

LYCÉE FRANÇAIS CHARLES DE GAULLE DE LONDRES SAFEGUARDING AND CHILD PROTECTION POLICY

Date of Review:

May 2023

September 2023

January 2024

September 2024

Next Review: September 2025

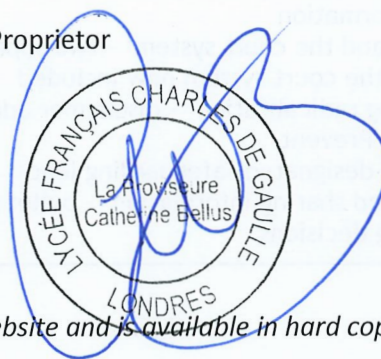
This policy was last reviewed and agreed by the Proprietor, Proviseure and Designated Safeguarding Lead of the Lycée Français Charles de Gaulle de Londres in September 2024 and will next be reviewed no later than September 2025 or earlier if significant changes to the systems and arrangements take place, or if legislation, regulatory requirements or best practice guidelines so require.

Signed: Stéphane Foin, acting on behalf of the Proprietor


AMBASSADE DE FRANCE
Service Culturel

Signed: Catherine Bellus-Ferreira - Proviseure

Le Conseiller Culturel Adjoint



This policy is publicly available on the School website and is available in hard copy on request.

Updates to policy:

Keeping Children Safe In Education (Department for Education's statutory guidance) amendments September 2024 :

Part one Safeguarding information for all staff

Paragraph 6 Definition of 'safeguarding and promoting the welfare of children' - amended to reflect the updated 'Working together to safeguard children 2023'

Paragraph 18 'Early help' - amended to reflect revised 'Working Together' guidance

Paragraph 19 'Abuse and Neglect' - heading amended to include 'exploitation' (also throughout the document as applicable)

Paragraph 24 'Indicators of Abuse and neglect' - additional text included 'including where they see, hear, or experience its effects' when referring to domestic violence.

Paragraph 29 'Safeguarding Issues' - 'deliberately missing education' amended to reflect revised definition of 'unexplainable and or/persistent absences from education'

Part two The management of safeguarding

Paragraph 92 Data Protection Act 2018 and UK GDPR - paragraph included to comply with DPA/UKGDPR requirements

Paragraph 171 'Alternative Provision' - text added to clarify school remains responsible for the pupils they place in alternative provision

Paragraph 204 Links added to NSPCC advice on protecting children with SEN; and deaf/disabled children and young people

Paragraphs 205 to 209 'Children who are lesbian, gay, bisexual, or questioning their gender' - disclaimer added, and additional text includes further clarification to comply with gender questioning children guidance terminology

Part five Child-on-child sexual violence and sexual harassment

Paragraph 497 'Early help' - text amended to reflect 'Working Together to Safeguard Children 2023' 184

Annex B Further information

Page 148 'Children and the court system' - two separate age-appropriate guides for schools to support children in the court system now included

Page 156 'Preventing radicalisation' - disclaimer added, and minimal changes to clarify schools' duties in relation to Prevent

Annex C Role of the designated safeguarding lead

Page 170 'Holding and sharing information' - bullet point 3 further guidance added regarding the rationale for making decisions

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This is the Safeguarding and child protection policy and procedures of Lycée Français Charles de Gaulle de Londres (the “School”).

INTRODUCTION

School Mission:

The School makes a simple and honest commitment: to offer each child the best conditions in which to realise their academic potential, to be able to develop and thrive in a peaceful environment and achieve the level of excellence required to access their desired course even at the most competitive universities. We nurture each individual with care and help them build self-confidence – this remains our pledge to our families as much today as it has been for over a century."

The School is an environment where children feel safe, happy, healthy, have better relationships and are actively participating in the school and wider world. We are committed to the welfare of our pupils. All professionals who work with children have a responsibility to safeguard them.

All who work, volunteer or supply services to the School have an equal responsibility to understand and implement this policy and its procedures both within and outside of normal school hours, including activities away from the School.

Members of the School community should also feel able to raise any safeguarding concerns, whether current or non-recent, safe in the knowledge that they will be supported, the matter will be handled sensitively, and appropriate action taken.

Anyone about whom a concern is raised should feel confident that they will be supported, and the matter will be handled sensitively, and that appropriate action will be taken.

This policy forms part of the School's whole school approach to promoting child safeguarding and wellbeing, which seeks to involve everyone at the School to ensure that the best interests of pupils underpins and is at the heart of all decisions, systems, processes and policies.

Although this policy is necessarily detailed, it is important to the School that our safeguarding policies and procedures are transparent, clear and easy to understand for staff, pupils, parents and carers. The School welcomes feedback on how we can continue to improve our policies.

1. SCOPE AND APPLICATION

This policy applies to all pupils of the School, including those pupils in the Early Years Foundation Stage (EYFS) (*maternelle*).

It applies to the School's four sites:

- **South Kensington** (Royal borough of Kensington and Chelsea)
35 Cromwell Road
London SW7 2DG
- **École de Wix** (borough of Wandsworth)
Wix's Lane
London SW4 0AJ
Ecole de Wix is a primary school based on a site shared with Belleville Wix Academy, and a shared bilingual programme is offered by both schools. Ecole de Wix and Belleville Wix Academy have a written shared understanding in relation to safeguarding, including:

- The head teachers of the schools are responsible for ensuring the wellbeing and safety of their respective pupils.
- Each school recognises that there is an overriding duty for the schools to co-operate to ensure that they promote the welfare, and protect the safety, of children.
- where the pupils are part of the bilingual classes both head teachers work together to achieve a mutually acceptable decision and approach.

The reporting of concerns about children enrolled in the shared bilingual programme and/or about staff involved in the shared bilingual programme must take place in accordance with article 10(d) hereafter.

- **École Marie d'Orliac** (borough of Hammersmith and Fulham)
60 Clancarty Road,
London SW6 3AA
Ecole Marie d'Orliac is a primary school based on a site shared with Holy Cross Catholic Primary School, and a shared bilingual programme is offered by both schools. Ecole Marie d'Orliac and Holy Cross Catholic Primary School have a shared understanding in relation to safeguarding, including:
 - The head teachers of the schools are responsible for ensuring the wellbeing and safety of their respective pupils.
 - Each school recognises that there is an overriding duty for the schools to co-operate to ensure that they promote the welfare, and protect the safety, of children.
 - where the pupils are part of the bilingual classes both head teachers work together to achieve a mutually acceptable decision and approach.

The reporting of concerns about children enrolled in the shared bilingual programme and/or about staff involved in the shared bilingual programme must take place in accordance with article 10(d) hereafter.

- **École André Malraux** (borough of Ealing)
44 Laurie Road, London W7 1BL

The policy is applicable to all on and off-site activities undertaken by pupils while they are the responsibility of the School.

Reference to staff in this policy includes all those who work for or on behalf of the School, regardless of their employment status, including contractors, supply staff, volunteers and those on work experience unless otherwise indicated.

2. KEY SCHOOL CONTACTS

SAFEGUARDING TEAM	
Designated Safeguarding Lead (DSL)	Colette Shulver Email: dsl@lyceefrançais.org.uk

Whole School (Including EYFS provision) (including Prevent, Mental health and Looked After Children lead)	Telephone: 020 7590 6897
Deputy Designated Safeguarding Lead (DDSL) <i>Proviseur Adjoint</i> / Head of British Section	Simon McNaught Email: smcnaught@lyceefrançais.org.uk Telephone number: 020 7590 6811
Deputy Designated Safeguarding Lead (DDSL) <i>Proviseur Adjoint</i> Secondary school Site: South Kensington	Lidia Viana Email: lviana@lyceefrançais.org.uk Telephone number: 020 7590 6872
Deputy Designated Safeguarding Lead (DDSL) <i>Proviseur Adjoint</i> Secondary school Site: South Kensington	Timothée Léridon Email: tléridon@lyceefrançais.org.uk Telephone number: 020 7590 6809
Designated Member of Staff (DMS) CPE/Head of year Secondary school Site: South Kensington	Isabelle Feurtet Email : ifeurtet@lyceefrançais.org.uk Telephone number: 020 7590 6824
Designated Member of Staff (DMS) CPE/Head of year Secondary school Site: South Kensington	Cebastien Gnahoré Email: cgnahore@lyceefrançais.org.uk Telephone number: 020 7590 6847
Designated Member of Staff (DMS) CPE/Head of Year Secondary school Site: South Kensington	Audrey Porceddu Email: aporceddu@lyceefrançais.org.uk Telephone number: 020 7590 6896
Designated Member of Staff (DMS) CPE/Head of Year Secondary school Site: South Kensington	Laurent Sagot Email: lsagot@lyceefrançais.org.uk Telephone number: 020 7590 6836
Designated Member of Staff (DMS) CPE/Head of Year Secondary school Site: South Kensington	Pascale Rivière Email : priviere@lyceefrançais.org.uk Telephone number: 020 7590 6801
Deputy Designated Safeguarding Lead (DDSL) Directrice école South Kensington Primary School (Including EYFS provision) Site: South Kensington	Veronique Dubès Email : direction.sk@lyceefrançais.org.uk Telephone number: 020 7590 6846
Designated Member of Staff (DMS) <i>Vie Scolaire</i>	Daniel Nunes Email: vie-scolaire-primaire@lyceefrançais.org.uk

Primary School (Including EYFS provision) Site: South Kensington	Telephone number: 07850 507 871
Deputy Designated Safeguarding Lead (DDSL) Directeur école de Wix Primary School (Including EYFS provision) Site: Ecole de Wix	Thibaud Ventelou Email: direction.wix@lyceefrançais.org.uk Telephone number: 020 7738 0287
Designated Member of Staff (DMS) <i>Vie Scolaire</i> Wix Primary School (Including EYFS provision) Site: Ecole de Wix	Omar Latrèche Email: olatreche@lyceefrançais.org.uk Telephone number: 020 7738 0287
Deputy Designated Safeguarding Lead (DDSL) Directeur école André Malraux Primary School (Including EYFS provision) Site: Ecole André Malraux	Daniel Riggs Email: direction.malraux@lyceefrançais.org.uk Telephone number: 020 8578 3011
Deputy Designated Safeguarding Lead (DDSL) Directeur école Marie d'Orliac Primary School (Including EYFS provision) Site: Ecole Marie d'Orliac	Etienne Jeanson Email: direction.fulham@lyceefrançais.org.uk Telephone number: 020 7736 5863
Designated Member of Staff (DMS) <i>Vie Scolaire</i> Marie d'Orliac Primary School (Including EYFS provision) Site: Ecole Marie d'Orliac	Muriel Martial Email: vsmdo@lyceefrançais.org.uk Telephone number: 07817 125 700
Designated Members of Staff (DMS) Doctor, nurses, speech therapist, psychologist Whole School Main Site: South Kensington	Doctor: Pardis Momeni pmomeni@lyceefrançais.org.uk Nurses : infirmierie@lyceefrançais.org.uk Speech therapist: orthophoniste@lyceefrançais.org.uk Psychologist: psychologue@lyceefrançais.org.uk Telephone number: 020 7590 6833 PSHE teacher: AJones@lyceefrançais.org.uk
Proviseure	
Whole School	Catherine Bellus-Ferreira Email: proviseure@lyceefrançais.org.uk Telephone number: 020 7584 6322
Proprietor	

Whole School	French State Represented by the Embassy of France, London via the Conseiller Culturel Telephone number: 020 70731300
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3. KEY PERSONNEL – EXTERNAL AGENCIES AND THEIR SAFEGUARDING PRIORITIES

3.1 The School's Local Safeguarding Children Partnership (LSCP):

- for its South Kensington (main) site is Kensington and Chelsea, which operates the [bi-borough Local Safeguarding Children Partnership](#),
 - for the Ecole Marie d'Orliac is the [Local Safeguarding Children Partnership for](#) Hammersmith & Fulham,
 - for the Ecole de Wix is the [Local Safeguarding Children Partnership for Wandsworth](#),
 - for the Ecole André Malraux is the [Local Safeguarding Children Partnership for Ealing](#),
- with each of these LSCPS following the guidance of the wider London Safeguarding Children's partnership.

3.2 For any concerns regarding pupils the School would usually contact the Children's Services Department of the borough in which the pupil resides.

3.3 For any concerns relating to the staff the School will always contact the LADO for the borough in which the School where the relevant member of staff works is situated (Kensington & Chelsea, Hammersmith & Fulham, Wandsworth or Ealing).

It is the policy of the School that referrals about pupils are made by the DSL; however anyone may make a referral and staff may raise concerns directly with Children's Services.

If there is a risk of immediate serious harm to a pupil a referral should be made to Children's Services immediately or by calling the police on 999.

Borough	Entity	Contact details
Kensington & Chelsea	Local Authority Designated Officer(s) (LADO)	Aqualma Daniel Telephone: 020 7361 2120 Email: kclado.enquiries@rbkc.gov.uk Website: https://www.rbkc.gov.uk/lscp/information-professionals-and-volunteers/lado-managing-allegations
	Bi-Borough Safeguarding Lead for Schools and Education	Elaine Campbell Telephone: 020 7361 3000 / 07712 236508 Email: elaine.campbell@rbkc.gov.uk
	Kensington and Chelsea children's social care department (Duty Line)	Telephone number: 0207 361 3013 Email: socialservices@rbkc.gov.uk Out of hours emergency: 0207 373 2227

	Local Safeguarding Children Partnership Kensington & Chelsea	Telephone number: 07739 315 388 Website: https://www.rbkc.gov.uk/lscp/
	LSCP Multi-agency Safeguarding Hub (MASH)	Address: Frampton Street, London, NW8 8LF Operating hours: M-F 9am – 5pm Referral should be made to the relevant local authority who will refer cases to MASH. Telephone for K&C: 020 7361 3013 / 0207 373 2227 Email for K&C: socialservices@rbkc.gov.uk
	Prevent partners and advice about extremism	LBHF/RBKC Prevent team Telephone: 020 8753 5727 Email: prevent@lbhf.gov.uk
	Kensington and Chelsea SENDIASS	Westminster Information, Advice and Support Service Telephone: 020 7641 5355 Email: iass@westminster.gov.uk Website: www.westminsteriass.co.uk
	The Bi-Borough Early Years and Inclusion Advisory Service	For Westminster and RBKC https://www.rbkc.gov.uk/kb5/rbkc/fis/advice.page?id=bSynNOV9RyE
	The Multi-agency Sexual Exploitation Panel The MASE covers the three local authorities of Hammersmith and Fulham, Kensington and Chelsea and Westminster	MASH Business Support Officer Telephone: 020 7641 3991
Hammersmith & Fulham	Local Authority Designated Officer(s) (LADO)	Megan Brown Telephone: 07776 673020/ 020 8753 5125 Email: LADO@lbhf.gov.uk / megan.brown@lbhf.gov.uk Website: https://www.lbhf.gov.uk/children-and-young-people/local-safeguarding-children-partnership/child-safeguarding-contacts
	Local Safeguarding Children Partnership, Hammersmith and Fulham	https://www.lbhf.gov.uk/children-and-young-people/local-safeguarding-children-partnership
	Hammersmith and Fulham Initial Consultation and Advice Team (ICAT)	Telephone: 020 8763 6600 Outside of normal office hours (after 5pm weekdays or on weekends): 020 8748 8588 Email: familyservices@lbhf.gov.uk

	LSCP Multi-agency Safeguarding Hub (MASH)	Address: Frampton Street, London, NW8 8LF Operating hours: M-F 9am – 5pm Referral should be made to the relevant local authority who will refer cases to MASH. Telephone for H&F: 020 8753 6610 / 020 8748 8588 Email for H&F: familyservices@lbhf.gov.uk
	Prevent partners and advice about extremism	LBHF/RBKC Prevent team Telephone: 020 8753 5727 Email: prevent@lbhf.gov.uk
	Hammersmith and Fulham SENDIASS	Telephone: 020 3886 1582 Email: info@hfsendiass.org.uk
	Inclusion and specialist intervention outreach service (Inspire) Early years	Telephone: 020 8811 8190 Email: inspire@lbhf.gov.uk https://www.lbhf.gov.uk/children-and-young-people/family-hub/local-offer-send/whos-who-guide-our-send-teams/inclusion-and-specialist-intervention-outreach-service-inspire
	The Multi-agency Sexual Exploitation Panel (MASE)	MASH Business Support Officer Telephone: 020 7641 3991
Wandsworth	Local Authority Designated Officer(s) (LADO)	Anita Gibbons Telephone: 07974 586 461 Email: LADO@wandsworth.gov.uk Interim LADO: Alice Peatling, (July 2023) alice.peatling@richmondandwandsworth.gov.uk Website: LADO (Local Authority Designated Officer) Wandsworth Family Information Service
	Wandsworth Safeguarding Children Partnership	Website: Home – Wandsworth Safeguarding Children Partnership (wscp.org.uk) Telephone: 020 8871 7401 Email: WSCP@wandsworth.gov.uk
	Wandsworth Multi-agency Safeguarding Hub (MASH)	Telephone: 020 8871 6622 Email: mash@wandsworth.gov.uk Outside of normal office hours (after 5pm weekdays or on weekends): 020 8871 6000 Professionals making a referral must complete the Multi-Agency Referral Form (MARF)
	Wandsworth SENDIASS Wandsworth Information, Advice, and Support Service (WASS) is a free service providing confidential and	Telephone: 0208 871 8065 Email: wass@wandsworth.gov.uk Website: www.wandsworth.gov.uk/wass

	impartial information, advice and support to children and young people (aged 0-25) with special educational needs and/or disabilities and their parents.	
	Early Years SEND Inclusion Service	https://s4s.wandsworth.gov.uk/Page/30964
	Multi-agency Child exploitation panel	https://wscp.org.uk/media/1454/child_exploitation_pan_london_operating_protocol_2021.pdf
Ealing	Local Authority Designated Officer(s) (LADO)	Natalie Cernuda Telephone: 07890940241 Email: asv@ealing.gov.uk Website: Contact the LADO (Local Authority Designated Officer) Ealing Directory (ealingfamiliesdirectory.org.uk)
	Ealing Safeguarding Children Partnership	Website: Ealing Safeguarding Children Partnership / ESCP Home Ealing Directory (ealingfamiliesdirectory.org.uk)
	Ealing Multi-agency Safeguarding Hub (MASH) Ealing Children's Integrated Response Service (ECIRS) Ealing	Telephone: 020 8825 8000, Email: ECIRS@ealing.gov.uk
	EALING SENDIASS	Telephone: 020 3978 8989 Email: isaidealing@family-action.org.uk Website: www.family-action.org.uk/ISAID
	SEND and inclusion - early years	https://www.egfl.org.uk/services-children/early-years/send-and-inclusion-early-years
	Multi-Agency Vulnerability and Exploitation Safeguarding (MAVES) Panel	Document (page 10)

3.4 Local Area Safeguarding Priorities

Local Area Safeguarding Priorities

Kensington and Chelsea | Westminster

Reducing the impact of Domestic Abuse and coercive control
Safer Communities (Serious Youth Crime and Exploitation) Knife Crime
Mental Health - post covid19

Transitional Safeguarding - Transitional safeguarding “..requires practitioners, leaders and all involved in services for children and adults, to consider how they might work together and think beyond child/adult silos for the benefit of young people at a key life stage.”¹

Hammersmith and Fulham

Safeguarding Adolescents, including children/young people with disabilities
Increasing awareness and strengthening the response to Domestic Abuse
Increasing awareness and strengthening the response to Mental Health, with focus on child’s mental health
Transitional Safeguarding
The Voice of the Child to be weaved through all the priorities

Ealing

3 year priorities 21-24
Domestic Abuse
Supporting young people who face multiple safeguarding risks and exploitation
Focus on safeguarding children with mental health needs
Improving responses to Child Sexual Abuse

Wandsworth 22/23

Vulnerable Adolescent/Contextual Risk
Voice of the child, their lived experience and participation
Emotional, Health, Physical and Mental Wellbeing
Domestic Abuse
Workforce Development
Children Missing Education
SEND

Other external referral and advice contacts:

CAMHS	Duty practitioner for mental health	Telephone: 020 3228 6000/7777
Mental Health out of hours	24 hour coverage for concerns	Telephone: 0800 731 2864
FGM Reporting – non emergency contact number	police	Telephone: 101
NSPCC Child Protection Helpline	24-hour freephone service for adults, children or young people for advice or to give details about a child who may be at risk	Telephone: 0808 800 5000
ChildLine	24-hour freephone for children and young people who need advice	Telephone: 0800 1111
Family Lives	A freephone advice line for parents/carers	Telephone: 0808 800 2222

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/990426/dhsc_transitional_safeguarding_report_bridging_the_gap_web.pdf

<p>NSPCC whistleblowing helpline</p>	<p>Available for staff who do not feel able to raise concerns regarding child protection failures internally</p>	<p>Telephone: 0800 028 0285 Email: help@nspcc.org.uk</p>
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4. THE SAFEGUARDING TEAM

With four main sites we have a clear and coordinated system to ensure everyone knows what to do if they are worried about a child. All who work or volunteer at the School, pupils and parents/carers know they may contact the safeguarding team with any concern and this team will ensure parents/carers are informed where appropriate, coordinate the work of the School with other organisations and maintain close vigilance on pupils who need our support.

The safeguarding team is led by the Designated Safeguarding Lead ("DSL") whose details can be found on the School contact details at the front of this policy. The Designated Safeguarding Lead has overall responsibility and ensures the policy framework is in place, provides individual supervision to the deputies and has oversight of all child protection cases, as well as leading responsibility for online filtering systems and their regular monitoring. They liaise about all such cases with the Provisure. For more details on the Designated Safeguarding Lead's responsibilities, please go to Section 19 hereafter.

The *directeurs/directrices* (primary school headteachers) and *proviseurs adjoints* (secondary school deputies) on all sites are the Deputy Designated Safeguarding Leads ("DDSL").

They have particular responsibility for the children on their site where there are child protection or safeguarding issues.

The site of each DDSL is specified in the School Contact details at the front of this policy.

On the South Kensington Site, the *directeur/directrice* (primary school headteacher) has particular responsibility for primary school pupils, while the *proviseurs adjoints* (secondary school deputies) have particular responsibility for secondary school pupils.

The following individuals are part of the safeguarding team, and are listed as in the Safeguarding team section (Key School Contacts) at the front of this policy as Designated Members of Staff (DMS):

- CPEs (Heads of Year in the secondary school),
- *vie scolaire* staff in primary schools, and
- the School doctor, the School nurses, the School speech therapist and the School psychologist

DMS are essential to the School's safeguarding effort; there is a strong overlap between the school leadership and pastoral support functions exercised by DMS, so that any plan required can be put in place with the required authority yet maintains a strong child focus.

- CPEs (Heads of Year) and *vie scolaire* staff are non teaching members of staff specialised in, and whose role is exclusively to provide pastoral care, in the School's secondary school and in the School's primary school, respectively. These DMSs interact with the School pupils for whom they provide pastoral care, and know (or are made aware by teaching staff and other staff in the School) the School pupils' unique circumstances, needs, and behavioural issues. Their high level of knowledge of, and interaction with, the School pupils means they are likely to raise safeguarding concerns from time to time, and to be involved in the adoption and implementation of plans, and undertake the work alongside pupils and sometimes with agencies under the direction of the DDSLs or DSL.

- the nature of the School doctor, the School nurses, the School speech therapist and the School psychologist's role means that they have access to information relating to, or can assess, pupils' health and wellbeing, and in addition to raising any safeguarding concerns they may have in accordance with this policy, will assist in the implementation of any safeguarding related plan under the direction of the DDSLs or DSL when needed.

DMS' responsibility is to ensure the proper procedures are followed and that the child is safer as a result.

All members of the safeguarding team have received up to date training for the position they hold.

5. POLICY STATEMENT AND AIMS

The *Human Rights Act 1998* (HRA) sets out the fundamental rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (ECHR) (the Convention) that are deemed to apply in the UK and France. Under the HRA, it is unlawful for schools to act in a way that is incompatible with the Convention.

There are four articles in the Convention that are seen as special. They are known as the "General Principles" and they help to interpret all the other articles and play a fundamental role in realising all the rights in the Convention for all children. They are:

Non-discrimination (Article 2);

Best interest of the child (Article 3)

Right to life survival and development (Article 6)

Right to be heard (Article 12)

The School is using the Convention as its basis for safeguarding.

Lycée Français Charles de Gaulle de Londres endeavours to ensure that its pupils are protected from any form of abuse, neglect or exploitation.

The School promotes a culture of openness where anyone in the community can share their concerns freely, and it supports the personal development of pupils in order to foster security, confidence and independence. It acknowledges that safeguarding incidents can happen anywhere and that everyone in the staff community must take responsibility for safeguarding, ensuring that they *always act in the best interests of the child.*

The purpose of this policy is to:

- Identify the name of responsible persons in the School and explain the purpose of their role;
- to raise awareness of all school staff and the school community of the importance of safeguarding and child protection, and of the fact that it is everyone's responsibility;
- Describe what should be done if anyone in the School has a concern about the safety and welfare of a child who attends the School;
- Identify the particular attention that should be paid to those children who fall into a category that might be deemed "vulnerable"; identify the factors that may deem a child susceptible.
- Ensure that those responsible for recruitment are aware of how to apply safeguarding principles in employing staff (as described in Appendix 4 hereafter);
- Outline how allegations against/concerns raised in relation to staff will be handled;
- Set out expectations regarding record keeping;

- Set out expectations in respect of training;
- Outline how the implementation of this policy will be monitored.

The School aims:

- to promote a strong safeguarding culture which enables all pupils to feel secure;
- to ensure that pupils know how to approach adults if they – or those they know – are in difficulties, and understand that they will be listened to and their concerns taken seriously;
- to provide early help to pupils and families;
- to identify, support and refer those pupils who may need additional support from agencies other than Children's Services, e.g. Child and Adolescent Mental Health Services (CAMHS);
- to provide all staff with the appropriate training so they are well-informed and confident about their responsibility to identify and report any concerns about pupils relating to possible harm or abuse;
- to ensure staff understand their responsibility to report any concerns about the actions of members of staff, volunteers or visitors;
- to ensure that there is effective and timely communication between staff with sensitive information known to the School disseminated to staff on a 'need to know' basis;
- to ensure that safeguarding procedures are followed by all staff in accordance with the School's policy, national guidance and locally agreed procedures;
- to provide appropriate support to any staff or pupils who may be involved in safeguarding or child protection issues.

6. SAFEGUARDING AND PROMOTING THE WELFARE OF CHILDREN

Definition of Safeguarding²:

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- 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
- promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children
- taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.

Children include everyone under the age of 18.

Some pupils are at increased risk of abuse.

And some pupils face additional barriers with respect to recognising or disclosing abuse.

² Working together to safeguard children 2023 (December 2023) page 7

The School is committed to recognising diversity and ensures anti-discriminatory practices. Intersectionality is the acknowledgement that everyone has their own unique experiences of discrimination and oppression, and we must consider everything and anything that can marginalise people – gender, race, class, sexual orientation, physical ability, etc.

We ensure that all pupils have the same protection.

The School gives special consideration to pupils who:

- Have special educational needs (SEN) or disabilities;
- May experience discrimination due to their race, ethnicity, religion or belief, gender identification, or sexuality;
- Are at risk due to their own mental health needs;
- Are known to be living in difficult situations e.g., where there are issues at home, such as: domestic violence, substance abuse/misuse, or where a family member has mental health needs;
- Are young carers;
- Are at risk of criminal or sexual exploitation, honour-based abuse such as Female Genital mutilation (FGM) , Forced Marriage or radicalisation. Following legislation which came into force on 27 February 2023, it is an offence to engage in any conduct for the purpose of causing a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. Such a marriage is deemed a forced marriage.

School staff are particularly important as they can identify concerns early, provide help for children and prevent concerns from escalating. Staff should be aware “it could happen here” and create a safe environment where children can disclose abuse.

It is the responsibility of every member of staff to know and understand Safeguarding policies and procedures.

The Designated Safeguarding Lead is the first point of contact for safeguarding and child protection concerns. The Designated Safeguarding Lead and Deputy Designated Safeguarding Leads are always available to discuss safeguarding concerns during school hours.

The process for raising concerns is detailed in Section 12 hereafter.

7. SPECIFIC SAFEGUARDING DUTIES IN RELATION TO CHILDREN

The School will:

- understand its role in each of the following safeguarding partner arrangements:
 - Local Safeguarding Children Partnership for Kensington & Chelsea (and Westminster)
 - Local Safeguarding Children Partnership for Hammersmith & Fulham
 - Local Safeguarding Children Partnership for Wandsworth
 - Local Safeguarding Children Partnership for Ealing,and operate safeguarding procedures in line with locally agreed multi-agency safeguarding arrangements, the key details of which are contained in Appendix 2 of this policy;
- be alert to signs of abuse whether in School, within the child’s family or outside, and take steps to protect children from any form of abuse, whether from an adult or another child;
- include opportunities within the curriculum for children to develop the skills they need to recognise, and stay safe from abuse;

- deal appropriately with every suspicion or complaint of abuse and support children who have been abused;
- promote the systems in place for children to confidentially report abuse, ensuring they know their concerns will be treated seriously, they can safely express their views and give feedback;
- take active steps to promote school attendance;
- allow staff to determine how best to build trusted relationships with pupils which facilitate communication within the parameters of the staff behaviour policy;
- Train staff to identify children who may benefit from early help, and encourage them to be particularly alert to the potential need for early help for children with the indicators listed in *Keeping Children Safe in Education 2024* (DfE September 2024), 10
- Be alert to children who are at potentially greater risk of harm, including children who need a social worker and children who have been identified as requiring mental health support.
- be alert to the needs of pupils with physical or mental health conditions, special educational needs or disabilities, which could be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation and where additional barriers can exist when detecting abuse or neglect.
- Support: encourage a culture of listening to pupils and victims of abuse and taking account of their wishes and feelings in any measure put in place and actions taken by the School to protect them; numerous people within the School community are available and advertised to the pupils, verbally, and on posters around the site as a potential listening ear: a member of staff, peer, prefect, member of the pastoral or safeguarding team, the School nurses. Concerns boxes are situated around the school site and can be used to voice concerns. Pupil surveys and feedback on a variety of matters are used to inform whole school decisions.
- operate robust and sensible health and safety procedures.
- assess the risk of pupils being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, based on an understanding of the potential risk in the local area.
- identify pupils who may be susceptible to radicalisation, and know what to do when they are identified; and
- consider and develop procedures to deal with any other safeguarding issues which may be specific to individual pupils in the School or in the local area. See Appendix 2 for more details.

Staff may follow the School's whistleblowing policy should they have any concerns about the handling of safeguarding matters either in general or in specific cases. The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns about child protection failures internally (see the front of this policy for the relevant contact details).

8. REGULATORY FRAMEWORK

This policy has been prepared to meet the School's responsibilities under the legislation listed in Appendix 1 to this Policy, and has regard to the guidance and advice also listed in Appendix 1 to this Policy.

9. CATEGORIES OF ABUSE AND SPECIFIC SAFEGUARDING RISKS AND CONCERNS

9.1 Abuse, neglect, Adverse Childhood Experiences

A number of safeguarding concerns will involve abuse.

Definition of Abuse: 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. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children

Abuse can be physical, emotional or sexual, or involve neglect. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused by others in a variety of situations and environments. They may be abused by an adult or adults or by another child or children.

Abuse can take place online, or technology may be used to facilitate offline abuse. Some pupils face additional barriers with respect to recognising or disclosing abuse. Keeping Children Safe in Education 2024 (DfE September 2024)

- (a) **Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- (b) **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include deliberately silencing them or 'making fun' of what they say or how they communicate and them not being able to express views or feelings. It may feature age or developmentally inappropriate expectations and interactions being imposed on children as well as overprotection and limitation of exploration, learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another such as witnessing domestic abuse. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- (c) **Sexual abuse:** involves forcing or enticing a child or to take part in sexual activities, not necessarily involving a high level of violence, whether the child is aware of what is happening. The activities

may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

(d) **Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, because of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing, and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

(e) **Adverse Childhood Experiences (ACEs)**

The ACEs acronym is used to describe a broad range of adverse childhood experiences that can be stressful or traumatic events that children can be exposed to. ACEs range from experiences that directly harm a child, such as physical, verbal, or sexual abuse, and physical or emotional neglect, to those that affect the environments in which children grow up, such as parental separation, domestic violence, mental illness, alcohol abuse, drug use or imprisonment. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour, and education.

(f) **Signs of abuse or neglect**

Possible signs of abuse or neglect include, but are not limited to:

- the pupil says he / she has been abused or asks a question or makes a comment which gives rise to that inference;
- there is no reasonable or consistent explanation for a pupil's injury, the injury is unusual in kind or location or there have been a number of injuries and there is a pattern to the injuries;
- the pupil's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour, or there is a sudden or significant change in the pupil's behaviour;
- the pupil asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons;
- the pupil's development is delayed, the pupil loses or gains weight or there is deterioration in the pupil's general well-being;
- the pupil appears neglected, e.g. dirty, hungry, inadequately clothed;
- the pupil is reluctant to go home, or has been openly rejected by their parents or carers;
- inappropriate behaviour displayed by other members of staff or any other person working with children, for example inappropriate sexual comments; excessive one-to-one attention beyond the requirements of their usual role or responsibilities; or inappropriate sharing of images;
- mental health problems can also be a sign of abuse, neglect or exploitation;
- education staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken (see section 12 on recording concerns).

The DfE advice [What to do if you're worried a child is being abused \(March 2015\)](#) provides advice in identifying child abuse.

The NSPCC website is also a good source of information and advice.

9.2 Specific Safeguarding issues

Statutory guidance acknowledges the following as specific safeguarding issues:

- domestic abuse (see section 9.2(a) below);
- child-on-child abuse (see 9.2(b));
- child-on-child sexual violence, sexual harassment, upskirting (9.2(c));
- so-called "honour-based" abuse (including Female Genital Mutilation and Forced marriage) (see 9.2(d));
- children missing or absent from education (see section 9.2(g) below);
- child criminal exploitation and child sexual exploitation (see section 9.2(k) below);
- county lines (see section 9.2(k) below);
- cybercrime; (see section 9.2(m) below)
- preventing radicalisation (see section 9.2(o) below);
- child abduction and community safety incidents;
- children and the court system;
- children with family members in prison;
- modern slavery and the national referral mechanism;
- homelessness;

Further advice and links to guidance on these specific safeguarding issues can be found in Annex A of *Keeping Children Safe in Education* (2024).

Staff should be particularly aware of the safeguarding issues set out below.

(a) Domestic Abuse and Operation Encompass

The *Domestic Abuse Act 2021* introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional, and economic abuse and coercive and controlling behaviour. Domestic abuse can impact on children when they witness it at home and/or suffer it in an intimate personal relationship.

"Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. 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, wellbeing, development, and ability to learn."

Operation Encompass

The School has signed up to be part of Operation Encompass, which operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when the police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the Designated Safeguarding Lead or a Deputy Designated Safeguarding Lead) in school before the child or children arrive at school the following day. This

ensures that the School has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs.

(b) Child on Child Abuse

All staff should be aware that children of any age can abuse other children (often referred to as child-on-child abuse). And that it can happen both inside and outside of the School and online.

Child on child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers.
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse) for more information: [Department for Education \(DfE\) \(2017\) Preventing and tackling bullying.](#)
- Sexual violence, sexual harassment and harmful sexual behaviour (see 9.2(c)below)

All staff understand that even if there are no reports in the School, it does not mean it is not happening; it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding child-on-child abuse, they should speak to the Designated Safeguarding Lead or a Deputy Designated Safeguarding Lead. Abuse that occurs online or outside of the School should not be downplayed and should be treated equally seriously.

Such behaviour is never accepted and should be considered as both a safeguarding issue and potentially a disciplinary one. The School will adopt a zero-tolerance approach to abuse. Downplaying certain behaviours can lead to a culture of unacceptable behaviours, an unsafe environment for children and its worst to a culture that normalises abuse.

All staff should challenge inappropriate behaviour between pupils and anyone who suffers, witnesses or hears of abuse of any form between pupils is asked to report it in accordance with this policy and / or the School's behaviour and anti-bullying policies, so that appropriate action can be taken.

Appropriate action will involve supporting all members of the School community who may be involved as a priority. This may require investigation by the School or other agencies. Until investigations have been undertaken and findings made, the School will work on the basis that the allegations may or may not be true and undertake careful risk assessment of the welfare of those involved to determine how best to manage the situation. This should be undertaken whether or not the incident is alleged to have occurred at school, or when the pupil involved was under the school's care, as an issue which may impact pupil welfare. Disciplinary action will follow separately, if appropriate.

(c) Child on Child Abuse - Sexual Violence, Sexual Harassment, Harmful Sexual Behaviour, Upskirting

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This is likely to adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physically and verbally) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Children with Special Educational Needs and Disabilities (SEND) are three times more likely to be abused than their peers.

The School is aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”;
- challenging behaviour (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia and flicking bras and lifting skirts. Dismissing or tolerating such behaviours risks normalising them;
- understanding that all the above can be driven by wider societal factors beyond the School, such as everyday sexist stereotypes and everyday sexist language;
- understanding intra familial harms and any necessary support for siblings following incidents.

The School is aware of **sexual violence** and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual violence offences under the [Sexual Offences Act 2003](#) (Updated 2023).

Sexual Harassment

Sexual harassment is ‘unwanted conduct of a sexual nature’ that can occur online and offline and can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance, and calling someone sexualised names.
- sexual “jokes” or taunting; physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos, or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
 - non-consensual sharing of sexual images and videos;
 - sexualised online bullying;
 - unwanted sexual comments and messages, including, on social media; and
 - sexual exploitation; coercion and threats.

Harmful Sexual Behaviour (HSB):

is an umbrella term that describes a range of sexual behaviours. HSB is defined as “sexual behaviours expressed by children and young people under the age of 18 years old that are developmentally inappropriate, that may be harmful towards self or others, or be abusive towards another child, young person or adult”.

This definition captures a range of behaviours, both offline and online, such as sexualised, gendered, or sexist name calling, sexual image sharing without consent, unwanted sexual touching, sexual assault and rape. Sexual behaviours are seen across a continuum ranging from normal and appropriate sexual behaviours that are expected from people of a certain developmental age through to sexual behaviours that are inappropriate, problematic, abusive, or violent.

Upskirting

Upskirting typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any gender can be a victim.

Upskirting is a criminal offence. Attempting to commit an act of upskirting may also be a criminal offence e.g. if actions are taken to do something that is more than merely preparatory to

committing the offence such as attempting to take a photograph on a telephone or camera but failing to do so because of lack of storage space or battery.

The School will treat incidences of upskirting as a breach of discipline and also as a safeguarding matter under this School's child protection policy and procedures.

All matters relating to upskirting images and devices which may have been used in connection with an allegation of upskirting will be dealt with in a similar manner to sharing sexual images / sexting.

(d) Honour Based Abuse

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation, forced or suggested marriage, and practices such as breast ironing.

Female genital mutilation (FGM) is a form of violence against women and young girls and considered as child abuse in the UK wherever it has occurred. It is a grave violation of the human rights of girls and women to life and their right to health.

Indicators of Honour-based abuse: Guidance on the warning signs that FGM or forced marriage may be about to take place, or may have already taken place, can be found on pages 38-41 of the [Multi agency statutory guidance on FGM](#) and pages 13-14 of the Multi-agency guidelines: [Handling cases of forced marriage](#).

Whilst all staff should speak to the designated safeguarding lead or deputy regarding any concerns about FGM or forced marriage, staff should note that there is a specific legal duty on teachers for FGM concerns. ([resource for speaking with young people and parents](#))

The *Serious Crime Act 2015* sets out a duty on professionals (including teachers) to notify police when they discover that FGM **appears to have been carried out** on a girl under 18. This will usually come from a disclosure. Under no circumstances should school staff physically examine pupils.

(e) Child Mental Health

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

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

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff members are aware of how these children's experiences can impact on their mental health, behaviour and education. Approximately 1 in 10 children aged under 15 years and 1 in 4 adolescents aged 16 & 17 experience mental health problems.

Signs of mental health problems It is important to recognise that all children and young people are different, and the signs and indicators of mental health difficulties will differ. Some common signs are listed below.

- sadness, or a low mood persisting for two weeks or more
- worries that stop them carrying out day-to-day tasks
- increase in irritability, recklessness or aggression; sudden outbursts of anger directed at themselves or others
- not being interested in things they used to enjoy
- feeling tired and exhausted a lot of the time
- changes in weight
- feeling guilty or worthless, talking negatively about themselves

- feeling empty or unable to feel emotions (numb)
- poor self-care
- refusing to go to school and/or decline in academic performance
- thoughts about suicide or self-harming
- actually self-harming, for example, signs of cutting their skin or taking an overdose
- panic attacks
- obsessive or compulsive behaviour
- misuse of drugs or alcohol

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

Further advice on mental health issues may be found in [Mental Health and Behaviour in Schools 2018](#) and in [Promoting Children and Young People's Emotional Health and Well-being 2021](#)

(f) **Self-Harm and Suicide**

Self-harm can be deliberate with the aim of a child just causing themselves an injury, attempted suicide which does not result in end of life or a successful attempt to end life resulting in death. Over the past two decades, rates of non-suicidal self-harm have increased across the population. Self-harm is more common among young people than other age groups, particularly young women. Self-harm has a strong relationship to suicide. While most young people who self-harm will not go on to take their own life, reducing rates of self-harm is important for suicide prevention.

Majority of self-harmers keep it a secret that goes undiscovered, finding it is the only way to express their feelings. Children self-harm for many reasons including: being bullied both at school or online, mental health issues, eating disorders, domestic abuse, any type of child abuse, parental conflict and bereavement. The signs of the distress the child may be under can take many forms and can include:

- cutting behaviours and self-poisoning, other forms of self-harm, such as burning, scalding, banging, hair pulling; not looking after their needs properly emotionally or physically;
- direct injury such as scratching, cutting, burning, hitting yourself, swallowing or putting things inside;
- staying in an abusive relationship, taking risks too easily, eating distress (anorexia and bulimia);
- addiction for example, to alcohol or drugs and low self-esteem and expressions of hopelessness. During a disclosure of self-harm, staff should check whether the pupil has ingested anything or has anything on their person that could cause damage or harm. Any concerns from staff members should be referred to the DSL, as an early help assessment may need to be completed to involve services that can help, or in the case of significant harm a referral can be made to Children's Services.

More advice can be found at Papyrus <https://www.papyrus-uk.org/>

(g) **Children Missing or Absent from Education**

All children, regardless of their circumstances, are entitled to a full time education, which is suitable to their age, ability, aptitude and any special educational needs they may have. Local authorities have a duty to establish, as far as it is possible to do so, the identity of children of compulsory school age who are missing education in their area.

All staff should be aware that children going missing, or being absent from education, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities (this may include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of child

criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, 'honour'- based abuse or risk of forced marriage).

Appropriate responses are implemented for children who are absent from education, particularly on repeat occasions.

The School's Designated Safeguarding Lead will report to the local authority any pupil who fails to attend school regularly or has been absent, without the School's permission, for a continuous period of 10 school days or more.

(h) Children with Special Educational Needs and Disabilities

Children with special educational needs and disabilities (SEND) can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration.
- being more prone to peer group isolation than other children.
- the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.
- Further information can be found in the department's: [SEND Code of Practice](#) 0 to 25 years, and [Supporting Pupils at School with Medical Conditions](#).

Support is available from specialist organisations such as: The Special Educational Needs and Disabilities Information and Support Services (SENDIASS). SENDIASS offer information, advice and support for parents and carers of children and young people with SEND. All local authorities have such a service: [Find your local IAS service \(councilfordisabledchildren.org.uk\)](#) Mencap - Represents people with learning disabilities, with specific advice and information for people who work with children and young people

(i) Private Fostering

Many adults find themselves looking after someone else's child without realising that they may be involved in private fostering. A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 (under 18, if disabled) by someone other than a parent or immediate relative. If the arrangement is to last, or has lasted, for 28 days or more, it is categorised as private fostering.

There is a mandatory duty on the School to inform the Local Authority of a private fostering arrangement.

(j) Contextual Safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the School. All staff should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

(k) Exploitation- Child Criminal Exploitation (CCE), Child Sexual Exploitation (CSE)

All staff should be aware of the indicators, which may signal children are at risk from, or are involved with exploitation these may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by,

or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

Child Criminal Exploitation (CCE)

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

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and susceptible adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations, including secondary schools. Children are also increasingly being targeted and recruited online using social media.

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

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys, professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation. The school takes into account the guidance <https://tce.researchinpractice.org.uk/>

Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. CSE can occur over time or be a one-off occurrence and may happen without the child’s immediate knowledge e.g., through others sharing videos or images of them on social media. 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 as they believe they are in a genuine romantic relationship.

(I) Serious violence

Our staff are aware of the indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from college, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. 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. If staff suspect that a pupil is at risk of serious violence, this will be reported to the DSL immediately.

(m) Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). We take advice to ensure that our security procedures for our IT infrastructure are effective and should staff have concerns about a pupil's involvement with cybercrime, they will refer this to the DSL, who may contact the [Cyber Choices Programme](#).

(n) Online Safety

The use of technology has become a significant factor of many safeguarding issues such as child sexual exploitation, child on child abuse and radicalisation. An effective approach to online safety empowers a school to protect the whole school community in their use of technology and establishes mechanisms to identify, intervene in and escalate any incident where appropriate. The range of incidents classified within online safety is considerable, but can be categorised into four areas of risk:

- **content:** being exposed to illegal, inappropriate or harmful material: for example, pornography, fake news, racist or radical and extremist views.
- **contact:** being subjected to harmful online interaction with other users: for example, commercial advertising as well as adults posing as children or young adults; and
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending, and receiving explicit images, or online bullying.
- **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams.

To ensure that pupils and staff are responsible users and stay safe while using the internet and other communications technologies for educational, personal and recreational use, the School is required to follow French guidance on online safety. School guidance can be found in the School's IT and Digital Charter and the [Charte pour l'Éducation à la culture et à la citoyenneté numériques](#). The school takes into account the government's guidance provided on [meeting digital and technology standards in schools and colleges 2023](#), with particular regard to filtering and monitoring systems. Processes and systems used include: Safesearch, TalkTalk web filtering, <http://testfiltering.com>, and School Leaders are regularly prompted to monitor pupil devices. The DSL and IT manager conduct an annual audit.

(o) Preventing Radicalisation

Children are susceptible to extremist ideology and radicalisation. Like protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a school's or college's safeguarding approach.

Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

The School has a legal duty to have due regard to the need to prevent people from being drawn into terrorism.

Although there is no single way of identifying an individual who is likely to be susceptible to an extremist ideology, there are possible indicators that should be taken into consideration alongside other factors and contexts. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Radicalisation can occur through many different methods (such as social media) and settings (such as the internet).

It is possible to protect susceptible people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. 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 the DSL making a [Prevent referral](#).

(p) Protected Characteristics

The protected characteristics are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

Schools must not unlawfully discriminate against pupils because of their protected characteristics, must consider how they are supporting pupils with protected characteristics

Children who are lesbian, gay, bi, or gender questioning (LGBT)

The fact that a child may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as susceptible as children who identify as LGBT. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. The School endeavours to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with trusted members of staff as required. LGBT inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and there is a range of support available to help schools counter homophobic, biphobic and gender questioning phobic bullying and abuse.

(q) Racism and Safeguarding

Many children who come from Black, Asian and minoritised ethnic communities experience racism, bias, stereotyping or cultural misunderstanding as they grow up. It might happen at an individual, institutional, or societal level and might be displayed consciously or unconsciously. This can result in some children being more likely to come to the attention of child protection services, while other children are less likely to receive effective support.

10. REPORTING OBLIGATIONS OF STAFF: SAFEGUARDING CONCERNS ABOUT PUPILS, OTHER PERSONS ASSOCIATED WITH THE SCHOOL, AND MEMBERS OF STAFF

Staff members should maintain an attitude of "it could happen here" where safeguarding is concerned. When concerned about the welfare of a pupil, staff members should always act in the best interests of the pupil and act immediately.

(a) All staff have a duty to report **any concerns they may have about the safety and / or wellbeing of **pupils**.**

Time is of the essence; early reporting and information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to local authority children's social care.

If staff have any concern about a pupil's welfare, they should follow the procedures in Section 12 of this policy and report their concern to the DSL or a DDSL immediately.

To assist staff in understanding the safeguarding concerns reporting process and actions taken after a concern has been raised, the School has prepared a *flow chart for raising safeguarding concerns about a pupil* in Appendix 3 hereafter.

- (b) All staff have a duty to report any concerns they may have about the safety and / or wellbeing of other persons associated with the School;
Staff concerned about the welfare of other persons associated with the School should report such concerns to their line manager or the DSL in the first instance.
- (c) All staff have a duty to report any safeguarding concerns **about staff** or anyone else associated with the School;
If the concern involves an allegation or concern raised about a member of staff this must be reported in accordance with the procedures set out in Section 14 hereafter and parts 1 and 4 of *Keeping Children Safe in Education 2024* (DfE September 2024)
- (d) For the avoidance of doubt, the School emphasises that **all staff, both teaching and non-teaching**, have an equal responsibility to report any concerns they may have about a pupil or about the conduct of another member of staff.
- (e) Specific provisions regarding Safeguarding in the Shared Bilingual Programmes

“Shared Bilingual Programmes” means the shared bilingual programme offered by Ecole Marie d’Orliac and Holy Cross Catholic Primary School, and the shared bilingual programme offered by Ecole de Wix and Belleville Wix Academy.

The following provisions apply to the reporting of concerns about children enrolled in a Shared Bilingual Programme and/or about staff involved in a Shared Bilingual Programme:

- Concerns about Children

Where the member of staff becomes aware of a potential safeguarding concern, they will speak to a member of the safeguarding team in the child/children's school of registration promptly - either immediately, or by the end of the next break from class – and always before the end of that school day.

Ecole Marie d’Orliac and Holy Cross Catholic Primary School Shared Bilingual Programme:

- Marie D’Orliac staff should contact Camille Grace or in her absence Lisa Parnis on 0207 736 5863 if they have a concern about a child registered through Holy Cross Catholic Primary School.
- Holy Cross Catholic Primary School staff should contact Francois Briquet or in his absence Muriel Martial if they have a concern about a child registered through the Marie D’Orliac Fulham Bilingual.

Ecole de Wix and Belleville Wix Academy Shared Bilingual Programme:

- Wix staff should contact Alex William if they have a concern about a child registered through Belleville Wix Academy.

- Belleville Wix Academy staff should contact Thibaud Ventelou if they have a concern about a child registered through the Ecole de Wix.

Where a member of staff becomes aware of a potential safeguarding concern, they will also make a written note of the concern on the shared form (Cause for Concern Form) kept in the School Office, the Staff Room, Assistant headteacher's Office/ or where staff have access to CPOMS they will add to the platform. The completed Cause for Concern form will be provided to the DSL in the child/children's school of registration before the end of that school day. If a member of the safeguarding team from the relevant school cannot be found, the form will be provided to a member of the safeguarding team for the other school.

Where there is a safeguarding concern, the DSLs from the child(ren)'s school of registration may need to interrupt class teaching, irrespective of which school has teaching responsibility for the class in question in the moment. This will be done with courtesy and professional respect, but may not always be able to be done by prior request.

Where a safeguarding concern involves children registered at both schools and/or staff of both schools, the DSLs will ensure that the schools work openly and collaboratively together in the best interests of the child(ren), in line with *Keeping Children Safe in Education* 2024 (DfE September 2024) as reflected in both schools' Safeguarding and Child Protection Policies.

- Concerns about Staff:

Where a member of staff has a concern about a colleague, the report should be made

- In the primary school (Petite Section to CM2): to the directeur/directrice for the primary school concerned, or with the DSL;
- In the secondary school (6ème to terminale): to a *Proviseur Adjoint* (secondary school deputy) or with the DSL.

This is for allegations against staff and for low level threshold concerns as per *Keeping Children Safe in Education* 2024 (DfE September 2024).

If the concern is about the Head of School, the report should be made:

- to Provisure@lyceefrancais.org.uk if the concern is about the Head of Ecole Marie d'Orliac or Ecole de Wix;
- to the Designated Local Governor for Safeguarding, Anthony Deane (020 7228 3055) if the concern is about the Head of Belleville Wix Academy;
- to the Executive Head k.williams@executivehead.co.uk if the concern is about the Head of Holy Cross Catholic Primary School.

- Policy links can be found below:
 - Belleville Wix Academy:

<https://www.bellevillewix.org.uk/our-school/safeguarding>

- Holy Cross Catholic Primary School:
https://www.holycrossfulham.org.uk/docs/SAFEGUARDING_AND_CHILD_PROTECTION_POLICY_HC_Sept_23.pdf

- Ecole Marie D'orliac and Ecole de Wix:
<https://www.lyceefrancais.org.uk/a-propos/rapports-et-reglements/>

11. RECEIVING A DISCLOSURE – GUIDANCE FOR STAFF

All staff should know what to do if a child tells them he/she is being abused or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality while never promising a child that they will not tell anyone about what they have disclosed. All staff should be able to reassure victims of abuse that they are being taken seriously and will be supported. Children should never be made to feel ashamed or that they are creating a problem by reporting abuse, sexual violence or sexual harassment.

If a child discloses that he or she has been abused in some way, the member of staff should:

- Listen carefully to what they're saying and keep an open mind. Be patient and focus on what you're being told. Try not to express your own views and feelings. Do not take a decision as to whether or not the abuse has taken place. If you appear shocked or as if you don't believe them, it could make them stop talking and take back what they've said.
- Give them the tools to talk - Do not ask leading questions, i.e. a question which suggests its own answer. Use "tell me, explain to me, describe to me" (TED) questioning. If they're struggling to talk to you, use open ended questions and simple prompts to help them share what's happening and how they're feeling.
- Do not attempt to investigate matters further. Your role is to listen, record and report your concerns to the DSL.
- Do not attempt any examination or remove a pupil's clothes to look further at an injury. Under no circumstances should photographs be taken of a pupil's injury.
- Let them know they've done the right thing by telling you - Reassurance can make a big impact. If they've kept the abuse a secret, it can have a big impact knowing they've shared what's happened.
- Never guarantee secrecy or confidentiality. Explain what you'll do next. Explain the need to pass on the information in accordance with this policy so that the correct action can be taken. For younger children, explain you're going to speak to someone who will be able to help. For older children, explain you'll need to report the abuse to someone who can help.
- Be aware that younger pupils may disclose issues of a safeguarding nature in general conversations rather than as a specific disclosure. Children who are affected by abuse or neglect may also demonstrate their needs and distress without specific concrete evidence through their words, actions, behaviour, demeanour, written work, artwork or through other children.
- There may also be concerns raised about a parent's interaction with a pupil or issues such as parental alcohol misuse, domestic violence or mental health.
- Keep a sufficient written record of the conversation. Ideally, take notes while you are being told of the abuse, or as soon as possible after you've been told about the abuse. In any event

write the record as soon after you've spoken to the child so the details are fresh in your mind and action can be taken quickly. Try to keep these as accurate as possible.

- All other evidence, for example, scribbled notes, mobile phones containing text messages, clothing, computers, must be kept securely with the written record.
- Report what the child has told you as soon as possible- Report as soon after you've been told about the abuse so the details are fresh in your mind and action can be taken quickly. It can be helpful to take notes as soon after you've spoken to the child. Try to keep these as accurate as possible.
- When a child has made a disclosure, or when an individual has concerns about a child's welfare our school protocols and systems require the member of staff to make a complete and formal record of the concern as soon as possible afterwards. See Section 12 "recording a concern".

12. RECORDING A CONCERN ABOUT THE SAFETY OR WELLBEING OF A CHILD– GUIDANCE FOR STAFF

If staff are unsure about the appropriate process to use, they should not hesitate to speak to the DSL or a DDSL.

12.1 Staff must record all concerns about a child in CPOMs.

Staff with access to CPOMS must complete an entry in CPOMS which should be submitted when reporting the matter in accordance with this policy. The entry can be completed after an initial discussion with a member of the Safeguarding team or beforehand, whichever is quicker or more practical.

- Certain staff do not have access to CPOMS (e.g. members of the catering team, volunteers). When they have a concern about the safety or wellbeing of a child, or if a child makes a disclosure to them, these members of staff must contact the DSL (or a DDSL) immediately. The contact details of the DSL and DDSLs are set out in the contacts list at the front of this policy.

Please note:

- in this policy, there are many instances where staff are required to report concerns to the DSL or a DDSL immediately. This requirement to contact the DSL/DDSL is met if the relevant concern is recorded on CPOMS (as the DSL will be automatically informed). Members of staff should of course also contact the DSL or a DDSL to discuss the concern and/or ask for advice if needed.
- The DSL or a DDSL will then record the concern on CPOMS immediately, with or for the member of staff, having received all relevant information and documents enabling them to do so.

12.2 Records should be factual and should include:

- the pupil's details: name; date of birth; address and family details;
- date time and place of the event / concern / conversation;
- a clear and comprehensive summary of the event/concern / conversation; any noticeable non-verbal behaviour and the actual words used by the child or any discussions you were involved in. Record explanations given by the child / adult. Provide record statements and observations rather than interpretations or assumptions;
- indicate the position of any injuries using the bodymap feature;
- details of how the concern was followed up and resolved;
- a note of any action taken and by whom, decisions reached and the outcome;

- the name and position of the person making the record.

13. AFTER A CONCERN ABOUT A CHILD HAS BEEN RECORDED

13.1 Action by the DSL

On receipt of a report of a concern about a child, whether made by a member of staff or by a member of the School community, the DSL will:

- Update the record in CPOMs, and record all discussions with both colleagues and external agencies;
- consider the appropriate course of action in accordance with the appropriate Local Safeguarding Partners procedures and referral threshold document;
- record decisions made and the reasons for them and detail of the action taken.

All actions taken by the DSL will be recorded on CPOMS by the DSL.

The appropriate course of action may include:

- (a) monitoring the pupil / managing any support for the child internally, through the School's own pastoral support processes, seeking advice from Children's Social Care (CSC) where required. CSC includes, depending on the context, the team based in the local authority where the School is located and, where appropriate, the team based in the local authority where the child is resident.
- (b) a discussion with parents/carers;
- (c) undertaking an early help assessment. This generally requires parental consent (see section 13.3 below);
- (d) a referral for statutory services, where the child is suffering, or is likely to suffer from harm (see section 13.4 below). If it is decided that a referral is not required, the DSL will keep the matter under review and give ongoing consideration to a referral if the pupil's situation does not appear to be improving
- (e) a referral to the LADO; or
- (f) a report to the police.

The member of staff making the report will be informed by the DSL of the action taken.

If the pupil's situation does not appear to be improving, the staff member with concerns should request the DSL to re-consider the action taken.

13.2 Preserving evidence

Any evidence eg pupil's work, notes, images on iPads, mobile phones containing messages, computer search history etc must be preserved. If evidence is found on an electronic device, the device involved should be isolated. Staff must not view images, look for further images, copy or print any images or forward images by email or any other electronic means.

13.3 Early Help Assessment

Early help, also known as early intervention, is support given to a family when a problem first emerges. It can be provided at any stage of a child's life to parents, children or whole families, and is generally supported by Children's Social Care (CSC) in consultation with the family.

Early Help in our School allows pupils to be supported at any point in their life by a range of external support agencies, enabling potential concerns to be addressed, to prevent further problems arising or before a child may come into immediate danger.

Targeting early help services, arranged by the relevant local authority, address the assessed needs of a child and their family. The School understands that providing early help is more effective in promoting the welfare of children than reacting later.

Staff and governors are mindful of specific safeguarding issues and those pupils who may face additional safeguarding challenges. Staff and governors should be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs;
- has special educational needs (whether or not they have a statutory education, health and care plan);
- has a mental health need;
- is a young carer;
- is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing / goes missing or absent from care or from home;
- is at risk of modern slavery, trafficking sexual or criminal exploitation;
- is at risk of being radicalised or exploited;
- has a family member in prison, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- is misusing alcohol or other drugs themselves;
- is looked after or has returned home to their family from care;
- is at risk of "honour-based" abuse such as Female Genital Mutilation or Forced or suggested Marriage;
- is a privately fostered child; if staff is aware of a child not living with a direct relative, this information should be entered in CPOMS; or
- is persistently absent from education including persistent absences for part of the school day.

Early Help Resources in the boroughs of Kensington & Chelsea, Hammersmith & Fulham, Wandsworth and Ealing can be found in Appendix 2.

In the first instance, staff should discuss early help requirements with the DSL. The DSL will lead on liaising with other agencies and in setting-up an inter-agency assessment as appropriate, by using the relevant Threshold of need document in the relevant borough (see Appendix 2) to consider the severity of the concern.

If early help is appropriate, staff may be required to support other agencies and professionals in an early help assessment and will be supported by the DSL in carrying out this role. In some cases School staff may be required to take a lead role.

The DSL will keep the matter under review and give ongoing consideration to a referral if the pupil's situation does not appear to be improving.

13.4 Making a referral to the Local Authority

- (a) Where a child is suffering, or is likely to suffer from harm (defined as the ill treatment or impairment of the health or development of a child), it is important that a referral to Children's Social Care Multi Agency Safeguarding Hub (MASH) and if appropriate the police (in particular if the allegation involves a potential criminal offence) is made immediately (including out of hours; out of hours numbers are indicated at the front of this policy).**

For the avoidance of doubt If appropriate in the circumstances, contact the police or call an ambulance immediately on 999.

- (b) The contact details for the School's CSC team are set out in the key external contact details section, at the front of this policy.

Referrals should be made to the local authority where the pupils resides.

- (c) Anyone can make contact with CSC to discuss concerns before a referral is made. This includes professionals as well as a child themselves, family members and members of the public. The child's local safeguarding partners will have a threshold of need framework and guidance which will provide more information which can support decision making in relation to contacting CSC (see Appendix 2 for the London boroughs of Kensington & Chelsea, Hammersmith & Fulham, Wandsworth, and Ealing).

- (d) **Anyone** can make a referral.

Anybody can make a referral. Staff required to make a direct referral may find helpful the flowchart set out on page 22 of *Keeping Children Safe in Education 2024* (DfE September 2024) and the flowcharts set out on page 76 of [Working together to safeguard children 2023](#) for information about the likely actions and decisions required.

Where referrals are not made by the Designated Safeguarding Lead, the Designated safeguarding lead should be informed, as soon as possible, that a referral has been made.

Staff should provide as much information as possible as part of the referral process to help social care assessments consider contexts outside the home and enable a contextual approach to harm. Staff should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision. It is important for children to receive the right help at the right time to address risks and prevent issues escalating.

- (e) The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate.

- (f) **Statutory assessments**

Children's social care may undertake a statutory assessment under the *Children Act 1989* into the needs of the child. It is likely that the person making the referral will be asked to contribute to this process.

All staff should be aware of the process for making referrals to children's social care and for statutory assessments under the *Children Act 1989*, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role that they might be expected to play in such assessments.

Statutory assessments include:

- Children in need: A child in need is a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Children in need may be assessed under section 17 of the *Children Act 1989*.
- Children suffering or likely to suffer significant harm: Local authorities have a duty to make enquiries under section 47 of the *Children Act 1989* if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm.
- All those involved in such allegations will be treated as being at risk and in need of support and the safeguarding procedures in accordance with this policy will be followed. Appropriate support will be provided to all pupils involved, including support from external services as necessary.

- (g) Parental consent is not required for referrals to statutory agencies, but staff will need to have access to certain information about the child and the safeguarding concern in order to make the referral. In general terms, this information will comprise:
- personal details of the child including the child's developmental needs;
 - detailed information about the concern;
 - information about the child's family and siblings including the capacity of the child's parents or carers to meet the child's developmental needs and any external factors that may be undermining their capacity to parent.
- (h) If the referral is made by telephone, this should be followed up in writing.
- (i) Confirmation of the referral and details of the decision as to what course of action will be taken should be received from the local authority within one working day. If this is not received, the DSL (or the person that made the referral) should contact children's social care again.
- (j) Following a referral, if the child's situation does not appear to be improving, the local escalation procedures should be followed to ensure that the concerns have been addressed and that the child's situation improves

13.5 Allegations against pupils – child on child abuse

Any allegation of child on child abuse will be treated as a potential safeguarding concern in the first instance and the DSL will have regard to Part 5 of *Keeping Children Safe in Education 2024* (DfE September 2024) in establishing whether this is the case. The DSL will seek the support of other agencies, such as local authority children's social care and the police as required. The views of the alleged victim will be considered but will not be determinative.

All those involved in such allegations will be treated as being at risk and in need of support and the safeguarding procedures in accordance with this policy will be followed.

Appropriate support will be provided to all pupils involved, following discussions between the DSL and external services as necessary. This may include support from such external services.

13.6 Record Keeping of concerns about pupils

Written and/or electronic notes are kept of all incidents and child protection or child in need concerns relating to individual pupils, including if the incident or the concern does not lead to a referral to other agencies. All contact with parents/carers and external agencies is also recorded, using the CPOMS system.

Information should be kept confidential and stored securely, separately from the child's academic records, in separate pupil profiles in CPOMS.

These should include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved; and
- a note of any action taken, decisions reached and the outcome.

Files will be kept for at least the period during which the pupil is attending the School, and beyond that in line with current data legislation and guidance.

If a pupil moves from the School, child protection and safeguarding records will be forwarded on to the DSL at the new school, with due regard to their confidential nature and in line with current government guidance on the transfer of such records. Direct contact between the two schools may be necessary.

Pupils and parents/carers do have the right to see all the information held in child protection records unless the information:

- could cause serious harm or is likely to cause serious harm to the physical or mental health or condition of the child or another person; or
- could reveal that the child or another person has been a subject of or may be at risk of child abuse, and the disclosure is not in the best interests of the child; or
- is likely to prejudice an ongoing criminal investigation; or
- also relates to another person who could be identified from it or the information has been given by another person who could be identified as the source, unless the person has consented to the disclosure or the person providing the information is an employee of the establishment or the Local Authority.

If an application is made to see the whole record, advice should be sought from the child's social worker, if they have one, and the Local Authority.

14. ALLEGATIONS OR CONCERNS ABOUT STAFF AND OTHERS IN SCHOOL

14.1 Scope and Application

This procedure must be used in any case in which it is alleged that a member of staff, visiting professional or volunteer has:

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

Although it is an uncomfortable thought, it needs to be acknowledged that there is the potential for staff in school to abuse pupils. In our school we also recognise that concerns may be apparent before an allegation is made. All staff working within our organisation must report any potential safeguarding concerns about an individual's behaviour towards children immediately.

Allegations or concerns about staff, colleagues and visitors (recognising that schools hold the responsibility to fully explore concerns about supply staff) must be reported directly to the Provisseure who will liaise with the Local Area Designated Officer (LADO) who will decide on any action required. If the concern relates to the Provisseure, it must be reported immediately to the School's Proprietor, who will liaise with the LADO and they will decide on any action required.

We remind all staff to maintain the view that 'it could happen here' and to immediately report any concern, no matter how small, to the DSL or Provisseure.

Any staff or volunteers from outside our setting will complete an induction to ensure they are aware of the risks and know what they need to do if they are concerned.

- Where the school is used for non-school activities, those providers are expected to meet the guidance in [Keeping Children Safe in Out of School Settings](#) (see KCSIE paragraph 167)
- If the school receives allegations related to an incident that 'happened when an individual or organisation was using their school premises for the purposes of running activities for children the school will follow their safeguarding policies and procedures, including informing the LADO'. (see KCSIE paragraph 377)

Statutory guidance: this Section of the policy has regard to the following statutory guidance:

- *Keeping Children Safe in Education 2024* (DfE September 2024). Part Four of *Keeping Children Safe in Education* deals with allegations made and concerns raised about staff, who are all adults working for, or on behalf of, the School. It distinguishes between two categories of concerns / allegations that can be raised about staff.

These are:

- concerns that do not meet the harm threshold, otherwise known as "low level concerns"; and
- allegations that may meet the [harm threshold](#).
- Working together to safeguard children (December 2023) ("WT"), which requires policies to be put in place setting out the process, including timescales for investigation and what support and advice will be available to individuals against whom allegations have been made. WT requires schools to have regard to *Keeping Children Safe in Education* in order to fulfil their duties in respect of safeguarding and promoting the welfare of children.

14.2 Key Staff duties

- (a) **Staff behaviour:** all Staff must comply with the School's Staff Behaviour Policy which sets out appropriate and expected standards of behaviour.
- (b) **Duty to report:** as a member of Staff, you must immediately follow this policy to report any concerns you have about the conduct of a member of Staff or any other adult. This includes any concern however it arises, for example behaviour you have witnessed, a concern raised with you by a colleague, pupil, parent/carer, or another adult, or because of checks or information brought to your attention.
- (c) **Duty to self-refer:** you must refer yourself to the DSL where, for example, you have found yourself in a situation which could be misinterpreted, which might appear compromising to others, and / or on reflection if you believe you have behaved in such a way that may fall below the standards expected of you.
- (d) **A culture of sharing:** All Staff have a positive obligation to support the School's culture of openness and sharing without fear of reprisal.

14.3 What needs to be reported?

- (a) **Reporting all concerns:** all concerns must be raised whether they are "low level" concerns or conduct which may meet the harm threshold.
- (b) **Low-level concerns:** a low-level concern is any concern, no matter how small, and even if no more than a sense of unease or a "nagging doubt", that a member of Staff may have acted in a way that is inconsistent with expected professional standards and / or the staff behaviour policy, whether inside or outside work. No concern is too small or minor to raise under this policy.
- (c) **Concerns that meet the harm threshold:** allegations that may meet the harm threshold are those that might indicate a person will pose a risk of harm if they continue to work in their present position, or in any capacity with children, for example where the individual 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 would 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. This includes behaviour that may have happened outside the School which creates a transferable risk.

14.4 How to raise concerns and allegations

- (a) **Raising low-level concerns:** Where you have a low-level concern in respect of any member of Staff, you must report the matter immediately. You can raise this:
- In the primary school (Petite Section to CM2): with the directeur/directrice for the primary school concerned, or with the DSL;
 - In the secondary school (6ème to terminale): With a *Proviseur Adjoint* (secondary school deputy) or with the DSL.
- (b) **Duty of the DSL to refer concerns to the Provisure:** The Provisure remains the ultimate decision maker in respect of all low-level concerns. Save for in cases involving the Provisure the DSL must therefore promptly report any concern raised with them to the Provisure. Wherever possible the DSL must speak to the Provisure in person about the concern as soon as possible after the concern is raised, and always on the same day the concern is raised. If it is not possible to speak to the Provisure in person about the concern, the DSL must email the Provisure with a summary of the concern on the same day the concern is raised.
- (c) **Concerns about Staff that meet the harm threshold:** Where you have a concern about the conduct of a member of Staff (other than the Provisure) that may meet the harm threshold (see 14.3(c) above) you must raise this immediately with the Provisure.
- (d) **Concerns involving the Provisure and conflicts of interest:** where you identify a concern about the Provisure, you must report the matter immediately to the Proprietor without first notifying the Provisure. Where there is a conflict of interest in raising the concern with the Proprietor you must report the concern directly to the Local Authority Designated Officer (LADO), without first notifying the Provisure or Proprietor. Details of the LADO for each relevant borough can be found at the start of this policy.
- (e) **Reports to the DSL:** If it is not possible for you to make a report to the Provisure or Proprietor, you must instead immediately make a report to the DSL. The DSL will act in accordance with these procedures and will as soon as possible inform the Provisure or, where appropriate, the Proprietor.

14.5 The School's response to concerns and allegations

- (a) **Appropriate action:** the School will ensure that appropriate action is taken to address concerns that are raised under this policy.
- (b) **Assessing concerns:** The Provisure (or, if the concern relates to the Provisure, the Proprietor/LADO) will determine whether the concerns raised are low-level or potentially meet the harm threshold. The DSL, the Provisure and the Proprietor have all been trained to assess concerns, and to record and address them appropriately.
- (c) **Low-level concerns:** If the School determines the concern is a low-level concern, then the School will address the concern as appropriate. This will usually involve making the individual aware of the concern about them, undertaking any investigation that may be required and may include giving management guidance and advice or invoking the school's capability or disciplinary procedures.
- (d) **Borderline cases:** the Provisure (or, if the concern relates to the Provisure, the Proprietor) may take advice from the LADO in borderline cases to establish whether the concern is a low-level

concern or an allegation that potentially meets the harm threshold. This may include conducting an initial "no names" conversation with the LADO about whether the harm threshold is met.

- (e) **Referral:** where the Proviseure (or, if the concern relates to the Proviseure, the Proprietor) considers the concerns raised potentially meet the harm threshold, the Proviseure (or, if the concern relates to the Proviseure, the Proprietor) will make a report to the LADO before further action is taken. The Proviseure (or, if the concern relates to the Proviseure, the Proprietor) may also seek advice from the LADO as appropriate. Where a LADO referral is appropriate, this will be made within one working day of the allegation being reported in accordance with this policy.
- (f) **Responding to an allegation that may meet the harm threshold:** where an allegation is made that may meet the harm threshold, the School will take advice from and co-operate with the LADO, the police, and any other external body that may be involved in the response to the allegation. The School will follow its internal procedures in order to investigate and respond to the allegation when it is appropriate to do so, and will keep the LADO informed of the action it is taking.
- (g) **Case Manager:** where an investigation is deemed necessary into an allegation of conduct that may meet the harm threshold, a "Case Manager" will be appointed by the School to lead the investigation. The Case Manager will be either the Proviseure or a person with appropriate authority appointed by the Proviseure. Where the Proviseure is the subject of an allegation, the Case Manager will usually be the Proprietor.

14.6 Disclosure of information about concerns and allegations

- (a) **Informing the individual of a concern:** the School will in most cases inform the individual concerned about any low-level concern that is raised about them.
- (b) **Informing the individual of an allegation where appropriate:** the Case Manager will consult with the LADO to agree if and when it is appropriate to inform the individual of the allegation.
- (c) **Communication and support for the individual subject to an allegation:** when it is appropriate to inform the individual of the allegation against them, the Case Manager will also offer appropriate pastoral support and will keep the individual informed of the timescales for the investigation under this procedure and the factors which may affect it. In all cases, the investigation will be concluded as soon as reasonably practicable.
- (d) **Informing the child's parents / carers where appropriate:** the Case Manager will agree with the LADO when and how the parents or carers of the child / children involved will be informed of the allegation if they do not already know of it. The Case Manager will also agree with the LADO what information shall be shared with the parents / carers of the child / children as the case progresses. The timing and extent of disclosures, and the terms on which they are made, will be dependent upon and subject to the laws on confidence and data protection and the advice of external agencies.
- (e) **Involvement of external agencies:** where the LADO(s) advise(s) that a strategy discussion is needed, or the police or children's social care need to be involved, the Case Manager will not inform the individual subject to the allegation, or the parents or carers until these agencies have been consulted and it has been agreed what information can be disclosed.

- (f) **Concerns about supply staff and contractors:** where a concern / allegation has been made in respect of a member of supply staff or a contractor, the concern / allegation may be notified to their employer. Where a Case Manager has been appointed to investigate an allegation, the Case Manager will consult with the LADO before sharing any information with the individual's employer.

14.7 Referrals to the Disclosure and Barring Service (DBS) and Teaching Regulation Agency

- (a) **Report to the DBS:** the School is under a legal duty to make a referral to the DBS where a member of Staff is removed by the School from working in regulated activity (whether paid or unpaid), or has resigned prior to being removed, because they have harmed, or pose a risk of harm to, a child. The DBS will then consider whether to impose sanctions which may restrict or prevent that person from working with children in future.
- (b) **Report to the Teaching Regulation Agency:** if a teacher is dismissed because they are found to have committed serious misconduct, or their conduct has breached the Teachers' Standards, or they resign prior to dismissal on such grounds, the School will also make a referral to the Teaching Regulation Agency. The Teaching Regulation Agency will consider whether to impose a prohibition order on that person which prevents them from undertaking teaching work in future.

14.8 Record keeping of concerns about staff

- (a) **Records of low-level concerns:** low-level concerns will be recorded in writing. The record of the concern will be retained so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and addressed. Records of low-level concerns that have been addressed with an individual will be stored securely in a central file (Low level Concerns and Allegations Record).
- (b) **Recording low-level concerns:** the Low-Level Concerns and Allegations Record will set out the name of the individual involved (if an individual is named), a brief description of the concern and the context in which it arose, any investigation that has been carried out, and the outcome / result of the investigation into the concern. The name of the individual who has raised the concern should also be noted. Where that individual wishes to remain anonymous the School will try to accommodate this as far as reasonably possible, but cannot guarantee anonymity in all circumstances.
- (c) **Records of allegations that may meet the harm threshold:** details of allegations that may meet the harm threshold will be recorded both on the individual's personnel file and the Low-Level Concerns and Allegations Record. The individual's personnel file and the Low-Level Concerns and Allegations Record will include a summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken in response to the allegation.
- (d) **Storage and security of Concerns and Allegations Record:** The Low-Level Concerns and Allegations Record will be stored and will be accessible by the Provisseure and the DSL only.
- (e) **Malicious or false low-level concerns and allegations:** details of low-level concerns and allegations found to be malicious or false will be removed from personnel records.
- (f) **Retention of records:** information stored on the Low-Level Concerns and Allegations Record, will be retained by the School indefinitely. The School may in future be required to produce this information if it is notified of an allegation of historic abuse relating to a current or former member of staff, if a former member of staff is accused of committing safeguarding offences

elsewhere or if a former member of staff is the subject of safeguarding allegations arising elsewhere.

14.9 References

- (a) **Low-level concerns:** low-level concerns will not be disclosed in a reference unless they were addressed formally and resulted in a sanction under the School's disciplinary or capability procedures and it is otherwise appropriate to disclose them.
- (b) **Allegations that meet the harm threshold:** allegations that meet the harm threshold will be disclosed in a reference if the allegation was found to be substantiated (including any cases in which any disciplinary sanction has expired). The School will not disclose information about allegations that were found to be false, unfounded, unsubstantiated, or malicious.

15. TRAINING

The School ensures that regular guidance and training is arranged on induction and at regular intervals thereafter so that staff understand what is expected of them by this policy and have the necessary knowledge and skills to carry out their roles.

The level and frequency of training depends on the role of the individual member of staff.

15.1 Induction

All new employees will be provided with induction training that includes (and where relevant includes the provision of copies of):

- (a) this policy;
- (b) the role, identity and contact details of the DSL and their Deputies;
- (c) the Staff Behaviour Policy;
- (d) a copy of Part 1 (and Annex B for school leaders) of *Keeping Children Safe in Education*; Annex A for staff having no direct contact with children and
- (e) appropriate Prevent duty training.

15.2 Safeguarding training

(a) a copy of this policy is available to School leaders and all employees.

All teaching staff members will undertake appropriate annual safeguarding training and will be required to read and sign that they have understood and agreed to implement Part One of *Keeping Children Safe in Education*. Non teaching staff will be asked to and sign that they have understood and agreed to implement Annex A

(b) The DSL and Deputy DSLs will undertake training to provide them with the knowledge and skills required to carry out the role. This training includes mandatory training at two yearly intervals.

15.3 Training Records

The School maintains a log of all staff training in safeguarding and child protection.

16. TEACHING PUPILS ABOUT SAFEGUARDING

The School teaches pupils about safeguarding through the curriculum and Personal, Social, Health and Economic education ("PSHE") and Relationships and Sex Education ("RSE").

This includes pupils being given information about safeguarding through the school procedures and through the teaching of relationships and sex education and PSHE in an age appropriate way. Relationship Education (for all primary pupils), RSE (for all secondary pupils) and Health Education (for all state school pupils) is compulsory since September 2020.

Safeguarding issues, including online safety, child on child abuse, sexual harassment, and extra familial harm (multiple harms) will be addressed through the curriculum in an age-appropriate way.

17. INFORMATION SHARING AND MULTI-AGENCY WORKING

The School will treat all safeguarding information with an appropriate level of confidentiality, only involving others where appropriate. The School will always act to safeguard and promote the welfare of others.

The School understands that information sharing is essential for effective safeguarding and promoting the welfare of children, including their educational outcomes. Fears about sharing information will not stand in the way of the need to promote the welfare, and protect the safety, of pupils, which is always the School's paramount concern.

Information may be shared directly with other agencies as appropriate and will be shared according to the HM Government guidance Information Sharing (July 2018). The guidance states that practitioners should use their judgement when making decisions about what information to share and the most important consideration should be whether sharing information is likely to safeguard and protect a pupil. Data protection legislation and guidance must not be allowed to stand in the way of sharing information to safeguard pupils.

The School will cooperate with children's social care, and where appropriate the police, to ensure that all relevant information is shared for the purposes of early help assessments, and assessments and child protection investigations under the *Children Act 1989*.

Where allegations have been made against staff, the School will consult with the Local Area Designated Officer (LADO) and, where appropriate, the police and children's social care to agree the information that should be disclosed and to whom.

While the School will share information with those involved where and when it is appropriate to do so, they may be unable to for reasons of data protection and confidentiality, for example because to do so may pose a risk of harm to others or because it has been prohibited by external agencies.

18. SITE SECURITY

All staff members have a responsibility to ensure the buildings and grounds are secure and for reporting concerns that may come to light.

Wherever possible, visits to the School should be pre-arranged. All visitors must report to reception first and not enter the School via any other entrance.

The identity of all visitors and volunteers coming into school is checked. Visitors are expected to sign in and out in the office visitors' log and to display a visitor's badge while on one of the School sites. Any individual who is not known or identifiable will be challenged for clarification and reassurance.

The School will not accept the behaviour of any individual, parent/carer, or anyone else, that threatens the School security or leads others, child, or adult, to feel unsafe. Such behaviour will be treated as a serious concern and may result in further action, including a decision to refuse the person access to a School site or all School sites.

The School has evacuation and lockdown procedures validated by the Proprietor.

19. THE ROLE OF THE DSL AND DSSLS

The role of the Designated Safeguarding Person was specified in the *Children Act 2004* and ensures every organisation had a “named person” for safeguarding children. The School has appointed deputies to support the role of the DSL. The deputy designated safeguarding leads are trained to the same standard as the lead and formal training for both will be updated at least every two years. Staff training should include understanding roles and responsibilities in relation to filtering and monitoring in place on school devices and school networks. Guidance on e-security is available from the [National Education Network](#). In addition, the school consults the [Cyber security standards for schools and colleges.GOV.UK](#).

The school also uses the [LGfL online safety audit](#) tool.

The DSL is a member of the School’s senior leadership team. Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL. This responsibility should not be delegated.

19.1. Key Aspects of the Designated Person role includes (*the full outline of the role can be found in Keeping Children Safe in Education 2024 (DfE September 2024)*):

- being the first point of contact for all safeguarding concerns.
- making sure all staff are aware how to raise safeguarding concerns and ensuring all staff understand child abuse and neglect.
- taking lead responsibility to ensure that online activity including filtering and monitoring systems are checked regularly as per [this guidance](#).
- referring any child protection concerns to social care and to relevant agencies who can provide support to children and families.
- monitoring children who are the subject of plans with social care.
- maintaining accurate and secure child protection records.
- helping promote educational outcomes by sharing information about the welfare, safeguarding and child protection issues.
- working closely with senior mental health leads.
- helping promote educational outcomes by working closely with teachers about children’s welfare, safeguarding and child protection concerns.
- ensuring safeguarding and child protection information is dealt with in a confidential manner.
- ensuring that the School is clear on parental responsibility for children on roll, and report all identified private fostering arrangements to the local authority.
- referring all cases of suspected abuse:
 - to children’s social care and to the police (where a crime may have been committed); Guidance on when to call the police may be found here. When to call the police
 - to children’s social care and to the Channel programme where there is a radicalisation concern.
 - the Disclosure and Barring Service where a person is dismissed or left due to risk/harm to a child.
- understanding the mandatory reporting duty for FGM and forced or suggested marriage.
- being informed by local authorities that a child has a social worker,
- sharing appropriate information about welfare, safeguarding and child protection issues with teachers and leaders, thus promoting the educational outcomes for children with Social Workers.

- working in partnership with social care, the police, health and other services to promote the welfare of children and protect them from harm. This includes providing a coordinated offer of early help, when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans.
- where necessary, and in liaison with the Provisure, using local escalation policies where the actions of other agencies have not been sufficiently timely or there is a disagreement. If the child's situation does not appear to be improving the DSL should press for re-consideration. Concerns should always lead to support for the child at the earliest possibility.
- sharing information with appropriate staff in relation to the child's looked after (CLA) status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility.
- liaising with the Provisure to inform them of issues- especially ongoing enquiries under section 47 of the *Children Act 1989* and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult.

19.2 Raising Awareness

The Designated Safeguarding Lead should:

- actively promote safeguarding throughout all aspects of the School
- ensure this policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the School's proprietor regarding this.
- ensure this child protection policy is available publicly and parents/carers know referrals about suspected abuse or neglect may be made.
- link with the local safeguarding partner arrangements to make sure staff are aware of training opportunities and the latest local policies on safeguarding; and be able to analyse concerns and referrals for patterns, trends and gaps and other safeguarding data and identify and target training for staff or groups of staff accordingly.
- maintain a centralised register of all concerns and referrals, including robust and chronological records of actions taken and encourages staff to be robust around documenting and reporting concerns; this can be done using CPOMS.
- regularly monitor and review all concerns and referrals – that links are made to all contextual sources of information relevant to a child's safeguarding, for example their behaviour, attendance and learning and progress, and that all decisions are recorded and actioned and where appropriate this is communicated to relevant staff.
- understand and support the School with regards to the requirements of the Prevent duty, and can provide advice and support to staff on protecting children from the risk of radicalisation.
- understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school and ensure regular checks on filtering and monitoring systems on schools devices and networks.
- Can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online.
- encourage a culture of listening to children, ensuring their voices are reflected in safeguarding and taking account of their wishes and feelings.

19.3 Availability

During term time the DSL or a DDSL should always be available (during school hours), for staff to discuss any safeguarding concerns. Whilst the designated safeguarding lead or deputy would be expected to be available in person, sometimes availability by phone or online, for staff to discuss any safeguarding concerns, will be acceptable. School leaders will ensure appropriate cover arrangements for any out of term activities.

20. RESPONSIBILITIES: THE PROVISEURE

The Proviseure will ensure that the policies and procedures are fully implemented, and that sufficient resources and time are allocated to enable staff members to discharge their safeguarding responsibilities. The Proviseure's role is to ensure that staff understand and follow policies and procedures.

On behalf of the Proprietor, the Proviseure will ensure that all staff read at least Part one of *Keeping Children Safe in Education 2024* (DfE September 2024). The Proviseure will ensure that mechanisms are in place to assist staff to understand and carry out their roles and responsibilities, as set out in part one of the above guidance.

The Proviseure and Designated Safeguarding Lead will prepare the safeguarding annual report to the Proprietor to review the effectiveness of child protection and safeguarding arrangements and, in turn, to influence the annual review of the policy. This enables the monitoring, compliance and to identify areas for improvement.

In order that all members of staff have the knowledge and skills required to fulfil their duties, school leaders will:

- ensure that, as part of the induction programme for all new members of staff, including newly qualified teachers, safeguarding and child protection training is provided.
- ensure that all staff complete statutory safeguarding training as required, and at least annually. The training includes an assessment module, so that staff understanding of safeguarding can be checked and monitored and staff have the skills and knowledge to safeguard children effectively
- ensure that all staff receive regular updates and opportunities for additional training.

The DSL will keep a record of staff induction and training.

Early Years

The Proviseure will report to Ofsted any allegations if applicable (see 22.2 hereafter), and ensure that provision for the early years meets the specific safeguarding requirements described in the Statutory Framework for the Early Years Foundation Stage.

21. PROPRIETOR

The Proprietor should ensure they facilitate a whole school approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.

The Proprietor should be aware of their obligations under the *Human Rights Act 1998*, the *Equality Act 2010*, and their local multi-agency safeguarding arrangements.

Where there is a safeguarding concern, the Proprietor and school leaders should ensure the child's wishes and feelings are considered when determining what action to take and what services to provide. Systems should be in place for children to express their views and give feedback.

The Proprietor should ensure that there are appropriate policies and procedures in place for appropriate action to be taken in a timely manner to safeguard and promote children's welfare:

- Ensuring that an effective safeguarding and child protection policy is in place and reviewed annually
- Ensuring that there is a staff behaviour policy or code of conduct that includes, amongst other expectations, acceptable use of technologies, staff/pupil relationships and communications including staff use of social media.

The Proprietor should ensure that staff receive regular updated safeguarding training, including online safety and ensure children are taught about safeguarding, including online safety. Safeguarding training for staff, including online safety training, is integrated, aligned, and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning.

The Proprietor should be doing all that they reasonably can to limit children's exposure to the above risks from the School's IT system. As part of this process, proprietors should ensure the School has appropriate filters and monitoring systems in place and regularly review their effectiveness.

22. EYFS SPECIFIC PROVISIONS

22.1 Use of mobile phones and cameras

This section has regard to Section 3.6 of the Early Years Foundation Stage Statutory Framework for group and school-based providers (DfE, December 2023) ("Safeguarding policies must include... How mobile phones, cameras and other electronic devices with imaging and sharing capabilities are used in the setting.")

a. Use of electronic devices with imaging and sharing capabilities (including mobile phones and cameras) by staff working in *petite section* or *moyenne section*:

- In accordance with Section 13.9 of the Staff behaviour policy, mobile phones and personally-owned devices may not be used in the classrooms or during working time at school, except if needed for professional or pedagogical reasons. They normally should be on silent mode at all times. The Bluetooth functionality of a mobile phone should be switched off at all times and may not be used to send images or files to other mobile phones.
- Staff may use their personal mobile phones and technological devices (i) during allocated breaks and away from the children's areas and (ii) outside of working hours, on school premises, providing that there are no children present.
- Members of staff will not use their personal mobile phones for taking photographs of children.
- Members of staff will be allowed to take their own mobile phones on outings for use in the case of an emergency however these will not be used for personal purposes.

b. Use of mobile phones and cameras by parents/carers and visitors:

The School asks parents/carers and visitors not to use their mobiles or recording/camera devices whilst at the School to ensure the safety and privacy of the School's pupils.

22.2 Reporting of significant events to OFSTED

This section has regard to regulation 8 and paragraph 7 of the Schedule to the Early Years Foundation Stage (Welfare Requirements) Regulations 2012 and the Early years foundation stage statutory framework for group and school-based providers (DfE, December 2023), specifically paragraph 3.8, 3.19, 3.57, 3.63, and 3.88 .

The Provisore will notify OFSTED within 14 days of the relevant event or allegation:

- of particulars of any allegation of serious harm to or abuse of a child committed by any person living, working or caring for children at the premises on which childcare is provided (whether that allegation relates to harm or abuse committed on those premises or elsewhere), and any other abuse which is alleged to have taken place on those premises, and of the action taken in respect of the allegation;
- of any significant event which is likely to affect the suitability of the School or any person who cares for, or is in regular contact with, children on the premises to look after children.

23. MISCELLANEOUS

23.1 The Use of Reasonable Force in Schools

There are circumstances when it is appropriate for staff in school to use reasonable force to safeguard children.³ The term 'reasonable force' covers the broad range of actions used by staff that involves a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a child needs to be restrained to prevent violence or injury.

'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom.

23.2 Transporting pupils

In accordance with the staff behaviour policy, transporting pupils using a vehicle is permitted using transport providers under certain circumstances.

Staff are not permitted to transport pupils with their personal car.

23.3 Use of school or college premises for non-school/college activities

When the School hires or rents out school facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) they should ensure that appropriate arrangements are in place to keep children safe, ensuring that the organisation have a safeguarding policy and clear procedures are in place for safeguarding children and susceptible adults. Where the school is used for non-school activities, those providers are expected to meet the guidance in [Keeping Children Safe in Out of School Settings](#).

If the school receives allegations related to an incident that 'happened when an individual or organisation was using their school premises for the purposes of running activities for children the school will follow the safeguarding policies and procedures, including informing the LADO'.

23.4 Homestay during exchange visits

Schools often plan for children to take part in exchange visits, either to other parts of the UK or abroad. Exchanges can benefit learning across a range of subjects. Foreign visits can enrich the languages

³ [Use of reasonable force Advice for headteachers, staff and governing bodies](#) July 2013

curriculum and provide exciting opportunities for pupils to develop their confidence and expertise in the use of other languages. Schools have a duty to safeguard and promote children's welfare. This extends to considering their safety and how best to minimise risk of harm to those children during any exchange visit arranged by the School and when organising for the care and accommodation of a child with a host family (known as homestays) as part of the exchange.

The School has taken account of Annex D of *Keeping Children Safe in Education: Host families – homestay during exchange visits*.

APPENDICES

Appendix 1: Regulatory Framework

1. This policy has been prepared to meet the School's responsibilities under the following legislation:

- Education (Independent School Standards) Regulations 2014;
- *Education and Skills Act 2008*;
- *Children Act 1989*;
- *Children Act 2004*;
- *Childcare Act 2006*;
- *Safeguarding Vulnerable Groups Act 2006*;
- *Children and Social Work Act 2017*;
- Data Protection Act 2018 and UK General Data Protection Regulation (UK GDPR);
- *Equality Act 2010*;
- *Human Rights Act 1998*.
- Data Protection in Schools Toolkit, DfE 2024

2. This policy has regard to the following statutory guidance/framework and non statutory advice:

(a) Statutory Guidance/framework

- [Keeping children safe in education 2024](#) (DfE, September 2024).
- [Working together to safeguard children 2023](#) (HM Government, updated July 2022)
- [early years foundation stage](#) statutory framework for group and school-based providers (DfE, December 2023)
- [Disqualification under the Childcare Act 2006](#) (DfE, 31 August 2018);
- [Revised Prevent duty guidance for England and Wales](#) (HM Government, April 2021);
- [Multi-agency statutory guidance on female genital mutilation](#) (HM Government, July 2020)
- [Children missing education](#) (DfE, September 2016);
- [Channel duty guidance: protecting vulnerable people from being drawn into terrorism](#) (HM Government, February 2023);
- [PACE Code C 2019](#).
- [Promoting the education of looked-after and previously looked-after children Feb 2018](#)
- [Supervision of activity with children Sep 2012](#)
- [SEND code of practice: 0 to 25 years April 2020](#)
- [Supporting pupils with medical conditions at school, Aug 2017](#)
- [Behaviour and discipline in schools: guide for governing bodies Sep 2015](#)
- [Children missing education Sep 2016](#)

(b) Non-statutory advice

- [What to do if you're worried a child is being abused: advice for practitioners](#) (HM Government, March 2015);
- [Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers](#) (HM Government, July 2018);
- [Behaviour in schools: advice for headteachers and school staff](#) (DfE, July 2022);
- [Working together to improve school attendance](#) (DfE, September 2022);
- [Child sexual exploitation: definition and a guide for practitioners' local leaders and decision makers working to protect children from child sexual exploitation](#) (DfE, February 2017);
- [Educate Against Hate \(HM Government 2018\)](#); Searching, screening and confiscation: advice for schools (DfE, September 2022);
- [Relationships education, relationships and sex education and health education guidance](#) (DfE, September 2021);
- [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) (DCMS and UKCIS, December 2020);
- [Safeguarding children and protecting professionals in early years settings: online safety considerations](#) (UK Council for Internet Safety, February 2019);
- [Teaching online safety in schools](#) (DfE, updated 12 January 2023);
- [Harmful online challenges and online hoaxes](#) (DfE, February 2021);
- [Equality Act 2010: advice for schools \(DfE, June 2018\)](#)
- [Operation Encompass](#)
- [Meeting digital and technology standards in schools and college \(Department of Education March 2023](#)
- [Keeping Children Safe in Out of School Setting \(DfE October 2020\)](#)
- [The right to choose: multi-agency statutory guidance for dealing with forced marriage HM government, February 2023](#)
- [Multi-agency practice principles for responding to child exploitation and extra-familial harm \(Department for Health and Social Care and the Ministry of Justice, March 2023\)](#)
- [Safeguarding children in whom illness is fabricated or induced](#)
- [Mental Health and Behaviour in Schools 2018](#)
- [Promoting Children and Young People's Emotional Health and Well-being \(HM Government, September 2021\)](#)
- [Use of reasonable force Advice for headteachers, staff and governing bodies](#) (DfE, July 2013)
- [Preventing and tackling bullying advice.](#)(DfE, July 2017)

(c) Local Safeguarding Partners referral / threshold procedures / guidance

- London Safeguarding Children Procedures and Practice Guidance, 7th Edition, 2022 Kensington & Chelsea: [Local Safeguarding Children Partnership \(Kensington and Chelsea, Westminster\)'s referral/threshold procedures/ guidance](#)
- Hammersmith & Fulham: [Local Safeguarding Children Partnership's referral/threshold procedures/ guidance](#)
- Wandsworth: [Local Safeguarding Children Partnership's referral/threshold procedures/ guidance](#)
- Ealing: [Local Safeguarding Children Partnership's referral/threshold procedures/ guidance](#)

The following School policies, procedures and resource materials are relevant to this policy:

- Staff behaviour and behaviour policy;

- IT and Digital Charter;
- use of social media policy;
- whistleblowing policy;
- behaviour policy;
- anti-bullying policy;
- risk assessment policy;
- attendance policy (including missing pupil provisions);
- health and safety policy statement;
- relationships and sex education policy;
- dealing with allegations of abuse against staff policy;
- School recruitment procedure (listed in Appendix 4 to this policy);
- Educational trips and visits procedures;
- First Aid Policy.

Appendix 2: Local arrangements

A/ Kensington & Chelsea

1. Early Help for Families Service

The Early Help for Families Service works with families with children up to the age of 19 to:

- ensure they progress in their normal settings
- provide targeted services to prevent their needs from escalating

The School can refer a pupil to the service by completing a [referral form](#).

2. Local thresholds

The main site of the School is situated in the London borough of Kensington and Chelsea and therefore for the main site follows the guidance of the bi-borough Local Safeguarding Children Partnership (LSCP) of the Royal Borough of Kensington and Chelsea and Westminster City Council.

[The Threshold of Need guide](#), is for practitioners in all agencies working with children, to assist in decision making about which agency should be involved in helping families depending on their levels of need.

3. Referrals and Referral forms

Referrals should be made to the relevant local authority who will refer cases to MASH. Details for the relevant local authorities are detailed in the Key Contacts at the front of the policy.

Referrals to the LADO should be made via the [LADO referral form](#).

B/ Hammersmith & Fulham

1. All referrals should go to the Initial Consultation and Advice Team (ICAT), Hammersmith & Fulham's family services front door service. The contact details of the ICAT on Key External Contacts at the front of the policy.

ICAT will allocate the referral either to the early help service for level 2 needs, or the contact and assessment service for level 3 /4 needs.

If practitioners are unsure if a threshold is met for referral or not they may contact ICAT for advice.

2. The Ecole Marie d'Orliac is situated in the London borough of Hammersmith & Fulham and therefore follows the guidance of the [Local Safeguarding Children Partnership for Hammersmith & Fulham](#).

The Threshold of Need Guide is to assist in decision making about which agency should be involved in helping families depending on their levels of need.

It should be used to help practitioners make decisions about which agency to refer to and when. The Guide gives examples of what we might expect to see in families receiving services at four different tiers or levels of need.

The examples are neither exhaustive nor rigid in their application, they are for guidance and should be used to enhance professional judgments and discussion about individual children and families.

3. Referrals and Referral forms

All referrals should be made to the Initial Consultation and Advice Team (ICAT). Contact details are included at the front of this policy.

Referrals to the LADO should be made via email or telephone, using the contact details included at the front of this policy.

C/ Wandsworth

1. Early Help Hub

The [Wandsworth Early Help Hub](#) provides resources for practitioners working with children and families to find services to help support these families.

Services are available by age groups (0-5 years, 5-11 years, 11-18 years and 18+ years).

Detailed guidance on the applicable processes is available in the [Guide to Early help Processes](#)

2. Local thresholds

The Ecole de Wix is situated in the London borough of Wandsworth and therefore follows the guidance of the Local Safeguarding Children Partnership for Wandsworth

The [Levels of Need Framework](#)⁴ is a threshold for intervention tool which underpins the local vision to provide the right support for children and their families at the earliest opportunity - right through to specialist and statutory interventions, when needed to ensure the welfare and safety of susceptible children and young people.

It aims to offer a clear framework and promote a common understanding of thresholds of need for all practitioners within all agencies.

3. Referrals and Referral forms

Referrals to MASH should be made via the [Multi-Agency Referral Form](#)

Referrals to the LADO should be made via the [LADO referral form](#).

D/ Ealing

1. Early help resources

The Early Help Assessment and Plan (EHAP) is the process and tool Ealing uses for professionals to support children and young people and their families, through the delivery of multi-agency, multi-disciplinary or targeted support.

⁴ [Levels of Need Framework - Wandsworth Safeguarding Children Partnership \(wscp.org.uk\)](#)

Detailed guidance on the EHAP is available on Ealing Council website: [Early Help Assessment and Plan \(EHAP\) | Early Help Assessment and Plan \(EHAP\) | Ealing Council](#)

2. Local Thresholds

The Ecole André Malraux is situated in the London borough of Ealing and therefore follows the guidance of the [Local Safeguarding Children Partnership for Ealing](#).

Ealing has developed four levels of need with descriptors for each level to assist practitioners in assessing needs and identifying appropriate responses. Ealing's model is similar to those used in other London local authorities to enable a consistent approach to working on a cross-authority basis.

Ealing Assessment Protocol and [Thresholds of Need Guide is accessible here](#).

3. Referrals and Referral forms

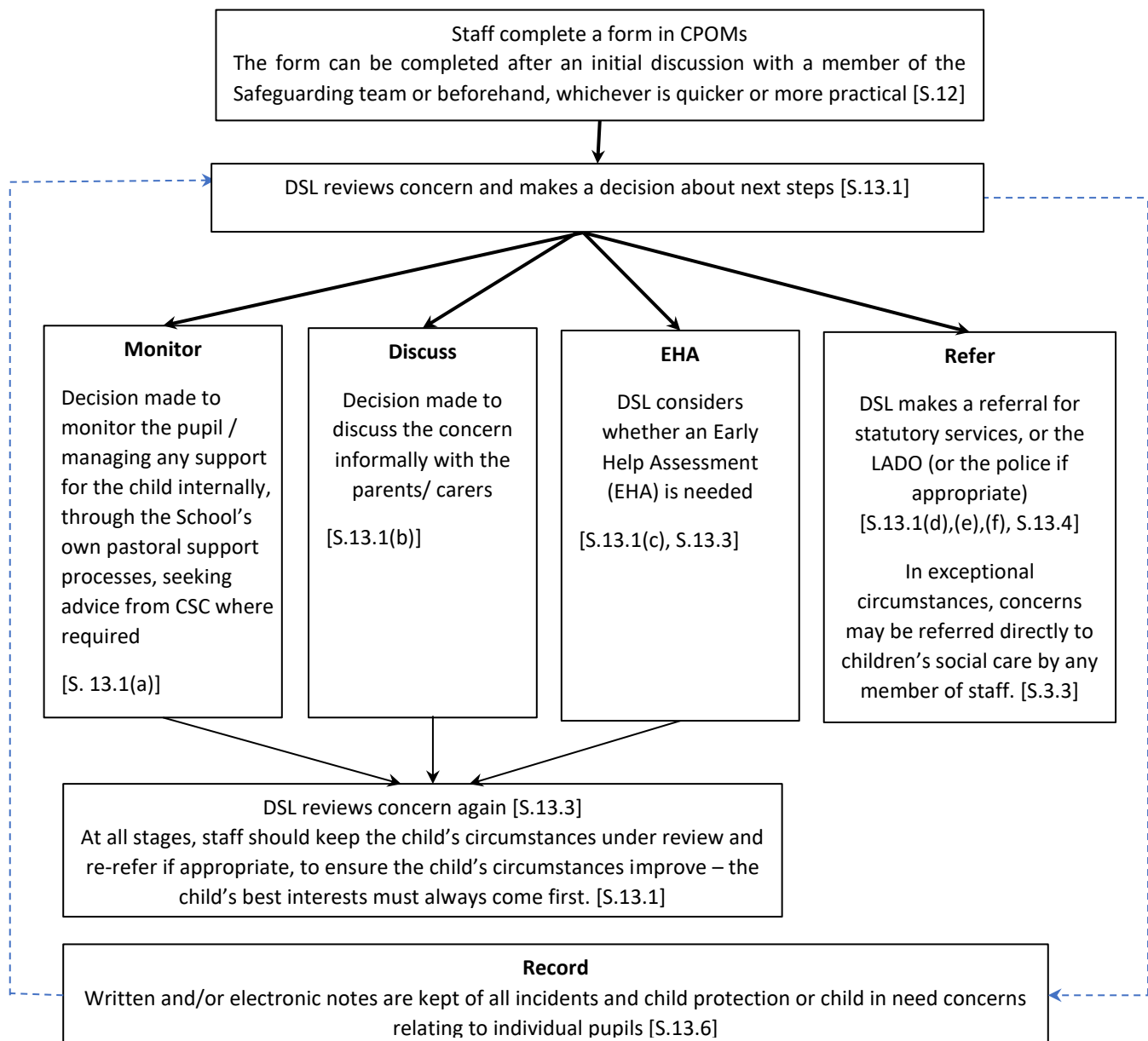
MASH: The MASH sits within Ealing Children's Integrated Response Service (ECIRS). Managers in ECIRS will decide if a referral should be discussed in the MASH meeting.

Referrals to the LADO should be made via the LADO referral form.

Appendix 3 Flow chart for raising safeguarding concerns about a pupil

This flowchart explains the process within the School only. Numbers between brackets are references to Section numbers in the policy.

For more details of other agencies' processes for dealing with referrals (i.e. after the School has made a referral), please see the flowchart within Keeping Children Safe in Education (DfE 2024).



Appendix 4 Staff Recruitment Procedures

The School follows safer recruitment procedures, paying due regard to Part 3 of *Keeping Children Safe in Education 2024* (DfE September 2024) and *Disqualification under the Childcare Act (2006)*.

Safer recruitment procedures are applicable to all categories of staff which includes employees, self-employed staff, staff of contractors, supply staff, volunteers and visitors.

The checks applied will vary according to the person's role within the School.

The checks include:

- a) Verification of identity;
- b) two references or recommendations (*avis hiérarchiques* for civil servants). French teachers appointed through the *Agence pour l'Enseignement Français à l'Étranger* (AEFE) are verified by the AEFE;
- c) Verification of the right to work in the UK;
- d) Where appropriate, verification of qualifications;
- e) A medical fitness questionnaire and declaration;
- f) Verification of employment history;
- g) For staff in regulated activity, a satisfactory enhanced check with the Disclosure & Barring Service (DBS);
- h) A check against the Barred List when an individual is deemed to be undertaking regulated activity;
- i) A self-declaration to ensure compliance with regulations made under the *Childcare Act 2006*;
- j) For staff engaged in teaching duties, a check that the teacher is not subject to a teaching prohibition order;
- k) Where appropriate, overseas police checks;
- l) Where appropriate, a check that there are no European Economic Area (EEA) regulating authority teacher sanctions or restrictions (Since 1 January 2021, the TRA no longer maintains a list of EEA teachers with sanctions. Teachers may be able to provide proof of their past conduct as a teacher, issued by the professional regulating authority in the country in which they worked.) ;
- m) As part of the shortlisting process, the School will consider carrying out an online search as part of their due diligence on the shortlisted and informed candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which the School might want to explore with the applicant at interview.
- n) Where appropriate, a check to ensure the person is not barred from taking part in the management of an independent school;
- o) written notification that appropriate recruitment checks have been undertaken by other organisations, if those personnel are not employed directly by the School, and a check that such staff presenting themselves are the ones on whom the checks have been made.

Staff involved in recruitment receive appropriate training in safer recruitment and this is updated no less than every five years.

The School ensures that there is at least one person on every recruitment panel who has completed this training.

All recruitment checks are recorded on the School's Single Central Record.

From September 2023, further guidance has been published in *Keeping Children Safe in Education* and as a result, the School, as part of the shortlisting process, will consider carrying out an online search as part of their due diligence on shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which the School might want to explore with the applicant at interview. In this process the School will only be making decisions on reasonable and objective information. The school will inform candidates about their procedure as appropriate.

Volunteers

Any parent/carer or other person/organisation **engaged by the School to work in a voluntary capacity with pupils** will be subject to all reasonable vetting procedures and Criminal Records Checks. Under no circumstances will a volunteer, in respect of whom no checks have been obtained, be left unsupervised or allowed to work in regulated activity. Volunteers who on an unsupervised basis teach or look after children regularly, or provide personal care on a one-off basis in the School are deemed to be in regulated activity. The School will obtain an enhanced DBS certificate (which will include barred list information) for all volunteers who are new to working in regulated activity.

Existing volunteers in regulated activity do not have to be re-checked if they have already had a DBS check (which includes barred list information). However, the School may conduct a repeat DBS check (which will include barred list information) on any such volunteer. Further information on checks on volunteers can be found in Part three of the DfE guidance *Keeping Children Safe in Education 2024* (DfE September 2024)". Volunteers will be subject to the same code of conduct as paid employees of the School.

Contractors

Contractors who are engaged by or on behalf of the School to undertake works on site will be made aware of this policy. Individuals and organisations that are contracted by the School to work with or provide services to pupils will be expected to adhere to this policy. Any such contractors will be subject to the appropriate level of DBS check, if any such check is required (for example because the contractor is carrying out teaching or providing some type of care for or supervision of children regularly). Contractors engaging in regulated activity relating to children will require an enhanced DBS check (including children's barred list information). For all other contractors who are not engaging in regulated activity relating to children, but whose work provides them with an opportunity for regular contact with children, an enhanced DBS check (not including children's barred list information) will be required. Contractors for whom an appropriate DBS check has not been undertaken will be supervised if they will have contact with children. We will not allow a contractor in respect of whom no checks have been obtained to work unsupervised, or engage in regulated activity relating to children. We will determine the appropriate level of supervision depending on the circumstances.

If an individual working at our school is self-employed, we will consider obtaining the DBS check, as self-employed people are not able to make an application directly to the DBS on their own account. We will always check the identity of contractors and their staff on arrival at the School.

Visitors

Please refer to Section 18 on Site Security.