

SAFEGUARDING AND CHILD PROTECTION POLICY AND PROCEDURES

Safeguarding and Child Protection Policies and Procedures follows the guidance of the *Keeping Children Safe in Education (KCSIE)*, September 2022, *Working Together to Safeguard Children (WTSC)*, September 2018, *London Child Protection Procedures*, 5th Edition, 2017, *Prevent Duty Guidance: for England and Wales*, July 2015, *The Prevent Duty: Departmental Advice for Schools and Childminders*, June 2015 and *The Use of Social Media for On-Line Radicalisation*, July 2015.

Important contact details can be found in Annex A at the end of this policy

1. POLICY STATEMENT

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

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

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 (including supply 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
- Risks of serious injuries or death must be prevented

This policy also applies to the children in the Early Years Foundation Stage.

2. SCHOOL AIMS

- Establishing and maintaining an environment where children feel secure, are encouraged to talk, and are listened to.

- Ensuring 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 safeguarding and child protection plan.

3. PROCEDURES

We will follow the procedures set out by the Local Authority and Local Safeguarding Children's Partnership (LCSP) 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

All members of the School community are responsible for safeguarding and protecting the children that attend the School. Specifically:

- Governors take responsibility for overseeing the safeguarding and child protection policies and procedures and ensure that they are reviewed annually. The named governor with responsibility is the chair of the Board of Governors, Bernard Manuel.
- Governors foster a whole school approach to safeguarding. Safeguarding and child protection underpin all relevant aspects of policy development and operate with the best interests of the child at heart.
- The named governor ensures that the School has a designated senior person for safeguarding and 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 Secondary School, Jeanne Gonnet, the Head of Primary School, Coralie Manhes, and the Assistant Head for Y9 & 10, Peter Cogavin.

- The DSL is responsible for ensuring that 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.
- The DSL is responsible for ensuring that 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.
- The DSL is responsible for ensuring that that parents have an understanding of the responsibility placed on the school and staff for child protection by setting out its obligations on the school website.
- 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.
- The School will develop effective links with relevant agencies and co-operate as required with their enquiries regarding child safeguarding and protection matters including attendance at case conferences.
- The School will 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)
- The DSL will ensure all records are kept securely; separate from the main pupil file, and in locked locations.
- Where an allegation is made against a member of staff or volunteer, we will follow the reporting procedures detailed further in this policy.
- The named governor and Head will ensure that safe recruitment practices are always followed.
- The Head will ensure that all staff are aware of their mandatory duty to report Female Genital Mutilation (FGM) to the local police.
- In accordance with KCSIE 2022, all staff including the DSL and deputy DSLs 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 & Annex B of the KCSIE 2022 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 Safeguarding and Child Protection Policy;
 - The Behaviour Policy
 - The E-Safety Policy
 - The staff Code of Conduct (see Staff Handbook); and
 - The identity and the role of the DSL and deputies
 - The School’s procedures in relation to children missing from education.

Digital copies of policies and a copy of Part One & Annex B of KCSIE 2022 shall be provided to staff at induction. Hard copies are available upon request.

- 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 and protect children effectively.
- Each time Part One of KCSIE is updated, all staff members are informed and training is updated as appropriate.
- 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 Safeguarding and child protection policy within the School;
- Supporting other staff in their understanding of safeguarding and child protection issues and ability to recognise the signs and symptoms of abuse; and
- Managing the School'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 safeguarding and child protection (including online safety) and anti-radicalisation is an important part of the induction process. All training is updated at 3 yearly intervals and is an integral part of the whole school safeguarding approach. 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 2022, and will be required to read Part 1 & Annex B. See duty of staff paragraph 6 for further information.

Governors also all receive training in safeguarding and child protection (including online) at induction, and regularly thereafter. This training equips them with the knowledge ensure the School's safeguarding policies and procedures are effective.

Governors and members of staff involved in recruitment will receive training appropriate to their level of responsibility.

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.
- Promoting a strong culture of listening to all children's concerns to maximise chances to provide early help.
- Ensuring pupils feel confident to report abuse by promoting procedure and reassuring confidentiality of any concerns
- Ensuring children are safeguarded and protected from potentially harmful and inappropriate online material. As such governing bodies should ensure appropriate filters and appropriate monitoring systems are in place.
- Teaching pupils about safeguarding and child protection, including e-safety, and how to build resilience to the risks of radicalisation. This is in addition to the aforementioned filters and monitoring systems.
- A preventative whole-school education which prepares pupils for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. Please refer to our RSHE policy for more information.
- Ensuring that visiting speakers are suitable (whether invited by staff or pupils). Further information on our vetting procedures can be found in our *Preventing Extremism and Radicalisation Policy*.

Pupils will be taught about safeguarding and child protection (including online) in an age-appropriate manner, through the curriculum and PSHCE. Our School's ethos is fully student-centred and we have implemented a well-being curriculum which places importance, amongst other things, on building resilience and care for oneself and others.

Particular attention is placed on the safe use of electronic equipment and the Internet.

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, 2018 and KCSIE 2022. They will be required to read Part 1 and Annex B of this guidance and confirm that they have read and understood them, 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 and they will never be made to feel like they are creating a problem for reporting abuse, sexual violence or sexual harassment. However, staff cannot guarantee confidentiality if concerns are such that referral must be made to the appropriate agencies in order to safeguard and protect the child's welfare. All staff are also aware that children may not feel ready or know how to tell someone that they are being abused. This could be due to their vulnerability, disability, sexual orientation or language barrier. Staff build trusted relationships with pupils to facilitate communication.

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 DSL. If the DSL is not available, staff should speak to one of the deputy DSLs. The DSL and deputy DSLs shall have attended a course and received Level 3 training on safeguarding and child protection which included training in child protection matters. Personal Assistants and other members of the Head Team can help locate the DSL and deputies, and staff should not hesitate to seek out their help in this respect.

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.

Staff should refer to the code of behaviour detailed in *Appendix 2* of this policy and to the code of conduct found in the Staff Handbook for further information on appropriate behaviour around pupils.

7. RESPONSIBILITIES OF THE DESIGNATED SAFEGUARDING LEADS - DSLS

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 Safeguarding Children Partnership 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 safeguarding and child protection policy is updated and reviewed annually and work with the governing body 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.
- Help promote educational outcomes by sharing relevant information about welfare, safeguarding and child protection that children are experiencing (including children with a social worker) with teachers and school leadership team as appropriate, and providing support as necessary.
- Where children leave the establishment, ensure their child protection file is transferred to the new school as soon as possible
- The DSL also has overall responsibility for online safety.

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 Partnership 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 safeguarding and child protection policy, including new or part time staff.
- Ensure all staff have induction training covering safeguarding, child protection and anti-radicalisation 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.
- The DSL and deputy DSLs will renew their formal training on a two-yearly basis and will receive regular informal updates. All DDSLs are trained to the same level as the DSL. Training includes local inter-agency working protocols as well as training in the safeguarding partners' approach to Prevent duties.

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. All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school, and that children may be at risk from extra-familial harm (e.g. criminal exploitation). 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 physical and mental 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.
- Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

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. Mental Health & Safeguarding

Mental health is a priority for our School. We are aware of the central role we play in supporting the mental health of every pupil, from Nursery to Y13, and do this through a whole-school approach, creating a culture where positive mental health and wellbeing for everyone is both promoted and valued.

Our whole-school approach involves various components such as prevention, early identification and intervention. Preventative mental health measures include CPD for our staff members to ensure they are aware of the common symptoms of mental health problems as well as a comprehensive PSHCE curriculum which builds resilience and gives students the skills, knowledge, and understanding they need to keep themselves mentally healthy. We strive to create an open culture of trust around mental health and students are encouraged to talk openly with their form tutor, Head, Assistant Head, school nurse or any adult they trust without feeling any stigma if something is troubling them. We also invite mental health speakers from external agencies to give talks to our students and raise awareness.

We promote a mentally healthy environment by celebrating both academic and non-academic achievements, promoting regular exercise and healthy eating, maintaining consistent boundaries and

offering a wide range of extra-curricular activities to support students' interests such as yoga, choir, arts and various sporting activities.

Additionally, there is always a generous staff: pupil ratio, both in the classroom, and during breaks / lunchtime, which allows us to monitor students closely and detect any signs of mental health issues at an early stage. Staff members who identify possible mental health problems report their concerns to their Head or directly to the DSL if the problem is more serious or if they suspect the child is at risk of immediate danger. There is also an on-site, qualified student nurse who is available to all pupils and shares any concerns with the DSL / DDSL. The Head of School / DSL is the senior mental health lead and she works closely with rest of the Head team to oversee the mental health and wellbeing support the School provides.

If we suspect a pupil is having mental health difficulties, we support them by putting necessary measures in place. This usually involves an assessment to establish a clear analysis of the pupil's needs, a plan to set out how the pupil will be supported, action to provide that support and regular reviews to assess the effectiveness of the provision. We always involve parents throughout the process and regular communication with them is vital. In the case where a student is diagnosed with a mental health problem, they may require support from a specialist service. We will also always work closely with mental health professionals providing such specialist support to our pupils.

With the ever-increasing importance of mental health in mind, we are implementing a Care Committee this academic year (2022/23) as part of our whole-school approach in ensuring the best mental health support for our pupils.

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. While only appropriately trained professionals should attempt to make a diagnosis of a mental health problem, staff are well placed to observe children day-to-day and identify those whose behaviour may suggest underlying mental health problems. If staff have a mental health concern about a child that is also a safeguarding concern, they should take immediate action and speak to the DSL, as outlined in this policy. Mental health resources can be found in the [mental health and behaviour in schools guidance](#).

10.6. 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. Such activities may involve physical contact, such as assault by penetration (e.g., rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It could also include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet. CSE can occur over time or be a one-off occurrence and may happen without child's immediate knowledge e.g., through others sharing videos or images of them on social media. 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.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited e.g., they believe they are in a genuine romantic relationship and may 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 and child protection 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) places 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.

10.7. Child Criminal Exploitation

Child Criminal Exploitation (CCE) is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity in exchange for something the victim needs or wants, and/or for the financial advantage of the perpetrator or facilitator and/or through violence or threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact and can also occur through the use of technology. Examples of CCE include children being forced to work in cannabis factories, being coerced into moving drugs or money (county lines), forced to shoplift or pickpocket, forced to commit vehicle crime or to threaten other young people.

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

10.8. Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Schools and colleges can play an important role in safeguarding children from forced marriage and if in doubt, staff should speak to the DSL.

10.9. Honour Based Abuse

So-called ‘honour-based’ abuse (HBA) encompasses crimes committed to protect or defend the honour of the family and/or the community, including FGM, forced marriage, and practices such as breast ironing. All forms of so-called HBA are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubts staff should speak to the DSL. 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 HBA, or already having suffered HBA.

10.10. Domestic Abuse

KCSIE highlights that “domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse), all of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.” Members of staff should report suspected incidents of domestic abuse to the DSL.

10.11. Preventing Radicalisation

Protecting children from the risk of radicalisation should be seen as part of schools’ wider safeguarding and child protection duties, and is similar in nature to safeguarding and 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.

10.12. Monitoring the Use of Online Technology

Use of technology has become a significant component of many safeguarding issues, including 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 four 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;
- Commerce: risk such as online gambling, inappropriate advertising, phishing or financial scams

Online safety also includes protection from online challenges and hoaxes. The school follows the *Harmful online challenges and online hoaxes* (February 2021) guidance to respond to such incidents.

The governors shall ensure that as part of the requirement for staff to undergo regularly updated safeguarding and child protection training and the requirement to ensure children are taught about safeguarding and child protection, including online that online safety training for staff is integrated, aligned and considered as part of the overarching safeguarding and child protection approach. Governors regularly review the effectiveness of the School's filtering and monitoring IT system to limit children's exposure to risks linked to online technology. They ensure the systems in place are managed effectively by the leadership team and that all staff members know how to escalate concerns when identified.

The school recognises the importance of its role in speaking to parents and carers about children's access to online sites when away from school or college and regularly shares resources or organises talks. Parents may also find the below resources useful when discussing internet safety with their children:

- ThinkUKnow: <https://www.thinkuknow.co.uk/parents/support-tools/support-your-child-at-home>
- NSPCC: <https://www.nspcc.org.uk/keeping-children-safe/online-safety/>
- UK Safer Internet Centre: <https://www.saferinternet.org.uk/advice-centre/parents-and-carers>

10.13. Children Missing Education

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding or child protection possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding or child protection risk and to help prevent the risks of a child going missing in future.

As per the School Attendance 2022 and Children missing education 2016, the School always notifies the local authority when a pupil is added or removed from the admission register at a non-standard transition point during the school year.

Staff should refer to the School's attendance policy for further information on unauthorised absence and procedures for children missing from education.

10.14. Child-on-child Abuse

Safeguarding issues can also manifest themselves via child-on-child abuse. Child-on-child abuse can manifest itself in many ways, including, but not limited to: bullying (including cyber-bullying), abuse within intimate partner relationships, physical abuse (including hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm), sexual violence and sexual harassment (including through the sharing of nude or semi-nude pictures, sexual remarks, jokes or comments – in person or online), causing someone to engage in sexual activity without consent, gender-based violence, initiations/hazing type violence and rituals or upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.

The School adopts a zero-tolerance policy to all forms of child-on-child abuse. It will never be passed off as “banter”, “just having a laugh” or “just part of growing up”. The School recognises that child-on-child abuse may be taking place even if there are no reported cases and endeavours to minimise the risk of child-on-child abuse through school rules, student support schemes, regular discussions and by reinforcing awareness.

All allegations of child-on-child abuse will be taken very seriously. As outlined in our anti-bullying policy (especially section 7: Responding to Bullying), if child-on-child abuse is suspected or reported, a clear account of the incident will be recorded and given to a member of the Head team. It will then be investigated accordingly and interviews may need to take place with individuals concerned. Sanctions will be issued as appropriate and parents will be kept informed. All staff are familiar with these procedures; they will take regular training so they are able to recognise the signs of child-on-child abuse and respond to reports appropriately. The process for reporting and dealing with child-on-child abuse will be easily understood and accessible to students. They will feel confident that reported incidents are

always investigated swiftly, sensitively and effectively and that they will always be fully supported throughout the process.

Staff should be aware that some groups are potentially more at risk of child-on-child abuse. Evidence shows that girls, children with SEND and LGBT+ children are at greater risk. Further information on responding to child-on-child abuse for children with SEND can be found in section 10.16.

a. Child on child sexual violence and sexual harassment

Sexual violence and sexual harassment can occur between two children of any age and sex. It exists on a continuum, may overlap, and can occur online or face to face in both intimate personal relationships and between groups and individuals. The School has a zero tolerance policy of sexual harassment and online sexual abuse. It is never acceptable and will never be tolerated. Even if no specific reports are received, we assume it is happening in our setting and adopt a whole-school approach to identify issues and intervene early to best protect our students.

All staff members are aware of the School's zero-tolerance and 'it can happen anywhere' approach. They complete regular training in sexual violence and harassment among young people and are aware of the four likely scenarios when managing reports (i.e. internal management, early help, referrals to children's social care and reporting to the police).

All reports of sexual violence and sexual harassment, including those which occur online or outside of the school, will be investigated thoroughly. Victims will always be taken seriously and will be supported and kept safe. Victims will always be told that the law is in place to protect children and young people rather than criminalise them. This will be explained in a way that avoids creating unnecessary alarm or distress.

The School looks out for potential patterns of concerning, problematic or inappropriate behaviour, and if identified, will decide on an appropriate course of action. The School will also consider whether there are wider cultural issues that enabled such behaviour to occur and what could be done to minimise the risk of it happening again. Actions are regularly reviewed and relevant policies updated to reflect lessons learnt.

Useful additional resources and guidance can be found in KCSIE 2022 Part 5

b. School's approach to sharing nudes and semi-nudes

The term 'sharing nudes and semi-nudes' is used to mean the sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18. It could be publicly via social media, gaming platform or forums. It could also be in 1:1 messaging or via group chats.

Pupils are taught about online safety, including the risks of sharing nudes and semi-nudes as part of the RSHE curriculum. We also invite external speakers to come to our School to talk to about the importance of e-safety and how students can protect themselves online. We understand however that young people experiment and therefore the risks associated with online activity can never be completely eliminated. The motivations behind sharing nudes or semi-nudes are not always sexually or criminally motivated however it is illegal and the School treats all incidents very seriously.

Steps to take in the event of an incident:

- Incident should be referred to the DSL as soon as possible
- The DSL will hold an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the relevant members of the Head team.
- There will be subsequent interviews with the students involved
- Parents will be informed at an early stage and involved in the process in order to best support the child
- A referral would be made to children's social care and/or the police if there is a concern that a child has been harmed or is at risk of immediate harm at any point in the process. A referral would also be made if the incident:
 - Involves an adult
 - Involves blackmailing, coercion or inability to consent
 - Is unusual for the child's developmental stage or is violent
 - Involves a child under 13 in the images
- The incident would be recorded following all child protection and safeguarding procedures

Initial review meeting

In the initial review meeting, the DSL will establish whether there is an immediate risk to the child and whether a referral to the police / social services needs to be made. They will also decide if it is necessary to view the image(s) - in most cases, it is not necessary unless there is no other way to safeguard the child - and what further information is required to decide on the best response. They will decide if immediate action needs to be taken to delete or remove images/videos from devices or online.

Support for the child(ren) involved

If the child is not at immediate risk, the DSL or another member of the Head team will have a conversation with them to decide the best course of action. They will be fully supported, kept informed and given a sense of control during the process. The child will be reassured that they have done the right thing by speaking to an adult and that the School and other adults are there to help. They would be made aware of the laws around sending nudes and semi-nudes but reassured that the intent is not to criminalise children.

Additional information can be found in *Sharing nudes and semi-nudes: advice for education settings working with children and young people* (December 2020).

10.15. Additional Concerns

The School must also be aware of the following:

- Bullying, including cyber-bullying;
- Change in friendships or relationships with older individuals
- Children who have family members in prison;
- County lines;
- Domestic violence (including as a witness)
- Drugs
- Fabricated or induced illness
- Faith abuse
- Forced marriage
- Gangs and youth violence
- Gender-based violence/violence against women and girls (VAWG)
- Hate
- Homelessness
- Honour based abuse, including breast ironing
- Mental health
- Missing children and adults
- Non-consensual sexual activity
- Private fostering
- Radicalisation
- Sexual violence and sexual harassment
- Sharing of nude and semi-nude images/videos (previously referred to as sexting)
- Significant decline in performance
- Teenage relationship abuse
- Trafficking
- Unexplained gifts or new possessions and
- Upskirting (of which a person of any gender can be a victim)

It is essential that children are safeguarded and protected from potentially harmful and inappropriate online material. As such, governors ensure that appropriate filters and monitoring systems are in place.

Further details are available in [Keeping Children Safe in Education, Statutory Guidance for Schools and Colleges](#), September 2022.

10.16. Children with Special Educational Needs

The School acknowledges that children with special educational needs or disabilities 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.

10.17. Children who are lesbian, gay, bi or trans (LGBT)

The School is aware that children who identify as LGBT as well as pupils who are perceived by their peers to be LGBT (whether they are or not) can be targeted by other children.

The School is aware of this increased risk and has measures in place to ensure that students have safe space where they can share their concerns and a trusted adult with whom they can be open. Please also refer to our RSHE policy for more information.

10.18. Children at greater risk of harm

The School recognises that children requiring a social worker or mental health support, or who are looked after or previously looked after children, are potentially at greater risk of harm. Where necessary, it is essential to work with external agencies to best support these children as detailed in KCSIE.

10.19. Children in need of Additional Support

The School realises there is a difference between children who have suffered or who are at risk of suffering from significant harm and those whose needs fall below the threshold for immediate intervention but still require additional support. The School will identify and provide early help children with additional needs through inter-agency assessment using the ‘Common Assessment Framework’ (CAF) and ‘Team around the Child’ (TAC) approaches.

10.20. Serious violence

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

10.21. Support for Perpetrators of Child-on-child Abuse

The School recognises that while perpetrators of child-on-child abuse pose a risk to others, they are also often vulnerable or victims of abuse themselves. While abuse will not be tolerated by the School, perpetrators of child-on-child abuse will always be treated fairly and consistently by the School. The School will work together with the parents/guardians, teachers and the local authority to ensure that the perpetrator is given adequate tools to understand the severity of their actions and to prevent future abuse.

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. They include a clear and comprehensive summary of the concern, details of how it was resolved and the outcome (e.g., actions taken, decisions reached etc.). 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 safeguarding or 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).

Safeguarding records are kept in accordance with GDPR law. Safeguarding records concerning a child requested by parents under a Subject Access Request may be refused should it be deemed that this put the child at further risk.

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 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.

Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision. If in doubt about information sharing, staff should consult government guidance on *Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers* (which includes information on information sharing in the context of the Data Protection Act and GDPR) or speak to the DSL or DDSL. Fears about information sharing **must not** be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children,

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.

1 2. 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 parents 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 at the time of the initial disclosure or within 48 hours of the incident to the local Social Services department office. Anybody can make a referral, if necessary.

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); and
- Information regarding parental knowledge or, and if appropriate, agreement to the referral.

12.2. Contact details for referrals

All referrals must be made directly to the Camden Children and Families Contact Service – Tel: 020 7974 3317 / 0207 974 4444 (out of hours). – Email: LBCMASHadmin@camden.gov.uk / Secure email: LBCMASHadmin@camden.gov.uk.cjsm.net

If referrer is in doubt that the threshold is met, please discuss the case with the Children and Families Contact Service by calling 020 7974 3317 who will direct your call to the Duty LADO.

Consult the Camden Safeguarding Children Partnership page for further information:

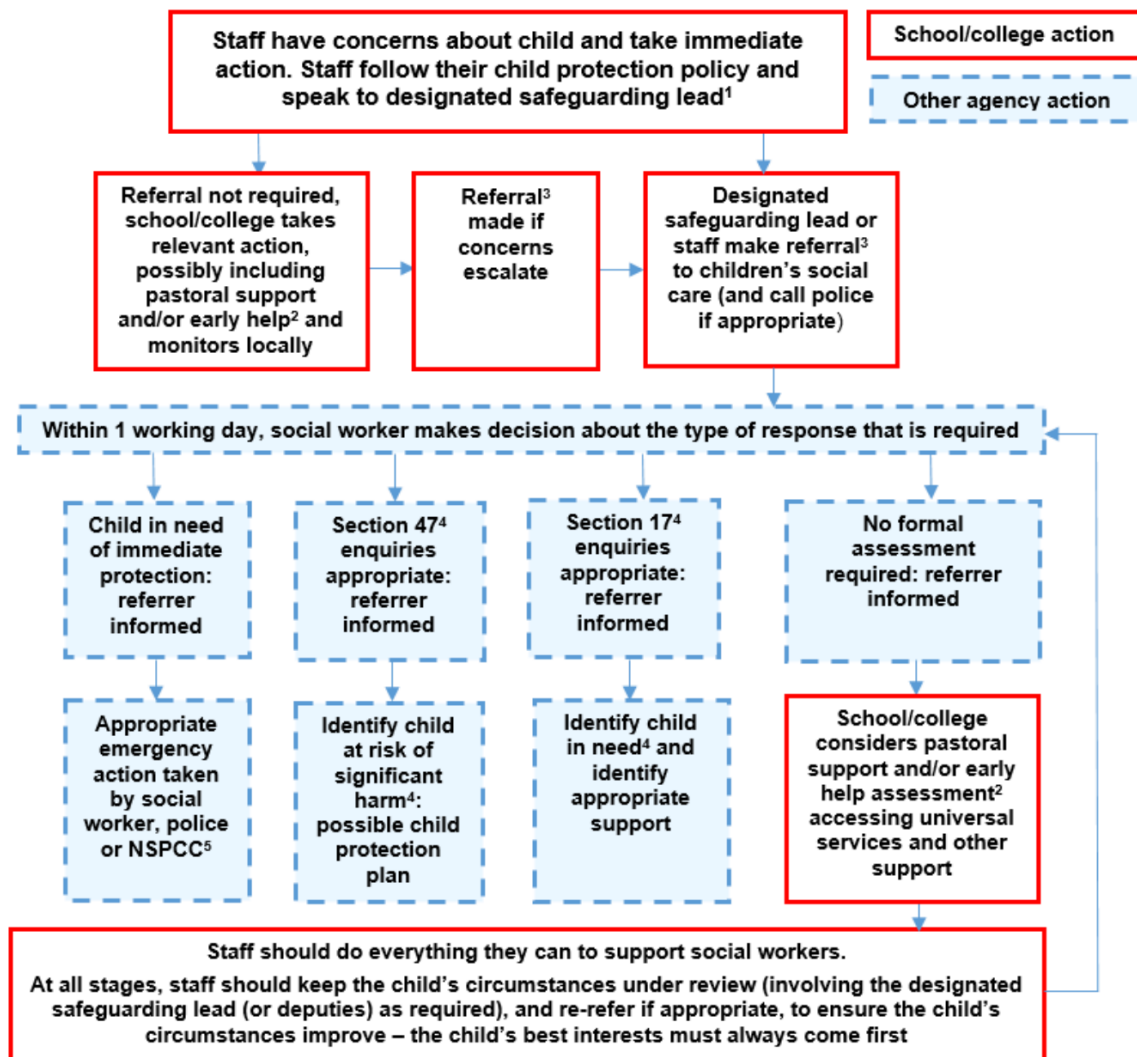
<https://cscp.org.uk/professionals/children-and-families-contact-service/>

For children who do not reside in Camden, the referrer should contact the relevant Child Protection Partnership. See Annex A for useful contact details.

Staff 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.

The flowchart included on the next page details the actions to take to make a referral about a child.

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).

This flowchart is taken from KCSIE 2022.

13. WHISTLEBLOWING

All staff will be made aware of the importance of whistleblowing and feel confident to voice concerns, no matter how small, about the attitude or actions of colleagues, including supply staff and volunteers. Staff will also be given training and support in whistleblowing.

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 Camden Safeguarding Children Partnership procedures: <https://cscp.org.uk/>)

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: 0808 800 5000 – the line is available from 8:00 AM to 10:00 PM, Monday to Friday and from 9:00 AM to 6:00 PM at the weekends. 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.

Please refer to the School's Staff Handbook for further guidance on our whistleblowing procedures.

14. 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 2017 section A. For further details refer to the LCPP: http://www.londoncp.co.uk/chapters/alleg_staff.html

15. GENERAL CONSIDERATIONS RELATING TO ALLEGATIONS AND CONCERNS OF ABUSE

There are two levels of allegation / concern:

- allegations that may meet the harms threshold
- allegations that do not meet the harms threshold ('low level concerns')

15.1. Allegations that may meet the harms threshold

These include instances where it is alleged that anyone working the School has:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;

- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (including because of transferable risk).

When an allegation is made, the School will inform the LADO immediately (and certainly within one working day). The School will not undertake its own investigation of allegation without prior consultation with the LADO, or in the most serious cases, the police, so as not to jeopardise statutory investigations. If the School identifies that a child has been harmed, that there could be an immediate risk of harm to a child or if the situation is an emergency, the School will immediately contact children's social care, and the police if appropriate. Where the procedures outlined below mention staff, this includes contracted staff as well as supply staff and volunteers.

The School will discuss the nature, content and context of the allegation with the LADO and will together agree on a course of action including any involvement from the police. All discussions will be recorded in writing.

The LADO will also 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; and,
- If suspended, be kept up to date about events in the workplace. The School will give due consideration the views of the LADO, KCSIE and WTSC when making a decision about suspension.

If the accused member of staff is from an agency or is a volunteer, the school will follow the procedures detailed in KCSIE to ensure that the allegation is dealt with appropriately, including liaising with the local LADO and working with the agency.

In the event of dismissal, referral of the case to the Secretary of State will be considered.

In the absence of the Head, and if she cannot be reached by telephone, reports should be made to the deputy DSLs who will keep the Head informed.

If the allegation concerns the Head the concern must be reported to the Chairman of the Board, without the Head being informed prior to contact with both the Chairman and the LADO.

For all allegations, the following information will be kept on the file of the person accused:

- clear and comprehensive summary of the allegation;
- details of how the allegation was followed up and resolved;
- a note of any action taken, and decisions reached and (new) whether the outcome was substantiated, unsubstantiated or unfounded;
- a copy provided to the person concerned, where agreed by children's social care or the police (new);
- a declaration on whether the information will be referred to in any future reference (new).

Substantiated allegations will be included in references as long as the information is factual and does not include opinions.

15.2. Allegations that do not meet the harms threshold ('low level concerns')

A low-level concern is 'any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the School may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate contact outside of work, and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.'

These behaviours can exist on a wide spectrum. Some examples include: being over friendly with children; having favourites; taking photos of children on their mobile phone; engaging with children on a one-to-one basis in a secluded area; and using inappropriate sexualised, intimidating or offensive language.

Low-level concerns about a member of staff should be reported to the headteacher. Staff should feel confident to self-refer. Low-level concerns about someone employed by a supply agency or contractor should be shared with the head, the concern recorded, and their employer notified so that potential patterns of inappropriate behaviour can be identified.

Where a third party has raised the concern, the headteacher should collect as much evidence as possible by speaking directly to the person who raised the concern (if known) as well as to the individual involved and any witnesses.

All low-level concerns will be recorded in writing by the Head of School. The following information will be included:

- details of the concern;
- the context in which it arose;
- evidence collected by the DSL where the concern has been raised via a third party;
- the decision categorising the type of behaviour;
- action taken;
- the rationale for decisions and action taken;
- the name of the individual sharing the concerns (respecting any wish to remain anonymous as far as possible).

Our low-level concerns policy aims to embed an open and transparent culture in which the School's values and expected behaviour as set out in the staff code of conduct are constantly lived, monitored and reinforced by all staff. This culture of openness, transparency and trust will help to identify any concerning or inappropriate behaviour at an early stage, minimise the risk of abuse and will ensure that adults working in schools are clear about and act within professional boundaries in accordance with the values and ethos Ecole Jeannine Manuel.

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 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)

The School will make a prompt referral to the DBS where it is found that an allegation against a person (whether employed, contracted, a volunteer or a student) is substantiated and the DBS referral criteria are met, that is, that they have caused harm or posed a risk of harm to a child.

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. The School will also make a referral to the DBS even when a person's services are no longer used by the School if the DBS referral criteria were met, i.e. that they have caused harm or posed a risk of harm to a child.

The LADO will discuss with the School whether a referral will also be made to a regulatory body (e.g. the Teaching Regulation Agency (TRA) or General Medical Council).

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. The School verifies that candidates have not been disqualified under the Disqualification under the Childcare Act (2006). The School verifies candidates' identity

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.

by checking the name on their birth certificate (where available), in line with government guidelines.

- All Staff are made aware of the Childcare Act (2006).
- 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, the outline of which is detailed in our Safer Recruitment Policy.
- 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.
- Please refer to the school's Safer Recruitment Policy for further information.

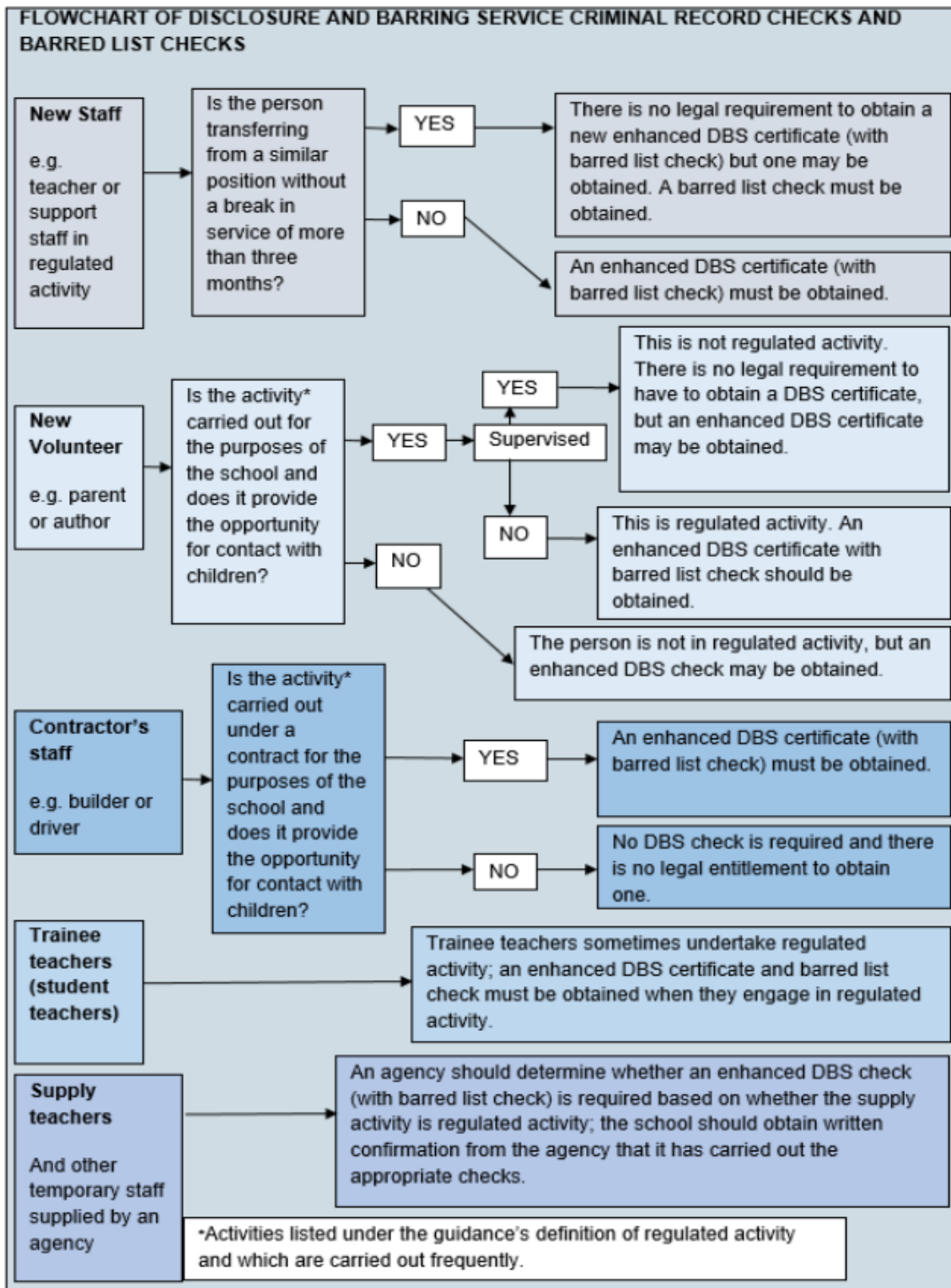
The Board of Governors will review this policy and all safeguarding arrangements, including the effectiveness of procedures and their implementation, on an annual basis. They will also ensure that the School contributes to inter-agency working in line with Working Together to Safeguard Children through effective communication and good co-operation with local agencies.

Reviewed by Bernard Manuel
Chairman of the Board of Governors
1st September 2022



This policy will be reviewed annually by the Board, who may commission an independent audit to be carried out to ensure its effectiveness. The Single Central Register will also be reviewed annually.

Draft for consultation



Annex A

Important Contact Information

Key Contacts - Internal

DSL: Pauline Prévot – p.prevot@jmanuel.uk.net / 0203 829 5970

Deputy DSLs

Jeanne Gonnet – j.gonnet@jmanuel.uk.net / 0203 829 5970

Coralie Manhes – c.manhes@jmanuel.uk.net / 0203 829 5970

Peter Cogavin – p.cogavin@jmanuel.uk.net / 0203 829 5970

Chair of Governors: Bernard Manuel – chair@jmanuel.uk.net / 0203 829 5970

Key Contacts - External

Camden Safeguarding Children Partnership (*for children living in Camden*)

Telephone: 020 7974 3317 (9am to 5pm) or 020 7974 4444 (out of hours)

Web: cscp.org.uk

Hammersmith & Fulham, Kensington & Chelsea and Westminster Local Safeguarding Children Partnership (LSCP) (*for children living in those boroughs*)

The LCSP team – Telephone: 07739 315388 Web: <https://www.rbkc.gov.uk/lscp/>

Hammersmith & Fulham – Telephone: 020 8753 6610

Kensington and Chelsea – socialservices@rbkc.gov.uk Telephone: 020 7361 3013

Westminster – accesstochildreancesservices@westminster.gov.uk Telephone: 020 7641 4000

NSPCC Helpline – contact the NSPCC Helpline to get advice or share concerns about a child.

Telephone: 0808 800 5000

Email: help@nspcc.org.uk

Independent Schools Inspectorate

Telephone: 020 7600 0100

Email: concerns@isi.net

Web: www.isi.net

Disclosure and Barring Service (DBS)

Address for referrals: PO Box 396, Royal Wootton Bassett, SN4 4HF UK.

DBS Referral Helpline: 03000 200 190

Email: customerservices@db.gov.uk

DfE non-emergency advice concerning extremism for staff and governors

Telephone: 020 7340 7264

Email: counter.extremism@education.gov.uk

If you are concerned for the immediate safety of a child, call the emergency services on 999.

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

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: Code of Conduct for Staff

This Code of Behaviour should be read in conjunction to the one detailed in the Staff Handbook

You must not -

- 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.
- 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. Physical contact may also be necessary for teaching (for example, when demonstrating a technique). In all such cases contact should only take place with the consent of the child.
- 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.
- Staff and volunteers should never:
 - Initiate or engage in sexually provocative conversations or activity.
 - Allow the use of inappropriate language to go unchallenged.
 - Do things of a personal nature for children that they can do themselves.
 - Allow any allegations made by a child go without being reported and addressed, or either trivialise or exaggerate child abuse issues.
 - Make promises to keep any disclosure confidential from relevant authorities.
- Staff or volunteers should not show Staff favouritism to any one child, nor should they issue or threaten any form of physical punishment.
- Staff or volunteers should not use mobile phones in class except in the case of an emergency. This also applies to the EYFS setting. Where staff need to take pictures of pupils for teaching purposes, they must do so using School devices (e.g. iPads).

You must -

- 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.
- 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.
- 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.

- 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.
- 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

Deficiencies and Weaknesses

It is the duty of all members of Staff and the named governor 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 named governor 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

Revised *Prevent Duty Guidance: for England and Wales* (Home Office: 2019)
<https://www.gov.uk/government/publications/prevent-duty-guidance/revised-prevent-duty-guidance-for-england-and-wales>

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

Female genital mutilation: multi agency practice guidelines (HM Government 2016)
<https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation>

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

<https://www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage>

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
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/138253/dh_124058.pdf

Keeping Children Safe in Education. Statutory guidance for schools and colleges. (DfE: September 2022)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1101454/Keeping_children_safe_in_education_2022.pdf

Working Together to Safeguard Children (2018)

<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

Information Sharing (2018)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1062969/Information_sharing_advice_practitioners_safeguarding_services.pdf

Sharing nudes and semi-nudes: advice for education settings working with children and young people (December 2020)

<https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>

Disqualification under the Childcare Act (2006)

<https://www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006>

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

Human Rights Act (1998)

<https://www.legislation.gov.uk/ukpga/1998/42/contents>

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

Preventing and tackling bullying: Advice for headteachers, staff and governing bodies (DfE: July 2017)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/623895/Preventing_and_tackling_bullying_advice.pdf

Advice for parents and carers on cyberbullying (DfE: 2014)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/444865/Advice_for_parents_on_cyberbullying.pdf

Guidance for Safer Working practices for Adults who Work with Children and Young People (2015)

<http://www.safeguardingschools.co.uk/wp-content/uploads/2015/10/Guidance-for-Safer-Working-Practices-2015-final1.pdf>

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>

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: February 2016)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/497825/Counselling_in_schools.pdf

Mental Health and Behaviour in School (DfE: November 2018)

<https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2>

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

Children missing education (DfE: September 2016)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/550416/Children_Missing_Education_-_statutory_guidance.pdf

School Attendance (2022)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1073591/School_attendance_guidance_May-2022.pdf

The use of social media for online radicalisation (DfE):

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/440450/How_social_media_is_used_to_encourage_travel_to_Syria_and_Iraq.pdf

Data Protection: a toolkit for schools (DfE, 2018)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/747620/Data_Protection_Toolkit_for_Schools_OpenBeta.pdf

When to call the police, guidance for schools and colleges (NPCC)

<https://www.npcc.police.uk/documents/Children%20and%20Young%20people/When%20to%20call%20the%20police%20guidance%20for%20schools%20and%20colleges.pdf>

Sexual violence and sexual harassment between children in schools and colleges (DfE, 2018)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/719902/Sexual_violence_and_sexual_harassment_between_children_in_schools_and_colleges.pdf

Mental health and behaviour in schools (DfE, 2018)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/755135/Mental_health_and_behaviour_in_schools_.pdf

Relationships education, Relationships and Sex Education (RSE) and Health Education

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/805781/Relationships_Education_Relationships_and_Sex_Education_RSE_and_Health_Education.pdf

UK Council for Child Internet Safety (UKCCIS)

<https://www.gov.uk/government/groups/uk-council-for-child-internet-safety-ukccis>

[Safeguarding and protecting people for charities and trustees \(DfE, 2019\)](#)

<https://www.gov.uk/guidance/safeguarding-duties-for-charity-trustees>

[Supporting practice in tackling child sexual abuse](#)

<https://www.csacentre.org.uk/knowledge-in-practice/practice-improvement/supporting-practice-in-tackling-child-sexual-abuse/>