



## Document Control Sheet

Document Title: BESA Child Protection & Safeguarding Policy

Circulation: General

	Prepared By	Reviewed By	Approved By
Original	Katie Vincent	KV / AR / PC	Board Signature Date: Nov. 2019
1 <sup>st</sup> Review September 2020	Katie Vincent		Board Signature Date: Oct. 2020
2 <sup>nd</sup> Review September 2021	Katie Vincent		Board Signature Date: Sept. 2021
3 <sup>rd</sup> Review September 2022	Katie Vincent		Board Signature Date: Sept. 2022
4 <sup>th</sup> Review September 2023	Katie Vincent		Board Signature Date: Sept. 2023

# BESA Child Protection and Safeguarding policy

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## **Policy statement and principles**

The British Embassy School Ankara (BESA) is committed to safeguarding and promoting the welfare of children and young people, along with their protection and expects all staff and volunteers to share this commitment. Adults in our school take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them. We will always act in the best interest of the child.

This policy is one of a series in the school's integrated safeguarding portfolio. Where appropriate, reference has been made to these policies throughout this document.

This policy is available on the school website and is included within the staff induction package.

This policy and its arrangements are intended to protect all children at the school, including those in the Early Years Foundation Stage.

At BESA our core safeguarding principles are:

- safeguarding is everyone's responsibility
- the school's responsibility to safeguard and promote the welfare of children is of paramount importance
- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection
- safer children make more successful learners
- policies will be reviewed at least annually unless an incident or new legislation or guidance suggests the need for an interim review.
- All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm
- Pupils and staff involved in child protection issues will receive appropriate support

## **Child protection statement**

At BESA we recognise our moral and statutory responsibility to safeguard and promote the welfare of all pupils. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice.

The procedures contained in this policy apply to all staff, volunteers and governors.

## Policy aims

- To provide all staff with the necessary information to enable them to meet their child protection responsibilities
- To ensure consistent good practice
- To demonstrate the school's commitment with regard to child protection to pupils, parents and other partners

## Terminology

- Safeguarding and promoting the welfare of children refers to the process of protecting children from maltreatment, preventing the impairment of children's mental & physical 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.
- Child protection refers to the processes undertaken to protect children who have been identified as suffering or being at risk of suffering significant harm.
- Staff refers to all those working for or on behalf of the school, full time or part time, temporary or permanent, in either a paid or voluntary capacity.
- DSL refers to the designated safeguarding lead at the school
- Child includes everyone under the age of 18.
- Parent refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents.
- Victim is a widely understood and recognised term. At BESA we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described in that way. When managing an incident, we will be prepared to use any term that the child involved feels more comfortable with.
- Alleged perpetrator(s) and perpetrator(s) are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what is appropriate and which terms to be used on a case-by-case basis.

## Safeguarding legislation and guidance

The following UK safeguarding legislation and guidance has been considered when drafting this policy:

- Keeping Children Safe in Education (KCSIE) 2023
- The Standards for British Schools Overseas 2023
- The Teacher Standards -updated 2021
- Working Together to Safeguarding Children 2018
- What to do if you're worried a child is being abused 2015
- Human Rights Act 1998 & Equality Act 2010

In addition the school strives to fully comply with Turkish Safeguarding legislation (TCK madde 86, 87, 103)

## Roles and responsibilities

Safeguarding is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school. Our policy & procedures also apply to extended school and off-site activities.

The school plays a crucial role in preventative education. This is in the context of a whole school approach to preparing pupils for life in modern society, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment. This will be underpinned by our behaviour policy, pastoral support system and a planned system of relationships, sex and health education (RSHE) which is inclusive and delivered regularly.

- The designated safeguarding lead (DSL) for child protection is: **Katie Vincent (Deputy Head Teacher)**  
email: [kvincent@besaturkey.org](mailto:kvincent@besaturkey.org) tel: 0532 771 5458 / 0312 468 6563
- The deputy designated lead(s) is **Sarah Sener (Student Support Lead)**  
email: [ssener@besaturkey.org](mailto:ssener@besaturkey.org) tel: 0312 468 6563
- The nominated child protection governor is **Babylonia Aziz**  
email: [babyloniaaziz@gmail.com](mailto:babyloniaaziz@gmail.com) tel: 0531 609 2372
- The headteacher is **Andrew Ryan**  
email: [aryan@besaturkey.org](mailto:aryan@besaturkey.org) tel: 0535 796 59 52 / 0312 468 6563

**The Designated Safeguarding Lead (DSL):** The designated safeguarding lead (DSL) takes lead responsibility for safeguarding and child protection in the school. As a member of the senior

leadership team the DSL has the status and authority within the school to carry out the duties of the post, which include:

- ensuring the child protection policies are known, understood and used appropriately by staff, reviewed annually and publically available
- advising and supporting staff on child protection and safeguarding matters
- acting as a source of support, advice and expertise for all staff
- encouraging a culture of listening to children
- ensuring that child protection records are kept up to date
- managing safeguarding referrals within school and to external agencies as appropriate.
- taking part in strategy discussions and inter-agency meetings
- liaising with staff (for example the school nurse, pastoral support lead, SENDCO, Senior Mental Health Lead) on matters of safety and safeguarding and welfare (including online & digital safety).
- Liaise with the senior mental health lead where safeguarding concerns are linked to mental health.
- liaising with the “case manager” and the designated officer(s) where allegations are made against staff
- making staff aware of training courses and the latest safeguarding arrangements & updates
- transferring the child protection file to a child’s new school
- undergoing training and receiving regular updates to maintain the knowledge and skills required to carry out the role, including Prevent awareness training and understanding of what constitutes harmful sexual behaviour
- being aware of what local specialist support is available to support all children and how to access this support
- work with the head teacher and relevant strategic leads, taking responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children may be experiencing or have experienced and identifying the impact that these issues might be having on children’s attendance, engagement and achievement at school.

**The deputy designated safeguarding lead(s):** Is trained to the same level as the DSL & supports the DSL with safeguarding matters as appropriate. In the absence of the DSL, the deputy DSL carries out those functions necessary to ensure the ongoing safety & protection of pupils. In the event of the long-term absence of the DSL, the deputy will assume all of the functions above.



## All staff will:

- Read and understand part 1 and Annex B of the KCSIE guidance & review this guidance at least annually
- Sign a declaration at the start of each year to say they have reviewed the guidance
- Be aware of the school systems which support safeguarding, including this policy, the staff code of conduct, behaviour policy and online safety policy which includes the expectations, roles and responsibilities in relation to filtering and monitoring.
- Reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- Provide a safe space for pupils who are LGBT to speak out and share their concerns

## Good practice guidelines and staff code of conduct

Good practice includes:

- treating all pupils with respect
- setting a good example by conducting ourselves appropriately
- involving pupils in decisions that affect them
- encouraging positive, respectful and safe behaviour among pupils
- being a good listener
- being alert to changes in pupils' behaviour and to signs of abuse, neglect and exploitation
- being aware of what to look for to identify children who need help or protection
- recognising that challenging behaviour may be an indicator of abuse
- reading and understanding the school's child protection policy, staff code of conduct and guidance documents on wider safeguarding issues
- being aware that the personal and family circumstances and lifestyles of some pupils lead to an increased risk of abuse
- being aware that children are at risk of harm inside and outside their home, at school and online
- referring all concerns about a pupil's safety and welfare to the DSL, or, if necessary directly to police or children's social care

Further information can be found in the BESA Staff Code of Conduct.

**Governing Board:** The governing board will facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development. They will also:

- evaluate and approve this policy this policy at each review, ensuring it complies with KCSIE and relevant local law and will hold the head teacher to account for its implementation
- be aware of its obligations under the Human Rights Act 1998 and the Equality Act 2010
- appoint a senior board level safeguarding governor to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL.

The governing body will ensure that:

- the DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support.
- Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies.
- the leadership team and relevant staff are aware of and understand the IT filters and monitoring systems in place, manage them effectively and know how to escalate concerns
- the school has procedures in place to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harms threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors).
- this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised.

The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the head teacher, where appropriate ( see 'Managing Allegations and Concerns Raised Against Staff & Volunteers Policy').

All Governors will read 'Keeping Children Safe in Education' in its entirety.

The Governing Board will ensure that new governors receive appropriate safeguarding and child protection training (including online) at induction. Governor training should be regularly updated.

Where another body is using the school premises to provide services / activities (regardless of whether the children who attend these are on the school role) the Governing Board will:

- Seek assurance that the body has appropriate safeguarding and child protection policies and procedures in place and will inspect them if necessary

- Make sure that there are arrangements for the body to liaise with the school about safeguarding arrangements
- Make sure safeguarding requirements are a condition of using school premises and that any agreement would be terminated if the body fails to comply.

Further information can be found in the Department for Education guidance: 'After-school clubs, community activities and tuition: safeguarding guidance for providers (2023)'

## **Abuse of position of trust**

All school staff are aware that inappropriate behaviour towards pupils is unacceptable and that their conduct towards pupils must be beyond reproach.

Staff understand that under the Sexual Offences Act 2003 it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the school staff and a pupil under 18 may be a criminal offence.

The school's Staff Code of Conduct sets out our expectations of staff and is signed by all staff members.

## **Children who may be particularly vulnerable**

Some children may have an increased risk of abuse. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur. To ensure that all of our pupils receive equal protection, we will give special consideration to children who are:

- living away from home or in temporary accommodation
- living in chaotic and unsupportive home situations
- living transient lifestyles
- affected by parental substance misuse, domestic abuse or parental mental health needs
- vulnerable to being bullied, or engaging in bullying
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality
- experiencing recent bereavement or loss
- do not have English as a first language
- at risk of sexual exploitation, female genital mutilation, forced marriage or being drawn into extremism.
- Children who are (or are perceived to be) lesbian, gay, bi or trans (LGBTQ)

This list provides examples of additionally vulnerable groups and is not exhaustive. Special consideration may include the provision of safeguarding advice, information and resources in community languages where available and accessible formats for children with communication needs.

## **Children with special educational needs and disabilities**

Children with special educational needs (SEN), disabilities or certain health conditions can face additional safeguarding challenges and are 3 times more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group of children, which can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as peer group isolation or bullying (including prejudice-based bullying) without outwardly showing any signs; and
- communication barriers and difficulties in overcoming or reporting these barriers.

Staff are trained to manage these additional barriers to ensure this group of children are appropriately safeguarded.

Any abuse involving pupils with SEND will require close liaison with the DSL and the SENDCO.

## **Children missing from education**

Attendance, absence and exclusions are closely monitored. BESA recognises that a child going missing from education is a potential indicator of abuse and neglect, including sexual abuse or exploitation, child criminal exploitation or mental health problems. The DSL, together with the Head Teacher, will monitor unauthorised absence and take appropriate action particularly where children go missing on repeated occasions and/or are missing for periods during the school day. Staff must also be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

## **Mental Health**

Schools have an important role to play in supporting the mental health and wellbeing of their pupils. At BESA all staff are aware that mental health problems can be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff are also aware that where children have suffered adverse childhood experiences those experiences can impact on their mental health, behaviour and education.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. BESA staff are not expected or trained to diagnose mental health conditions or issues, but may notice behaviours that may be of concern. Where staff are concerned that a child's mental health is also a safeguarding concern, they will discuss it with the DSL or Deputy DSL.

## **Contextual Safeguarding**

The school has an awareness of the risks and issues in the wider community when considering the wellbeing and safety of its pupils. Through training, staff at BESA are alert to the signs and potential risks to students at the school.

## **Complaints and Concerns about Safeguarding Policies**

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

Safeguarding complaints of other types, e.g. those related to pupils or premises will be handled in line with our 'BESA Complaints policy', available on the school website.

## **Whistle blowing if you have concerns about a colleague**

Staff who are concerned about the conduct of a colleague towards a pupil are undoubtedly 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. All staff must remember that the welfare of the child is paramount. The school's whistleblowing policy enables staff to raise concerns or allegations, initially in confidence and for a sensitive enquiry to take place.

All concerns of poor practice or possible child abuse by colleagues should be reported to the Head Teacher.

Complaints about the Head Teacher should be reported to the chair of governors, without the head being informed.

Staff may also report their concerns directly to children's social care or the police if they believe direct reporting is necessary to secure action.

Please refer to the BESA Whistleblowing Policy for further information.

## **Allegations against staff**

At BESA we recognise the possibility that adults working in the school may harm children, including governors, volunteers, supply teachers and contracted workers. Concerns may come from various sources, for example, a suspicion; complaint; or disclosure made by a child, parent or other adult within or outside the organisation; or as a result of vetting checks undertaken. The Head teacher has to decide whether the concern is an allegation or low-level concern. The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the harms threshold criteria of 'allegation'.

When a concern is raised or an allegation is made against a member of staff, including supply staff or a volunteer, our set procedures must be followed. The full procedures for dealing with concerns / allegations against staff can be found in Part 4 (pg 87) Keeping Children Safe in Education (2023) and in the BESA Managing Allegations & Concerns Raised Against Staff & Volunteers policy.

Allegations concerning staff who no longer work at the school, or historical allegations will be reported to the police.

## **Staff training**

It is important that all staff receive training to enable them to recognise the possible signs of abuse, neglect and exploitation and to know what to do if they have a concern.

New staff will receive a Safeguarding briefing during their induction, which also includes the school's Child Protection & Safeguarding policy, a copy of Keeping Children Safe in Education Part One & Annex B (2023), the Staff Code of Conduct, reporting and recording arrangements, and details for the DSL. All staff, including the DSL, Head teacher and governors will receive training that is regularly updated. All staff will also receive safeguarding and child protection updates via email, e-bulletins, website access and staff meetings throughout the year.

## **Safer recruitment**

BESA complies with the requirements of Keeping Children Safe in Education (2023) by carrying out the required checks and verifying the applicant's identity, qualifications and work history. The BESA Safer Recruitment policy sets out the process in full.

At least one member of each recruitment panel will have attended safer recruitment training.

The school obtains written confirmation from third party organisations that staff or other individuals who may work in the school have been appropriately checked. This includes catering staff and school

bus drivers.

Trainee teachers will be checked either by the school or by the training provider, from whom written confirmation will be obtained confirming their suitability to work with children.

The school maintains a single central record of appointments (SCR) detailing recruitment checks undertaken. This is checked regularly.

## **Volunteers**

Volunteers, including governors will undergo checks commensurate with their work in the school, their contact with pupils and the supervision provided to them. Under no circumstances will a volunteer who has not been appropriately checked be left unsupervised. Risk assessments are completed by the Head Teacher to determine the level of checks required.

## **Contractors**

The school checks the identity of all contractors working on site and requests appropriate further checks (including criminal record checks) as required. Contractors will not be allowed to work unsupervised during the school day.

## **Site security**

The school is situated within the British Embassy compound and as such follows all guidance provided by the Embassy on site security measures.

Visitors to the school, including contractors, must provide ID and are given a visitor badge at the school gate, which confirms they have permission to be on site. All visitors must sign in at the school reception. Parents who are delivering or collecting their children must provide their school pass to enter the site, but are not required to sign in. All visitors are expected to observe the school's Safeguarding Regulations and Visitor Code of conduct. The Head teacher will exercise professional judgement in determining whether any visitor should be escorted or supervised while on site.

## **Extended school and off-site arrangements**

All extended and off site activities are subject to a full risk assessment to satisfy health and safety and safeguarding requirements. Where extended school activities are provided by and managed by the school, our own child protection policy and procedures apply. If other organisations provide services or activities on our site on behalf of our school we will check that they have appropriate procedures in place, including safer recruitment procedures.

When our pupils attend off-site activities, including day and residential visits and work related activities, we will check that effective child protection arrangements are in place.

## **Staff/pupil online relationships**

The school provides advice to staff regarding their personal online activity and has strict rules regarding online contact and electronic communication with pupils. These can be found with the Staff Code of Conduct and the ICT Security & Social Media Policies. Staff found to be in breach of these rules may be subject to disciplinary action or a child protection investigation.

## **Child protection procedures**

### **Recognising abuse**

To ensure that our pupils are protected from harm, we need to understand what types of behaviour constitute abuse and neglect.

Abuse and neglect are forms of maltreatment. 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.

Abuse may be committed by adult men or women and by other children and young people.

Keeping Children Safe in Education, Part One (pg 6), (DfE 2023) refers to the indicators of abuse & neglect. These are set out in Appendix One along with indicators of abuse.

### **Bullying**

While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause anxiety and distress. All incidences of bullying, including cyber-bullying and prejudice-based bullying should be reported and will be managed through our tackling-bullying procedures which can be accessed via the BESA Anti-Bullying Policy.

### **Taking action**

Any child, in any family, in any school could become a victim of abuse. Staff should always maintain an attitude of “it could happen here”. Key points for staff to remember for taking action are:

- in an emergency take the action necessary to help the child.
- report your concern as soon as possible to the DSL, definitely by the end of the day
- do not start your own investigation



- share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family
- complete a record of concern
- seek support for yourself if you are distressed.

### **If you are concerned about a pupil's welfare**

There will be occasions when staff may suspect that a pupil may be at risk. The pupil's behaviour may have changed, their artwork could be bizarre, they may write stories or poetry that reveal confusion or distress, or physical signs may have been noticed. In these circumstances, staff will try to give the pupil the opportunity to talk and ask if they are OK or if they can help in any way.

Staff should use **CPOMS or the Record of Concern form** to record these early concerns. If the pupil does reveal that they are being harmed, staff should follow the advice below. Following an initial conversation with the pupil, if the member of staff has concerns, they should discuss their concerns with the DSL.

### **If a pupil discloses to you**

It takes a lot of courage for a child to disclose that they are being 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. Sometimes they may not be aware that what is happening is abusive.

Staff must bear in mind that some children may not feel ready or know how to talk about abuse, may not recognise their experiences as harmful, or feel embarrassed, humiliated or threatened. However, none of this should stop staff from having a 'professional curiosity' and speaking to the DSL if they have concerns about a child.

If a pupil talks to a member of staff about any risks to their safety or wellbeing, **the staff member will, at the appropriate time, let the pupil know that in order to help them they must pass the information on to the DSL.** The point at which they tell the pupil this is a matter for professional judgement. A victim reporting any form of abuse or neglect will never be given the impression that they are creating a problem by doing so. During their conversations with the pupils staff will:

- allow them to speak freely
- remain calm and not overreact
- give reassuring nods or words of comfort – 'I'm so sorry this has happened', 'I want to help', 'This

isn't your fault', 'You are doing the right thing in talking to me'

- not be afraid of silences
- **under no circumstances** ask investigative questions – such as how many times this has happened, whether it happens to siblings, or what does the pupil's mother think about it
- not automatically offer any physical touch as comfort
- avoid admonishing the child for not disclosing earlier. Saying things such as 'I do wish you had told me about this when it started' may be interpreted by the child to mean that they have done something wrong
- tell the pupil what will happen next
- report verbally to the DSL even if the child has promised to do it by themselves
- **complete a record of concern** via CPOMS or paper form and alert the DSL as soon as possible
- seek support if they feel distressed.

## **Notifying parents**

The school will normally seek to discuss any concerns about a pupil with their parents. This must be handled sensitively and the DSL will make contact with the parent in the event of a concern, suspicion or disclosure.

Our focus is the safety and wellbeing of the pupil. If the school believes that notifying parents could increase the risk to the child or exacerbate the problem, the DSL will seek further external advice on actions to be taken, which once agreed upon, will be recorded on the pupil's child protection file.

In the case of allegations of abuse being made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other children involved and when.

## **Confidentiality and sharing information**

All staff will understand that child protection issues warrant a high level of confidentiality. Staff should only discuss concerns with the DSL, Head teacher or chair of governors (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

Following a number of cases where senior leaders in school had failed to act upon concerns raised by staff, *Keeping Children Safe in Education (2023)* emphasises that any member of staff can contact children's social care if they are concerned about a child.

Child protection information will be stored and handled in line with the school's Data Protection Policy.

Information sharing will take place in a timely and secure manner and where:

- it is necessary and proportionate to do so; and
- the information to be shared is relevant, adequate and accurate.

Information sharing decisions will be recorded, whether or not the decision is taken to share.

Record of concern forms and other written information will be securely stored in lockable, non-portable containers and electronic information will be password protected and only made available to relevant individuals.

Child protection information will be stored separately from the pupil's school file.

The DSL will normally obtain consent from the pupil and/or parents to share sensitive information within the school or with outside agencies. Where there is good reason to do so, the DSL may share information *without* consent, and will record the reason for not obtaining consent.

If any member of staff receives a request from a pupil or parent to share information or see child protection records, they will refer the request to the DSL.

The GDPR and the Data Protection Act 2018 do not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as a soon as possible, securely and separately from the main pupil file. The DSL should ensure secure transit and confirmation of receipt should be obtained. In addition to the child protection file, the DSL should also consider if it would be appropriate to share any information with the new school in advance of a child leaving.

### **Referral to an external agency**

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

In the absence of local children's social care services BESA will work with local Turkish agencies and / or British Embassy staff as may be required, for example (but not limited to):

- In the instance of suspicion of sexual abuse the DSL will make a referral directly to the Turkish Child Protection Centre (Cocuk Izlem Merkezi) situated at Yenimahalle State Hospital, Yeni Bati Mahallesi, 2026. Cad., Batikent, Yenimahalle, Ankara, Tel 0312 587 2000
- In the instance of suspicion of radicalisation or other form of abuse that warrants police involvement, the DSL will first contact with the British Embassy Police Liaison, who will assist in deciding a course of action or liaising with local Turkish authorities on the school's behalf
- In the instance of an allegation against a member of the diplomatic community the DSL will first make contact with the Safeguarding Governor who will approach the British Embassy representative on the Board of Governors for further advice.

Any member of staff may make a direct referral to these or other external agencies if they genuinely believe immediate independent action is necessary to protect a child and if:

- the situation is an emergency and the designated safeguarding lead, their deputy, the headteacher and the chair of governors are all unavailable
- they are convinced that a direct report is the only way to ensure the pupil's safety
- for any other reason they make a judgement that direct referral is in the best interests of the child.

### **Child on child abuse**

At BESA we recognise that children may be abused by other children or young people and that it can happen both inside and outside of school and online. Sometimes it may occur simultaneously between the two. Staff will be aware of the harm caused by bullying and will use the school's anti-bullying procedures where necessary. However, all staff recognise that children are capable of abusing their peers and should be clear about the school's policy and procedures regarding child on child abuse.

It is essential that all staff understand the importance of challenging inappropriate behaviours between peers, that are actually abusive in nature. Downplaying certain behaviour, for example dismissing sexual harassment as just banter, just having a laugh, part of growing up or boys being boys, can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse and prevents children from coming forward to report it. Staff should also be aware that some groups are potentially more at risk. Evidence shows girls, children with special educational needs and disabilities (SEND) and LGBTQ+ children are at greater risk. We also recognise that child on child abuse can occur between children of any age and any sex.

All child on child abuse is unacceptable and will be taken seriously. Child on child abuse can take many forms, including:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- physical abuse such as biting, hitting, kicking or hair pulling, or otherwise causing physical harm; (this may include an online element which facilitates, threatens and/ or encourages physical abuse).
- Sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and / or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- abuse in intimate personal relationships between peers
- upskirting, taking a picture under a person's clothing without their permission with the intention of viewing their genitals or buttocks for the purposes of sexual gratification or to cause humiliation, distress or alarm
- consensual and non-consensual sharing of nudes and semi-nude images and / or videos (also known as sexting or youth produced sexual imagery)
- initiation/hazing - used to induct newcomers into an organisation such as sports team or school groups by subjecting them to a series of potentially humiliating, embarrassing or abusing trials which promote a bond between them

Abuse is abuse and should never be tolerated or passed off as 'banter' or 'part of growing up'. Different gender issues can be prevalent when dealing with child on child abuse, for example girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence. At our school, we take the following steps to minimise or prevent the risk of child on child abuse.

- An open and honest environment where young people feel safe to share information about anything that is upsetting or worrying them.
- Assemblies are used to provide a moral framework outlining acceptable behaviour and stressing the effects of bullying.
- PSHE & RSE are used to reinforce the message through stories, role play, current affairs and other suitable activities.
- Staff will endeavour always to create surroundings where everyone feels confident and at ease in school.

- We will ensure that the school is well supervised, especially in areas where children might be vulnerable.

All staff should understand that even if there are no reports of child on child abuse in the school, this does not mean it is not happening, it may be the case that it is just not being reported. As such it is important that **any** concerns regarding child on child abuse should be discussed with the DSL.

All allegations of child on child abuse should be passed to the DSL immediately. They will then be investigated and dealt with as follows.

- **Information gathering** – children, staff and witnesses will be spoken with as soon as possible to gather relevant information quickly to understand the situation and assess whether there was intent to cause harm.
- **Decide on action** – if it is believed that any young person is at risk of significant harm, a referral will be made to an external agency (as detailed above). The DSL will then work with the external agency to decide on next steps, one of which may include contacting the local police.
- **Inform parents** - as with other concerns of abuse, the school will normally seek to discuss concerns about a pupil with parents. Our focus is the safety and wellbeing of the pupil and so if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, external advice will first be sought before parents are contacted.

Where allegations of sexual violence or sexual harassment are made, the school will endeavour act in accordance with the guidance set out in Part 5 (Pg. 105) of *Keeping Children Safe in Education (2023)* and in the separate guidance, 'Sexual violence & sexual harassment in schools & colleges' (2021)

In cases where nudes or semi-nudes have been shared we follow guidance given to schools and colleges by the UK Council for Internet Safety (UKCIS): Sharing nudes and semi-nudes (2020).

## **Supporting those involved**

The support required for the pupil who has been harmed will depend on their circumstance and the nature of the abuse. Support could include counselling, mentoring, the support of family and friends and/or support with improving peer relationships or some restorative justice work.

Support may also be required for the pupil that harmed. We will seek to understand why the pupil acted in this way and consider what support may be required to help the pupil and/or change behaviours. Once those needs have been met, the consequences for the harm caused or intended will be addressed.

## **Serious Violence**

All staff are made aware of indicators that children are at risk from or are involved with serious violent crime. These include increased absence, 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 could also indicate that children have been approached by or are involved with individuals associated with criminal gangs.

## **Child criminal exploitation (CCE) and child sexual exploitation (CSE)**

Both CCE and CSE are forms of abuse and both occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual or criminal activity. This power imbalance can be due to a range of factors, including age, gender sexual identity, cognitive ability, physical strength, status and access to economic or other resources.

CSE & CCE do not always involve physical contact; they can also occur through the use of technology.

The school includes the risks of criminal exploitation and sexual exploitation in the PSHE and RSE curriculum.

A common feature of such exploitation is that the child often doesn't recognise the coercive nature of the relationship and doesn't see themselves as a victim. The child may initially resent what they perceive as interference by staff, but staff must act on their concerns, as they would for any other type of abuse.

## **Sexual exploitation of children**

Sexual exploitation involves an individual or group of adults taking advantage of the vulnerability of an individual or groups of children or young people, and victims can be boys or girls. Children and young people are often unwittingly drawn into sexual exploitation through the offer of friendship and care, gifts, drugs and alcohol, and sometimes accommodation. Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to child trafficking.

Through training staff are made aware of the indicators of sexual exploitation and all concerns are reported immediately to the DSL.

## Criminal exploitation of children

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs exploiting children to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns.

Staff are made aware of indicators that children are at risk from or experiencing criminal exploitation. The main indicator can include children who:

- appear with unexplained gifts or new possessions
- associate with other young people involved in exploitation
- suffer from changes in emotional well-being
- misuse drugs or alcohol
- go missing for periods of time or regular return home late
- regularly miss school or education or do not take part in education.

## County lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs around the country using dedicated mobile phone lines. Children and vulnerable adults are exploited to move drugs or money, with offenders often using coercion, intimidation, violence and weapons to ensure compliance of victims.

County lines exploitation can occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child. This power imbalance can be due to the same range of factors set out under CCE, above.

Through training, staff at BESA are made aware of the definition and features associated with County Lines and CCE as described above.

## Online safety

As schools increasingly work online, it is essential that children are safeguarded from potentially harmful and inappropriate material. The use of technology has become a significant component of many safeguarding and wellbeing issues.

To address this, our school aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology



- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

Our approach to online safety is based on addressing each of the four key categories of risk:

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism
- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

At BESA pupils are taught about safeguarding including online safety, through various teaching and learning opportunities, as part of a broad and balanced curriculum. Children are taught to recognise when they are at risk and how to get help when they need it. This is delivered informally through assemblies, discussions and special weeks or more formally through the PSHE, RSE and ICT lessons.

To meet our aims and address the risks above, we will:

- Educate pupils about online safety as part of our curriculum. For example: the safe use of social media, the internet and technology, keeping personal information private, how to recognise unacceptable behaviour online, how to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' workshops. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their

- mobile phone and cameras, for example that: staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present, staff will not take pictures or recordings of pupils on their personal phones or cameras
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
  - Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
  - Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.
  - Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community
  - Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
  - Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

This section summarises our approach to online safety and mobile phone use. Full details can be found within the BESA ICT Security & Online Safety Policies.

## **Artificial Intelligence (AI)**

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents / carers may be familiar with AI generative chatbots such as ChatGPT and Google Bard.

BESA recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (e.g. bullying or grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

BESA will treat any use of AI to access harmful content or bully pupils in line with this policy and the behaviour policy.

Staff will be made aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being used at school.

## **Sexting**

There is no accepted definition of 'sexting' but most professionals agree that it refers to the sending or posting of sexually suggestive images, including nude or semi-nude photographs of a person under 18 years of age, via mobiles or over the internet. The UKCCIS advice document refers to this as 'youth produced sexual imagery'.

All incidents involving youth produced sexual imagery will be responded to as follows:

- The incident will be referred to the DSL immediately and the DSL will hold an initial review meeting with appropriate staff. If appropriate, there will be subsequent interviews with the young people involved.
- Parents will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.
- At any point in the process, if there is a concern a young person has been harmed or is at risk of harm a referral will be made to an external agency and/or the police immediately in accordance with this policy.

In some instances, it may be necessary to refer the matter to the police. Once a report is made to the police, the report must be recorded and the police will investigate. This may include seizure of devices and interviews with the young people involved.

## **Domestic Abuse**

The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either a pattern of behaviour, or as a single incident, between two people over the age of 16 who are 'personally connected' to each other:

- (a) Physical or sexual abuse
- (b) Violent or threatening behaviour
- (c) Controlling or coercive behaviour
- (d) Economic abuse
- (e) Psychological, emotional or other abuse

People are 'personally connected' when they are, or have been married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibility for the same child or they are relatives.

The definition of Domestic Abuse applies to children if they see or hear, or experience the effects of the abuse; and they are related to the abusive person.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child / adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others – for example, the impact of all forms of domestic abuse on children. Anyone can be a victim of domestic abuse, regardless of socio-economic status, sexuality or background and domestic abuse can take place inside or outside the home. Children who witness domestic abuse are also victims.

Children can witness and be adversely affected by domestic violence and exposure to it can have long lasting negative impact on children. In some cases, a child may blame themselves for the abuse. All staff are aware of the impact domestic violence can have on a child. If any of our staff are concerned that a child has witnessed or experienced the effects of domestic abuse, they will report their concerns immediately to the DSL.

## **Honour-Based Abuse**

'Honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of Honour Based violence are abuse.

FGM is the collective name given to a range of procedures involving the partial or total removal of external female genitalia for non-medical reasons. In both the United Kingdom and in Turkey, the practice is a criminal offence. The practice can cause intense pain and distress and long-term health consequences, including difficulties in childbirth.

FGM is carried out on girls of any age, from young babies to older teenagers and adult women, so staff are trained to be aware of risk indicators. Many such procedures are carried out abroad and staff should be particularly alert to suspicions or concerns expressed by female pupils about going on a long holiday during the summer vacation period.

A forced marriage is a marriage in which a female (and sometimes a male) does not consent to the marriage but is coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse. Children may be married at a very young age, and well below the age of consent. In England and Wales the practice is

a criminal offence under the Anti-Social Behaviour, Crime and Policing Act 2014. Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used.

Through annual courses school staff receive training in the area of Honour-based Abuse and should be particularly alert to suspicions or concerns raised by a pupil about being taken abroad.

A forced marriage is not the same as an arranged marriage. In 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 to accept the arrangement remains with the prospective spouses.

## **Radicalisation and Extremism**

The UK government defines extremism as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. Some children are at risk of being radicalised: adopting beliefs and engaging in activities which are harmful, criminal or dangerous. Islamic extremism is the most widely publicised form and schools should also remain alert to the risk of radicalisation into white supremacy extremism.

School staff receive Prevent training to help to identify signs of extremism. Opportunities are provided in the curriculum to enable pupils to discuss issues of religion, ethnicity and culture and the school follows the DfE advice Promoting fundamental British Values as part of SMSC (spiritual, moral, social and cultural education)

In line with best practice a risk assessment is completed by the Head Teacher and reviewed annually. In the instance of suspicion of radicalisation, the DSL will first contact with the British Embassy Police Liaison, who will assist in deciding a course of action or liaising with local Turkish authorities on the school's behalf

## **Private fostering arrangements**

A private fostering arrangement occurs when someone other than a parent or a close relative care for a child for a period of 28 days or more, in their own home with the agreement of the child's parents. It applies to children under the age of 16, or aged under 18 if the child is disabled. Where a member of staff becomes aware that a pupil may be in a private fostering arrangement they should raise this with the DSL.

On admission to the school we will take steps to verify the relationship of the adults to the child who is being registered.

# Appendix One

## Signs & Symptoms of Abuse & Neglect

### 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. They may be abused by an adult or adults or another child or children. Child sexual and child criminal exploitation are also forms of child abuse.

## Four categories of abuse

### 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 (this used to be called Munchausen's Syndrome by Proxy, but is now more usually referred to as fabricated or induced illness).

### Emotional abuse

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

### 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, including assault by penetration (for example, rape or oral

sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

## **Neglect**

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

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

## **Indicators of abuse**

Physical signs define some types of abuse, for example, bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. 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 if they 'tell'. It is also quite difficult for anyone without medical 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.

It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a child has been abused.

A child who is being abused, neglected or exploited 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, arrive late or leave the school for part of the day
- 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
- display sexual knowledge or behaviour beyond that normally expected for their age
- acquire gifts such as money or a mobile phone from new 'friends'.

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSL to decide how to proceed.