

Signature: _____

Date: _____

Parental agreement

As the parent / guardian of: _____

Computer user name: _____

I hereby acknowledge that I have read this agreement and discussed it with my child. I understand network and Internet access is for educational purposes only. I understand that every effort to monitor the use of the Internet will be made by Royal School and that the school will endeavour to prevent access to all unsuitable material. However, I recognise that unsuitable material exists on the Internet, this material being accessible if the user actively seeks to find it. I therefore do not hold the Director or his teachers responsible for any material acquired from the Internet.

Parent / guardian signature: _____ **Date:** _____

I have read the above agreement with my parents, and I agree to abide with the guidelines.

Student signature: _____ **Date:** _____

Please return the whole form to your form tutor for placement in your student portfolio.

Safeguarding & Child Protection Policy
Appendix 2

Written Disclosure Form	
Students Name	
Students Date of Birth	
Date (when you were told about incident)	
Does the student you're concerned about know this form is being completed? If not, why?	
Details of disclosure that has been said to you	
If given by the student, details of the alleged abuser (don't ask questions or investigate yourself if these details have not been given freely)	
Date and Time of written record	
Your Name	
Your Position	

If you have used additional sheets to complete this record of concern please staple them to this form and write the number of additional sheets here _____

Attach this form to the iSAMS concern you have raised if a disclosure has been made to you in regards to a child's safety or harm.

If the DSL has asked you to fill this out after you have initially sent the welfare concern on iSAMS, then complete it as soon as you can and give them the physical copy.

Appendix 3

Student Witness Statement	
Name	
Year/Tutor Group	
Date of Incident	
Time of Incident	
Statement (write only what you have seen)	
Did anyone else witness the incident, is yes who	<input type="checkbox"/> <input type="checkbox"/>
What I have written is a fair and honest description of what happened	<input type="checkbox"/> <input type="checkbox"/>
Your Signature	
Today's Date	
Staff Signature	

Safeguarding & Child Protection Policy

If you have used additional sheets please staple them to this form and write the number of additional sheets here _____

Appendix 4

Staff Witness Statement	
Name	
Position	
Date of Incident	
Time of Incident	
Statement (write only what you have seen)	
Did any other staff witness the incident, is yes who	<input type="checkbox"/> <input type="checkbox"/>
Your Signature	
Today's Date	

If you have used additional sheets please staple them to this form and write the number of additional sheets here _____