COGNITA

Safeguarding and Child Protection Policy and Procedure
Summary

Please note: all policy and procedures are subject to local law and practice

September 2021

Contents

1 Safeguarding in our school

1.1 Definition of safeguarding and terminology

Definition
Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

• protecting children from maltreatment;
• preventing impairment of children's physical and/or mental health, or development;
• ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
• taking action to enable all children to have the best outcomes.

Terminology
'Children' includes everyone under the age of 18
'DSL' refers to the school's named Designated Safeguarding Lead
'DDSL' refers to the school's named Deputy Safeguarding Lead
'EYDSL' Early Years Designated Safeguarding Lead
'MD' refers to the Managing Director (Middle East)
'HHR' refers to the Head of Human Resources

1.2 Our aims and responsibilities

Our commitment is to safeguard and promote the welfare, physical and mental health, and safety of our pupils by creating and maintaining an open, safe, caring and supportive atmosphere. This includes:

• Proactively teaching pupils about safeguarding
• Ensuring that systems and procedures are in place to protect pupils equally regardless of age, gender, ability, culture, race, language, religion or identity
• Acting in the best interests of the child

If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child, taking into consideration the views and wishes of the child. All staff have the following responsibilities whilst always adhering to the laws and procedures of the UAE:

• Contribute to providing a safe environment in which all children can learn and flourish
• Be aware of Early Help processes and their role in identifying children who may benefit

- Know what to do if a child says that he or she is being abused or neglected, including being aware of the processes for contacting the authorities as needed
- Know what to do if they are concerned about the behaviour or conduct of an adult in the school

1.3   Who this policy applies to

This policy applies to all pupils in the school, and all teaching, non-teaching, residential, pastoral, support, peripatetic, contract staff and ancillary staff, agency/supply staff, volunteers, non-school based Cognita staff and any other adults working at the school. All references in this document to "staff" or "members of staff" should be interpreted as relating to the aforementioned, unless otherwise stated. This also applies to adults in the early years phase of the school.

This policy also applies to all of the above when being educated off-site and undertaking an educational visit. They also apply to students who are on an exchange and being hosted by the school.

1.4   Inter-agency working

The school is committed to inter-agency working in order to secure the best levels of safeguarding for all of its pupils. There are occasions, for example, if we have concerns that a child is being abused, which may mean that we need to consult other agencies. We always aim to work in partnership with parents to ensure that the appropriate support and interventions are in place to support the child.

1.5   Related documentation

This policy should be read in relation to the most recent version of the following documents published by the UK government which underpins this policy and our safeguarding processes in Cognita:

UK National documents:

- The Education (Independent School Standards) Regulations 2014
- Keeping Children Safe in Education (KCSIE) (Sep 2021)
- Working Together to Safeguard Children (July 2020)
- Early Years Foundation Stage Framework (2021)

Our work must always also adhere and respect the laws and procedures of the UAE, namely:

Federal law No. 3 regarding child protection often referred to as 'Wadeema's Law' and Local Safeguarding Guidelines/Child Protection Procedures – UAE Ministry of Interior   UAE Department for Health, School Health Guidelines for Private Schools 2011 UAE School Inspection Framework 2016, Section 5 The protection, care,   guidance and support of students http://www.moi-cpc.ae/en/default.aspx
https://government.ae/en/information-and-services/social-affairs/children

This policy should also be read in conjunction with our other school policies.

1.6   Safer recruitment

Our school prioritises embedding a culture of safer recruitment as part of our strategy for preventing harm to children. Statutory procedures for checking the suitability of staff and volunteers who work with children are always followed (see Safer Recruitment Policy).

1.7   Policy review

The Safeguarding and Child Protection policy is reviewed and updated annually, drawing on feedback from staff, and is published to all staff. This includes an evaluation of the extent to which these policies have been effectively implemented throughout the school. The school will remedy any deficiencies or weaknesses in safeguarding arrangements without delay and without waiting for the next policy review date, should any be necessary. This summary of the policy is placed on the school website.

1.8   Information sharing

Information sharing is vital in identifying and tackling all forms of abuse and neglect. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children. School staff should, therefore, be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to the authorities. This includes the sharing of information without parental consent where there is good reason to do so, i.e. the risk of harm to the child will be increased.

2   Key people and contacts

School contacts	
Designated Safeguarding Lead (DSL)	Lizzie Varley
Deputy Designated Safeguarding Lead (Lead Deputy DSL)	Asma Ahmad
Other Deputy DSL staff	David Tangney Aislinn McCabe Katherine Morris
Designated Practitioner responsible for safeguarding in Early Years	Asma Ahmad
Inclusion Champion(s)	Lizzie Varley Aislinn McCabe
Mental Health Lead	Asma Ahmad
Anti-Radicalisation Lead	Lizzie Varley
Principal	Ian Wallace
Cognita (proprietor) contacts	
Cognita Consultant Safeguarding Advisor (ME) (see note below)	Alison Barnett alison.barnett@cognita.com
Managing Director (ME)	David Baldwin David.baldwin@cognita.com
General Counsel	Jayne Pinchbeck Jayne.pinchbeck@cognita.com

Cognita (proprietor) board member with responsibility for safeguarding	The Cognita Board Member with responsibility for safeguarding is Frank Maassen Frank.Maassen@cognita.com

Note: The Cognita Consultant Safeguarding Advisor (ME) is a role which supports the development of effective safeguarding practice within the Cognita family of schools and is not intended to replace, in any way, referral and reporting requirements in the UAE.

3   Types of abuse

The term 'abuse' is often used as an umbrella term. Our staff are aware of indicators of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection. Abuse and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

Physical abuse	Emotional abuse	Sexual abuse	Neglect

The following definitions of abuse are taken from WTSC (2020), which is UK government guidance. **However, staff should always adhere to the laws and procedures of the UAE.

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

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

3.3   Emotional abuse
Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Emotional abuse also often occurs when the child sees or hears domestic abuse occurring in the home. The definition of domestic abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or

abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or identity. The abuse can encompass, but is not limited to: psychological; physical; sexual; financial; and emotional. Exposure to domestic abuse can have a serious, long lasting emotional psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

3.4 Sexual abuse

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 but may also include noncontact activities. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. The sexual abuse of children by other children is a specific safeguarding issue in education called Peer on Peer abuse and is explored below.

3.5 Neglect

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 involve a parent or carer failing to:

provide adequate food, clothing and shelter (including exclusion from home or abandonment);

protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure

access to appropriate medical care or treatment.

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

3.6 Honour Based Abuse (HBA)

HBA includes all incidents or crimes which have been committed to protect or defend the honour of the community and/or the family, and commonly involve practices such as FGM, forced marriage and/or breast flattening. Abuse often involves a wider network of family or community pressure and therefore it is important to be aware of this dynamic and consider risk factors when deciding on action.

3.7 Behavioural signs of abuse

If a child is being abused, their behaviour may change in a number of ways. For example, they may:

- behave aggressively or be disruptive, act out, demand attention and require more discipline than other children;
- become angry or disinterested and/or show little creativity;
- seem frightened of certain adults;
- become sad, withdrawn or depressed;
- have trouble sleeping;
- exhibit inappropriate sexual knowledge for their age or sexualised behaviour in their play with other children;
- refuse to change for gym or participate in physical activities;
- develop eating disorders;
- self-harm and/or express suicidal ideation;
- refuse to attend school or run away from home;
- lack confidence or have low self-esteem; or
- use drugs or alcohol as a coping strategy

3.8   Emotional Wellbeing and Mental Health

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. All staff are aware of how these children's experiences can impact on their mental health, behaviour and educational progress. They 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.

All staff are also aware that deteriorating emotional wellbeing and escalation of mental health problems can, *in some cases*, be an indicator that there is an underlying safeguarding concern, for example, a child has suffered or is at risk of suffering abuse, neglect, bullying/cyberbullying or exploitation. Please note, however, that only appropriately trained health professionals are able to make a diagnosis of a mental health problem.

Whilst all children should be protected, some groups of children are potentially at greater risk of harm (including online harm). For example, this vulnerable group includes, but is not limited to: those pupils of determination, young carers, those with a parent in prison, those with identity difficulties and those living in homes characterised by domestic abuse and/or parental acrimony.

3.9   Pupils of determination

Pupils of determination are statistically more vulnerable to child abuse, including peer on peer abuse. Additional barriers can exist when recognising abuse and neglect in this group of children. These include:
•   assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
•   assumptions that pupils of determination can be disproportionately impacted by things like bullying without outwardly showing any signs; and
•   communication barriers and difficulties in overcoming these challenges.

3.10   Signs of abuse or neglect manifested by the parents or other responsible adult
•   places unrealistic expectations on the child, i.e. demands a level of academic or physical performance of which they are not capable;
•   offers conflicting or unconvincing explanation of any injuries to the child;
•   delays seeking medical treatment for the child's mental/physical health
•   appears indifferent to, is emotionally unavailable, or overtly rejects, the child;
•   denies existence of or blames the child for the child's behaviours at home or at school;
•   sees and describes the child as entirely worthless, burdensome or in another negative light;
•   refuses offers of support to meet the child's needs;
•   refuses to consent to referrals to external agencies to meet their child's needs/does not engage as expected

3.11   Grooming

Grooming is a 'process' by which an individual prepares a child, significant adults and the environment for abuse of this child. Children and young people can be groomed online or in the real world, by a stranger or by someone they know. Groomers may be of any gender or identity. They could be of any age, including another young person. Many children and young people do not understand that they have been groomed, or that what has happened is abuse. The signs that a child is being groomed are not always obvious. Groomers will also go to great lengths not to be identified.

A child may be experiencing abuse *online* if they:
- spend lots, much more, or much less time online, texting, gaming or using social media;
- are withdrawn, upset or outraged after using the internet or texting;
- are secretive about who they're talking to and what they're doing online or on their mobile phone; and/or
- have lots of new phone numbers, texts or e-mail addresses on their mobile phone, laptop or tablet.
- have more than one phone

3.12 Signs of grooming for radicalisation

All schools should have regard to the need to prevent people from being drawn into terrorism. There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

3.13 Contextual Safeguarding

Contextual Safeguarding is an approach to understanding, and responding to young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers often have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships. Contextual Safeguarding, therefore, expands the objectives of child protection systems in recognition that young people are vulnerable to abuse beyond their front doors. This also includes the risk of abuse occurring in or outside of school.

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

CSE is a form of child sexual abuse (see above) and occurs where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into *sexual* activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator.

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any *criminal* activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

3.15 Children Missing in Education

Staff are aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation, and can also be a sign of child criminal exploitation. It may indicate mental health difficulties, risk of illegal substance abuse, risk of travelling to conflict zones, risk of Honour Based Abuse. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going

missing in future. We will work with parents to encourage good attendance and share concerns as needed.

4 Stages of safeguarding

The school will always work cooperatively with external agencies **and adhere to the laws and procedures of the UAE.** The diagram opposite outlines the hierarchy of approaches.
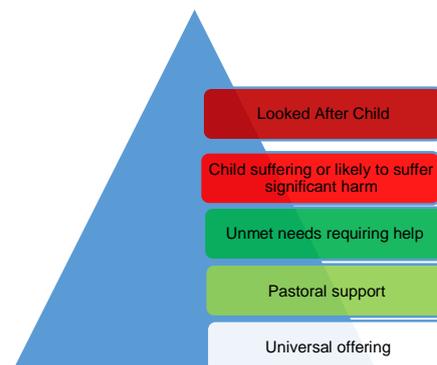

4.1 Unmet needs requiring early help

Early help means providing support as soon as a problem emerges, at any point in a child's life. If early help is appropriate to support parents to meet their child's needs, the DSL or DDSL will generally lead on liaising with the parents, and other agencies as appropriate. Staff may be required to support other agencies and professionals in any assessment of need. Any such cases should be kept under constant review and consideration may be given to a referral to the authorities if the child's situation does not appear to be improving or is getting significantly worse.

4.2 Children suffering or likely to suffer significant harm

There are occasions that our concerns about a child may mean that we need to consult other agencies. We always aim to work in partnership with parents to ensure that the appropriate support and interventions are in place to support the child. The authorities, with the help of other organisations as appropriate, have a responsibility to investigate if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect. Should an investigation occur, then the school's involvement and any action may be determined on the advice given by the investigating agency.

4.3 What to do if you have a concern about a child in the school

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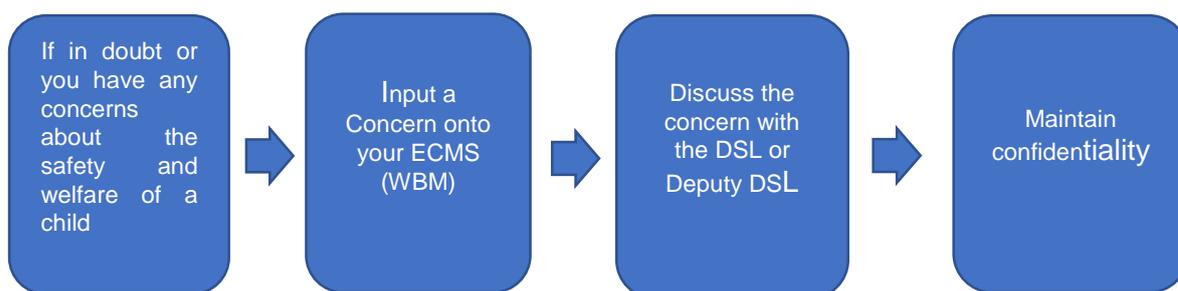
Safeguarding and promoting the welfare of children is **everyone's responsibility**.

All staff should know what to do when a child discloses abuse to them, they have concerns about a child's welfare, or when children or staff raise concerns about a pupil to them.

<u>Making referrals to the authorities</u>

If a child is thought to be at risk of harm

When a child is thought to be at risk of harm or is likely to be at risk of harm (see above), after full consideration, the authorities may be contacted. This is the role of the DSL or Principal. The school does **not** require parental consent for the above contact to be made but will be informed unless doing so would put the child's safety at increased risk or could jeopardise any investigation by partner agencies.

If a child has unmet needs

When a child is not considered at risk of harm, but still has unmet needs, any concerns will be discussed with the parents and any subsequent contact to the authorities made transparently with the parent's knowledge unless to do so would place the child at heightened risk.
Confidentiality

Whilst it is always important to take into consideration the wishes and feelings of a child, staff should never guarantee confidentiality to pupils or adults wishing to tell them about something serious, as this may ultimately not be in the best interests of the child. They should guarantee that they will not tell anyone who does not have a clear need to know and that they will pass on information in confidence only to the people who must be told in order to ensure their safety.

4.4 <u>Passing on safeguarding records when a child leaves the school</u>
Information sharing is vital in identifying and tackling all forms of abuse. Whilst data protection legislation places duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure, this is not a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm. Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

If we have concerns about a child's safety, we have a duty to contact the relevant authorities. However, we will not share safeguarding information with a new school, until we have notified the authorities and obtained guidance from the authorities on whether we can share the safeguarding information with the new school. Upon approval from the authorities, we may need to share the safeguarding information with the new school. However, the child's place at the new school will be confirmed and the child enrolled at the school before the information is shared.

5 The role of the Designated Safeguarding Lead and Deputy Designated Safeguarding Lead

The Designated Safeguarding Lead (DSL) is the senior member of staff responsible for leading safeguarding and child protection matters in the school (including online safety). The

Deputy DSL role is to support the DSL in their role. Whilst the *activities* of the DSL can be delegated to DDSLs, the ultimate lead responsibility for child protection must remain with the DSL, and this lead responsibility must not be delegated.

There are 3 key elements to the DSL/DDSL role. They will:

• Manage contact and referrals to authorities where there are concerns about their safety
• Work with other agencies and parents to meet any unmet needs of their children
• Raise awareness of safeguarding within the school staff group and offer learning opportunities

6 Responsibilities of the proprietor

Cognita is the proprietor of the school. As proprietor, Cognita will comply with all duties under legislation and will always take into account statutory guidance, ensuring that all policies, procedures and training are effective and comply with the law at the time. The proprietor ensures than an annual review of safeguarding arrangements is conducted. This includes a written report which is presented to the Cognita Board.

7 Induction, training and teaching

Induction
At the point of induction, **all** new school employed staff must be provided with, and should read:
• KCSIE 2021 – Part One (contact with children) and/or Annex A (no contact)
• The Safeguarding and Child Protection Policy and Procedure, including whistleblowing;
• Staff Code of Conduct and Acceptable Use of IT Policy (including staff/pupil relationships and communications);
• Digital Safety Policy (including use of social media);
• Anti-Bullying Policy;
• Behaviour Policy
At the point of induction, new staff must be informed of the names and role of the DSL and any DDSLs. Likewise, all agency/supply staff must be informed of those with these roles, and of the school processes for raising concerns about children or adults in the school.

Training
All staff employed in school receive Basic Safeguarding awareness training which must be updated every three years or less. In addition to this, all staff will also receive safeguarding updates, including online safety, regularly throughout the year, provided by the DSL, in order to provide them with relevant skills and knowledge to safeguard children effectively. Those in the DSL, DDSL or Principal role will also receive Advanced Safeguarding training every two years via Cognita/agreed other provider. Third-party contractors who work regularly in school (with the opportunity for contact with pupils) will be encouraged to also complete Basic Safeguarding training, at a level appropriate to their role.

Teaching
The school is committed to proactively teaching children about safeguarding, including online safety, as part of our approach to offering a broad and balanced curriculum. Through ongoing work with the children, we aim to build resilience so that every child knows that we are a

'telling school' and that speaking up about any concern is valued and actively promoted. This includes raising a concern about themselves or about another.

8   Online Safety

Technology often provides the platform that may facilitate harm. All staff are aware of the unique risks associated with online safety, and that technology is a significant component in many safeguarding and wellbeing issues. DSLs are responsible for overseeing online safety in schools and should raise awareness in the staff group accordingly. The school will protect and educate the school community in their use of technology and has mechanisms to identify, intervene in, and escalate any incident, where appropriate.

There are four main areas of risk:
Content: being exposed to illegal, inappropriate or harmful material.
Contact: being subjected to harmful online interaction with other users.
Conduct: personal online behaviour that increases the likelihood of (or causes) harm; for example, the making, sending and receiving of explicit images, or online bullying.
Commercial: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

Pupils and staff at the school will not be allowed to access personal mobile devices during school time, and all school devices will have appropriate software/filtering to ensure effective and safe use.

9   Peer on peer abuse

Peer on peer abuse is any form of abuse perpetrated by *a child towards another child*. It can take many different forms, including, but not limited to:

- serious bullying (including cyber-bullying) and youth violence
- relationship abuse and domestic violence
- harmful sexual behaviours
- gender-based violence

It can often be difficult to distinguish between abusive behaviour and behaviour which does not constitute abuse. Factors which may indicate that behaviour is abusive include:

- where it is repeated over time and/or where the perpetrator (s) intended to cause serious harm;
- where there is an element of coercion or pre-planning; and
- where there is an imbalance of power, for example, as a result of age, size, social status or wealth.

Staff are trained on the nature, prevalence and effect of peer on peer abuse, and how to prevent, identify and respond to it. The school actively seeks to prevent all forms of peer on peer abuse by educating students and staff, challenging the attitudes that underlie such abuse, encouraging a culture of tolerance and respect amongst all members of the school community, and responding to all cases of peer on peer abuse and any cases of bullying or cyber-bullying promptly and appropriately.

Children are educated about the nature and prevalence of peer on peer abuse in a child friendly and age-appropriate manner. They are told what to do if they witness or are victims of such abuse, the effect that it can have on the victims and the possible reasons for it, including vulnerability of the perpetrator. They are informed about the school's approach to such issues, including its zero-tolerance policy towards all forms of bullying and peer on peer abuse.

10   Staff conduct

All staff must behave responsibly and professionally in all dealings with children for whom they have a duty of care. Staff should always avoid behaviour which might be misinterpreted by others. As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people are in positions of trust in relation to the young people in their care. A relationship between a member of staff and a pupil cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people and all members of staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

The safety and wellbeing of children in our school is dependent on the vigilance of all our staff and their prompt communication to the DSL or Principal of any concerns, no matter how small or seemingly low level, about any conduct by an adult which causes them to doubt that adult's suitability to work with or have access to children. The notification and prompt handling of all concerns about adults, including those raised by individuals about themselves, is fundamental to safeguarding children. It helps to identify and prevent abuse and to protect adults against misunderstandings or misinterpretations. It also encourages openness, trust and transparency and it clarifies expected behaviours.

Those raising concerns or reporting allegations in good faith will always be supported, and adults in respect of whom concerns or allegations have been raised will not suffer any detriment unless the concern or allegation is found to be substantiated. Allegations represent situations that might indicate a person would pose a risk of harm to children if they continue to work in regular or close contact with children in their present position, or in any capacity. This policy applies to all adults in the school if it is alleged that they have met one of the following four statements;

•   behaved in a way that has harmed a child, or may have harmed a child;
•   possibly committed a criminal offence against or related to a child; or
•   behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children.
•   behaved or may have behaved in a way that indicates they may not be suitable to work with children (potential transfer of risk)

An allegation may be triggered by one specific incident or by a pattern of behaviour by the adult, or one or more low level concerns which when considered *collectively* amount to an allegation. In these situations, the school will conduct full investigations and refer to the authorities as appropriate.

11   Letting School premises

Schools have a duty to ensure that appropriate arrangements are in place to keep children safe when allowing outside organisations to use their facilities. If the activity is being run by the school, or overseen by the school, then the school's safeguarding policy and procedures apply. If not, then the school will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed). Should the organisation wishing to use the school premises not have any safeguarding polices or procedures in place, then the organisation should not be allowed to let the facilities. The school should also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

Ownership and consultation	
Document sponsor	General Counsel
Document author	Alison Barnett – Consultant Safeguarding Advisor (ME)

Document application and publication	
UAE	Yes
England	No- alternative version
Wales	No - alternative version
Spain	No - alternative version

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