



# **iRock School of Music LTD**

## **Child Safeguarding Policy 2023/24**

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### **1. Introduction**

iRock School of Music provides a music education service within schools for small groups of children. Therefore, we are obligated to ensure that our safeguarding policies are adhered to by all staff, including management, directors, volunteers and anyone working on behalf of iRock School of Music. We will ensure that these are up to date, in line with current legislation, reviewed and updated regularly.

This policy is to be read in addition to any child protection policies in place at the hosting school. Visiting staff members should request a copy of the policy if this is not readily displayed at the school.

Safeguarding and promoting the welfare of children is defined as:

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

*Children includes everyone under the age of 18*

iRock School of Music takes its safeguarding responsibilities seriously and will ensure that it is underpinned in all of our practices. Where safeguarding is concerned, we maintain an attitude of “it could happen here”. We recognise that everyone has a role to play in keeping children safe; this includes identifying concerns, sharing information and taking prompt action. iRock will respond expeditiously and appropriately in line with child protection procedures to any report of an incident or concern regarding the safety of a child. All professionals working with children at iRock should ensure they work in a child centred way and always consider the best interests of the child.

### **Overall Aims**

This policy will contribute to the safeguarding of pupils by:

- Clarifying the safeguarding expectations of both the company and the schools we work with, to aid understanding of policies and the following of procedures for all staff.
- Ensuring all staff are appropriately recruited in line with our safer recruitment policy.
- Ensuring all staff are trained and supported in responding to any child protection concerns.
- Contributing to the establishment of a safe, resilient, and robust safeguarding culture in the company.
- Creating a culture where pupils are treated with respect and dignity, taught to treat each other and staff with respect, feel safe, have a voice and are listened to.
- Working in conjunction with each school’s safeguarding policies.
- Outlining the reporting procedures for staff when safeguarding concerns arise.
- Ensure this policy is annually updated in alignment with key guidance changes.

### **Statutory Guidance**

This policy enables iRock School of Music to carry out its functions to safeguard and promote the welfare of children and must be read alongside key guidance:

- [Working Together to Safeguard Children](#) (2018)
- [Keeping children Safe in Education](#) (2023)
- [Guidance for Safer Working Practices for Adults who work with Children and Young People in Education Settings](#) (October 2015)
- [Prevent Duty Guidance](#) (2015)
- [The Domestic Abuse Act](#) (2021)

## 2. Definition of Safeguarding

**Safeguarding is defined as:**

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

**Child Protection** is defined in the Children Act 1989 (s.47) as when a child is suffering or is likely to suffer significant harm. Under statutory guidance and legislation action must be taken to safeguard and promote the child's welfare.

## 3. Types of Abuse

All staff should be aware that abuse, neglect 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** happens when a child is deliberately hurt, causing physical harm. It can involve hitting, kicking, shaking, throwing, poisoning, burning or suffocating. It's also physical abuse if a parent or carer makes up or causes the symptoms of illness in

children. For example, they may give them medicine they don't need, making them unwell. This is known as behaviour or induced illness (FI).

**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 in so far 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 cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

**Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether the child is aware of what is happening or not. 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** 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 caregivers), ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

### **Child Sexual Exploitation (CSE) and Criminal Exploitation (CCE)**

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Further information about CCE including definitions and indicators is included in KCSIE 2023 Annex B.

### **SEND**

For children with Special Educational Needs and Disabilities (SEND) additional barriers can exist when identifying abuse and neglect, these include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury

relate to the child's disability without further exploration.

- Being more prone to peer group isolation than other children.
- The potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Communication barriers and difficulties in overcoming these barriers.

To address these additional challenges, staff consider extra pastoral support for children with SEND (KCSIE 2023). iRock recognises that all staff have a duty to make reasonable adjustments for students with SEND, and ensures all staff have an understanding of how to remove barriers to participation for these children at iRock.

### **Radicalisation**

As part of the Counter Terrorism and Security Act 2015, schools have a duty to 'prevent people being drawn into terrorism'. This has become known as the 'Prevent Duty'.

Where staff are concerned that children and young people are developing extremist views or show signs of becoming radicalised, they should discuss this with the Designated Safeguarding Lead. Staff should be alert to changes in children's behaviour, which could indicate that they may need help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately.

DSL should receive training about the Prevent Duty and tackling extremism and be able to support staff with any concerns they may have. The DSL will consider the level of risk and decide to which agency this concern should be referred. This could include Channel guidance, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, that staff and governors can call to raise concerns about extremism with respect to a pupil. In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321.

Further information about the Prevent Duty and to Prevent Radicalisation including definitions and indicators is included in KCSIE 2023 Annex B.

## **Honour Based Abuse**

So-called 'honour-based' Abuse (HBA) encompasses incidents or 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. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA (regardless of the motivation) should be handled and escalated as such.

If staff are concerned that a child might be at risk of HBA, they must inform the school DSL and iRock DSL as a matter of urgency

## **Female Genital Mutilation (FGM)**

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs for non-medical reasons. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

Professionals in all agencies, individuals and groups from the wider communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There are a range of potential risk indicators which are detailed in the [Multi-agency statutory guidance on female genital mutilation](#) issued by the home office.

Risk factors for FGM include:

- Low level of integration into UK society.
- Mother or a sister who has undergone FGM.
- Girls who are withdrawn from PSHE.
- Visiting female elder from the country of origin.
- Being taken on a long holiday to the country of origin.
- Talk about a 'special' procedure to become a woman.

Whilst all staff should speak to the designated safeguarding lead (or deputy) in regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on

teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the policy.

### **Child-on-child abuse**

All staff should be aware that children can abuse other children (often referred to as peer-on-peer abuse), and that it can happen both inside and outside of school and online. It is important that all staff recognise the indicators and signs of child-on-child abuse and know how to identify and respond to reports. All staff should be clear on the important role they have to play in preventing child-on-child abuse and should understand, that even if there are no reports in school it does not mean it is not happening, it may be the case that it is just not being reported.

If staff have any concerns regarding child-on-child abuse, they should speak to their designated safeguarding lead (or deputy). It is essential that all staff understand the importance of challenging inappropriate behaviours between peers. Downplaying certain behaviours, 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 leading to children accepting it as normal, and therefore not coming forward to report it.

Child-on-child abuse can include, but not be limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying).
- Abuse in intimate personal relationships between peers.
- Physical abuse such as hitting, kicking, shaking, biting, 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.
- Consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as sexting or youth produced sexual imagery).
- Up skirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm.
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

### **Sexual Violence and Sexual Harassment**

All staff should acknowledge that sexual violence and sexual harassment between children can happen at this school. Sexual violence and sexual harassment can occur between two children of any age and sex and the fact children can and sometimes do, abuse their peers in this way from primary to secondary stage and into colleges. It may exist on a continuum

and may overlap. It can occur online and face to face (both physically and verbally). It can happen both inside and outside of school. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will likely adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attend the same school.

All victims should be reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. Some groups are potentially more at risk and evidence shows girls, children with special educational needs and disabilities (SEND) and LGBT children are at greater risk.

Staff must recognise that a child abusing another child may have been abused themselves, and therefore the need may be to support the alleged perpetrator.

When referring to Sexual Harassment, this includes:

- Unwanted conduct of a sexual nature
- Sexual remarks
- Sexual taunts
- Physical behaviour
- Online sexual harassment

When referring to sexual violence, this is defined under the Sexual Offences Act 2003, described below:

### **Rape**

A person (A) commits an offence of rape if: they intentionally penetrate the vagina, anus, or mouth of another person (B) with their penis; B does not consent to the penetration; and A does not reasonably believe that B consents.

### **Assault by Penetration**

A person (A) commits an offence if: they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else; the penetration is sexual; B does not consent to the penetration; and A does not reasonably believe that B consents.

### **Sexual Assault**

A person (A) commits an offence of sexual assault if: they intentionally touch another person (B); the touching is sexual; B does not consent to the touching; and A does not

reasonably believe that B consents. (Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)

### **Causing someone to engage in sexual activity without consent**

A person (A) commits an offence if: they intentionally cause another person (B) to engage in an activity; the activity is sexual; B does not consent to engaging in the activity; and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

All iRock teachers should read Part five (KCSIE 2023) alongside the Departmental of Education advice: Sexual Violence and Sexual Harassment Between Children in Schools and Colleges.

### **Domestic violence and abuse, Gender-based violence and teenage relationship**

**abuse** Domestic abuse (over 16 years) and teenage relationship abuse (under 16 years) involves

any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those who are, or have been in relationships or family members regardless of gender or sexuality. The new Domestic Abuse Bill understands the impact domestic abuse at home has on children and has now classified children who witness domestic abuse as victims. This reflects the emotional turmoil and impact on brain development of young people who experience trauma and understands that witnessing abuse can have lifelong implications for young people.

The curriculum should enable children and adolescents to understand what constitutes a healthy relationship, consent and tackle gendered stereotypes.

### **Online Grooming and Sexual Abuse**

Online grooming involves the use of technology to manipulate, exploit, coerce or intimidate a child to (but not limited to) engage in sexual activity, produce sexual material/content, force a child to look at or watch sexual activities, encourage a child to behave in sexually inappropriate ways or groom a child in preparation for sexual abuse (either online or offline).

It can also involve directing others to, or coordinating, the abuse of children online. As with other forms of sexual abuse, online abuse can be misunderstood by the child and others as being consensual, occurring without the child's immediate recognition or understanding

of

abusive or exploitative conduct. In addition, fear of what might happen if they do not comply can also be a significant influencing factor. No child under the age of 18 can consent to being abused or exploited. Financial gain can be a feature of online child sexual abuse, it can involve serious organised crime and it can be carried out by either adults or peers.

### **Child and Adolescent Mental Health**

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

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

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

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy and speaking to the designated safeguarding lead or a deputy.

Good mental health and resilience are fundamental to our children's physical health, relationships, education and to achieving their potential. The school should promote positive self-esteem and tackle behaviours such as bullying that can impact a young person's self-esteem. Pastoral care should be available to those with mental health concerns as well as staff being aware of pathways for young people to Early Help and CAHMS.

## 4. Expectations, Roles and Responsibilities

### Role of all staff

- All staff will read and understand Part 1 of statutory guidance Keeping Children Safe in Education (2023). Those working directly with children will also read Annex B. Those who do not work directly with children will have the option of reading Annex A instead.
- In addition to this all staff will be aware of the guidance in place which support safeguarding, including reading the Safeguarding/Child Protection Policy; the Staff Behaviour Policy (code of conduct); and the role of the Designated Safeguarding Lead (DSL).
- All staff will know who and how to contact the DSL and any deputies, however in exceptional circumstances where the DSL or deputy is not available, action should not be delayed and members of staff must speak to the school leadership team and/or take advice from children's social care. Any action taken must be shared with the DSL.
- In cases of emergency or risk of immediate serious harm to a child, a member of staff should call the police on 999 and make a referral to Children's social care. They must also share any action taken with the DSL as soon as possible.
- Know what to look for in early identification of abuse and neglect to be able identify cases where children may need help or protection.
- Know how to respond if a child tells them they are being abused, exploited, neglected, or otherwise at risk of harm.
- Understand the host school's safeguarding response to children who are absent from education.
- Be aware of behaviours linked to safeguarding issues that can put children at risk of harm.

## **Designated Safeguarding Officer (DSL) & Deputy Designated Safeguarding Officer (DDSO)**

The Designated Safeguarding Lead (DSL) is a senior member of staff, who undertakes lead responsibility for safeguarding and child protection within the company. Details of our DSL and Deputy DSL are detailed within this policy.

Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding child protection remains with the DSL.

### **Duties of DSL & DDSO**

- Undertake Training to ensure the DSL (and any deputies) has the knowledge and skills required to carry out the role (updated every 2 years). Further knowledge and skills should be updated at regular intervals and shared with relevant parties as appropriate.
- Liaise with DSL & DDSO at individual schools and ensure that all cases of suspected abuse reported by iRock staff are referred appropriately to local statutory children's services agencies, and support is given to staff who make referrals.
- Refer individual incidents or issues to the Police in accordance with NPCC guidance 'When to call the Police'.
- Liaise with school staff, including pastoral support and SENCo's, on matters of safety and safeguarding.
- Be aware of the process for making referrals to Children's Social Care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.
- Recognise the additional risks that children with SEND face from online bullying, grooming and radicalisation.
- Keep detailed, accurate and secure written records of concerns and referrals and

understand relevant data protection legislation and regulations.

### **Senior Leadership Team**

The Senior Leadership Team are accountable for ensuring the effectiveness of this policy and compliance with it. They have responsibility to ensure staff are supported to understand - and are effective in - adhering to their role and responsibilities under Part one of KCSIE 2023 to ensure that safeguarding underpins all aspects of process and policy.

### **Local Authority Designated Officer (LADO)**

iRock School of Music does not maintain a list of relevant LADO for each school that we work with. iRock teaching staff should familiarise themselves with the host school's child safeguarding policy including contact details of LADO to be referred to should the need arise to make contact.

## **5. Key Safeguarding Contacts**

Designated Safeguarding Lead (DSL)	<b>Jamie Gillman</b> <a href="mailto:jamie.gillman@irockschool.com">jamie.gillman@irockschool.com</a> 0330 174 2655
Deputy Designated Safeguarding Lead (DDSL)	<b>Michelle Hiseman</b> <a href="mailto:michelle.hiseman@irockschool.com">michelle.hiseman@irockschool.com</a> 0330 174 2655

## **6. Staff Training**

- In addition to this policy, all staff should read and understand Part One and Annex A of Keeping Children Safe in Education (KCSIE) 2023.

- All iRock staff and volunteers upon induction will receive appropriate safeguarding and child protection training, which will include staff understanding their legal duty under the Mandatory FGM Reporting Duty. This will be refreshed at least every 2 years. In addition, all staff will receive safeguarding and child protection updates (for example, via email and staff meetings), throughout the school year, to provide them with relevant skills and knowledge to safeguard children effectively (KCSIE, 2023).
- Annual training and knowledge check on KCSIE to ensure staff know their responsibilities.
- All staff must have the awareness of child-on-child abuse and understand their responsibility to challenge it and not pass it off as 'banter'.
- Whistleblowing procedures will be covered in staff inductions so that staff know what to do if they have concerns relating to safeguarding practice within the company.
- All training will be effective and always comply with the law.
- The DSL and any deputies will undergo training to provide them with the knowledge and skills required to carry out the role. The training will be updated every two years.
- Deputies will be trained to the same level as the DSL and should have the confidence to carry out tasks in line with the role.
- Recruitment staff have undertaken safer recruitment training and made aware of our safer recruitment policies.

## **7. Responding to concerns about a child's welfare**

### **If you have concerns about a child's welfare**

Key points to remember for any member of staff (including volunteers or supply staff) whenever they have any concerns about a child's welfare:

- In an emergency take the action necessary to help the child, for example, call 999.



- Do not assume a colleague or another professional will take action and share information that might be critical to keeping a child safe. Early information sharing is vital in keeping children safe, whether this is when problems first emerge.
- Report your concern to the DSL at the school, or - in their absence - the deputy DSL. The concern should then be raised with iRock's DSL when available who will contact the school.
- Share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family.
- If the concerns are about sharing nudes and semi-nudes, do not view, copy, print or share the images.
- Staff are required to follow the child protection procedures for the school they are visiting.

All information regarding a concern will be recorded on iRock's safeguarding concern form as soon as possible after the events. The record will include:

- Date of the disclosure/observation/incident of which caused concern
- Date and time the record was made
- Name of the child/ren involved
- The school of which the child attends
- A clear summary of the concern
- In the event of a disclosure, the child's own words will be used

The record will be sent to iRock's DSL who will have direct contact with the school and decide on what steps to take next. A copy of the safeguarding concern form will also be given to the schools DSL/DSP.

If an iRock staff member feels their concerns are not being addressed by either the school or iRock, they may refer their concerns to the children's services.

In the event of an allegation being made involving staff members, please see section 11 of this policy, and the policy of the school where the staff member has worked.

## **Child disclosures to members of staff about a concern or abuse**

It takes a lot of courage for a child, parent, carer or other significant adult to disclose that they are worried or have concerns. They may feel ashamed, the 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. It is important they are reassured that they are being taken seriously, and that they will be supported and kept safe. They should not be made to feel they are creating a problem or feel ashamed for making a report. Reports, particularly those about sexual violence and harassment, if possible, should be managed with two members of staff present (preferably one being the designated safeguarding lead or a deputy), however this might not be possible in all cases.

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

During your conversation with the child (or their parent/carer):

- Allow them to speak freely, listen to what is being said without interruption and without asking leading questions.
- Keep questions to a minimum and of an open nature ('TED' - Tell me, Explain, Describe) i.e., 'can you tell me what happened?' rather than 'did X hit you?'
- Remain calm and do not overreact – the child (or their parent/carer) may stop talking if they feel they are upsetting you.
- 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'.
- Avoid reprimanding the child or adult for not disclosing earlier. Saying 'I do wish you had told me about this sooner' or 'I can't believe what I'm hearing' may be your attempt at being supportive, but the child (or their parent/carer) may interpret it as though they have done something wrong.
- Do not be afraid of silences – remember how hard this must be for the child or

adult. Leave space in the conversation for the person disclosing information to think and speak freely.

- Under no circumstances should you ask investigative questions such as: asking how many times this has happened; whether it happens to siblings / other family members too; or what other family members think about the situation.
- At an appropriate time, tell the child or adult that in order to help them you have a duty to disclose the information they have given you to the relevant body.
- Do not automatically offer any physical touch as comfort; this may not be wanted or well received, especially in cases where the disclosing person has suffered abuse.

Following any disclosures staff members must:

- Speak to the school's DSL or DDSL
- Speak to iRock's DSL or DDSL
- Complete a safeguarding concern form and follow the school's procedure

## **8. Role of the designated safeguarding lead and their deputy following identification of concerns**

Whenever the designated safeguarding lead (or their deputy) receives information regarding concerns about a child, they will:

- Review information received and assess if any urgent actions are needed, i.e. emergency services if the child's immediate safety is at risk or contacting social services.
- Discuss the concern with the child's school DSL/DSP.

After consulting with the school DSL/DSP, a decision will be made as to whether it is necessary to:

- Decide whether on not to make a referral this stage
- Initiate further monitoring
- Consider discussing the information with the child's parents or carers, or whether to do so would put the child at further risk of harm

If unsure about the correct course of action, including whether a child protection referral should be made, the DSL will seek advice from local authority children's social care or another appropriate agency.

If it is considered that any concerns reported are not being responded to appropriately, then these concerns will be escalated until the DSL feels a resolution has been achieved.

## **9. Record Keeping**

All concerns, discussion and decisions made, and the reasons for these, should be recorded on both the appropriate records of the host school and iRock's secure records / logs. A concern form should be completed as soon as possible after any incident. Staff must not attempt to investigate a situation themselves. If in doubt about the requirements of recording a concern, staff should discuss with the iRock DSL or DDSL. Staff must be mindful of the need to record facts and not opinions.

Records should be made in writing and include:

- A clear and comprehensive summary of the concern.
- Details of how the concern was followed up and resolved.
- A note of any action taken, decisions reached and the outcome.
- Information will be kept confidential and stored securely.

## **10. Code Of Conduct**

Staff are always expected to behave professionally when visiting or working in schools by:

- Always being polite and using appropriate language, when talking to children, colleagues, or school staff.
- Adhering to the individual schools' and iRock's safeguarding policies and procedures.
- Always carrying a form of ID and DBS certificate.
- Not using a personal device, such as a mobile phone, in the presence of children.
- Always using appropriate and designated adult/staff toilets.
- Always signing in/out at the school office
- Always dressing appropriately

### **Use of devices for photography**

Photographs will only be taken of children with their parent or guardian's permission. Only devices belonging to the company (iPads or laptops provided to staff by the iRock for work purposes) will be used to take photographs of children. To protect staff and children, personal devices can only be used by staff when children are not present, and preferably only off school premises.

Any media captured during iRock sessions is helpful in publicising the success of the pupils and iRock in promoting educational initiatives. However, the following must be adhered to by all staff at iRock:

- Consent from parents/guardians must be obtained before any filming or photography can take place.
- Media images/video must only be captured using iRock approved equipment and never on personal devices.
- Staff must not share captured media with anyone outside of the company.
- Never share any media on your personal social media channels unless taken from an approved iRock channel.
- Children's full names will not be used on any of iRock's publications unless consent is obtained from parents/guardians.

### **Use of devices for internet access**

Company devices (iPads or laptops provided to staff by the company) are used to access lesson timetables, timings, student information and Spotify. This may require devices to be connected to the internet. In order to ensure guidance is followed and devices are used appropriately and safely in schools, all iRock staff must adhere to the following guidelines:

- Only use a company-issued device when working in schools.
- Do not take personal devices (such as laptops / tablets) into schools, with the exception of mobile phones - however these must not be used on school premises unless in an emergency e.g. to call the emergency services.
- Mobile phones should never be connected to school WiFi, and must remain on silent or switched off in a concealed bag while in schools.
- Company devices should only access the internet via school WiFi - this ensures safe filtering and monitoring systems are in place to prevent access to any inappropriate content or websites.
- Students should not touch or use a company device unless reading song lyrics on the screen. No other applications, websites or content will be seen or accessed by students.
- The iRock Spotify account is censored - this restricts songs that can be played to ensure no explicit material is seen or heard by students. No other application should be used to play/listen to music. All songs on the iRock Spotify Playlist will be vetted in advance to ensure content is appropriate.
- All company devices must be passcode protected - unique passcodes must be set by staff on their company device, and this should not be shared with anyone other than their line manager when necessary.

iRock will continue to review filtering and monitoring procedures in order to ensure company devices are always used safely and appropriately in schools and beyond.

### **One-to-one lessons/before or after school lessons**

Some services delivered by iRock happen outside of school hours. Staff should ensure they have made arrangements with the school for parents who are collecting or dropping off their child.

Children will on the majority of occasions be taught in a group, however one-to one lessons are occasionally necessary. Staff will take steps to ensure you are seen and heard by other adults in the school if working alone with a student. Staff should keep the door open where possible. When teaching one-to-one, staff should be aware that students are particularly susceptible to misinterpretations or inappropriate behaviour. Staff should be even more vigilant to keep the professional boundaries as they would in a group setting.

## **11. Managing allegations made against members of staff or volunteers**

An allegation is any information which indicates that a member of staff/volunteer may have:

- Behaved in a way that has - or may have - harmed a child / children.
- Potentially committed a criminal offence against or related to a child / children.
- Behaved towards a child / children in a way that indicates he or she may pose a risk of harm to them.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

This applies to any child the member of staff/volunteer has contact with in their personal, professional or community life. It also applies regardless of whether the alleged abuse took place in one of our schools.

If any member of staff has concerns that a colleague or volunteer might pose a risk to children, it is their duty to report these to the DSL. Where the concerns or allegations are about the DSL, these should be referred to the Managing Director.

If an allegation has been made against a member of staff the company will:

- Make a record on the iRock safeguarding concern form
- The DSL should report the concern to the Local Area Designated Officer (LADO)
- Following advice from the LADO, the company may find it necessary to suspend

- and/or remove the member from their school pending a full investigation
- iRock will work closely with the school and LADO to ensure the investigation has been handled appropriately

## **12. Referral to the DBS**

The school / company has a legal duty to refer to the DBS any member of staff who has harmed or poses a risk of harm, to a pupil where:

- The harm test is satisfied.
- The staff member has received a caution or conviction for a relevant offence, or if there is reason to believe the staff member has committed a listed relevant offence.
- The staff member has been removed from working in regulated activity or would have been removed had they not exited their contract.
- The staff member has been moved to an area of work not in regulated activity.
- The staff member has been suspended.

*Referrals will be made as soon as possible after the resignation, removal or redeployment of the staff member.*

## **13. Whistleblowing**

Members of staff have an individual responsibility to bring matters of concern to the attention of senior leadership and/or relevant agencies. Although this can be difficult, this is particularly important where the welfare of children may be at risk.

Follow iRock's Whistleblowing Policy found within the staff handbook for full details of the guidance and procedures.



## 14. Confidentiality

iRock recognises the importance of sensitivity and confidentiality when dealing with safeguarding issues. It also recognises that:

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

**NOTE:** *It is the responsibility of all staff to follow data protection protocol. It is the company's responsibility to store, share and decide when to provide/not provide information appropriately in accordance with Data Protection Act 2018 and the GDPR. This will include assessing risk against the HARM TEST. The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. 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. In KCSIE 2023 there is a link to Data protection: toolkit for schools - Guidance to support schools with data protection activity, including compliance with the GDPR for further information.*

*In Working Together to Safeguard Children (2020), information was refined in response to the Data Protection Act 2018 and General Data Protection Regulation (GDPR). This includes guidance about appropriate information sharing of safeguarding and child protection concerns, including the explicit statement that data protection legislation does not prevent the sharing of information to keep a child safe and that consent is not required when sharing information for safeguarding and protecting the welfare of a child (p.19). In making decisions about appropriate information sharing, the guidance recommends using GDPR lawful bases for sharing, i.e. legal obligation (the exercise of official authority) or public task (a task performed in the public interest). Further information about this is available in the new appendices of this document in Appendix B, and includes a useful myth busting guide to information sharing (p.21).*

*It is also stated that (p.15), while encouraged, the agreement of the child and parents is not*

*required to share information, although it is important to explain the reasons for this.*

## **WORKING TOGETHER TO SAFEGUARD CHILDREN (DEC 2020) CLEARLY**

### **STATES: Myth-busting guide to information sharing**

Sharing information enables practitioners and agencies to identify and provide appropriate services that safeguard and promote the welfare of children. Below are common myths that may hinder effective information sharing.

#### **'Data protection legislation is a barrier to sharing information'**

No – the Data Protection Act 2018 and GDPR do not prohibit the collection and sharing of personal information, but rather provide a framework to ensure that personal information is shared appropriately. In particular, the Data Protection Act 2018 balances the rights of the information subject (the individual whom the information is about) and the possible need to share information about them.

#### **'Consent is needed to share personal information'**

No – you do not need consent to share personal information. It is one way to comply with the data protection legislation but not the only way. The GDPR provides a number of bases for sharing personal information. It is not necessary to seek consent to share information for the purposes of safeguarding and promoting the welfare of a child provided that there is a lawful basis to process any personal information required. The legal bases that may be appropriate for sharing data in these circumstances could be 'legal obligation', or 'public task' which includes the performance of a task in the public interest or the exercise of official authority. Each of the lawful bases under GDPR has different requirements.<sup>15</sup> It continues to be good practice to ensure transparency and to inform parent/carers that you are sharing information for these purposes and seek to work cooperatively with them.

#### **'Personal information collected by one organisation/agency cannot be disclosed to another'**

No – this is not the case, unless the information is to be used for a purpose incompatible with the purpose for which it was originally collected. In the case of children in need, or children at risk of significant harm, it is difficult to foresee circumstances where information law would be a barrier to sharing personal information with other practitioners

**'The common law duty of confidence and the Human Rights Act 1998 prevent the sharing of personal information'**

No – this is not the case. In addition to the Data Protection Act 2018 and GDPR, practitioners need to balance the common law duty of confidence and the Human Rights Act 1998 against the effect on individuals or others of not sharing the information.