



**RARE**  
**CHILD PROTECTION AND SAFEGUARDING POLICY**  
**2023-24**

| Role/organisation                                 | Name             | Contact details  |
|---|------------------|--|
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## 1. Policy statement

Rare takes seriously its 'duty to safeguard and promote the welfare of students at the school' (Children Act 1989 and Education Act 2004). The welfare of the child is paramount, and we adhere to all aspects of Keeping Children Safe in Education (September 2023) and Working Together to Safeguard Children (2018). Nothing is more important than children's welfare and we will always work in the best interests of the child. All children must have equal rights to protection. We fully understand and accept that child protection and safeguarding is everyone's responsibility and that involves preventing impairment to children's physical and mental health.

We are committed to having in place policies and procedures that will support informed and sensitive management of safeguarding and child protection issues. The Organisation recognises that there are several inter-linking components which form an integrated framework to provide protective / preventative service.

These include:

- known operational policies and procedures for dealing with child protection issues
- having in place clear structures to support the child protection function (i.e. Head of Pastoral, designated lead, and a clear policy)
- having a Safer Recruitment policy and procedures (see policies)
- ensuring that staff understand the expected code of conduct for working with children (see Professional Integrity and Code of Conduct policy)
- that students are empowered and aware of issues related to their own welfare (particularly through the embedding of subjects relating to PHSE within various modules throughout the programme).

The Organisation recognises the importance of always being vigilant, both with regards to those we know and those we do not, and in never believing that 'it could never happen here' (see Bichard Report 2004). In relation to this, we recognise that it is possible for staff (including supply staff, volunteers and contractors) and visitors to behave in a way that causes harm to children. We take any allegation seriously and follow local arrangements for dealing with this (see Dealing with Allegations of Abuse Against Staff policy).

All staff understand that any concerns must be reported immediately to the Head of Pastoral and Designated Safeguarding Lead (DSL).

This policy has been developed in accordance with the principles established by:

- Children Acts (1989) and (2004)
- Education Act (2002), and in line with government publications
- Revised Safeguarding Statutory Guidance 2 'Framework for the Assessment of Children in Need and their Families' (2000)
- Working Together to Safeguard Children (2015)
- What to do if you are Worried a Child is Being Abused - Advice for Practitioners (2015)
- Keeping Children Safe in Education (2015)
- Disqualification under the Childcare Act (2006)
- Counter-Terrorism and Security Act (2015)
- Children and Social Work Act (2017)
- Working Together to Safeguard Children (2018)
- Positive Environments Where Children Can Flourish – Ofsted (2018)

- Teaching On-line Safety in Schools (June 2019)
- Keeping Children Safe in Education (September 2023)

Safeguarding students is a core function of the Organisation and a whole-school approach is maintained. As such, this policy relates to many other policies and in particular the following:

- Anti-Bullying (Appendix 1)
- Behaviour (Appendix 2)
- Managing Allegations and General Complaints (Appendix 3)
- Health and Safety (Appendix 4)
- Online Safety and Acceptable Use of Information Technology (Appendix 5)
- Professional Conduct (Appendix 6)
- Safer Recruitment Selection (Appendix 7)
- Whistleblowing (Appendix 8)

Through all the above, we operate a robust approach to safeguarding and child protection whereby all staff (including supply staff, volunteers, and contractors) are made aware of and take seriously, their responsibilities so that every precaution can be taken to minimise risk of harm to our students whilst they are on site, when being educated off-site, and in their lives outside of education.

## 2. Scope and purpose

- 2.1. To ensure that all staff understand their role as part of a wider safeguarding system for children.
- 2.2. To ensure all staff understand that safeguarding and promoting the welfare of children is everyone's responsibility and, in order to fulfil this responsibility effectively, all staff should consider at all times what is in the best interests of the child.
- 2.3. To ensure that all staff know that no single person can have a full picture of a child's needs and circumstances and to understand the importance of taking concerns and disclosures seriously, taking prompt action, and sharing information appropriately.
- 2.4. To enable all staff to understand the 'duty of care' placed on them and their role in safeguarding and promoting the welfare of all students.
- 2.5. To ensure that all staff understand the procedures in place when dealing with potential child protection issues.
- 2.6. To demonstrate the Organisation's commitment and procedures with regards to child protection.

For the purposes of this policy and guidance, 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

- taking action to enable all children to have the best outcomes.

Children includes everyone under the age of 18.

### 3. Procedures and training

To minimise risk to students, the main elements to our safeguarding practice are as follows:

- 3.1. We practice safer recruitment in checking the suitability of staff and volunteers to work with children (see Safer Recruitment policy).
- 3.2. We continually review all practices in order to establish a safe environment in which children can learn and develop (see Health and Safety policy)
- 3.3. We raise awareness of child protection issues with students and aim to equip them with the skills needed to keep them safe.
- 3.4. We ensure staff are aware of how to conduct themselves with students and give regular training on child protection and safeguarding. All staff in school have read Part 1 (or, if they do not work directly with children, Annex A) of Keeping Children Safe in Education (Sept 2021) and re-read it on an annual basis as part of the induction refresher, to ensure a common understanding that safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play in safeguarding children.
- 3.5. Regular updates are provided to staff via emails and staff meetings. We adhere to the recommendation that formal training is delivered at least annually, and regular updates keep safeguarding at the forefront of everyone's thinking and practice
- 3.6. The Senior Leadership Team are informed of the students with social workers, and they understand that they have a particular responsibility for removing barriers to learning for this disadvantaged group
- 3.7. The Early Help ethos ensures that we provide support for our students as soon as a problem is identified and applies to all students. Staff discuss early help requirements with the designated safeguarding lead and support other agencies undertaking an early help assessment.
- 3.8. We recognise that some children are more vulnerable than others and, therefore, may be more at risk from abuse
- 3.9. We carry out appropriate risk assessments in all buildings for all activities (e.g. educational visits) and also for individual children as necessary.
- 3.10. We raise awareness with all students of the risks of technologies and online platforms through teaching about e-safety
- 3.11. We encourage a positive atmosphere of openness and support where students are encouraged to have the confidence to talk to familiar adults with the

understanding that they will be listened to. Enough time is dedicated to the pastoral curriculum to allow for teaching of all aspects of safeguarding.

- 3.12. We operate a 'zero-tolerance' approach to peer-on-peer abuse, including bullying, cyberbullying, and prejudiced-based and discriminatory bullying (see Behaviour and Anti-Bullying policies)
- 3.13. We have a strong emphasis on student voice through pastoral and policy reviews and the employment of key staff.
- 3.14. We have procedures for identifying and reporting cases or suspected cases of abuse and are ever vigilant to all concerns regarding any unhealthy opinions or behaviours a child may display.
- 3.15. We support students who have been abused in accordance with their agreed child protection plan and offer non-prejudicial support for those who make allegations.
- 3.16. We ensure all staff have training in child protection procedures at induction. These procedures follow the guidelines set out by Ofsted, Circular 10/95, Safeguarding Children in Education 2004 and Keeping Children Safe in Education (2021). Staff are re-inducted annually to ensure everyone is trained in how to respond appropriately and sensitively to child protection concerns
- 3.17. We are committed to working with other agencies to safeguard children and setting up an inter-agency assessment as appropriate
- 3.18. We will consider the child's wishes or feelings when determining what action to take and what services to provide to ensure every child is safe and staff do not promise confidentiality at any point.
- 3.19. The Designated Safeguarding Lead undertakes formal re-designation training at least every 2 years with a recognised trainer

#### **4. Our Commitment**

- 4.1. We recognise that, for students, high self-esteem, confidence, supportive friends, and clear lines of communication with a trusted adult promotes prevention.
- 4.2. The Organisation will therefore:
  - 4.2.1. Establish and maintain an ethos where students feel secure, are encouraged to talk and are listened to.
  - 4.2.2. Ensure that students know there are adults in the Organisation who they can approach if they are worried or in difficulty.
  - 4.2.3. Include in the curriculum activities and opportunities for personal and social development which will equip students with the skills they need to recognise and be safe from abuse. Students need to recognise behaviours which are unacceptable from peers and adults.

- 4.2.4. Ensure that, wherever possible, every effort will be made to establish effective working relationships with parents whilst always putting the needs of the child first.
- 4.2.5. Ensure that our approach to managing behaviour is positive and that staff understand how to behave when working with children.
- 4.2.6. Recognise its obligation to work with and co-operate with colleagues from other agencies (Education Act 2004 and Working Together 2018).
- 4.2.7. Ensure that staff are fully aware of the different types of child abuse and signs of abuse
- 4.2.8. Recognise that staff build up expertise in dealing with concerns and safeguarding issues overtime. Therefore, the Organisation will provide opportunities for staff to contribute to shaping the safeguarding arrangements and child protection policies.

## **5. Roles and responsibilities**

- 5.1. The Organisation has a 'Designated Safeguarding Lead' (DSL) and Deputy Designated Safeguarding Lead, who are senior members of staff and have the responsibilities set out in Annex C of Keeping Children Safe in Education (2023).
- 5.2. The Organisation also has a Head of Pastoral for child protection who is trained on a regular basis and who has the responsibility, alongside the Principal, to ensure that the Organisation has an effective policy and structures in place to support the safeguarding of children.
- 5.3. The Organisation has a specific job description for both the DSL and Head of Pastoral which is available on request.
- 5.4. All staff need to be aware of the signs of child abuse and neglect; staff must inform the DSL in total confidence, and a sensitive, tactful, and totally confidential investigation will then take place. If the signs are confirmed, the Principal will manage any potential Child Protection issue.
- 5.5. All staff understand that child protection information is 'need to know' and confidential information about a child should not be freely shared and that neither the Data Protection Act (2018) nor UK GDPR prevent the sharing of information for the purposes of safeguarding children. The child's interests come first, and their dignity must be protected.
- 5.6. The Principal has overall responsibility for ensuring all aspects of child protection and safeguarding are paramount in the organisation.
- 5.7. **Designated Safeguarding Lead (DSL)**
  - 5.7.1. On induction, all staff are advised of the names of their Designated Safeguarding Leads (DSL) and the Organisation ensures that these roles have a high-profile among staff and students.

### 5.7.2. Role of the Designated Safeguarding Lead for Child Protection:

- Lead on all aspects of safeguarding and child protection including online safety.
- Seek advice and guidance in line with the local safeguarding board's practice.
- Make referrals to children's social care if there is a concern that the child is suffering significant harm or is likely to do so, understanding
  - that all referrals are child-centred, and the needs of the child are paramount.
- Ensure the voice of the child is heard and that the unique characteristics of the child within their family and community context is communicated.
- Make a referral to the National Referral Mechanism if there are any concerns that a child may be a potential victim of slavery or human trafficking.
- Be alert to the specific needs of children in need, for example, those with special educational needs and young carers.
- Refer promptly all cases of suspected child abuse to the local social services department. In the case of a social worker attending the school to see a student following a referral, if the student's parent arrives to collect the student before the social worker, it must be remembered that we have no right to prevent the removal of the student. However, if there are clear signs of physical risk or threat, the police should be called.
- Be able to keep detailed, accurate, secure written records of concerns and referrals.
- Ensure written records of concerns about a child are kept even if there is no need to make an immediate referral and ensure these records are stored securely and separate to the student's curriculum file until the child's 25th birthday.
- Work with the Principal in informing the Local Authority Designated Officer (LADO) for child protection concerns (all cases which concern a staff member), Disclosure and Barring Service (cases where a person is dismissed or left due to risk / harm to a child), and /or the police (cases where a crime may have been committed).
- The Principal should make all referrals to the LADO or, where appropriate, delegate to the DSL. If the concern is about the Principal, the referral will be managed directly by LADO.
- Liaise with the Principal to inform him / her of issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Act as a source of support, advice, and expertise to staff on matters of safety and safeguarding, and when deciding whether to make a
  - referral by liaising with relevant agencies.
- Attend all child protection multi-agency conferences and contribute to child protection plans.
- Understand the role of other child protection and safeguarding agencies.

### 5.8. Coordinating Training



The DSL should take responsibility for coordinating Safeguarding and Child Protection training as follows:

- Co-ordinate annual statutory training as well as regular training and information updates for all staff to keep child protection and the welfare of children paramount
- Ensure all staff read and understand the latest version of Keeping Children Safe in Education, this policy and related policies and guidance as signposted by the DSL and senior leadership team
- Designated Safeguarding Leads (and deputies) should undergo the relevant Child Protection training, and ensure training is updated regularly – at least every two years to act as a source of support and expertise for our learning community
- Ensure that new staff (including supply staff, volunteers and contractors) receive safeguarding children induction by their first day of work
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- Obtain access to resources and attend any relevant or refresher training courses
- Understand the assessment process for providing early help and intervention, for example, through locally agreed common and shared assessment processes, such as early help assessments
- Encourage a culture of listening to children, including taking any concerns or disclosures seriously and ensuring children do not feel that they are causing a problem or inconvenience, feel reassured and not shamed, and taking account of their wishes and feelings in any measures Rare may put in place to protect them
- Be clear that early help is the most effective way of promoting the welfare of children and understand how to work with other agencies to provide this for children and families in need and be alert to the potential need for early help for children

### 5.9. Raising Awareness

- Ensure all staff are aware of Rare's processes and the role of the Designated Safeguarding Lead
- Work with the Principal and Head of Pastoral in reviewing the Child Protection policy annually and the procedures and implementation are updated and reviewed regularly
- Ensure the Child Protection policy is available publicly and parents know referrals about suspected abuse or neglect may be made and the role of the Organisation in this
- Ensure that the school operates within the legislative framework and recommended guidance
- Make sure staff are aware of training opportunities and the latest local policies on safeguarding

- Ensure the Designated Safeguarding Lead attends case conferences or nominates an appropriate member of staff to attend on his / her behalf
- Where children leave the Organisation, ensure their child protection file is copied for any new school or college as soon as possible, but transferred separately from the main student file
- Develop effective links with relevant statutory and voluntary agencies to support the protection of children

## 6. Prevention through Education

The school recognises that taking action to enable all students to have the best outcomes is a key part of safeguarding and promoting the welfare of children, and that providing a high-quality education that is equitable and accessible to all learners is what underpins this.

Therefore, Rare will ensure that:

- 6.1. Each student's provision enables them to achieve their best and become confident individuals living rewarding lives
- 6.2. All students are supported to make successful transition between phases and then into adulthood, whether into employment, higher education, or training, and to enjoy and achieve throughout their time at Rare.
- 6.3. Opportunities to teach about safeguarding, including online safety, should be personalised and contextualised to take into account student's individual needs as well as making content appropriate for those who have pre-existing vulnerabilities including having been the victim of abuse.

## 7. Children who are looked after by the Local Authority including those previously looked after

- 7.1. Local governing bodies must ensure that the Principal has appointed a designated teacher to promote the educational achievement of children who are looked after and to ensure that this person has appropriate training
- 7.2. The most common reason for children becoming looked after is because of abuse and / or neglect or increasingly because they are a refugee. Appropriate staff will have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility; the levels of authority delegated to the carer by the authority looking after him / her; details of the child's social worker and the name of the virtual school head in the authority that looks after the child.
- 7.3. The Designated Safeguarding Lead will ensure that responsible staff are aware of the information they require in relation to the student's status, for example, access rights for birth parents or those with parental responsibility. We recognise that in some cases students will not be from the geographical local authority and will ensure that liaison takes place with the relevant professionals from the appropriate authority.

## 8. Children with increased potential need for Early Help

8.1. Any child may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child that falls into any of the categories listed below:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have an EHCP)
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing / goes missing from care or from home
- is at risk of modern slavery, trafficking, sexual or criminal exploitation
- is at risk of being radicalised or exploited
- has a family member in prison, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing drugs or alcohol themselves
- has returned home to their family from care
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child
- is persistently absent from education, including persistent absences for part of the school day

8.2 All staff should understand that children with special educational needs and disabilities (SEND) may be more vulnerable to exploitation and abuse. They may be more isolated from their peers and may find it difficult to express concern. No concern should be over-looked or passed off as a symptom of SEN or disability – staff must be hyper-vigilant and sensitive to their specific needs and potential communication barriers.

8.3 All staff need to be aware that mental health problems can, in some cases, be an indicator that the child is at risk of suffering abuse, neglect or exploitation and, in other cases, be a pre-vulnerability to abuse. All staff must be aware that a diagnosis can only be made by trained professionals, however, we must all be aware of the signs and symptoms that would suggest that a child is developing or is experiencing mental health issues. Historic trauma, for example, adverse childhood experiences, can have a lasting impact and this can impact on the child's mental health and possibly vulnerability to safeguarding risks. Any indication of mental health issues should be referred to the DSL in the usual way. Mental health issues may still carry a stigma for some families in the

communities that we serve and therefore all communication must be extremely sensitively handled.

8.4 Appropriate safeguarding responses to children who go missing from education settings are in place, particularly on repeat occasions, to help identify any risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of their going missing in future. The Organisation has staff dedicated to following up on children's absence and a system of early contact.

## 9. Contextual safeguarding

Designated Safeguarding Leads will be particularly mindful of contextual safeguarding (Firmin 2017). Young people's experiences and relationships beyond the family may mean that they are more or less likely to experience significant harm. This is particularly the case for adolescents who may have access to influences beyond the family, for example, on-line, peer-group, criminal subcultures. This influence occurs at a time when they are particularly vulnerable and suggestable to influence. Peer relationships are increasingly influential and may undermine familial relationships. It is for this reason that schools must be safe spaces where staff are hyper-vigilant to negative peer influences including those that challenge school and social norms. Staff must be wary of potentially exploitative peer to peer relationships, particularly where there is an imbalance of power. Staff must never underestimate the weight of peer influence and must report this as a safeguarding concern where they witness it occurring.

9.1. CSE and CCE occur where an individual or group take advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual or criminal activity, often referred to as grooming. The abuse may take various forms, including enticement and or violence. The victim may believe that their involvement is consensual, however, by nature of the power imbalance, this is not the case. In the areas that we serve, CSE and CCE is a prevalent contextual safeguarding issue e.g. sexual exploitation and 'County Lines'. See Annex B of Keeping Children Safe in Education for more information.

9.2. All staff must be aware and trained on the indicators that young people are at risk of, or involved in, serious violent crime. As we know, the context in which our academies are based can mean that our children are vulnerable to being exploited by criminal networks or gangs.

## 10. Peer on peer abuse

10.1. All staff should be aware that children can abuse other children, this can happen both inside and outside of school, as well as online, and that no reports being made does not mean that peer on peer abuse is taking place. Rare is committed to:

10.2. Ensuring all staff are able to recognise the indicators and signs of peer-on-peer abuse and know how to identify and respond to it.

10.3. Ensuring all staff are knowledgeable about the different forms of peer-on-peer abuse, which includes (but may 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 physical abuse)
- 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)
- Upskirting, 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)

10.4. Ensuring we create a culture of safety by challenging inappropriate behaviours between peers and not downplaying or dismissing behaviour that is actually abusive in nature by saying things like "it's just banter", "just having a laugh", "part of growing up" or "boys will be boys".

10.5. Having a 'zero tolerance' approach to managing peer on peer abuse in any form.

10.6. Following the statutory guidance set out in Part 5 of Keeping Children Safe in Education 2021 regarding response to all reports and concerns of child on child sexual violence and sexual harassment.

## 11. Prevent duty

11.1. The Organisation is subject to a duty under section 26 of the Counter-Terrorism and Security Act (2015), in the exercise of functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty. As such, the Organisation is committed to ensuring that all DSLs will also be trained in Prevent and related safeguarding issues.

## 12. Online Safety

12.1. Rare recognises that it is essential that children are safeguarded from potentially harmful and inappropriate material online. In response to this, Rare is committed to:

- Ensuring an approach to online safety that protects and educates both staff and students in their use of technology and establishes mechanisms to identify, intervene in and escalate concerns where possible

- Ensuring awareness of the 'four Cs' of online risk – content, contact, conduct and commerce – amongst both staff and students and having policies and procedures in place to address all areas of risk
- Where children are being asked to learn online at home, to have regard to the DfE advice regarding remote education as well as advice provided by the NSPCC and PSHE Association, as reflected on the Online Safety and Acceptable Use of Technology policy
- Having appropriate levels of e-security / cybersecurity protection procedures in place for staff and students and for these to be regularly reviewed in order to keep up with changes in the sector.
- For all aspects of online safety to be regularly reviewed in order to keep up with the latest changes to technology, risk and potential harms in this rapidly evolving sector.
- The 360-degree safe website is a free online self-review resource that can support with this.

### 13. Whistleblowing

13.1. All staff and volunteers should be able to raise concerns should they consider there to be poor or unsafe practice and potential failures in the safeguarding regime and know that concerns are taken seriously by the leadership team.

13.2. Whistleblowing procedures are in place across the Organisation and are available on request.

13.3. The NSPCC whistleblowing helpline is available for staff who feel unable to raise concerns directly on 0800 028 0285 or [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

#### 13.4. Dealing with disclosures of abuse

- Always listen carefully and quietly – do not press for any evidence at all.
- Remain calm and reassuring – do not dismiss the disclosure – do not show distress or concern.
- Do not refute the allegation.
- Show that you care through open and reassuring facial and body language.
- Do not interrogate or ask leading questions (it could later undermine a case).
- At this point, take the following steps:
  - explain to the student that the disclosure must be reported – emphasise your trust in them
  - do not promise to keep the allegation secret or that 'everything will be alright'
  - reassure the student by telling them that they have done the right thing in telling you. Do not offer physical reassurance
  - do not admonish in any way e.g. 'I wish you had told me sooner'
  - inform the Designated Safeguarding Lead (DSL) immediately and verbally to begin with where possible

- under no circumstances discuss the matter with any other person - if the allegations prove to be untrue, any such discussion would be deemed
- defamatory. Information to staff is on a 'need to know' basis at the discretion of the DSL
- if the child agrees, take them with you to the DSL, although not at the expense of a disclosure continuing
- with the DSL, prepare a detailed report itemising:
  - the information revealed by the student with absolutely no opinion
  - actions taken by yourself, including when the suspicions were reported, to whom the suspicions were reported, and follow-up action taken within Rare
  - date and sign any written record of events and action taken and keep this confidential and secure. You must keep, in absolute confidence, a copy of the report, as will the DSL
- the DSL keeps Child Protection records centrally and securely; they are not kept in the child's file
- all staff are under a duty to report all suspicions of abuse to the DSL
- the DSL is responsible for passing on these concerns to Social Services
- accurate records are essential in the event of further investigations
- If you see or hear something that concerns you:
  - don't ignore it
  - make a mental note and seek advice
  - don't feel silly – if it worries you, someone else needs to know
  - see the DSL immediately (or a safeguarding officer if the DSL is unavailable) if a child is deemed to be at risk of harm. No child should go home without external agency involvement if the DSL is concerned about risk. As well as a face to face with the DSL, a cause for concern must be completed by the member of staff reporting
  - see the appropriate head of year, or in the case of a COP child – Individual Needs if it is something related to safeguarding, but not a child whose safety is immediately at risk
  - see the DSL, or safeguarding officer immediately if it is related to the child being at risk and do this before the child goes home that day
- all staff may raise concerns directly with Children's Social Care services
- concerns about adults should be made to the Principal
- Child protection procedures – points of action

#### Discovery or suspicion of child abuse

- Inform the DSL in person and also electronically record in CPOMs. The DSL will, in the appropriate manner and according to procedures, assess the situation.

#### The DSL will, if appropriate, take the following steps:

- where it is clear that a Child Protection Referral (significant harm) is needed, contact Social Services without delay.

- where the DSL is not sure whether it is a child protection issue, or where they need to check the child protection register, they may seek advice from the Child Protection Unit
- follow locally agreed protocols which can be found on the local Children's Services website under the safeguarding section

The DSL will attend a child protection conference

We recognise the importance of multi-agency working and will ensure that staff including the DSL are able to attend all relevant meetings, case conferences, core groups and strategy meetings.



# Appendix 1 – Anti-Bullying Policy

## 1. Introduction

- 1.1. Rare Liverpool is committed to fostering an environment in which every student feels welcome, comfortable, and safe.
- 1.2. We will strive to ensure that every student can enjoy a journey that is free from harassment and bullying and that every individual is treated with dignity and respect.
- 1.3. Rare Liverpool operates a zero-tolerance approach to bullying and harassment of any kind.

## 2. Definitions

- 2.1. Bullying can be defined as ‘a physical, psychological, or verbal attack against an individual or group of individuals by a person or group of persons, causing physical or psychological harm to the victim’.
- 2.2. It is normally conscious behaviour and commonly consists of repeated acts of aggression and/or manipulation.
- 2.3. Bullying can take several forms – both physical and non-physical, either in combination or in isolation. Any bullying, whether physical or non-physical, may result in lasting psychological damage to the individual.

## 3. Types of bullying

- 3.1. There are many forms of bullying. We recognise that they typically fall into one of the following categories:

- Physical Bullying

Unprovoked assault on a person on which can range from a prod to grievous bodily harm.

- Psychological

Reduction of a person’s self-esteem or confidence through threatening behaviour, taunting, or teasing about race, gender, religion, sexual orientation, gender identity, disability, family circumstances, appearance, or any other feature of their lives which can be used to harm humiliate. (Perceived or otherwise)

- Social

Ostracising or rejecting an individual from/by a peer group. Deliberately making a person feel isolated and that they don’t belong.

- Verbal

The use of language in a derogatory or offensive manner, such as swearing, racist or sexist abuse, sexual innuendo etc. This can also include spreading rumours or malicious discussion about an individual.

- Cyber/online bullying

Using mobile phones or the internet to deliberately upset someone. Being subjected to harmful online interaction with other users.

#### 4. Spotting signs & symptoms of bullying

4.1. All staff members, students and parents are encouraged to spot any signs or symptoms of bullying and report them in confidence, to the Head of Pastoral immediately

4.2. Signs and symptoms could include:

A child that:

- Is frightened of walking to or from school
- attempts or threatens to self-harm or runs away
- cries themselves to sleep at night or has nightmares
- comes home with clothes torn or books damaged
- has possessions which are damaged or " go missing "
- asks for money or starts stealing money (to pay bully)
- has unexplained cuts or bruises
- is bullying other children or siblings
- is afraid to use the internet or mobile phone
- is nervous & jumpy when a cyber message is received
- gives improbable excuses for any of the above

Sudden or gradual changes in behaviour such as:

- an unwillingness to go to school (school-phobic) or regularly feels ill in the morning
- becomes withdrawn anxious, or lacking in confidence
- starts stammering
- stops eating
- begins to do poorly in schoolwork
- becomes aggressive, disruptive, or unreasonable
- is frightened to say what's wrong
- becomes withdrawn in home, school, or social settings.

4.3. The above list is by no means exhaustive nor does it necessary indicate that a child is being bullied but it is advisable to report them in any event so that the right support can be identified where necessary

4.4. Students who are courageous enough to report that they are being bullied or signs of bullying among their peers will be supported by the Head of Pastoral

who will ensure that they will not suffer any detriment as a result of reporting such concerns

## 5. The Procedure

- 5.1. Students, parents, or staff members should report any concern about bullying immediately, in confidence, to the Head of Pastoral
- 5.2. The Head of Pastoral will normally arrange a fact-finding meeting with the victim(s) and any other student(s) thought to be involved or witness to the bullying
- 5.3. A thorough investigation into the reported incident will be conducted. The Head of Pastoral may appoint a senior member of staff to carry out the investigation on their behalf.
- 5.4. The Head of Pastoral will provide assurance to the victim(s) that the process will be handled sensitively and identify any additional pastoral support that would be beneficial
- 5.5. It may be necessary to suspend or temporarily relocate the alleged perpetrator pending the investigation. Where this is the case, the parent of the alleged perpetrator will be contacted and informed of the reasons for this before discussion with the student
- 5.6. Both the victim(s) and the alleged perpetrator(s) and their parent(s) will be kept updated on the progress of the investigation as frequently as possible and will be provided with details of their designated point of contact within the school
- 5.7. If necessary, where the case is considered to be significantly serious, the Head of Pastoral may consult external agencies for advice and guidance and/or report the incident where it is a potential safeguarding or criminal matter

## 6. Outcomes

- 6.1. Once the investigation is concluded, the Head of Pastoral or appointed investigating Officer will arrange to meet the victim and their parent to inform them of the outcome and to discuss a way forward and the best resolve for the individual
- 6.2. The alleged perpetrator(s) will also be invited to a meeting with their parent(s) to discuss the findings of the investigation and how it will be resolved
- 6.3. Rare Liverpool will always strive to encourage harmonious relationships between students and so where possible, the Head of Pastoral may recommend restorative discussions between the student(s), in the presence of their parent(s) if requested.

6.4. In cases where the case of bullying is serious or has lasted for a protracted period in which case the victim feels unsafe to attend school with the perpetrator, Rare Liverpool may need to consider that expulsion from the school is the only option available. Both the student and parent will be fully consulted on the matter before any action is taken and the Principal will oversee any final decision.

## 7. Prevention

7.1. Rare Liverpool recognises that preventing bullying is an essential part of safeguarding students and supports a better, more enjoyable and harmonious environment for both students and staff members

7.2. Through effective management and education, Rare Liverpool is committed to preventing bullying through various methods, including but not limited to:

- Fostering an environment that encourages an open, responsive, and caring ethos
- Encouraging discussions and eliminating fear about speaking out
- Adopt a problem-solving and restorative approach to issues
- Ensuring that staff are aware of how to prevent and spot bullying in the classroom
- Raising awareness and exploring issues together through the curriculum and other initiatives
- Support the bully and the victim in recognising and modifying behaviour
- Providing information and sign-posting students through notice boards, posters, and staff advocates
- Educating and engaging students, parents, and staff members on the principles of online safety so they know the dangers of what unsupervised internet access can create and how to identify cyber-bullying
- Encouraging parents to check what their children are doing online and using parental controls on their computer so that they are comfortable that children are not wandering into dangerous territory
- Keeping up to date on the latest research, information and guidance relating to anti-bullying in schools and reviewing our strategy to include new information as necessary

## 8. Related policies

8.1. This policy should be read alongside the behaviour policy and disciplinary procedure which is found in the student handbook.

## Appendix 2 – Behaviour

Behaviour which we deem unacceptable includes the following:

- Talking back, not following or disobeying instructions or being disrespectful to teachers
- Disrespecting other students
- Repeatedly not listening, talking, being disruptive and any other behaviour not deemed appropriate in class by your teachers
- Damage to the building and facilities
- Using mobile phones in class
- Bullying behaviour (including cyber bullying)

We will not tolerate bullying of any form and we expect everyone to be treated with dignity and fairness at all times. If we suspect bullying or it is reported to us, we will deal with it fairly and swiftly.

Whilst we actively discourage smoking of any kind, there is no smoking or use of electronic cigarettes anywhere on the premises of both Wood Street and Hope Street studios. Similarly, smoking in the doorway of these premises is not allowed. We will point out the designated smoking areas outside of each building during induction week.

## Appendix 3 – Managing Allegations and General Complaints

### 1. Introduction

- 1.1. Rare Liverpool is committed to ensuring that the highest standards are maintained both in the provision of education to pupils and in every other aspect of the running of the school.
- 1.2. A complaints procedure is an important part of effective management, allowing parents the opportunity to voice any concerns or complaints they may have through appropriate channels.
- 1.3. This procedure has been adopted by the School to ensure a systematic and fair approach to the resolution of such complaints.
- 1.4. Parents or guardians of students will be notified of the procedure to follow should they have a concern, complaint, or allegation about a member of staff.
- 1.5. This procedure also covers the management of cases of allegations that might indicate that a person is unsuitable to work with children in their present position or in any capacity.
- 1.6. The purpose of the procedure is to ensure that any allegation of abuse made against a member of staff member is dealt with fairly, quickly, and consistently and achieves the best possible outcome for all involved.
- 1.7. Rare Liverpool will ensure that any action taken as part of this procedure does not compromise the welfare or safeguarding of any student and that any impact on education delivery is minimised as far as possible.

### 2. Definitions

- 2.1. A 'concern' may be defined as 'an expression of worry or doubt over an issue considered to be important for which reassurances are sought'.
- 2.2. A 'complaint' may be generally defined as 'an expression of dissatisfaction however made about actions taken or lack of action'.
- 2.3. An 'allegation' can be defined as 'a claim or assertion that someone has done something illegal or wrong'.

### 3. Principles

- 3.1. Where a concern, complaint or allegation is received from a parent, this will be logged by the Head of Pastoral who will manage the case. If the issue is raised verbally, the complainant will be requested to follow this up in writing using the Complaints form (Appendix 1).

- 3.2. All parties believed to be involved in the case will be notified immediately and Rare Liverpool may deem it appropriate to take immediate but temporary action to safeguard both the student and the staff member, such as suspension, additional supervision, or changes to timetables.
- 3.3. Any complaint will be kept confidential unless it is necessary to involve other parties and will be dealt with as quickly as possible.
- 3.4. A thorough investigation will be conducted prior to any final action being taken, which may include gathering witness statements, reviewing any available video footage or evidence, and interviewing those involved in the case.
- 3.5. Rare Liverpool will endeavour to resolve any difficulties informally in the first instance, although this will depend on the severity of the situation and will be dealt with on a case-by-case basis.
- 3.6. All parties will be kept fully informed of the handling of any complaint.
- 3.7. The parent(s) and student will be asked at the earliest stage what they think might resolve the issue and Rare Liverpool will encourage a collaborative approach to achieving the best outcome.

#### **4. Stages in the Procedure**

- 4.1. Receipt of notification of concern/complaint/allegation
  - 4.1.1. Upon receipt of a concern, complaint, or allegation from a parent, the Head of Pastoral will arrange to meet with the parent(s) and the student for an initial discussion and to gather as much information as possible.
  - 4.1.2. The staff member(s) identified to be involved in the case will be notified as soon as reasonably practicable and asked to provide any information that they have relating to the case
  - 4.1.3. It may also be necessary to speak to any other witnesses to the incident if appropriate, including other students and staff members
  - 4.1.4. All parties, including witnesses, will be instructed to keep any related discussions confidential.
- 4.2. Informal stage
  - 4.2.1. Where the issue is considered to be a 'concern' or 'complaint' in accordance with the definitions outlined above in 2.1 and 2.2, the Head of Pastoral may determine that this can be dealt with informally and/or internally and will strive to resolve this in the best interests of all parties.
  - 4.2.2. All parties will be notified of the outcome in writing and any temporary measures in place during the investigation will cease.
  - 4.2.3. If the parent is dissatisfied with the outcome of the informal stage, the case will be referred to the Principal who will review the case and determine

whether any further action is required. This will usually involve a further meeting with the parent(s) to discuss and agree the next steps.

#### 4.3. Formal Stage

##### 4.3.1. Where an allegation is received about a staff member where it is alleged that they have:

- Behaved in a way that has harmed a child or may have harmed a child;
- Possibly committed a criminal offence against or related to a child; or
- Behaved towards a child or children in a way that indicates s/he is unsuitable to work with children
- Committed a breach of any safeguarding regulations.

The allegation will be dealt with under the Formal stage of this procedure and the informal stage will be omitted.

##### 4.3.2. The parent(s) will be asked to meet with the Head of Pastoral and/or the Principal to establish the facts of the case and determine any necessary immediate action, which may include:

###### 4.3.2.1. Suspending the staff member involved pending a full investigation;

###### 4.3.2.2. Ensuring that the Designated Safeguarding Lead (DSL) and the deputy DSL are fully aware of the case

###### 4.3.2.3. Carrying out a risk assessment

###### 4.3.2.4. Identifying any additional support the parent(s) and student may need;

###### 4.3.2.5. Notifying the relevant external bodies, including but not limited to:

- Local Authority Designated Officer (LADO):

They will be involved in managing and overseeing the case, providing advice and guidance and if applicable, liaising with the police and local authorities

- The Police

Where the allegation may constitute a criminal offence, Rare Liverpool will report this to the police.

##### 4.3.3. HR will be notified and will assume responsibility for coordinating the internal investigation and advising in accordance with Rare Liverpool's disciplinary procedures

##### 4.3.4. The Head of Pastoral will be responsible for managing the ongoing wellbeing of the student(s) involved, in collaboration with the parent(s) and ensuring that any impact is minimised.



## 5. The outcome

- 5.1.1. Rare Liverpool will strive to conclude the investigation and delivery an outcome as soon as possible and normally within 20 working days of receipt of the complaint. However, the timeframe may vary from case to case and will normally be dependent on a number of variables such as the complexity of the case, the availability of witnesses and response times from external bodies.
- 5.1.2. The response may be in writing or at a meeting with written confirmation of the outcome.
- 5.1.3. Should a parent be dissatisfied with the outcome of Rare Liverpool's investigation, they should notify the Principal in writing within 5 days of receipt. If deemed necessary, the Principal will escalate to an appropriate person or body for review.

## 6. Low level concerns

- 6.1. Rare recognises that there may be times when there are concerns about a professional's behaviour which do not meet the harm threshold as set out in section 2 of this policy. This includes third party staff and volunteers. Concerns such as this may arise in several ways and from a number of sources. Examples of this may be:
  - suspicion, complaint or disclosure made by a child, parent or other adult within or outside of our school;
  - or as a result of vetting checks undertaken during recruitment
- 6.2. Rare promotes an open and transparent culture in which all concerns about adults working in or on behalf of the organisation are dealt with promptly and appropriately. Creating this culture in which all concerns are shared responsibly, in a timely way with the right person, and are recorded and dealt with appropriately is critical to effective safeguarding practice. This culture enables Rare to identify concerning, problematic or inappropriate behaviour at the earliest possible stage, minimises the risk of abuse and ensures that all adults working in or on behalf of the school are clear about professional boundaries and act within these, in accordance with our ethos and values. This culture also empowers individuals to share concerns with key staff about their own behaviour at the earliest possible opportunity.
- 6.3. The term 'low level concern' does not mean that the behaviour is insignificant. It means a behaviour towards a child which does not meet the threshold set out in section 2 of this policy and part 4 of Keeping Children Safe in Education 2021. A low-level concern is any concern (no matter how small, and even if no more than causing a sense of unease) that an adult working in or on behalf of the school may have acted in a way that:
  - is not consistent with the staff code of conduct, including conduct outside of the workplace, and/or

- does not meet the allegations threshold or is otherwise not considered serious enough for a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating, or offensive language.

- 6.4. Behaviours which are not consistent with the standards and values of our organisation, and which do not meet the expectations set out in our code of conduct for staff, must be addressed. Behaviours such as this, can exist on a spectrum from inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.
- 6.5. It is essential that concerns such as this are shared responsibly and with the right person, and that they are recorded and dealt with appropriately. Effective reporting and management of such concerns also protects staff from potential false allegations of misunderstandings. Concerns should be shared as soon as is reasonably possible, and ideally within 24 hours of becoming aware of a problem, however it is never too late to share a concern.
- 6.6. Occasionally a member of staff may find themselves in a situation which could be misinterpreted or may appear compromising to others. Equally, a member of staff may have behaved in a manner which, on reflection, they consider falling below the standards set out within our code of conduct for staff. Self-reporting such circumstances is actively encouraged as it allows issues to be dealt with at the earliest opportunity and it is an important means of maintaining our culture of everyone aspiring to have the highest standards of conduct and behaviour.
- 6.7. Staff do not need to be able to determine whether their concern is a low level concern, or if it would be dealt with under our managing allegations policy. Staff must simply be empowered to share their concern. The determination regarding process will be made by the designated safeguarding lead and headteacher.
- 6.8. Low level concerns should be reported in writing to the designated safeguarding lead. Where a low-level concern is in relation to the designated safeguarding lead, it should be shared with the Principal.
- 6.9. If a report of a low level concern is received, it will be dealt with responsively, sensitively, and proportionately. Where a concern is reported, the designated safeguarding lead should collect as much evidence as possible by speaking directly with the person who raised the concern (unless it has been raised anonymously), and by speaking to the

individual involved along with any witnesses. The information collected will help to categorise the behaviour and determine what further action may need to be taken. Support and advice will be provided to ensure any identified behaviours can be corrected at an early stage.

- 6.10. All low level concerns will be recorded in writing by the designated safeguarding lead and this record should include the details of the concern, the context and the action taken, including the rationale for any decisions. Records must be kept confidential and held securely in line with the Data Protection Act 2018 and the UK General Data Protection Regulation. Records will be kept in individual personnel files and will be retained for the duration of the individual's employment.
- 6.11. Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, school will decide on a course of action either through our disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, referral to LADO.
- 6.12. The designated safeguarding lead will regularly and effectively communicate with the Headteacher, all low-level concerns reported to them, along with the outcome of the concern. This is to ensure there is appropriate scrutiny and analysis of information in order to agree at what point a series of low-level concerns or a pattern of behaviour would escalate and meet the threshold set out in section 15 of this policy and part 4 of Keeping Children Safe in Education 2021. School to include specific detail here of how often these meetings will occur e.g. after any concern is raised, weekly, monthly, etc.
- 6.13. Low level concerns will not be included in references unless they relate to an issue which would normally be included in a reference. Paragraph 423 of Keeping Children Safe in Education specifies: "However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference."

## **7. Unsubstantiated complaints and allegations**

- 7.1.1. Where an allegation is found to be unsubstantiated and no further action is taken, Rare Liverpool will encourage restorative discussions between the parties involved to ensure that good relations can be maintained.
- 7.1.2. Rare Liverpool expects any complaint or allegation to be made in good faith and will not tolerate vexatious or malicious behaviour towards any of its employees or associates.

## Appendix 4 – Health & Safety Statement

### Introduction

In accordance with its duty under sections 2 and 3 of the Health and Safety at Work etc. Act 1974, and in fulfilling its obligations to employees, students and members of the public who may be affected by its activities, the centre has produced the following statement of policy in respect of Health and Safety:

It is our aim to achieve a working environment that is free of work-related accidents and ill health and to this end we will pursue continuing improvements from year to year.

The Centre recognises its Health and Safety duties under the Health and Safety at Work etc. Act 1974 and the Management of Health and Safety at Work Regulations 1999, and all concomitant legislation, to ensure, so far as is reasonably practicable, the health and welfare at work of all employees and students.

Particular attention will be paid to duties required, namely:

- Provision and maintenance of safe plant and systems of work.
- Safe and healthy use, handling and storage of articles and substances.
- Provision of necessary information, instruction, training and supervision.

We undertake to discharge our statutory duties by:

- Identifying hazards in the workplace, assessing the risks related to them, and implementing appropriate preventative and protective measures.
- Providing and maintaining safe plant and work equipment.
- Establishing and enforcing safe methods of work. Recruiting and appointing personnel who have the skills, abilities, and competence commensurate with their role and level of responsibility.
- Ensuring that tasks given to employees are consistent with their skills, knowledge, and ability to perform.
- Ensuring that technical competence is maintained through the provision of refresher training as appropriate.
- Promoting awareness of Health and Safety and of good practice through the effective communication or relevant information.
- Furnishing sufficient resources needed to meet these objectives.

A successful Health and Safety programme is dependent on the participation and co-operation of all employees. All employees are aware that they have a legal duty to:

- Exercise reasonable care for the Health and Safety of themselves and others who may be affected by their acts or omissions at work.
- Co-operate with and assist the employer in meeting statutory obligations.
- Not intentionally or recklessly interfere with anything provided in the interests of health, safety and welfare.

Our Health and Safety Policy will be reviewed annually as a minimum, to monitor its effectiveness and to ensure that it reflects changing needs and circumstances. The Policy will be subject to additional review to reflect changes to legislative requirements, changes to key personnel in the centre, and advancement in technologies which affect the centre's activities.

Copies of this Health and Safety Policy Statement will be displayed in the workplace. The full Centre Health and Safety Policy will be available for all employees to read.

All Employees, external Consultants and Contractors employed by the centre will be expected to comply with this Health and Safety Policy.

## Appendix 5 – Online Safety and Acceptable Use of IT

### 1. Introduction

- 1.1. To maximise the benefits of computer resources and minimise potential liability, staff members are only permitted to use Rare Liverpool's computer systems in accordance with the GDPR policy as well as adhering to the following guidelines.
- 1.2. Rare Liverpool's computer systems, software and their contents belong to the Organisation, and they are intended for business purposes. Staff members and associates are permitted to use the systems to assist in performing their jobs only.
- 1.3. Rare Liverpool has the right to monitor and access all aspects of its systems, including data which is stored on Rare Liverpool's computer systems in compliance with the Data Protection Act 1998.

### 2. Security

- 2.1. Staff members are required to log on to Rare Liverpool's computer systems using their own password (where provided) which they are required to keep confidential.
- 2.2. Staff members are not permitted to use another individual's password to log on to the computer system, with or without the employee's permission. If an employee logs on to the computer using another employee's password, that employee will be liable to disciplinary action up to and including summary dismissal for gross misconduct. Any employee who discloses their password to another employee will be liable to disciplinary action.
- 2.3. To safeguard Rare Liverpool's computer system from viruses, staff members are not permitted to load or run unauthorised games or software, or to open documents or communications from unknown origins. Where the computer has Internet or electronic mail (Email) facilities installed, staff members are not permitted to download or open files from the Internet. Email attachments received must be forwarded to the designated IT person, for virus checking prior to opening.
- 2.4. On leaving Rare Liverpool's, and at any other time at management request, staff members are required to hand in all Organisation information and data held in computer-useable format.

### 3. Use of the Internet and Email

- 3.1. Rare Liverpool's web and email accounts should be used only for the purpose of Rare Liverpool and related matters. Staff members should be always aware that they are representing Rare Liverpool when emailing from Rare Liverpool's accounts and therefore all communication should uphold the professional integrity of Rare Liverpool.
- 3.2. Emails sent on behalf of Rare Liverpool could give rise to legal action against Rare Liverpool. Claims of defamation, breach of confidentiality or breach of contract could arise from the misuse of emails. It is therefore vital for email messages to be

treated like any other form of correspondence. You are also reminded that these email messages may be disclosed to the individual and any legal action could be commenced against Rare Liverpool, relevant to the issues set out in the email.

- 3.3. Care must always be taken when referring to individuals and references to students and their personal information should be shared only in adherence to Rare Liverpool's GDPR policy and Safeguarding policies

#### **4. Inappropriate Use**

- 4.1. Misuse of Rare Liverpool's computer systems may result in appropriate action being taken against the staff member. Examples of misuse include, but are not limited to, the following:
  - Sending, receiving, downloading, displaying, or disseminating material that insults, causes offence, or harasses others
  - Accessing inappropriate or unlawful materials
  - Engaging in on-line chat rooms or gambling
  - Use of Social Networking Websites
  - Forwarding electronic chain letters or similar material
  - Downloading or disseminating copyright materials
  - Transmitting confidential information about Rare Liverpool or its students
  - Downloading or playing computer games
  - Copying or downloading Software
  - Any conduct that constitutes a violation of any of Rare Liverpool's policies.

#### **5. Safeguarding students online**

- 5.1. Rare Liverpool embraces the use of technology in delivering learning objectives and recognises the value it adds to communication, enhancing knowledge and supporting learner's needs
- 5.2. However, Rare Liverpool recognises the increasing risk and potential threats that come with online systems as technology advances and new platforms emerge
- 5.3. It is the responsibility of all staff members to safeguard students online and to report any potential harm to the Head of Pastoral immediately

#### **6. Student emails**

- 6.1. All students are issued with individual Rare Liverpool email addresses which they should use to communicate with other students and staff members
- 6.2. Emails are monitored and where misuse or risk to the student or other students is identified; this will be addressed immediately and sensitively by the Head of Pastoral
- 6.3. Staff must correspond electronically with students using Rare Liverpool email addresses only. Staff are strictly forbidden from communicating with students using their own or the recipient's personal email addresses.

#### **7. Evaluation of content**

- 7.1. When using online platforms to deliver learning, it is imperative that staff members firstly check that the content is suitable and age appropriate
- 7.2. When asking students to search online, teachers must have carried out an initial check prior to this to evaluate the suitability of the available content

## **8. Student awareness**

- 8.1. Rare Liverpool acknowledges its responsibility to educating students and raising their awareness of the risks and potential threats to them while using online platforms
- 8.2. Students will be made aware of the risks online through regular communication and teachers will encourage discussion around this
- 8.3. Students will be encouraged to report any content, conduct or incidents that they become aware of that poses a potential risk or harm to themselves or any other student(s)
- 8.4. Rare Liverpool will foster an environment in which students feel comfortable raising their concerns or alerting a staff member about misuse of online platforms or any material that they have found offensive.
- 8.5. Rare Liverpool will be clear with students that the same standards of behaviour are expected online as they are offline and will manage any negative interactions or behaviour issues in accordance with the Keeping Children Safe in Education 2023 guidance.

## **9. Mobile phones**

- 9.1. Mobile phones are not permitted to be used by students in class at any time and it the responsibility of staff members to ensure that this is adhered to
- 9.2. Staff members are also discouraged to use mobile phones other than specifically for work purposes and such use should be limited

## **10. Associated policies**

- 10.1. This policy should be read in conjunction with the following policies:
  - Staff social media policy
  - Student behaviour policy
  - Staff and student disciplinary procedure
  - GDPR policy

# **Appendix 6 - Professional Conduct**

## **1. Introduction**

Rare Liverpool strives to deliver excellence through to all its students and therefore commands high standards of teaching and professional practice from all its workforce. We recognise the key role of teachers in ensuring the quality of education our students receive and that they are integral to achieving our objectives and as such, must demonstrate high standards of professional integrity and conduct.

The core values and professional standards that teachers subscribe to are expressed in terms that are accessible to educators and to all others with an interest in education and should be adhered to during your time with Rare Liverpool.

## **2. Principles and Code of Conduct**



2.1. All employees, workers and associates of Rare Liverpool are required to uphold the values and principles of education within and outside of the professional setting. While this policy cannot cover every eventuality, we expect every individual to be always mindful of these principles and when conducting themselves.

2.2. All employees, workers and associates must adhere to the following Code of Conduct:

- Uphold the dignity of our students and promote equality and diversity through their teaching practice
- Demonstrate respect for different cultural values and social justice
- Foster an environment of mutual respect and positive relations among all students and staff
- Recognise that relationships with students, colleagues, parents, and management are fundamentally based on trust
- Demonstrate and promote fairness and honesty among students and staff
- Foster an environment whereby students feel comfortable approaching staff and are free from detriment
- Recognise and uphold the professional boundaries between teachers and students and parents
- Keep safeguarding at the forefront of every decision and action
- Report or escalate any concerns for the welfare of any student immediately with the Head of Pastoral

### **3. Conflict of interest**

All teachers are required to declare any potential conflicts of interest to the Principal as soon as they are aware. This could be anything that compromises the professional relationship between you and a student, any new or pre-existing conflict or poor relations with students or their parents, any activity that you engage in outside of Rare Liverpool that could have the potential to bring the organisation into disrepute or compromise our values and ethos.

### **4. Professional boundaries**

Rare Liverpool encourages positive, caring relationships between students and teachers. However, those relationships fundamentally rely on trust between you and the students, parents, and the management team and Rare Liverpool has an obligation to protect the safety and welfare of both the students and staff.

Rare Liverpool therefore expects all teachers to be clear on and uphold the professional boundaries between themselves and students.

Social events and social interaction with students outside of Rare is strictly discouraged and relationships between teachers and students and parents, should be of a professional nature only.

If you are unclear about what constitutes professional boundaries, you should seek advice from the principal



## Appendix 7 - Safer Recruitment Policy

### 1. Policy Statement

- 1.1. The purpose of this policy and procedures is to set out Rare's commitment to fair, safe, and effective recruitment and selection of our workforce.
- 1.2. We are committed to safer recruitment practices that:
  - deter prospective applicants who are unsuitable to work with children or young people
  - identify and reject applicants who are unsuitable to work with children or young people
  - prevent and deter inappropriate behaviours by providing on-going supervision, training and support to all staff and volunteers

### 2. Recruitment and selection process

- 2.1. Our recruitment steps outlined below are based on part 3 of Keeping Children Safe in Education and best practice.
- 2.2. To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.
- 2.3. The following recruitment and selection process has been implemented to ensure we are committed to safeguarding and promoting the welfare of children.

### 3. Advertising

- 3.1. When advertising roles, we will make clear:
  - Rare's commitment to safeguarding and promoting the welfare of children
  - That safeguarding checks will be undertaken
  - The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
  - Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020.

### 4. Application forms

- 4.1. Our application forms will:
  - Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
  - Include a copy of, or link to, our Child Protection and Safeguarding policy
  - Make clear that successful candidates will be subject to an enhanced DBS check
  - Ask applicants to provide contact details for Rare to obtain a minimum of 2 references

### 5. Shortlisting

- 5.1. Our shortlisting process will involve at least 2 people and will:
- Objectively assess the application form against the job description and person specification
  - Consider any inconsistencies and identify gaps in employment and reasons given for them
  - Explore all potential concerns
- 5.2. Once we have shortlisted candidates, those invited for interview will receive a candidate pack which will include:
- A self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
    - If they have a criminal history
    - Whether they are included on the barred list
    - Whether they are prohibited from teaching
    - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
    - Any relevant overseas information
    - A declaration confirming the information they have provided is true

## **6. Seeking references and checking employment history**

- 6.1. Rare will obtain a minimum of 2 references for each candidate, one of which must be from their latest employer, prior to the employment commencement date. We will include a statement asking the referee to confirm the candidate's suitability for working with children.
- 6.2. Any concerns raised will be explored further with referees and taken up with the candidate prior to the employment commencement date.
- 6.3. When seeking references we will:
- Not accept open references
  - Liaise directly with referees and verify any information contained within references with the referees
  - Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations
  - Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
  - Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
  - Resolve any concerns before any appointment is confirmed
  - Store the references on a single central record and within any successful candidate's employment file

## **7. Interview and selection**

- 7.1. All candidates will be interviewed by an interview panel, consisting of a minimum of 2 members of the SLT.
- 7.2. All panel members will be asked to declare whether they know of or have any type of relationship with any candidate so that Rare can manage any potential conflict of interest.
- 7.3. When interviewing candidates, we will ensure the following:
  - Every applicant is assessed consistently against the criteria identified on the person specification. The selection panel must look for relevant objective evidence on which to make a decision.
  - Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
  - Explore any potential areas of concern to determine the candidate's suitability to work with children
  - Record all information considered and decisions made including justifications
  - Questions asked of applicants must relate to the requirements of the post and should not be discriminatory, offensive or in any way off-putting to any person or group.
  - At the end of the interviews, each panel member should have recorded evidence of how each candidate has met each of the selection criteria. Systematic analysis and assessment against the school's scoring system is important so that fair and justified decisions are made and so that constructive feedback can be given to candidates.
  - The panel should then reach agreement on which candidate is to be appointed.
  - Short summative verbal feedback should be offered to unsuccessful shortlisted candidates.

## **8. Pre-appointment vetting checks**

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

## **9. Appointments**

- 9.1. All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:
  - Verify their identity
  - Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken

- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
  - For all staff, including teaching positions: criminal records checks for overseas applicants
  - For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach

#### 9.2. Regulated activity means a person who will be:

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

## 10. Existing staff

### 10.1. In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more
- We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:
  - We believe the individual has engaged in relevant conduct; or
  - We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
  - We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
  - The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

## **11. Agency and third-party staff**

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

All new employees will receive a mandatory safeguarding induction in keeping with the DfE guidance Keeping Children Safe in Education and evidence of this will be retained in the individual's personnel file.

Any complaints made in relation to the recruitment and selection process should be dealt with under the grievance procedures for internal candidates and school's complaints policy for external applicants.

## • Appendix 8 – Whistleblowing

### 1. Introduction

1.1. Rare Liverpool prides itself on providing a safe, professional, and nurturing environment for its students, employees, and associates. The health, safety, wellbeing of every individual attending any of the Organisation's sites, including visitors, is a priority and any concerns raised about its practice will be taken seriously. The safeguarding of Rare Liverpool's students is of paramount importance and should be regarded the same by everyone attending Rare Liverpool's sites.

### 2. Purpose

2.1. The purpose of this policy is to:

- Ensure staff feel confident raising any concerns they may have in relation to any of Rare Liverpool's practice that may compromise the Organisation's integrity
- Provide a platform for staff to raise issues in confidence and assurance that they are protected from suffering any detriment as a result of doing so
- Ensure staff are knowledgeable about what counts as a 'protected disclosure'
- Inform staff of the procedure including how and who to report protected disclosures
- Provide staff with information about their rights under this policy

### 3. Scope

3.1. Rare Liverpool encourages all employees, associates and visitors to report any concerns about wrongdoing or malpractice within the Organisation, which will be treated in confidence and taken seriously.

3.2. However, this policy applies only to Rare Liverpool's employees and agency workers.

3.3. The above named are protected for making disclosures in accordance with Public Interest Disclosure Act 1998.

3.4. It covers those who are making a 'qualifying disclosure' under the act.

### 4. Complaints that qualify as 'protected disclosures'

4.1. You're protected by law if you report any of the following:

- 4.1.1. a criminal offence, for example fraud
- 4.1.2. someone's health and safety are in danger
- 4.1.3. risk or actual damage to the environment



- 4.1.4. a miscarriage of justice
  - 4.1.5. the Organisation is breaking the law, for example does not have the right insurance
  - 4.1.6. you believe someone is covering up wrongdoing
- 4.2. Any serious concerns that a member of staff has about any aspect of service provision or the conduct of the Organisation, school employees, others acting on behalf of the school or students, can be reported under the whistle blowing policy where the member of staff has a reasonable belief in those concerns, and they relate to one of the specific areas set out above.

## **5. Complaints that do not qualify as 'protected disclosures'**

- 5.1. Personal grievances (for example bullying, harassment, discrimination) are not covered by whistleblowing law, unless your case is in the public interest.
- 5.2. Rare Liverpool has other policies and procedures in place to support you with raising concerns that fall outside of Whistleblowing, such as the Grievance policy
- 5.3. Any concerns with safeguarding should be raised immediately to the Head of Pastoral or the Principal

## **6. The procedure to follow**

- 6.1. If you have a complaint that you think counts as a protected disclosure, you should raise this with the Head of Pastoral. You should confirm that you are making the disclosure in accordance with this Whistleblowing policy
- 6.2. The Head of Pastoral will gather as much information from you as possible and notify you of the steps that will be taken from this point, which will include investigating the concern raised and keeping you informed of its progress and the action taken
- 6.3. The Organisation is not obligated to provide you with details about the case that could compromise the confidentiality of the person(s) involved
- 6.4. How the complaint is dealt with is down to the Organisation and you will not have any right to determine how the case is dealt with or what action should be taken

## **7. The Organisation's promise**

7.1. In the case of a protected disclosure, Rare Liverpool promise:

- 7.1.1. To listen and take the concern seriously
- 7.1.2. To commence with the appropriate action within a suitable timeframe
- 7.1.3. To support the employee or worker who has raised the concern
- 7.1.4. To ensure that a thorough, impartial investigation is conducted
- 7.1.5. To take the action deemed necessary following the investigation
- 7.1.6. To seek the advice or guidance of third parties where the integrity of the investigation may be compromised internally.

## **8. Anonymity and confidentiality**

- 8.1. Where possible, you should always put your name to a complaint, in the confidence that you will be protected from suffering any detriment including harassment and victimisation because of the disclosure
- 8.2. If you do want it to be known that it is you who has made the disclosure, you must notify the Head of Pastoral straight away

## **9. If you are not satisfied**

- 9.1. If you are not satisfied that the Organisation has taken appropriate action, you should notify the Principal
- 9.2. If you feel that you are being treated differently as a result of making a protected disclosure, you should notify the Principal immediately. If you are not satisfied with the Principal's response, you should seek advice from an external party such as ACAS.

## **10. Unsubstantiated allegations**

- 10.1. The Organisation recognises that not every complaint or allegation under this policy will be proven, however this should not discourage people from coming forward and raising concerns
- 10.2. Where an allegation is unsubstantiated, providing that the concern was raised in good faith, no action will be taken, and the case will be closed
- 10.3. If, however, an allegation is made frivolously, maliciously or for personal gain, disciplinary action may be taken.

## **11. Contact details**

Head of Pastoral – Michelle Gerrard – [mgerrard@rarestudioliverpool.co.uk](mailto:mgerrard@rarestudioliverpool.co.uk) - 0151 707 2055

Principal – Lindsay Inglesby - [lindsay@rarestudioliverpool.co.uk](mailto:lindsay@rarestudioliverpool.co.uk) – 07858 605 997