

SAFEGUARDING AND CHILD PROTECTION POLICY AND PROCEDURES

Safeguarding and Child Protection Policies and Procedures follows the guidance of the Working Together to safeguard Children, 2018, the Keeping Children Safe in Education, DfE, September 2018 (KCSIE 2018), London Child Protection Procedures 4th Edition, 2011 and Section A 5th Edition, 2013. This policy takes account of the updated version of KCSIE 2018.

1. POLICY STATEMENT

Safeguarding and promoting the welfare of children can be defined as:

- Protecting children from maltreatment
- Preventing impairment of children's 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

The staff at École Jeannine Manuel ("the School") fully recognise their professional responsibilities for protection from harm to all children in its care. This policy applies to all staff, volunteers and everyone working in the School as:

- Children have a right to be safe
- Adults have a responsibility to safeguard and protect children
- Abuse is damaging, and can blight the remainder of the child's life
- Abused children sometimes become abusing adults
- Child abuse exists in a world of secrecy and silence - the cycle of abuse has to be broken
- An abuser may well abuse many other children who also have a right to protection
- Children should be able to grow up to be well-adjusted adults
- To prevent death and serious injuries.

2. SCHOOL AIMS

- Establish and maintain an environment where children feel secure, are encouraged to talk, and are listened to.
- Ensure children know that there are adults in the school whom they can approach if they are worried.
- Raising awareness of child protection issues and equipping children with the skills needed to keep them safe.
- Ensuring we practice safe recruitment, in accordance with the Disclosure and Barring Services (DBS) check when checking the suitability of staff, teaching, administrative, and volunteers who work with children.
- Developing and then implementing procedures for identifying and reporting cases, or suspected cases, of abuse.
- Supporting pupils who have been abused in accordance with the agreed child protection plan.

3. PROCEDURES

We will follow the procedures set out by the Local Authority and Local Safeguarding Children's Board in accordance with locally agreed interagency procedures and take account of guidance issued by the DfE to establish:

- Duty of Care
- Definitions and symptoms of abuse
- Monitoring and Record keeping
- Disclosure and actions following a disclosure (child)
- Whistle-blowing
- Disclosure and actions following a disclosure (adult)
- Safer Recruitment

4. DUTY OF CARE

- Ensure that the School Governors take responsibility for overseeing the Child Protection Policies and Procedures and that they are reviewed annually. The named governor with responsibility is Bernard Manuel.
- Ensure we have a designated senior person for child protection who has received appropriate training and support for this role. The named Designated Safeguarding Lead (DSL) is the Head of School, Pauline Prévot.
- The deputy DSLs are the Head of Middle School, Jeanne Gonnet, and the Head of Primary, Coralie Manhes.
- Ensure every member of staff (including temporary and supply staff and volunteers) knows the name of the designated senior person responsible for child protection and their role.
- Ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse and responsibility for referring any concerns to the designated senior person responsible for child protection.
- Ensure that parents have an understanding of the responsibility placed on the school and staff for child protection by setting out its obligations in the school prospectus.
- Parents/carers should assist the School in maintaining records, by providing the School with multiple emergency contacts for the child, and keeping the School updated of any changes.
- In the case of an unexplained absence, the School will follow standard procedures as set out in the Attendance policy, by contacting parents/guardians as soon as possible on the same day. If no response is received, further action may be taken, as per the Attendance policy.
- Develop effective links with relevant agencies and co-operate as required with their enquiries regarding child protection matters including attendance at case conferences.
- Keep written records of concerns about children, even where there is no need to refer the matter immediately. (See **appendix 3** for pastoral concern sheet)
- Ensure all records are kept securely; separate from the main pupil file, and in locked locations.
- Develop and then follow procedures where an allegation is made against a member of staff or volunteer.
- Ensure safe recruitment practices are always followed.

- Ensure that all staff are aware of their mandatory duty to report Female Genital Mutilation (FGM) to the local police.
- In accordance with KCSIE 2018, all staff including DSL's will be updated annually on any additional guidance issued on safeguarding to provide them with relevant skills and knowledge to safeguard children effectively.
- The School shall ensure that all staff read and sign to say that they have read at least Part one of the KCSIE 2018 guidance.
- The School shall ensure that mechanisms are in place to assist staff to carry out their duties.
- All staff members should be aware of systems within their school which support safeguarding and these should be explained to them as part of staff induction. This should include:
 - The child protection policy;
 - The staff code of conduct (re. Staff Handbook); and
 - The role of the designated safeguarding lead. Copies of policies and a copy of Part one of KCSIE 2018 shall be provided to staff at induction.
- All staff members should receive appropriate safeguarding and child protection training, which is regularly updated. In addition all staff members will receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.
- Parents and carers will be made aware that they can make a referral about any suspected abuse or neglect to the local LADO. The school DSL should be informed.

5. DUTY OF THE SCHOOL

5.1. To appoint a Designated Safeguarding Lead (DSL) to take responsibility for:

- Implementing the child protection policy within the establishment
- Supporting other staff in their understanding of child protection issues and ability to recognise the signs and symptoms of abuse
- Managing the establishment's response to a disclosure of abuse

5.2. To provide induction and training:

Every new member of staff, including part-timers, temporary, visiting and contract staff working in school, receives basic training on their responsibilities in being alert to the signs of abuse and bullying and on the procedures for recording and referring any concerns to the DSL or the Head as well as working with different agencies. Training in child protection and safeguarding is an important part of the induction process. All training is updated at 3 yearly intervals. All staff are given guidelines on what to do if a child approaches them to discuss allegations of abuse (**appendix 1**) and the Code of Behaviour - for All Staff and Volunteers (**appendix 2**). All are also made aware of the pastoral care concern sheet (**appendix 3**) and Keeping Children Safe in Education, Statutory Guidance for Schools and Colleges, September 2018, and will be required to read section 1. See duty of staff paragraph 6 for further information.

5.3. To support children:

We create a culture of value and respect for each individual, having positive regard for each child's heritage arising from their colour, ethnicity, and language, cultural and social background.

We recognise that children who are abused or witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame. The School may be the only stable, secure and predictable element in the lives of children at risk. When at school their behaviour may be challenging and defiant or they may be withdrawn. The School will endeavour to support the pupil through:

- The content of the curriculum.
- The school ethos which promotes a positive, supportive and secure environment and gives pupils a sense of being valued.
- The School Behaviour and Anti-bullying policies, which are aimed at supporting vulnerable pupils in the School. The School will ensure that the pupil knows that some behaviour is unacceptable but they are valued and not to be blamed for any abuse which has occurred.
- Liaison with other agencies that support the pupil such as social services, Child and Adult Mental Health Service, education welfare service and educational psychology service.
- Ensuring that, where a pupil on the child protection register leaves, their information is transferred to the new school immediately and that the child's social worker is informed if applicable.
- Ensure that the School has considered how to teach pupils about safeguarding, including e-safety, and how to build resilience to the risks of radicalization. This includes adequate IT filtering systems to keep the pupils safe when accessing the Internet at school.
- The School has procedures to ensure that visiting speakers are suitable (whether invited by staff or pupils).
- The policy also applied to the children in the Early Years Foundation Stage.
- It is essential that children be safeguarded from potentially harmful and inappropriate online material. As such governing bodies and proprietors should ensure appropriate filters and appropriate monitoring systems are in place.

6. DUTY OF STAFF

It will be made clear to staff applying for posts within the School that the position is exempt from provisions of the Rehabilitation of Offenders Act 1974.

Staff will be made aware of the [Working Together to safeguard Children, 2013](#), the [Statutory Guidance for Schools and Colleges, Amended 2018](#) and KCSIE 2018. They will be required to read part 1 of this guidance and confirm that they have read, understand and will fully implement all the requirements.

All staff (teaching and non-teaching) adopt an open and accepting attitude towards pupils as part of their responsibility for pastoral care. The staff hope that parents and pupils feel free to talk about any concerns and see school as a safe place. Pupils' worries and fears will be taken seriously if they seek help from a member of staff. However, staff cannot guarantee confidentiality if concerns are such that referral must be made to the appropriate agencies in order to safeguard the child's welfare.

Staff who observe injuries which appear to be non-accidental, or who are told anything significant by a pupil, must report their concerns to the Designated Safeguarding Lead (DSL). The DSL have attended a course and received Level 3 training on Child Protection which included training in child protection matters. Training is updated regularly for the Head and Child Protection Coordinators every other year.

Any child may benefit from early help, but all school staff should be particularly alert to the potential need for early help for a child who is disabled and has specific additional needs; has special educational needs (whether or not they have a statutory education, health and care plan); is a young

carer; is frequently missing/goes missing from care or home; is misusing drugs or alcohol; is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse; and/or has returned home to their family from care.

7. RESPONSIBILITIES OF THE DESIGNATED TEACHERS - DSL

Broad areas of responsibility proposed for the designated senior person for child protection:

7.1. Referrals

- Refer cases of suspected abuse or allegations to the relevant investigating agencies.
- Act as a source of support, advice and expertise within the School when deciding whether to make a referral by liaising with relevant agencies.
- Liaise with Head (where role is not carried out by the Head) to inform him/her of any issues and ongoing investigations and ensure there is always cover for this role.
- Liaise with the Local Child Protection Board to ensure awareness of local multi-agency procedures, local referral procedures and training opportunities, and maintain a list of local multi-agency contacts.

7.2. Raising Awareness

- Ensure the School's child protection policy is updated and reviewed annually and work with the governing body/proprietor regarding this.
- Ensure parents are aware of the child protection policy on the website which alerts them to the fact that referrals may be made and the role of the establishment in this to avoid conflict later.
- Where children leave the establishment ensure their child protection.

7.3. Training

- To recognise how to identify signs of abuse and when it is appropriate to make a referral.
- Having a working knowledge of how the Local Safeguarding Children Board operates, the conduct of a child protection case conference and be able to attend and contribute to these effectively when required to do so.
- Ensure each member of staff has access to and understands the school's child protection policy, including new or part time staff.
- Ensure all staff have induction training covering child protection and are able to recognise and report any concerns immediately they arise.
- Be able to keep detailed accurate secure written records of referrals/concerns.
- Training all staff concerning the risks of radicalisation and how to identify children and young people at risk.

8. DUTY OF PARENTS

Parents are expected to help their children to behave in non-violent and non-abusive ways towards both staff and other pupils. Parents will be informed if it was necessary to use minimal force to protect a pupil from injury or to prevent a pupil from harming others.

Parents should always inform the school of any accidental bruising or other injuries that might otherwise be misinterpreted. They should also inform the school of any changes in home circumstances, such as the death of a member of the family, separation or divorce, that might lead to otherwise unexplained changes in behaviour or characteristics.

9. DUTY OF THE SCHOOL TO PARENTS

Parents can feel confident that procedures are in place to ensure that all staff appointed have undergone procedures to ensure that they are suitable to work with children. All voluntary helpers undergo similar procedures including a police check.

Every staff member has enhanced DBS check (<https://www.gov.uk/government/news/disclosure-and-barring-service-update-service-now-available>) and also an overseas equivalent if applicable. Guidelines on the procedures if an allegation is made about a member of staff will be made available to a parent if they make an allegation against a member of staff. Parents will be informed of the procedure if they make a formal complaint about a staff member or volunteer.

10. DEFINITIONS AND SYMPTOMS OF ABUSE

All school 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.

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults, or another child or children. The Children Act 1989 introduced the concept of "Significant Harm" as the threshold that justifies compulsory intervention in family life in the interests of children.

There are no absolute criteria to rely on when judging what constitutes significant harm. Overall, it can be described as the detrimental outcome of various forms of child maltreatment to the child's well being.

- **Harm** means ill treatment or the impairment of health or development.
- **Development** means physical, intellectual, emotional, social or behavioural development.
- **Ill treatment** includes sexual abuse and forms of ill treatment that are not physical.
- **Health** includes physical or mental health.

Where the question of whether harm suffered by a child is significant turns on the child's health and development, the child's health or development shall be compared with that which could reasonably be expected of a similar child.

There are four main categories of abuse – **physical**, **neglect**, **sexual** and **emotional**. The list of symptoms given is not exhaustive or comprehensive but consists of frequently observed symptoms. It is important to remember that most abuse involves more than one main type, for example, sexual and emotional abuse may be recognised together. These symptoms, for example cuts and grazes, may also be accidental and not a sign of abuse. These different types of abuse require different approaches. A child suffering from physical abuse may be in immediate and serious danger. Action should, therefore, be taken immediately. With other forms of abuse there is a need to ensure that adequate

information is gathered. There is also a need to make sure that grounds for suspicion have been adequately investigated and recorded. The need to collate information must be balanced against the need for urgent action. If there are reasonable grounds for suspicion then a decision to monitor the situation should only be taken after consultation. A situation that should cause particular concern is that of a child who fails to thrive without any obvious reason. In such a situation a medical investigation will be required to consider the causes.

10.1. Physical Injury – Symptoms:

- Bruises and abrasions - especially about the face, head, genitals or other parts of the body where they would not be expected to occur given the age of the child. Some types of bruising are particularly characteristic of non-accidental injury especially when the child's explanation does not match the nature of injury or when it appears frequently.
- Slap marks – these may be visible on cheeks or buttocks.
- Twin bruises on either side of the mouth or cheeks – can be caused by pinching or grabbing, sometimes to make a child eat or to stop a child from speaking.
- Bruising on both sides of the ear – this is often caused by grabbing a child that is attempting to run away. It is very painful to be held by the ear, as well as humiliating and this is a common injury.
- Grip marks on arms or trunk – gripping bruises on arm or trunk can be associated with shaking a child. Shaking can cause one of the most serious injuries to a child; i.e. a brain haemorrhage as the brain hits the inside of the skull. X-rays and other tests are required to fully diagnose the effects of shaking. Grip marks can also be indicative of sexual abuse.
- Black eyes – are mostly commonly caused by an object such as a fist coming into contact with the eye socket. A heavy bang on the nose, however, can cause bruising to spread around the eye but a doctor will be able to tell if this has occurred.
- Damage to the mouth – e.g. bruised/cut lips or torn skin where the upper lip joins the mouth.
- Bite marks
- Fractures
- Poisoning or other misuse of drugs – e.g. overuse of sedatives.
- Burns and/or scalds – a round, red burn on tender, non-protruding parts like the mouth, inside arms and on the genitals will almost certainly have been deliberately inflicted. Any burns that appear to be cigarette burns should be cause for concern. Some types of scalds known as 'dipping scalds' are always cause for concern. An experienced person will notice skin splashes caused when a child accidentally knocks over a hot cup of tea. In contrast a child who has been deliberately 'dipped' in a hot bath will not have splash marks.

10.2. Neglect – Symptoms:

- Dirty, lack of appropriate clothing, smells of urine, unkempt hair
- No parental interest (a distinction needs to be made between situations where children are inadequately clad, dirty or smelly because they come from homes where neatness and cleanliness are unimportant and those where the issue is lack of care.)
- Underweight – a child may be frequently hungry or pre-occupied with food or in the habit of stealing food or with the intention of procuring food. There is particular cause for concern where a persistently underweight child gains weight when away from home, for example, when in hospital or on a school trip. Some children also lose weight or fail to

gain weight during school holidays when school lunches are not available and this is a cause for concern.

- Body sores
- Not wanting to communicate
- Behaviour problems
- Attention seeking
- Lack of respect
- Often in trouble – police
- Bullying
- Use of bad language
- Stealing
- Lack of confidence – low self-esteem
- Jealousy

10.3. Sexual Abuse – Symptoms:

- Detailed sexual knowledge inappropriate to the age of the child.
- Behaviour that is excessively affectionate or sexual towards other children or adults.
- Attempts to inform by making a disclosure about the sexual abuse often begin by the initial sharing of limited information with an adult. It is also very characteristic of such children that they have an excessive pre-occupation with secrecy and try to bind the adults to secrecy or confidentiality.
- Fear of medical examinations.
- Fear of being alone — this applies to friends/family/neighbours/baby-sitters, etc
- Sudden loss of appetite, compulsive eating, anorexia nervosa or bulimia nervosa.
- Excessive masturbation is especially worrying when it takes place in public.
- Promiscuity
- Sexual approaches or assaults - on other children or adults.
- Urinary tract infections (UTI), sexually transmitted disease (STD) are all cause for immediate concern in young children, or in adolescents if his/her partner cannot be identified.
- Bruising to the buttocks, lower abdomen, thighs and genital/rectal areas. Bruises may be confined to grip marks where a child has been held so that sexual abuse can take place.
- Discomfort or pain particularly in the genital or anal areas.
- Drawing of pornographic or sexually explicit images.
- Withdrawn
- Rejecting physical contact or demanding attention

10.4. Emotional Abuse – Symptoms:

- Crying
- Rocking
- Withdrawn
- Not wanting to socialise
- Cringing

- Picking up points through conversation with children
- Bad behaviour
- Aggression
- Behaviour changes
- Bribery by parent
- Self-infliction
- Lack of confidence
- Attention seeking
- Isolation from peers – unable to communicate
- Clingy
- Afraid of authoritative figures
- Treating others as they have been treated

10.5. Child Sexual Exploitation and Female Genital Mutilation

Child sexual exploitation (CSE) involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly ‘consensual’ relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyber-bullying and grooming. However, it also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

Female Genital Mutilation (FGM): professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. For information on warning signs that FGM may be about to take place, or may have already taken place, please refer to the Multi-Agency Practice Guidelines. Staff should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children’s social care.

Mandatory Reporting Duty

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) will place a statutory duty upon teachers, along with social workers and healthcare professionals, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies.

The Mandatory reporting duty commenced in October 2015. Once introduced, teachers must report to

the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the school's designated safeguarding lead and involve children's social care as appropriate.

10.6. Honour Based Violence

So-called 'honour-based' violence (HBV) encompasses crimes committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so-called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubts staff should speak to the designated safeguarding lead. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

10.7. Preventing Radicalisation

Protecting children from the risk of radicalisation should be seen as part of schools' wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation it is possible to intervene to prevent vulnerable people being radicalised.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The Internet and the use of social media in particular has become a major factor in the radicalisation of young people. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include making a referral to the Channel programme.

From 1 July 2015 specified authorities, including all schools (and since 18 September 2015 all colleges) as defined in the summary of this guidance, are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 ("the CTSA 2015"), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent Duty.

The school staff responsible for the Prevent Duty is the Head of School, who is the Prevent Officer.

10.8. Monitoring The Use of Online Technology

Use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; and sexual predation. Technology often provides the platform that facilitates harm. An effective approach to online safety empowers a school or college to protect and educate the whole school or college community in their use of technology and establishes mechanisms to identify, intervene and escalate any incident where appropriate.

The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- Content: being exposed to illegal, inappropriate or harmful material;
- Contact: being subjected to harmful online interaction with other users;
- Conduct: personal online behaviour that increases the likelihood of, or causes, harm

The governors shall ensure that as part of the requirement for staff to undergo regularly updated safeguarding training (KCSIE 2018 paragraph 75) and the requirement to ensure children are taught about safeguarding, including online (KCSIE 2018 paragraph 77), that online safety training for staff is integrated, aligned and considered as part of the overarching safeguarding approach.

10.9. Additional Concerns

The School must also be aware of the following in addition to CSE and FGM

- Bullying, including cyber-bullying;
- County lines;
- Domestic violence;
- Drugs;
- Fabricated or induced illness;
- Faith abuse;
- Forced marriage;
- Gangs and youth violence;
- Gender-based violence/violence against women and girls (VAWG);
- Mental health;
- Private fostering;
- Radicalisation;
- Sexual violence and sexual harassment;
- Sexting;
- Teenage relationship abuse;
- Trafficking;
- Honour based violence including breast ironing;
- Missing children and adults; and
- Hate.

It is essential that children are safeguarded from potentially harmful and inappropriate online material. As such governing bodies and proprietors should ensure appropriate filters and appropriate monitoring systems are in place.

Peer on peer abuse can manifest itself in many ways. Governors and proprietors should ensure sexting and the school or colleges approach to it is reflected in the child protection policy.

Schools and colleges that provide such residential accommodation and/or are registered as children's homes should be alert to inappropriate pupil relationships and the potential for peer on peer abuse, particularly in schools and colleges with a significant gender imbalance

Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Governing bodies and proprietors should ensure their child protection policy reflects the fact that additional barriers can exist when recognising abuse and neglect in this group of children.

A section 128 direction prohibits or restricts a person from taking part in the management of an independent school, including academies and free schools. A person who is prohibited is unable to participate in any management of an independent school.

Further details are available in Keeping Children Safe in Education, Statutory Guidance for Schools and Colleges, September 2018.

10.10. Children with Special Educational Needs

The School acknowledges that children with special educational needs may be especially vulnerable to abuse and expect staff to take extra care to interpret correctly apparent signs of abuse and neglect. Indications of abuse will be reported as for other pupils. The Head will identify pupils with particular communication needs and to ensure clear guidance is available for staff in relation to their responsibilities when working with children with intimate care needs.

11. MONITORING AND RECORD KEEPING

It is essential that accurate records be kept where there are concerns about the welfare of a child. Pastoral care concern sheets are to be filled in (**appendix 3**) and given to the DSL. These records are kept in secure, confidential files, which are separate from the child's school records by the DSL. It is important to recognise that regulations published in 1989 do not authorise or require the disclosure to parents of any written information relating to Child Protection. However, it is preferable, where circumstances allow, that parents be informed of and agree to any referral being made (unless it relates to sexual abuse).

Staff must keep the DSL informed of:

- Poor attendance & punctuality
- Concerns about appearance and dress
- Changed or unusual behaviour
- Concerns about health and emotional well being
- Deterioration in educational progress
- Discussions with parents about concerns relating to their child
- Concerns about home conditions or situations
- Concerns about pupil on pupil abuse (including serious bullying)

When there is suspicion of significant harm to a child and a referral is made as much information as possible should be given about the nature of the suspicions, the child and the family. Use of previous records (if available) may prove to be particularly useful in this respect.

All communications, whether verbal or written, are strictly confidential and only when the Head deems it appropriate, will other members of staff be informed.

Support must be given to members of staff involved in child protection referral and, in the interest and protection of all staff, the procedure for child protection shall be under continual review in order to eliminate any bad practice. The School recognises that staff involved in a child protection issue will find it distressing and will offer support and guidance accordingly.

All Local Authority Designated Officer (LADO) referrals must be made directly to the Multi-Agency Safeguarding Hub team (MASH) – Tel: 020 7974 3317 – Email: LSCMASHadmin@camden.gov.uk or Secure email: LSCMASHadmin@camden.gov.uk.cjism.net

If the referrer is in doubt that the threshold is met, please discuss the case with the LADO on duty by calling Karen Lahat on Tel: 020 7974 4556 who will direct your call to the Duty LADO.

Staff shall be made aware that they can report any concerns directly to the LADO or social services if they consider that a child protection matter is not being dealt with appropriately.

12. DISCLOSURE AND ACTION FOLLOWING A DISCLOSURE (CHILD)

Where a child discloses concerns or makes an allegation no judgement should be made or enquiries initiated by the staff member merely listening and seeking clarification is required before consulting with the DSL. Confidentiality should not be promised to anyone. A record should be kept of the conversation. Where there is a suspicion that a child is suffering or likely to suffer significant harm, the concern should be referred without delay to the Head/DSL who will investigate.

Where the child requires urgent medical treatment an ambulance should be called to take him/her to hospital and concerns raised with the DSL.

12.1. Action for the DSL

Following a disclosure, the DSL will then speak to the parent/s in the case of evidence of physical abuse to seek an explanation, but only if there is no risk to the child of further harm resulting out of this action.

In the event of disclosure of suspected sexual abuse, an immediate referral to the local Social Services authority will be made by the DSL.

In all other cases of suspected abuse the DSL will enter into preliminary discussion with the parents to ascertain any possible explanation. These discussions are exploratory, and the DSL should be careful not to prejudice the outcome of any potential multi-agency investigation.

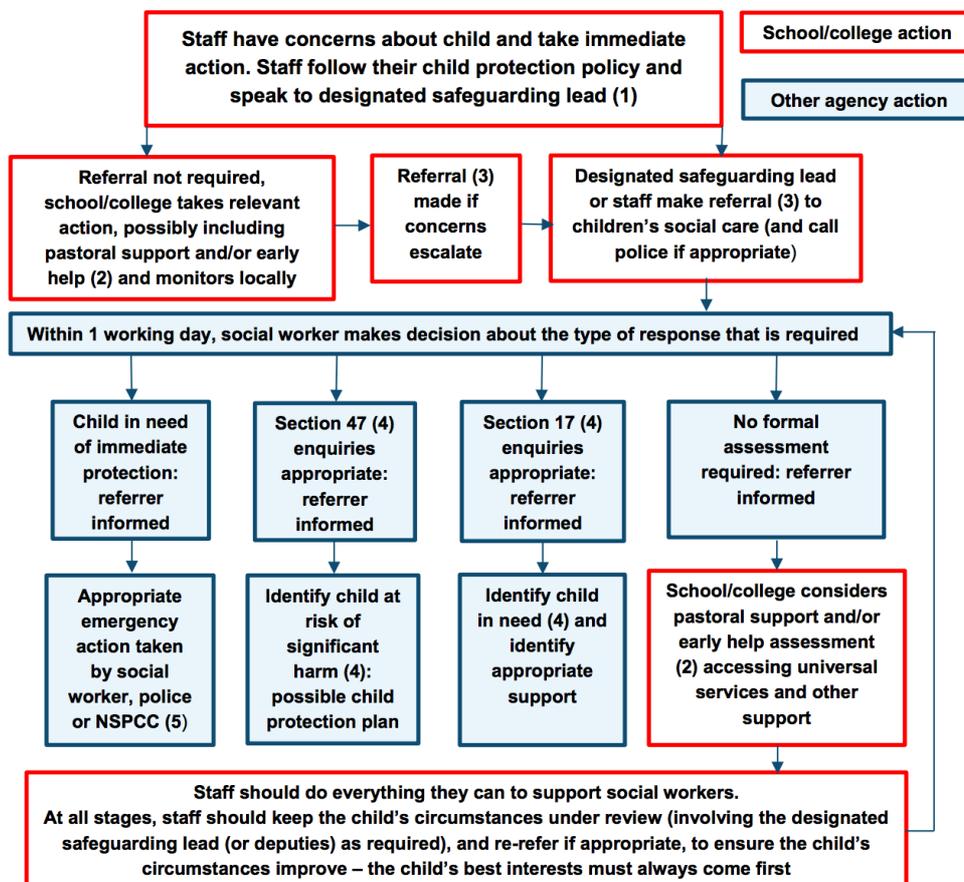
Where, following preliminary enquiries by the DSL, a prima facie case of abuse is apparent, or where there are contra-indications to preliminary enquiries, a referral should be made under local multi-agency arrangements. The referral should be made by fax faxed either at the time of the initial disclosure or within 48 hours of the incident to the local Social Services department office

The person making the referral should provide the following information if available:

- Details about their own location, status and relationship with the child.
- Whether the child is currently safe and any deadlines approaching (e.g. child about to be collected by parent; alleged abuser returning imminently to household)
- When the child was last seen and the current location of the child.
- The child's name, date of birth, sex, disability, or any known health care issues, ethnic origin, religion, language spoken.
- Any other names the child or family members have been known by.
- The address of the child and parents, and any known previous addresses.
- The family and household structure and details of any other significant people in the child's life.
- Details of the concern (if an incident, the time, place, persons involved)
- Information regarding parental knowledge or, and if appropriate, agreement to the referral.

If the allegation concerns the Head the concern must be reported to the Chairman of the Board.

Actions where there are concerns about a child



(1) In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of this guidance.

(2) Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

(3) Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).

(4) Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working Together to Safeguard Children](#).

(5) This could include applying for an Emergency Protection Order (EPO).

1 3. WHISTLEBLOWING

All staff will be made aware of the importance of whistleblowing and feel confident to voice concerns about the attitude or actions of colleagues.

If a member of staff believes that a reported allegation or concern is not being dealt with appropriately by their organisation, they should report the matter to the Duty LADO. (See also Local Safeguarding Children Boards Procedure.)

Where a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

- General guidance can be found at: advice on whistleblowing (<https://www.gov.uk/whistleblowing>)
- The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk.

From September 2016, section 128 direction prohibits or restricts a person from taking part in the management of an independent school.

1 4. DISCLOSURE AND ACTIONS FOLLOWING A DISCLOSURE (ADULT)

London Child Protection Procedures - Child Protection – Professional Abuse Policy
Guidelines for the management of allegations of abuse by staff and other Professionals

These guidelines are taken from the London Child Protection Procedures 5th Edition 2013 section A. For further details refer to the LCPP: http://www.londoncp.co.uk/consultation/alleg_staff.html

1 5. GENERAL CONSIDERATIONS RELATING TO ALLEGATIONS AND CONCERNS OF ABUSE

The School will inform the LADO when an allegation is made or within one working day.

They will then advise the School whether or not informing the parents of the child involved will impede the disciplinary or investigative processes. Acting on this advice, if it is agreed that the information can be fully or partially shared, the School will inform the parents. In some circumstances, however, the parents may need to be told straight away (e.g. if a child is injured and requires medical treatment).

The School will seek advice from the LADO, the police and/or Local Authority (LA) children's social care about how much information should be disclosed to the accused person.

Subject to restrictions on the information that can be shared, the School will promptly inform the accused person about the nature of the allegation, how enquiries will be conducted and possible outcome (e.g. disciplinary action, and dismissal or referral to the barring lists or regulatory body).

The accused member of staff should:

- Be treated fairly and honestly and helped to understand the concerns expressed and processes involved.
- Be kept informed of the progress and outcome of any investigation and the implications for any disciplinary or related process
- If suspended, be kept up to date about events in the workplace.

16. CONFIDENTIALITY

Every effort should be made to maintain confidentiality and guard against publicity while an allegation is being investigated or considered. Apart from keeping the child, parents and accused person (where this would not place the child at further risk) up to date with progress of the case, information should be restricted to those who have a need to know in order to protect children, facilitate enquiries, manage related disciplinary or suitability processes.

The police should not provide identifying information to the press or media, unless and until a person is charged, except in exceptional circumstances (e.g. an appeal to trace a suspect). In such cases, the reasons should be documented and partner agencies consulted beforehand.

Section 13 of the Education Act 2011 introduces new restrictions implemented in September 2012 on the publication of any information that would identify a teacher who is the subject of an allegation of misconduct that would constitute a criminal offence, where the alleged victim of the offence is a registered pupil at the School.

Such restrictions remain in place unless or until the teacher is charged with a criminal offence, though they may be dispensed with on the application to the Magistrates' Court by any person, if the court is satisfied that it is in the interests of justice to do so, having regard to the welfare of –

- a. The person who is the subject of the allegation and
- b. The victim of the offence to which the allegation relates

There is a right of appeal to the Crown Court.

This restriction will apply to allegations made against any teacher who works at the School, including supply and peripatetic teachers.

There is a new offence of publishing any information in breach of these restrictions. Publication includes any communication, in whatever form, which is addressed to the public at large or any section of the public.

It is a defence to show that the person publishing was not aware of the allegation having been made as set out in section 141H 'Defences' of the Act.

17. SUPPORT

The organisation, together with LA children's social care and/or police, where they are involved, will consider the impact on the child concerned and provide support as appropriate. Liaison between the agencies will take place in order to ensure that the child's needs are addressed.

As soon as possible after an allegation has been received, the accused member of staff should be advised to contact their union or professional association. Human resources will be consulted at the earliest opportunity in order that appropriate support can be provided via the organisation's occupational health or employee welfare arrangements.

18. SUSPENSION

Suspension is a neutral act and it will not be automatic. It will be considered in any case where:

- There is cause to suspect a child is at risk of significant harm; or
- The allegation warrants investigation by the police; or
- The allegation is so serious that it might be grounds for dismissal

If a strategy meeting/discussion is to be held or if the LA children's social care or the police are to make enquiries, the LADO will canvas their views on suspension and inform the School. Only the

School, however, has the power to suspend an accused employee and they cannot be required to do so by a local authority or police.

Suspension does not imply a finding of guilt but is intended to enable a dispassionate investigation of the facts, unimpeded by interpersonal tensions. Any employee who is suspended will be informed immediately for the reason for suspension.

Should the LA case manager be concerned about the welfare of other children in the community or the teacher's family, those concerns should be reported to the designated officer(s), children's social care or the police.

19. REFERRAL TO THE DISCLOSURE AND BARRING SERVICE (DBS)

Guidance on the DBS, the vetting and barring scheme

If the allegation is substantiated and the person is dismissed or the School ceases to use the person's services, or the person resigns or otherwise ceases to provide their services, the LADO will discuss with the School whether a referral will be made to the DBS, and/or a regulatory body (e.g. the National College for Teaching and Leadership (NCTL), or General Medical Council). Employers have a legal duty to refer concerns to the DBS. A referral **MUST** be made when an employee or volunteer is removed from working with children (even temporarily) because the employer thinks the person has engaged in relevant conduct¹.

If a referral is to be made, it will be submitted within one month of the allegation being substantiated.

20. SAFER RECRUITMENT

The School operates Safe Recruitment procedures and all prospective staff are subject to criminal records checks, checks by the DBS and compliance with the Independent School Standards Regulations. All Staff are made aware of the Childcare Act (2006). We observe the requirement to report to the DBS, within one month of leaving the school any person (whether employed, contracted, a volunteer or student) whose services are no longer used because he or she is considered unsuitable to work with children. The DBS address for referrals is PO Box 181, Darlington DL1 9FA. (PH: 01325 953 795). All Senior Management shall attend Safer Recruitment Training every two years.

All new appointments to regulated activity

An offer of appointment to a successful candidate, including one who has lived or worked abroad, must be conditional upon satisfactory completion of pre-employment checks. When appointing new staff, schools and colleges must:

- Verify a candidate's identity, preferably from current photographic ID and proof of address except where, for exceptional reasons, none is available
- Obtain a certificate for an enhanced DBS check with a barred list information where the person will be engaging in regulated activity
- Obtain a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available. If this is the case a DBS risk assessment will be carried out every two weeks until the DBS is finalised.
- Check that a candidate to be employed as a teacher is not subject to a prohibition order issued by the Secretary of State, using the Teacher Services' System.
- Subject to statutory restrictions, verify the candidate's mental and physical fitness to carry out their work responsibilities and ask relevant questions about disability and health in order to establish whether they have the physical and mental capacity for the specific role

¹ Relevant conduct is when a person has harmed or may have harmed a child or vulnerable adult. Inciting or encouraging another person to harm a child or vulnerable adult is also relevant conduct.

- Verify the person's right to work in the UK. If there is uncertainty about whether an individual needs permission to work in the UK, then prospective employers, or volunteer managers, should follow advice on the GOV.UK website
- If the person has lived or worked outside the UK, make any further checks the school or college consider appropriate or if necessary gain a certificate of good conduct from the police authority in the country in which the person has been working
- Verify professional qualifications, as appropriate
- For teaching staff check that they are not prohibited from teaching
- Check that any person taking up a management position is not subject to a section 128 prohibition ² issued by the Secretary of State.

There is a legal requirement for employers to make a referral to the DBS where they think that an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child.

The chair of the board will review this policy annually.

Reviewed by Bernard Manuel, Chairman of the Board of Governors on 20th September 2018.

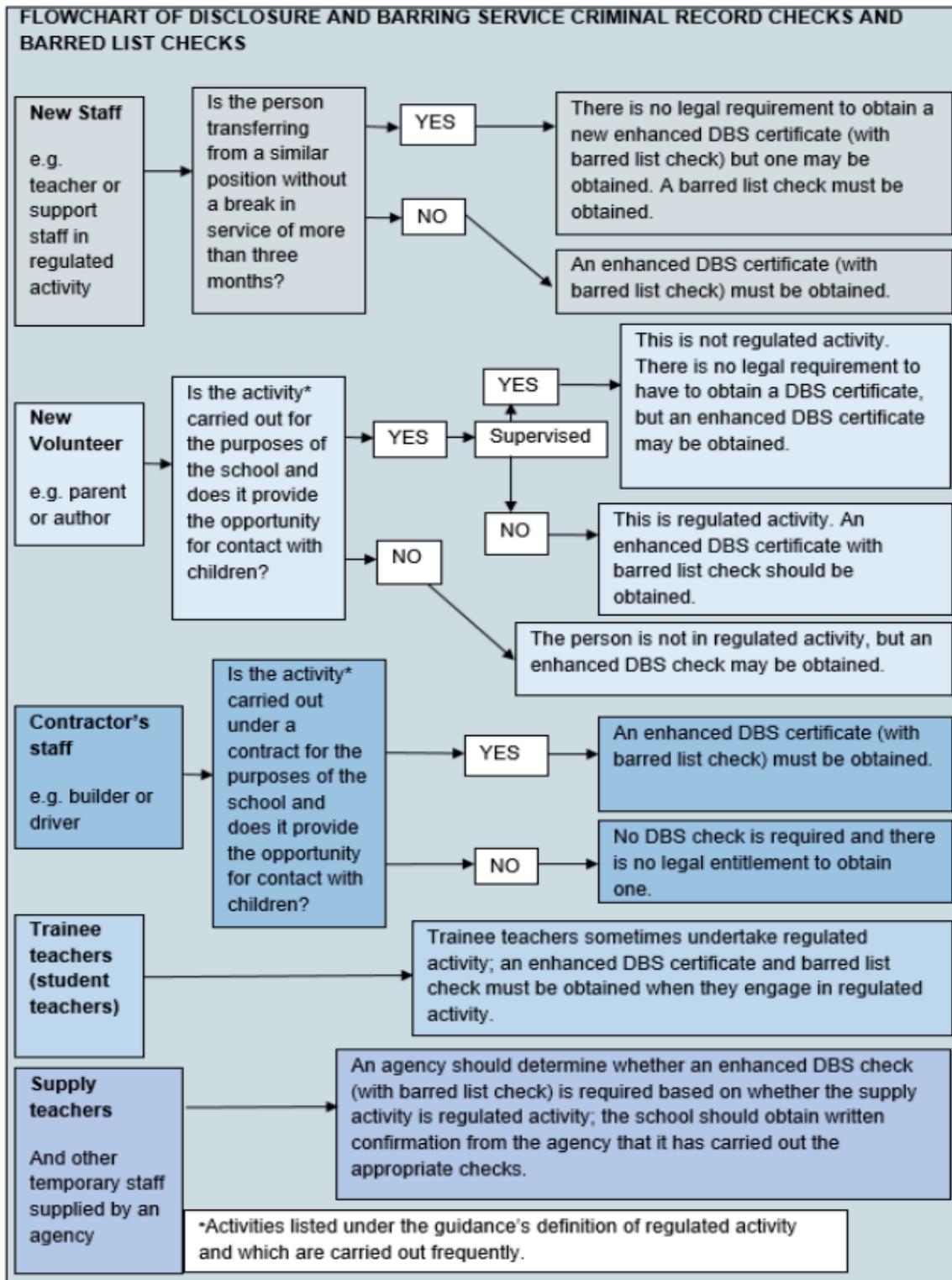


This policy will be reviewed annually by the Board, also an independent audit will be carried out to ensure its effectiveness, the single central register will be reviewed by the head of HR annually.

² The Independent Educational Provision in England (Prohibition on Participation in Management) Regulations 2014

Reviewed by the Chairman of the Board, August 2018

Draft for consultation



APPENDIX 1

What to do if a child at the school approaches you to discuss allegations of abuse.

Any staff who has contact with children at the School may be approached by a child who needs to talk about something in confidence. Here are some basic principles to follow if this happens to you.

| What to do | What not to do |
|--|---|
| Stay calm | Do not panic. Don't over react. It is extremely unlikely that the child is in immediate danger |
| Listen, hear and believe | Do not probe for more information. Questioning the child may affect how the disclosure is received later on |
| Give time to the person to say what they want | Do not make assumptions. Do not paraphrase or offer alternative explanations or suggestions |
| Reassure and explain that they have done the right thing in telling. Explain that only those professionals who need to know will be informed | Do not promise confidentiality to keep secrets or that everything will be OK (it might not) |
| Act immediately in accordance with the procedure in the Child Protection Policy | Do not try to deal with it yourself |
| Record accurately in writing as soon as possible what was said and without personal comment | Do not make negative comments about the alleged abuser. Do not make personal observations. Do not make a child repeat a story unnecessarily |
| Report to the DSL or Deputy DSL only | Do not 'gossip' with colleagues about what has been said to you |

It is the duty of anyone who works with children at the School to report any suspicions or disclosures of abuse. This includes teachers, teaching assistants, kitchen and lunch staff, office staff, etc. It is not for the individual member of staff approached to decide whether or not a suspicion or allegation is true. All must be taken seriously and dealt with according to the policy and procedures laid down at the School.

APPENDIX 2

Code of Behaviour - for All Staff and Volunteers Interaction with Pupils: Model Code of Conduct for Staff

You must not -

1. Staff and volunteers should not spend excessive amounts of time alone with children, away from others. Meetings with individual children should be avoided or take place within sight of others. If privacy is needed, the door should remain open and other staff or volunteers should be aware of the meeting.
2. Staff and volunteers are advised not to make unnecessary physical contact with children. However, there may be occasions when physical contact is unavoidable, such as providing comfort at times of distress, or physical support in contact sports or similar. In all such cases contact should only take place with the consent of the child.
3. Staff and volunteers should not start an investigation or question anyone after an allegation or concern has been raised. This is the job of the authorities. You should just record the facts and report these to a designated person.
4. Staff and volunteers should never (even in fun):
 - a. Initiate or engage in sexually provocative conversations or activity.
 - b. Allow the use of inappropriate language to go unchallenged.
 - c. Do things of a personal nature for children that they can do themselves.
 - d. Allow any allegations made by a child go without being reported and addressed, or either trivialise or exaggerate child abuse issues.
 - e. Make promises to keep any disclosure confidential from relevant authorities.
5. Staff or volunteers should not show favouritism to any one child, nor should they issue or threaten any form of physical punishment.

You must -

6. Staff and volunteers must respect children's rights to privacy and encourage children and adults to feel comfortable enough to report attitudes or behaviour they do not like.
7. Staff and volunteers will be expected to act with discretion with regard to their personal relationships. They should ensure their personal relationships do not affect their role within the School.
8. All staff and volunteers should be aware of the procedures for reporting concerns or incidents, and should familiarise themselves with the contact details of the designated persons.
9. If a member of staff or volunteer finds himself or herself the subject of inappropriate affection or attention from a child, they should make others aware of this.
10. If a member of staff or volunteer has any concerns relating to the welfare of a child in their care, be it concerns about actions/behaviours of another staff member or volunteer or concerns based on any conversation with the child; particularly where the child makes an allegation, they should report this to a designated person.

APPENDIX 3

Pastoral Care Concern Sheet

| | |
|---|--------------|
| Pupil's Name: D.O.B: Class: | |
| Teacher: | Date: |
| Details of incident/concern: | |
| Action Taken: Signed: (Name and position) Reviewed by DSL (Sign /date) | |
| Final Outcome/ Next steps: Signed: | |

USEFUL REFERENCES

Key Contacts and Resources

Ofsted Piccadilly Gate, Store Street, Manchester, M1 2WD Tel: 03001234234

Email: enquiries@ofsted.gov Web: www.ofsted.gov.uk

Disclosure and Barring Service (DBS)

Address for referrals: PO Box 181, Darlington, DL1 9FA Telephone for referrals: 01325 953 795

Telephone for customer services: 0870 909 08 Email: customerservices@dbs.gsi.gov.uk

NSPCC Child Protection Helpline: 0808 800 5000

Childline: Tel: 0800 1111 www.childline.org.uk

Deficiencies and Weaknesses

It is the duty of all members of Staff and the proprietor to draw to the attentions of the DSL any weakness or deficiencies in this policy. The DSL will ensure that this is then followed up without delay, with policies and procedures being updated as needed rather than waiting to any regular review date.

Complaints

All complaints arising from the operation of this policy should be referred to the DSL. The Proprietor will arrange for the complaint to be investigated.

References

This policy has also been drawn up with reference to the following:

Education (Independent School Standards) (England) Regulations (2014) and (January 2015)

<http://www.legislation.gov.uk/id/uksi/2014/3283>

Preventing and tackling bullying (DfE:2017)

<https://www.gov.uk/government/publications/preventing-and-tackling-bullying>

DfE and ACPO drug advice for schools <https://www.gov.uk/government/publications/drugs-advice-for-schools>

Channel Duty Guidance Protecting vulnerable people from being drawn into terrorism (HM Government: 2015)

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/425189/Channel_Duty_Guidance_April_2015.pdf

Domestic violence and Abuse <https://www.gov.uk/domestic-violence-and-abuse>

Female genital mutilation: multi agency practice guidelines (HM Government 2014)

<https://www.gov.uk/government/publications/female-genital-mutilation-guidelines>

Preventing youth violence and gang involvement (Home Office: March 2015)

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/418131/Preventing_youth_violence_and_gang_involvement_v3_March2015.pdf

The Right to Choose: Multi-agency statutory guidance for dealing with forced marriage (HM Government: June 2014)

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/322310/HMG_Statutory_Guidance_publication_180614_Final.pdf

National action plan to tackle child abuse linked to faith or belief

<https://www.gov.uk/government/publications/national-action-plan-to-tackle-child-abuse-linked-to-faith-or-belief>

No Health Without Mental Health strategy

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/213762/dh_125123.pdf

Keeping Children Safe in Education. Statutory guidance for schools and colleges. (DfE: September 2018)

https://consult.education.gov.uk/safeguarding-in-schools-team/keeping-children-safe-in-education/supporting_documents/Keeping%20Children%20Safe%20in%20Education%20Proposed%20Revisions.pdf

This is Abuse Discussion Guide (Home Office: 2013)

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/443659/Discussion_Guide_-_This_is_Abuse_update_July15_v2_Final.pdf

Working Together to Safeguard Children (2018) [Working Together to Safeguard Children 2018](#)

Children and Families Act (2014) <http://www.legislation.gov.uk/ukpga/2014/6/contents/enacted>

Safeguarding children in whom illness is fabricated or induced

<https://www.gov.uk/government/publications/safeguarding-children-in-whom-illness-is-fabricated-or-induced>

Schedule 10 of the Equality Act (2010)

http://www.legislation.gov.uk/ukpga/2010/15/pdfs/ukpga_20100015_en.pdf

Special Educational Needs and Disability Code of Practice, 0-25 years (DfE and Department for Health: January 2015)

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/398815/SEND_Code_of_Practice_January_2015.pdf

Safeguarding Our Children - 4LSCB Procedures (2007)

<http://www.4lscb.org.uk/documents/4lscbproceduresupdated220708.pdf>

Supporting children and young people who are bullied: advice for schools (DfE: 2014)

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/444864/Supporting_bullied_children.pdf

Guidance for Safer Working practices for Adults who Work with Children and Young People (2007)

<http://www.everychildmatters.gov.uk/resources-and-practice/IG00311/>

[What to do if you suspect a child is being sexually exploited \(DfE: 2012\)](https://www.gov.uk/government/publications/what-to-do-if-you-suspect-a-child-is-being-sexually-exploited)

<https://www.gov.uk/government/publications/what-to-do-if-you-suspect-a-child-is-being-sexually-exploited>

What to do if you're Worried a Child is Being Abused (HM Govt. 2015)

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf

Counselling in Schools: a blueprint for the future (DfE: March 2015)

<https://www.gov.uk/government/publications/counselling-in-schools>

Mental Health and Behaviour in School (DfE: March 2015)

<https://www.gov.uk/government/publications/mental-health-in-schools>

Safeguarding children who may have been trafficked: practice guidance DfE and Home Office: 2011)

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/177033/DFE-00084-2011.pdf