

Child Protection and Safeguarding Policy

Authorised by:	The Board of Governors of CFBL
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This is a core policy that forms part of the induction for all staff. It is a requirement that all members of staff have access to this policy and sign to say they have read and understood its contents.

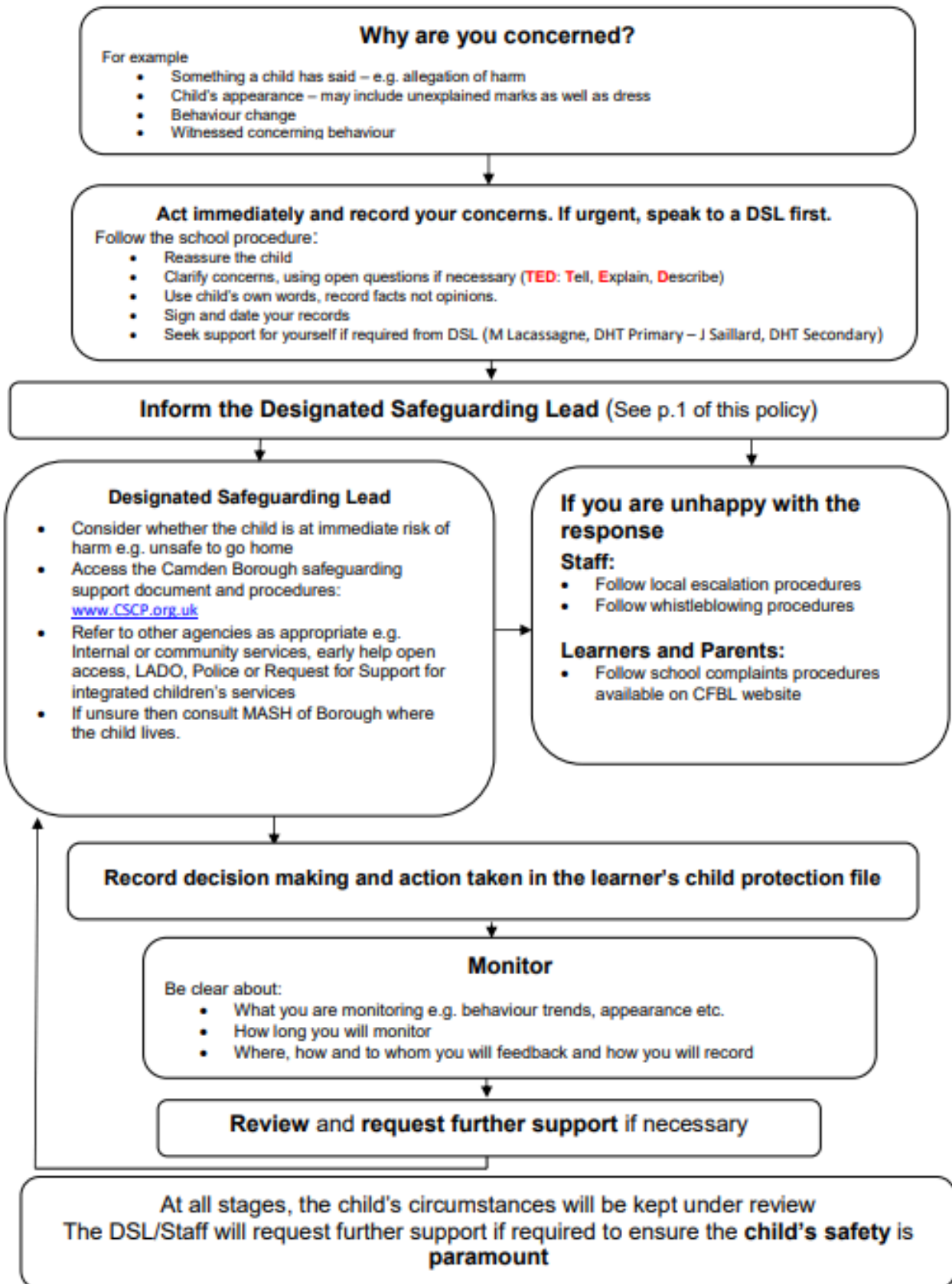
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Contents

	Page
What to do if you have a welfare concern flowchart	4
1. Child Focused Approach to Safeguarding	5
2. Key Responsibilities	8
3. Child Protection Procedures	10
4. Specific Safeguarding Issues	16
5. Supporting Children Potentially at Greater Risk of Harm	20
6. Online Safety	23
7. Staff Engagement and Expectations	26
8. Safer Recruitment and Allegations	27
9. Opportunities to teach safeguarding	30
10. Physical Safety	31
Appendix 1: Categories of Abuse	33
Appendix 2: Support Organisations	35
Appendix 3: Incident report form	37
Appendix 4: Legal duties	39
Appendix 5: Staff Behaviour Policy	40

What to do if you have a welfare concern in CFBL



1. Child Focused Approach to Safeguarding

1.1 Introduction

- CFBL recognizes its statutory responsibility to safeguard and promote the welfare of all children. Safeguarding is everybody's responsibility and all those directly connected (staff, volunteers, governors, leaders, parents, families, and learners) are an important part of the wider safeguarding system for children and have an essential role to play in making this community safe and secure.
- CFBL believes that the best interests of children always come first. All children (defined as those up to the age of 18) have a right to be heard and to have their wishes and feelings taken into account and all children regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
- Staff working with children at CFBL will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff will always act in the best interests of the child and if any member of our community has a safeguarding concern about any child or adult, they should act and act immediately.
- As part of the safeguarding ethos of our setting, we are committed to:
 - Maintaining children's welfare as our paramount concern
 - Providing an environment and culture in which children feel safe, secure, valued, and respected, confident to talk openly and sure of being listened to
 - Developing appropriate and positive relationships between children and the adults that care for them
 - Providing suitable support and guidance so that:
 - children have a range of appropriate adults who they feel confident to approach if they are in difficulties;
 - pupils know how to raise concerns, feel safe to raise concerns and are confident that their concerns will be taken seriously
 - Using learning opportunities to increase self-awareness, self-esteem, assertiveness, and decision making. This is so that young children develop a range of contacts and strategies to ensure their own protection and understand the importance of protecting others
 - Expecting inclusive and anti-discriminatory behaviour for staff and pupils
 - Not tolerating all forms of bullying, harassment and discrimination, or inappropriate, sexualised or offensive language and behaviour
 - Working with parents and carers to build an understanding of the setting's responsibility to ensure the welfare of all children including the need for referral to other agencies in some situations.
- Our core safeguarding principles are:
 - **Prevention**
 - positive, supportive, safe culture, curriculum and pastoral opportunities for children, safer recruitment procedures.
 - **Protection**
 - following the agreed procedures, ensuring all staff are trained and supported to recognize and respond appropriately and sensitively to safeguarding concerns and disclosures.
 - **Support**
 - and monitoring for all learners, parents and staff, and where appropriate specific interventions are required for those who may be at risk of harm.
 - **Working with parents and other agencies**
 - to ensure timely, appropriate communications and actions are undertaken when safeguarding concerns arise.
- The procedures contained in this policy apply to all staff, governors, temporary or third-party agency staff and volunteers) and are consistent with those outlined within KCSIE 2023.

1.2 Policy Context

- This policy is implemented in accordance with our compliance with the statutory guidance from the Department for Education, 'Keeping Children Safe in Education' 2023 (KCSIE) which requires individual schools and colleges to have an effective child protection policy.
- This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related guidance. This includes but is not limited to:
 - Keeping Children Safe in Education 2023 (KCSIE)
 - Working Together to Safeguard Children 2023 (WTSC)
 - Ofsted: Education Inspection Framework' 2023
 - OFSTED guidance: Non association independent schools handbook
 - Framework for the Assessment of Children in Need and their Families 2000
 - Camden Safeguarding Children Procedures
 - The Childcare Act 2006
 - Early Years and Foundation Stage Framework 2023 (EYFS)
 - The Education Act 2002
 - The Education (Independent School Standards) Regulations 2014
 - The Independent School Standards - Guidance for Independent Schools 2019
 - "Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings" - Safer Recruitment Consortium, May 2019.
 - "What to do if you are worried a child is being abused" – DfE, March 2015
- Section 175 of the Education Act 2002 requires school governing bodies, local education authorities and further education institutions to make arrangements to safeguard and promote the welfare of all children who are pupils at a school, or who are students under 18 years of age. Such arrangements will have to have regard to any guidance issued by the Secretary of State.

1.3 Definition of Safeguarding

- In line with KCSIE 2023, safeguarding and promoting the welfare of children is defined for the purposes of this policy as:
 - protecting children from maltreatment
 - preventing impairment of children's mental and physical health or development
 - ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and
 - taking action to enable all children to have the best outcomes.
- The school acknowledges that safeguarding includes a wide range of specific issues including (but not limited to):
 - Abuse and neglect
 - Bullying, including cyberbullying
 - Children with family members in prison
 - Children Missing Education (CME) or child absent from school
 - Child missing from home or care
 - Child Sexual Exploitation (CSE)
 - Child Criminal Exploitation (CCE)
 - Contextual safeguarding (risks outside the family home)
 - County lines and gangs
 - Domestic abuse
 - Drugs and alcohol misuse
 - Fabricated or induced illness
 - Faith abuse
 - Gender based abuse and violence against women and girls
 - Hate
 - Homelessness
 - Human trafficking and modern slavery
 - Mental health

- o Nude or semi-nude image sharing, aka youth produced/involved sexual imagery or “Sexting”
- o Online safety
- o Child on child abuse
- o Preventing radicalisation and extremism
- o Private fostering
- o Relationship abuse
- o Serious violence
- o Sexual violence and sexual harassment
- o So-called ‘honour-based’ abuse, including Female Genital Mutilation (FGM) and forced marriage
- o Upskirting
- o Adulteration

(Also see Part One and Annex B within ‘Keeping Children Safe in Education’ 2023)

1.4 Related Safeguarding Policies

- This policy is one of a series in the school safeguarding portfolio and should be read and actioned in conjunction with the policies as listed below:
 - o School’s rules: *Règlement intérieur*;
 - o Behaviour and discipline policy;
 - o E- Safety and use of internet, mobile phones and other electronic equipment policy (for pupils);
 - o Anti-bullying policy;
 - o Attendance and absence policy;
 - o Missing Child Policy & Procedures When a Child is Not Collected on Time;
 - o Educational visits policy;
 - o Health and Safety policy;
 - o Risk assessment policy;
 - o First Aid policy;
 - o Administration of Medication policy;
 - o PHSCE policy;
 - o RSE policy;
 - o Complaints’ policy;
 - o Staff Behaviour policy;
 - o Low level concern policy;
 - o Taking, storing and using images of Children policy;
 - o CFBL Employee Handbook which includes staff obligations in safeguarding, whistleblowing procedure, CFBL’s safer recruitments procedures, and to CFBL Rules and Policies Handbook (for contractors, workers and volunteers);
 - o Procedures for managing allegations of abuse made against staff.
 - o Privacy notices;
 - o Record retention policy.

1.5 Policy Compliance, Monitoring and Review

- CFBL will review this policy at least annually (as a minimum) and will update it as needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt. The policy will also be revised following any national or local updates, significant local or national safeguarding events and/or learning, and/or any changes to our own procedures.
- All staff (including temporary staff, volunteers and governors) will be provided with a copy of this policy and Part One of KCSIE 2023 as appropriate. Our policy is available on the school’s website and on the Staff Shared Drive (under policies tab). KCSIE 2023 is available on the internet and also on the Staff Shared Drive (under policies > key safeguarding resources tab).

- Parents/carers can obtain a copy of the school Child Protection & Safeguarding Policy and other related policies on request. Additionally, our policies can be viewed via the school website: <https://www.cfbl.org.uk/en/our-school/inspections-and-policies>.
- The policy forms part of our school development plan and will be reviewed annually by the governing body who has responsibility for oversight of safeguarding and child protection systems.
- The Designated Safeguarding Leads and headteacher will ensure regular reporting on safeguarding activity and systems to the governing body. The governing body will not receive details of individual learner situations or identifying features of families as part of their oversight responsibility.

2. Key Responsibilities

2.1 Governance and Leadership

- The governing body and leadership team have a strategic responsibility for our safeguarding arrangements and will comply with their duties under legislation.
- The governing body have regard to the EYFS 2023 and the KCSIE 2023 guidance and will ensure our policies, procedures and training is effective and complies with the law at all times.
- The school has two nominated governors for safeguarding. The nominated governors will support the DSLs and have oversight in ensuring that the school has an effective policy which interlinks with other related policies, that locally agreed procedures are in place and being followed, and that the policies are reviewed at least annually and when required. They will also have the responsibility for liaising with Camden on safeguarding and child protection matters. They will liaise with the LADO in the event of an allegation against the head teacher.
- The governing body and leadership team will ensure that the DSLs are supported in their role and are provided with sufficient time so they can provide appropriate support to staff and children regarding any safeguarding and welfare concerns.
- All governors and trustees receive safeguarding and child protection training needed to help them effectively scrutinise school safeguarding and child protection policies so that they can ensure policies are fit for purpose.
- The headteacher will ensure that our child protection and safeguarding policies and procedures adopted by the governing body, are understood, and followed by all staff.

2.2 Designated Safeguarding Leads (DSLs)

- CFBL has appointed two Designated Safeguarding Leads (DSLs):
 - Marjorie Lacassagne, DHT for the Primary School and
 - Jean Saillard, DHT for the Secondary School.
- The DSLs have overall responsibility for the day-to-day oversight of safeguarding and child protection systems (including online safety) at CFBL. Whilst the activities of the DSLs may be delegated to the deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSLs and this responsibility will not be delegated.
- CFBL has also appointed two Deputy DSL who will have delegated responsibilities and act in the DSLs absence.
 - Elodie Malard, the School nurse, also DDSL in charge of Early Years and
 - Vincent Wiemann, the Student Support Officer.
- It is the role of the DSLs to carry out their functions as identified in Annex C of KCSIE 2023. This includes but is not limited to:

- o liaise with and manage referrals to relevant agencies such as CSSW (Children’s Safeguarding and Social Work), the LADO, the Channel Panel, the Police and the Disclosure and Barring Service (DBS);
 - o keep the headteacher, senior leadership team and the board of governors informed of on-going safeguarding and child protection issues and enquiries;
 - o provide advice and guidance for staff on safeguarding and child protection issues and making referrals and support them through the referral process;
 - o ensure the school’s safeguarding and child protection policies are up to date and consistent with Camden’s Safeguarding Children Partnership policies and that policies are reviewed annually;
 - o ensure all staff, including temporary staff, are aware of and understand policies and procedures and are able to implement them through robust induction processes;
 - o attend regular training, including Prevent awareness training, and the designated teachers’ meetings hosted by Camden in order to keep up to date with new policy, emerging issues and local early help, safeguarding and child protection procedures and working practices;
 - o provide regular updates received from Camden to all staff members and governors on any changes in safeguarding or child protection legislation;
 - o have an awareness of those children who may be more vulnerable to poor educational outcomes due to safeguarding and other issues such as children in need, children with child protection plans, children with mental health issues, young carers and children who have special educational needs;
 - o liaise with the SENCO when considering any safeguarding action for a child with special needs;
 - o liaise with the school’s mental health lead or CAMHS team as appropriate where safeguarding concerns are linked to mental health issues;
 - o raise awareness with staff on how children’s vulnerabilities and exposure to safeguarding issues such as neglect, abuse and trauma can negatively influence their educational attainment and behaviour and how staff can work to meet these challenges and improve outcomes;
 - o liaise with the Camden Virtual School Head in order to meet the educational needs of children known to CSSW;
 - o liaise with the designated teacher for LAC (Looked after Children) whenever there are safeguarding concerns relating to a looked after child or previously looked after child;
 - o oversee child protection systems within the school, including the management of records, ensuring confidentiality, standards of recording, and referral processes;
 - o provide a link between the school and other agencies, particularly CSSW and the Camden Safeguarding Children Partnership;
 - o ensure staff, including temporary staff, receive appropriate safeguarding and child protection training every 2 years, including online safety training, identifying the early signs of child-on-child abuse and sexual violence and sexual harassment;
 - o ensure parents are fully aware of the school’s policies and procedures and that they are kept informed and involved;
 - o encourage a culture where children are listened to, their views taken into account and where they are encouraged to participate in keeping themselves safe;
 - o ensure relevant records are passed on appropriately when children transfer to other schools and where appropriate, share relevant information with schools to enable continued support for the child on transfer.
- The DSLs will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. Deputy DSLs will be trained to the same standard as the DSL. The DSLs training will be updated formally at least every two years, but their knowledge and skills will be updated through a variety of methods at regular intervals and at least annually.

2.3 Members of Staff

- All members of staff have a responsibility to:
 - o Provide a safe environment in which children can learn.
 - o Be aware of the indicators of abuse and neglect so that they can identify cases of children who may need help or protection.
 - o Know what to do if a child tells them that he or she is being abused or neglected and understand the impact abuse and neglect can have upon a child.
 - o Be able to identify and act upon indicators that children are, or at risk of developing mental health issues.

- o Be prepared to identify children who may benefit from early help.
- o Understand the early help process and their role in it.
- o Understand the School's safeguarding policies and systems.
- o Undertake regular and appropriate training which is regularly updated.
- o Be aware of the local process of making referrals to children's social care and statutory assessment under the Children Act 1989.
- o Know how to maintain an appropriate level of confidentiality.
- o Reassure children who report concerns that they are being taken seriously and that they will be supported and kept safe.

2.4 Children and Young People

- Children and young people (learners) have a right to:
 - o Feel safe, be listened to, and have their wishes and feelings taken into account.
 - o Confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.
 - o Contribute to the development of CFBL's safeguarding policies.
 - o Receive help from a trusted adult.
 - o Learn how to keep themselves safe, including online.

2.5 Parents and Carers

- Parents/carers have a responsibility to:
 - o Understand and adhere to the relevant CFBL policies and procedures.
 - o Talk to their children about safeguarding issues with their children and support CFBL in their safeguarding approaches.
 - o Identify behaviours which could indicate that their child is at risk of harm including online.
 - o Seek help and support from CFBL or other agencies.
- The school will:
 - o make parents aware of the school/college's statutory role in safeguarding and promoting the welfare of pupils, including the duty to refer pupils on where necessary, by making all School policies available on the school website or on request;
 - o provide opportunities for parents and carers to discuss any problems with class teachers and other relevant staff; consult with and involve parents and carers in the development of School policies to ensure their views are taken into account;
 - o ensure a robust complaints system is in place to deal with issues raised by parents and carers; provide advice and signpost parents and carers to other services and resources where pupils need extra support.

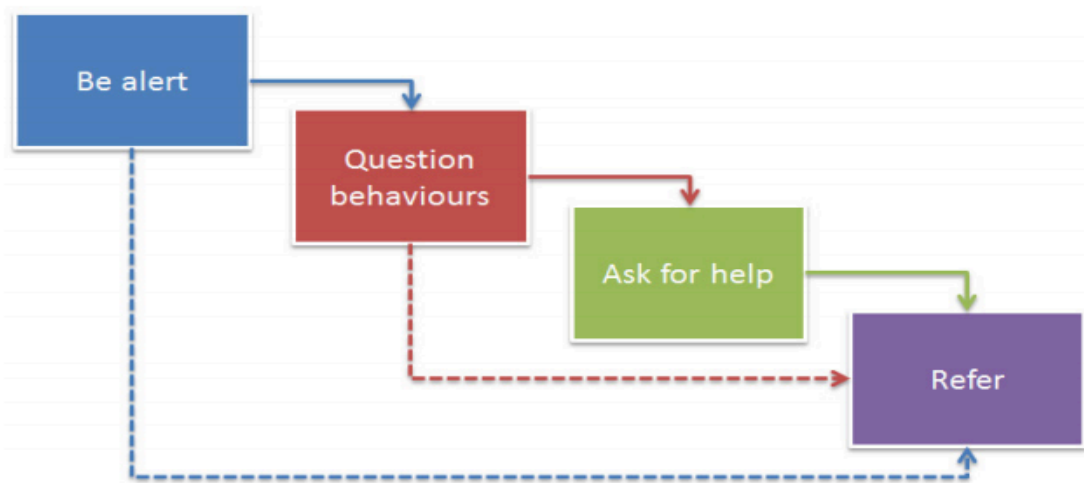
3. Child Protection Procedures

3.1 Recognising Indicators of Abuse and Neglect

- All staff are made aware of the definitions and indicators of abuse and neglect as identified by Working Together to Safeguard Children (2023) and Keeping Children Safe in Education 2023. This is outlined locally within Camden Thresholds Criteria for Children Services.
- CFBL recognises that when assessing whether a child may be suffering actual or potential harm there are four categories of abuse:
 - Physical abuse
 - Sexual abuse
 - Emotional abuse
 - Neglect

For further information see Appendix 1.

- CFBL recognises that concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. The indicators of child abuse and neglect can vary from child to child. Children develop and mature at different rates, so what appears to be worrying behaviour for a younger child might be normal for an older child. It is important to recognise that indicators of abuse and neglect do not automatically mean a child is being abused; however, all concerns should be taken seriously and will be explored by the DSLs on a case-by-case basis.
- CFBL recognises abuse, neglect, and safeguarding issues are rarely standalone events and cannot always be covered by one definition or one label alone. In many cases, multiple issues will overlap with one another, therefore staff will always be vigilant and always raise concerns with a DSL.
- Parental behaviours can indicate child abuse or neglect, so staff will be alert to parent-child interactions or concerning parental behaviours; this could include parents who are under the influence of drugs or alcohol or if there is a sudden change in their mental health.
- Children may report abuse happening to themselves, their peers or their family members. All reports made by children to staff will be taken seriously and will be responded to in line with this policy.
- Safeguarding incidents and/or behaviours can be associated with factors and risks outside CFBL. Children can be at risk of abuse or exploitation in situations outside their families; extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.
- Technology can be a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face and in many cases, abuse will take place concurrently via online channels and in daily life. Children can also abuse other children online.
- By understanding the indicators of abuse and neglect, we can respond to problems as early as possible and provide the right support and services for the child and their family.
- All members of staff are expected to be aware of and follow this approach if they are concerned about a child:



[‘What to do if you are worried a child is being abused’](#) 2015

- In all cases, if staff are unsure, they will always speak to the DSL (or deputy).
- CFBL recognises that some children have additional or complex needs and may require access to intensive or specialist services to support them.

- If deemed necessary by the headteacher or by staff authorised by the headteacher following a concern about a child's safety or welfare, the searching and screening of children and confiscation of any items, including electronic devices, will be managed in line with the School's Behaviour and Discipline policy.

3.2 Responding to Child Protection Concerns

- If a pupil discloses to a member of staff that they are being abused, the member of staff should;
 - listen to what is said without displaying shock or disbelief and accept what the child is saying;
 - allow the child to talk freely;
 - only use open questions to clarify information where necessary, e.g. who, what, where, when or Tell, Explain, Describe (TED).
 - not ask direct questions but allow the child to tell their story;
 - reassure the child but not make promises that it may not be possible to keep, or promise confidentiality, as concerns will have to be shared further, for example, with the DSL and potentially a referral may have to be made to CSSW;
 - reassure the child that what has happened is not their fault and that they were right to tell someone;
 - not criticise the alleged perpetrator;
 - explain what will happen next and who has to be told;
 - make a formal record, in line with CFBL record keeping requirements, and pass this on to the DSLs (or deputy), as soon as practically possible.
- Staff should bear in mind that children may not find it easy to disclose abuse and may need time before they feel ready to do so; in some cases, for example child exploitation, they may not recognise that what they are experiencing is abusive. Disclosure is more likely where there is a trusting relationship with the staff member and the pupil feels safe to share information.
- It is important that where staff have reason to believe a pupil is at risk of harm but there is no disclosure, they persevere, giving the pupil time and space to disclose when they feel comfortable to do so. Any concerns should be shared with the designated safeguarding lead so that advice and support can be offered on how to support the pupil to engage. Consideration should also be given to addressing any communications difficulties that may be a barrier to disclosure.
- The DSLs or a deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances, no DSL or deputy is available, this should not delay appropriate action being taken. Staff should speak to a member of the senior leadership team and/or take advice from Education Safeguarding Service or via consultation with a social worker from the Camden's Children and Family Contact team ('Front Door' for children's social care referrals). In these circumstances, any action taken will be shared with a DSL as soon as is practically possible.
- CFBL will refer to Camden's thresholds and eligibility criteria (available at the link below) to help make decisions on the child's level of need and the appropriate service to refer on for services. Staff will consult with the designated safeguarding lead for advice and to discuss the case prior to making any referral for services.
Thresholds-for-childrens-services.pdf (cscp.org.uk)
- CFBL will respond to concerns in line with the Camden Safeguarding Children Partnership (CSCP) procedures.
 - The full CSCP procedures and additional guidance relating to reporting concerns and specific safeguarding issues can be found on their website:
<https://www.camden.gov.uk/children-s-safeguarding-and-social-work>
 - Specific information and guidance to follow with regards to accessing Early Help and Preventative Services and/or Children's Social Work Services as part of Children and Families Contact Service can be found here:
<https://www.camden.gov.uk/early-help-for-children-and-families>

Early help

Staff will identify children who need extra help at an early stage and provide help and support in order to prevent concerns from escalating. In particular, staff will be aware of the needs of the following groups of children whose circumstances may mean they will require early help:

- o children with disabilities and additional needs, including those with special educational needs
- o children with mental health needs
- o young carers
- o children showing early signs of being drawn into anti-social or criminal behaviour, including gangs and organised crime or county lines;
- o children who frequently go missing or absent from school or care;
- o children who are misusing drugs or alcohol;
- o children at risk of exploitation through modern slavery and trafficking;
- o children whose home circumstances are negatively affected by adult substance misuse or mental ill health or domestic abuse;
- o children who have returned home from care;
- o children who show early signs of abuse or neglect;
- o children at risk of radicalisation;
- o children at risk from honour-based abuse ie: FGM, forced marriage
- o children who have a parent in prison or who are affected by parental offending;
- o privately fostered children;
- o children who are persistently absent from school including for part of the school day.

Where the child's extra needs require services, consideration will be given to what early help support can be offered to a child by the CFBL.

If the child requires an early help service from another agency, CFBL will make a referral to the Early Help service (via the Children and Families Contact team) for appropriate help and support.

Staff will consult with parents prior to making any referral to discuss the matter and gain consent to refer the child.

Where the child is receiving an Early Help service, CFBL will work as part of the Team around the Family and take up the role of lead professional where this is appropriate.

Early help provision should be monitored and reviewed to ensure outcomes for the child are improving. If the school believes that this is not the case, consideration should be given to making a referral for a statutory social work service.

Referral for a statutory social work service

- Where a child is suffering, or is likely to suffer from harm, or is in immediate danger, a 'referral' will be made immediately to Children and Family Contact team (via the Contact Service) and/or the police, in line with CSCP procedures.
 - o CFBL recognises that in situations where there are immediate child protection concerns for a child as identified in line with Support Level Guidance, it is NOT to investigate as a single agency, but to act in line with CSCP guidance which may involve multi-agency decision making.
 - o The DSL may seek advice or guidance from their Area Education Safeguarding Advisor from the Education Safeguarding Service before deciding next steps.
 - o They may also seek advice or guidance from a social worker at the Front Door service who are the first point of contact for Children and family Contact team.
- In the event of a request for support to the Front Door being necessary, parents/carers will be informed and consent to this will be sought by the DSL in line with guidance provided by CSCP and ICS. Parents/carers will be informed of this, unless there is a valid reason not to do so, for example, if to do so would put a child at risk of harm or would undermine a criminal investigation.
- Where the referral raises concerns that the child is at risk of significant harm, the case will be passed on to Camden's MASH team to gather relevant information from other agencies.
- The Contact Service will inform the school within 1 working day of the outcome of any referral and what action CSSW will be taking. This may include any of the following:
 - o Carrying out a child and family assessment to identify the child's needs and establish if the child is a child in need under section 17 of the Children Act 1989. These are children (including disabled children) who are unlikely to meet a reasonable standard of health and development unless provided with services.

- o Convening a strategy meeting under child protection procedures as set out in section 5 of the Children Act 1989 for any child where there are concerns about significant harm and/or taking any immediate action in order to protect the child.
 - o Providing services for the child and their family in the meantime whilst work is on-going (including details of services).
- If the child already has an allocated CSSW social worker, the referral should be made directly to them. If the child is not already known to CSSW, referrals should be made to the Contact team. If the child lives outside Camden, a referral should be made to their home local authority.
 - If the school/college does not think the child's situation is improving within a reasonable timescale following referral, this should be taken up with CSSW/Early help services via the designated safeguarding lead.

Attendance at case conferences and core groups

- The designated safeguarding lead will liaise with CSSW to ensure that all relevant information held by the school is provided to CSSW during the course of any child protection investigation.
- The designated safeguarding lead will ensure that the school/college is represented at child protection case conferences and core group meetings or will ensure that a report is made available to the conference or meeting.

Contacting the Police

- In the event that a criminal offence takes place on the School premises or police assistance is needed to deal with incidents, the School will follow the guidance set out in the NSPCC guidance When to call the police.

Operation Encompass

- Operation Encompass is a national initiative that helps to safeguard children and young people who may have been exposed to domestic abuse. In practice, this means that if the police are called to a domestic abuse incident and a child has been present when this happened, then the police will notify the child's school/college's designated safeguarding lead. This will be done as early as possible in the morning and allow the school to silently support the child. This allows for rapid provision of support within the school environment and means that children are better safeguarded against the effects of domestic abuse.
- The school will take relevant action on receipt of all police notifications of children who have been involved in domestic abuse incidents via Operation Encompass. There is no need for schools/colleges to make a referral to CSSW following a notification as the police will have already referred the case to the MASH.
- The designated safeguarding lead will inform relevant staff of any notification and agree what support (if any) the pupil should receive from the school.

3.3 Recording Concerns

- All safeguarding concerns, discussions and decisions, and reasons for those decisions, will be recorded in writing on a school safeguarding concern form and passed without delay to the DSL by email or in person.
- Incident/Welfare concern forms are kept in a secured log kept by the DSLs, on the Shared Drive (restricted access only).
- Records will be completed as soon as possible after the incident/event, using the child's words and will be signed and dated by the member of staff. Child protection records will record facts and not personal opinions. A body map will be completed if injuries have been observed.
- If there is an immediate safeguarding concern the member of staff will consult with a DSL before completing the form as reporting urgent concerns takes priority.
- If members of staff are in any doubt about recording requirements, they will discuss their concerns with the DSLs.
- Child protection records will include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and details regarding any action taken, decisions reached and the outcome.

- Child protection records will be kept confidential and stored securely. Child protection records will be kept for individual children and will be maintained separately from all other records relating to the child in the School. Child protection records are kept in accordance with data protection legislation and are retained centrally and securely by the DSLs.
- All child protection records will be transferred in accordance with data protection legislation to the child's subsequent school/college, under confidential and separate cover as soon as possible. Child Protection files will be transferred securely to the new DSL, separately to the child's main file, and a confirmation of receipt will be obtained.
- In addition to the child protection file, the DSL will also consider if it would be appropriate to share any information with the DSL at the new school or college in advance of a child leaving, for example, information that would allow the new school or college to continue to provide support.
- Where CFBL receives child protection files, the DSLs will ensure key staff such as the Deputy DSL, the teachers of the child for primary and PP for secondary, will be made aware of relevant information as required.
- Where a pupil is the subject of a child protection plan and the school has been asked to monitor their attendance and welfare as part of this plan, monitoring will be carried out by the relevant staff member in conjunction with the designated safeguarding lead. The designated safeguarding lead will notify the allocated social worker if the child is removed from the school roll, excluded for any period of time or goes missing.
- Child protection records will be kept for the duration set out in our records retention policy and then will be disposed of as confidential waste.

3.4 Multi-Agency Working

- CFBL will work in partnership with relevant agencies in order to meet its obligations under section 11 of the Children Act 2004 and working together to safeguard children 2023
- CFBL recognises and is committed to its responsibility to work within Camden multi-agency safeguarding arrangements. The Lead Safeguarding Partner (LSP), Delegated Safeguarding Partner (DSP) and DSL will work to establish strong and co-operative local relationships with professionals in other agencies in line with statutory guidance.
- CFBL recognises the importance of multi-agency working and is committed to working alongside partner agencies to provide a coordinated response to promote children's welfare and protect them from harm. This includes contributing to CSCP processes as required, such as, participation in relevant safeguarding multi-agency plans and meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings or other early help multi-agency meetings.
- Governors, school managers and the senior leadership team will ensure these safeguarding arrangements are followed and that the School is able to raise any safeguarding issues and emerging trends with the CSCP via the CSCP Head teacher members and/or the Camden Learning representative.

3.5 Confidentiality and Information Sharing

- CFBL recognises its duty and powers to hold, use and share relevant information with appropriate agencies in matters relating to child protection at the earliest opportunity as per statutory guidance outlined within KCSIE 2023.
- CFBL has a Data and Systems Manager to ensure that our School is compliant with all matters relating to confidentiality and information sharing requirements. The Data and Systems Manager is Valérie Baudin.
- The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children (KCSIE 2023). Schools have a lawful basis for sharing information without parental consent where there are safeguarding risks. DfE "[Information sharing advice for safeguarding practitioners](#)" (2018) provides further detail and is available on the Staff shared drive (under policies > key safeguarding resources tab).
- The headteacher and DSLs will disclose relevant safeguarding information about a learner with staff on a 'need to know' basis.

- All members of staff must be aware that whilst they have duties to keep information confidential, in line with our Staff Handbook (available on the Staff shared drive > HR), they also have a professional responsibility to be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children; this may include sharing information with the DSLs and with other agencies as appropriate. All staff are aware they cannot promise confidentiality in situations which might compromise a child's safety or wellbeing.

3.6 Complaints

- All members of the School community should feel able to raise or report any concerns about children's safety or potential failures in the School's safeguarding regime. The School has a complaints procedure available to parents, learners and members of staff and visitors who wish to report concerns or complaints. This can be found on the website.
- Whilst we encourage members of our community to report concerns and complaints directly to us, we recognise this may not always be possible. Children, young people, and adults who have experienced abuse at school can contact the NSPCC 'Report Abuse in Education' helpline on 0800 136 663 or via email: help@nspcc.org.uk
- Staff can also access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally.
 - Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email help@nspcc.org.uk.
- The leadership team at CFBL will take all concerns reported to the School seriously and all complaints will be considered and responded to in line with the relevant and appropriate process.
 - Anything that constitutes an allegation against a member of staff or volunteer will be dealt with in line with section 8 of this policy.

4. Specific Safeguarding Issues

- CFBL is aware of a range of specific safeguarding issues and situations that can put children at greater risk of harm. In addition to Part One, DSLs, school leaders and staff who work directly with children will read annex B of KCSIE 2023 which contains important additional information about specific forms of abuse and safeguarding issues.
- Where staff are unsure how to respond to specific safeguarding issues, they should follow the processes as identified in part 3 of this policy and speak with the DSL or a deputy.

4.1 Child-on-child Abuse

- All members of staff at CFBL recognise that children are capable of abusing other children, and that it can happen both inside and outside of School and online.
- CFBL recognises that child-on-child abuse can take many forms, including but not limited to:
 - bullying, including cyberbullying, prejudice-based and discriminatory bullying
 - abuse in intimate personal relationships between peers
 - physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
 - sexual violence and sexual harassment
 - consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
 - causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
 - upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
 - sexting
 - initiation/hazing type violence and rituals

- CFBL believes that abuse is abuse and it will never be tolerated or dismissed as “banter”, “just having a laugh”, “part of growing up” or “boys being boys” as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.
- CFBL recognises that even if there are no reported cases of child-on-child abuse, such abuse is still likely to be taking place.
- All staff have a role to play in challenging inappropriate behaviours between peers. Staff recognise that some child on-child abuse issues may be affected by gender, age, ability and culture of those involved, i.e. for gender based abuse, girls are more likely to be victims and boys more likely to be perpetrators, but all child-on-child abuse is unacceptable and will be taken seriously.
- Concerns about learner’s behaviour, including child-on-child abuse taking place offsite will be responded to as part of a partnership approach with learners and parents/carers. Offsite behaviour concerns will be recorded and responded to in line with existing appropriate policies, for example anti-bullying, e-safety , behaviour and child protection policies.
- In order to minimise the risk of child on child abuse, CFBL will:
 - implement a robust anti-bullying policy,
 - provide age/ability appropriate PSHE and RSE curriculum,
 - providing a report mechanism on Pronote.
- CFBL wants children to feel able to confidently report abuse and know their concerns will be treated seriously. All allegations of child-on-child abuse will be reported to the DSLs and will be recorded, investigated, and dealt with in line with associated School policies, including child protection, anti-bullying and behaviour. Learners who experience abuse will be offered appropriate support, regardless of where the abuse takes place.
- Alleged victims, perpetrators and any other child affected by peer-on-peer abuse will be supported by:
 - taking reports seriously, listening carefully, avoiding victim blaming, providing appropriate pastoral support, working with parents/carers, reviewing educational approaches, following procedures as identified in other policies e.g. the School’s Anti-bullying, Behaviour and Discipline and Child Protection policies, and where necessary and appropriate, informing the police and/or Children and Families Contact Service.

4.2 Child-on-Child Sexual Violence or Harassment

- CFBL recognises that sexual violence and sexual harassment between pupils is a serious safeguarding issue and such behaviour will not be tolerated.
- When responding to concerns relating to child-on-child sexual violence or harassment, CFBL will follow the guidance outlined [in Part Five of KCSIE 2023](#) “Child-on-child sexual violence and sexual harassment”, the [Child on child abuse and sexual violence and harassment: guidance for schools and colleges in Camden - 2023](#), and the [Camden Safeguarding Children Partnership Sexually harmful behaviour in children and young people; multi-agency guidance and protocol 2023](#).
- CFBL recognises sexual violence and sexual harassment can occur between children of any age and sex. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children and can occur online and face to face (both physically and verbally). Sexual violence and sexual harassment is never acceptable.
- All victims of sexual violence or sexual harassment will be reassured that they are being taken seriously and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment or be made to feel ashamed for making a report.
- When there has been a report of sexual violence or harassment, the DSLs will make an immediate risk and needs assessment which will be considered on a case-by-case basis which explores how best to support and protect the victim and the alleged perpetrator (and any other children involved/impacted).

- The risk and needs assessment will be recorded and kept under review and will consider the victim (especially their protection and support), the alleged perpetrator, and all other children, and staff and any actions that are required to protect them.
- Reports will initially be managed internally by the School and where necessary will be referred to Integrated Children’s Services and/or the Police.
 - The decision making and required action taken will vary on a case by case basis, but will be informed by the wishes of the victim, the nature of the alleged incident (including whether a crime may have been committed), the ages and developmental stages of the children involved, any power imbalance, if the alleged incident is a one-off or a sustained pattern of abuse, if there are any ongoing risks to the victim, other children, or School staff, and, any other related issues or wider context.
- If at any stage the DSLs are unsure how to proceed, advice will be sought from the Children and Families Contact Service.

4.3 Nude and/or Semi-Nude Image Sharing by Children

The term ‘sharing nudes and semi-nudes’ is used to mean the sending or posting of nude or semi-nude images, videos or live streams of/by young people under the age of 18. Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal which makes responding to incidents complex.

The [UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people’ guidance](#) outlines how schools and colleges should respond to all incidents of consensual and non-consensual image sharing, and should be read and understood by DSLs working with all age groups, not just older learners.

- CFBL recognises that consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as youth produced/involved sexual imagery or “sexting”) is a safeguarding issue; all concerns will be reported to and dealt with by the DSL (or deputy).
- When made aware of concerns involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos by children, staff are advised to:
 - Report any concerns to the DSL immediately.
 - Never view, copy, print, share, store or save the imagery, or ask a child to share or download it – this may be illegal. If staff have already viewed the imagery by accident, this will be immediately reported to the DSLs.
 - Not delete the imagery or ask the child to delete it.
 - Not say or do anything to blame or shame any children involved.
 - Explain to child(ren) involved that they will report the issue to the DSLs and reassure them that they will receive appropriate support and help.
 - Not ask the child or children involved in the incident to disclose information regarding the imagery and not share information about the incident with other members of staff, the child(ren) involved or their, or other, parents and/or carers. This is the responsibility of the DSLs.
- DSLs will respond to concerns as set out in the non-statutory UKCIS guidance: [Sharing nudes and semi-nudes: advice for education settings working with children and young people’](#) and the local Camden guidance. When made aware of a concern involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos:
 - the DSLs will hold an initial review meeting to explore the context and ensure appropriate and proportionate safeguarding action is taken in the best interests of any child involved. This may mean speaking with relevant staff and the children involved as appropriate.
 - parents and carers will be informed at an early stage and be involved in the process to best support children, unless there is good reason to believe that involving them would put a child at risk of harm.
 - All decisions and action taken will be recorded in line with our child protection procedures.
 - a referral will be made to ICS and/or the police immediately if:
 - the incident involves an adult (over 18).
 - there is reason to believe that a child has been coerced, blackmailed, or groomed, or there are concerns about their capacity to consent, for example, age of the child or they have special educational needs.

- the image/videos involve sexual acts and a child under the age of 13, depict sexual acts which are unusual for the child's developmental stage, or are violent.
- a child is at immediate risk of harm owing to the sharing of nudes and semi-nudes.
- The DSLs may choose to involve other agencies at any time if further information/concerns are disclosed at a later date.
- If DSLs are unsure how to proceed, advice will be sought from the Children and Families Contact Service.

4.4 Extra-familial harm, Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

- CFBL is aware of the risk to children and young people from extra-familial harm and staff will be vigilant to the indicators of extra-familial harm in relation to pupils at all times. Sources of harm and exploitation can include :
 - child sexual exploitation
 - child criminal exploitation including county lines
 - modern slavery and trafficking
 - gang activity and youth violence
 - radicalisation.
- CFBL recognises that CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.
- If staff are concerned that a child may be at risk of CSE or CCE, immediate action should be taken by speaking to aDSL or a deputy. The DSL will consider the level and nature of the risk before making decisions on referrals.
- The school/college will adhere to the CSCP guidance Extra-familial harm and child exploitation whenever there are concerns that young people are at risk from extra-familial harm or exploitation.

4.5 Young people at risk from gang activity or serious violence

- All staff are made aware of the indicators which may signal children are at risk from or are involved with serious violent crime. These may include unexplained gifts or new possessions, 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.
- Any concerns regarding serious violence will be reported and responded to in line with other child protection concerns.
 - The initial response to child victims is important and staff will take any allegations seriously and work in ways that support children and keep them safe.

4.6 So-called honour based abuse

- So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing.
- Whilst all staff should speak to a DSL (or a deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police. The School will follow the statutory guidance on FGM and the mandatory reporting rules and make appropriate referrals to the police as set out in the CSCP guidance.
- All forms of HBA are abuse (regardless of the motivation) and concerns should be responded to in line with section 3 of this policy. Staff will report any concerns about HBA to the DSLs (or a deputy).

- Whilst all staff will speak to the DSL (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers.
 - If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

4.7 Preventing radicalisation

- CFBL is aware of our duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), to have “due regard to the need to prevent people from being drawn into terrorism”, also known as the Prevent duty and the [specific obligations](#) placed upon us as an education provider regarding risk assessments, working in partnership, staff training, and IT policies. Under Counter-Terrorism and Security Act 2015, the school also has a duty to refer young people on to Camden’s Channel Panel under the Prevent strategy where there are concerns that they are being radicalised.
- CFBL recognises that children are vulnerable to extremist ideology and radicalisation and staff will be alert to changes in children’s behaviour which could indicate that they may be in need of help or protection.
- Staff will report any concerns to the DSLs (or a deputy) and the School will follow the guidance set out in the CSCP guidance “Safeguarding children and young people from radicalisation and extremism” where: a school/college has concerns that a young person might be considering extremist ideologies and/or may be radicalised and would benefit from specialist support to challenge extremist ideologies, or that a younger pupil may be at risk due to their parent’s radicalisation.

4.8 Cybercrime

- CFBL recognises that children with particular skill and interest in computing and technology may inadvertently or deliberately stray into ‘cyber-enabled’ (crimes that can happen offline but are enabled at scale and at speed online) or ‘cyber dependent’ (crimes that can be committed only by using a computer/internet enabled device) cybercrime.
- If staff are concerned that a child may be at risk of becoming involved in cyber-dependent cybercrime, the DSLs will be informed, and consideration will be given to accessing local support and/or referring into the [Cyber Choices](#) programme, which aims to intervene when young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.
- Where there are concerns about ‘cyber-enabled’ crime such as fraud, purchasing of illegal drugs online, child sexual abuse and exploitation, or other areas of concern such as online bullying or general online safety, they will be responded to in line with this and other appropriate policies.

4.9 Domestic abuse and/or sexual violence

- Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.
- Staff should be aware of the nature of domestic abuse and recognise the harm it may cause to children who witness incidents. For more details please refer to the CSCP guidance on domestic abuse.

5. Supporting Children Potentially at Greater Risk of Harm

- Whilst all children should be protected, some groups of children are potentially at greater risk of harm.

5.1 Safeguarding Children with Special Educational Needs or Disabilities (SEND)

- CFBL acknowledges that children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges and barriers for recognising abuse and neglect.

- CFBL recognises that children with SEND may face additional communication barriers and experience difficulties in managing or reporting abuse or challenges. Children with SEND will be appropriately supported to communicate and ensure that their voice is heard and acted upon.
- All members of staff will be encouraged to appropriately explore possible indicators of abuse such as behaviour, mood changes or injuries and not to assume that they are related to the child's disability. Staff will be mindful that children with SEND or certain medical conditions may be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Members of staff are encouraged to be aware that children with SEND can be disproportionately impacted by safeguarding concerns, such as exploitation, peer group isolation or bullying including prejudice-based bullying.
- To address these additional challenges, our School will always consider implementing extra pastoral support and attention for children with SEND.
- Where there are concerns about abuse involving a pupil with SEND, the DSLs will liaise with the SENDCO. The School will consider extra pastoral support for pupils with SEND including extra help in supporting communication.

5.2 Children and young people experiencing mental health issues

- The school recognises that some pupils may experience mental health issues that can negatively affect their behaviour and their ability to participate fully in education.
- All staff will be made 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.
- Staff are aware that children's experiences, for example where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, can impact on their mental health, behaviour and 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.
- The school will ensure early identification of pupils who have mental health needs, with the support of our school psychologist, and put in place appropriate support and interventions where needed.
- If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the DSL or a deputy.

5.3 Children Missing or absent from Education

- Children missing or absent from education, particularly persistently, can act as a vital warning sign to a range of safeguarding issues including neglect, sexual abuse, and child sexual and criminal exploitation.
- Where the School has concerns that a child is missing from education, we will respond in line with our statutory duties and local policies. CFBL will refer to Camden Missing from Education Policy.
- CFBL recognises the interplay between attendance and wider school improvement efforts, building it into strategies on attainment, behaviour, bullying, special educational needs support, supporting pupils with medical conditions or disabilities, safeguarding, wellbeing, and support for disadvantaged students. Attendance is central to the School's vision, values, ethos, and day to day life. CFBL's Attendance & Absence policy is available from its website.

5.4 Elective Home Education

- Where a parent/carer expresses their intention to remove a child from school with a view to educating at home, we will respond in line with [national Elective Home Education guidance](#) and local Camden guidance and will work together with parents/carers and other key professionals and organisations to ensure decisions are made in the best interest of the child.

5.5 Children who have a Social Worker

- The DSLs will hold details of social workers working with children in the School so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes.
- Where children have a social worker, this will inform School decisions about their safety and promote their welfare, for example, responding to unauthorised absence and provision of pastoral and/or academic support.
- CFBL recognises that children who are receiving a social work service from CSSW and who are subject to child in need or child protection plans are likely to have experienced abuse, neglect and trauma and that this could have a negative effect on their behaviour and learning.
- CSSW social workers will inform schools whenever a child is receiving a service and the DSLs will keep a record of all pupils who have an allocated social worker.
- CFBL will work in partnership with social workers and the Camden Virtual School Head to implement the child's plan in order to support their education and safeguard and promote their welfare. A representative of the School who knows the pupil well will become part of the professional network and will share information about safeguarding risks and attend planning meetings. In their absence, a suitable colleague will deputise for the member of staff or a written report will be provided for meetings.

5.6 Looked after children, previously looked after children and care leavers

- CFBL recognises that the common reason for children becoming looked after is as a result of abuse and/or neglect and a previously looked after child also potentially remains vulnerable.
- CFBL will appoint a '[designated teacher](#)' (Primary or Secondary teacher according to the child's level) who will work with local authorities to promote the educational achievement of registered pupils who are looked after or who have been previously looked after.
- The designated teacher will work with the DSLs to ensure appropriate staff have the information they need in relation to a child's looked after legal status, contact arrangements with birth parents or those with parental responsibility, care arrangements and the levels of authority delegated to the carer by the authority looking after them.
- Where a child is looked after, the DSLs will hold details of the social worker and the name of the virtual school head in the authority that looks after the child.
- Where the School believes a child is being cared for as part of a private fostering arrangement (occurs when a child under 16 or 18 if the child is disabled is cared for and lives with an adult who is not a relative for 28 days or more) there is a duty to recognise these arrangements and inform the Local Authority via the front door.
- Where a child is leaving care, the DSLs will hold details of the local authority Personal Advisor appointed to guide and support them and will liaise with them as necessary regarding any issues of concern.

5.7 Pupils who are lesbian, gay, bi or trans (LGBT)

- The School recognises that LGBT pupils, or pupils who are perceived to be LGBT, may be more vulnerable to bullying, harassment and victimisation and may find it difficult to disclose to staff due to a lack of trust in adults. The School will provide safe spaces and opportunities for LGBT pupils to raise concerns and will ensure that LGBT inclusion is part of the sex and relationships curriculum.

5.8 Privately fostered children

- Schools have a legal duty to notify Camden of any pupil they know to be privately fostered. Schools should contact the Fostering team on 020 7974 6783 to notify Camden of any private fostering arrangements that come to their notice.

6. Online Safety

This part should be read and actioned in conjunction with our E-Safety and Use of Internet, Mobile Phones Other Electronic Equipment Policy.

- It is essential that children are safeguarded from potentially harmful and inappropriate material or behaviours online. CFBL will adopt a whole school approach to online safety which will empower, protect, and educate our learners and staff in their use of technology, and establish mechanisms to identify, intervene in, and escalate any concerns where appropriate. This includes robust filtering and monitoring systems that comply with the Department of Education Filtering and monitoring standards for schools and colleges.
- CFBL will ensure online safety is reflected as required in all relevant policies. Online safety is considered as a running and interrelated theme when devising and implementing our policies and procedures and when planning our curriculum, staff training, the role and responsibilities of the DSL and parental engagement.
- CFBL identifies that the breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:
 - Content: being exposed to illegal, inappropriate or harmful content. For example pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
 - Contact: being subjected to harmful online interaction with other users. For example peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
 - Conduct: personal online behaviour that increases the likelihood of, or causes, harm. For example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying.
 - Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.
- CFBL recognises that technology, and the risks and harms related to it, evolve and change rapidly. The School will carry out an annual review of our approaches to online safety, supported by an annual risk assessment which considers and reflects the risks our children face.
- The headteacher will be informed of online safety concerns by the DSLs, as appropriate. The DSLs will report on online safety practice and incidents, including outcomes, on a regular basis to the governing body.

6.1 Policies and Procedures

- Governors should ensure that there are policies and procedures in place to keep pupils safe online and that these are reviewed regularly. Governors should liaise with IT staff and service providers to annually review school IT filtering and monitoring systems to check their effectiveness and ensure that the school leadership team are aware of what provision is in place and how to escalate any concerns.
- The DSL for Secondary has overall responsibility for online safety within the School but will liaise with other members of staff, for example the IT Manager, teachers etc. to ensure the school remains up to date with online safety issues and to address any new trends, incidents and arising problems and that the school has appropriate filtering and monitoring systems.
- The DSLs will respond to online safety concerns reported in line with our Child Protection & Safeguarding Policy and other associated policies, including our Anti-bullying, *Règlements Intérieurs* and Behaviour & Discipline policies.
 - Internal sanctions and/or support will be implemented as appropriate.
 - Where necessary, concerns will be escalated and reported to relevant partner agencies in line with local policies and procedures.

- CFBL uses a wide range of technology. This includes computers, laptops, tablets and other digital devices, the internet, our learning platform, intranet and email systems.
 - All School owned devices and systems will be used in accordance with our acceptable use policies and with appropriate safety and security measures in place.
- CFBL recognises the specific risks that can be posed by mobile and smart technology, including mobile/smart phones, cameras and wearable technology including all electronic devices with imaging and sharing capabilities. In accordance with KCSIE 2023 and EYFS 2023 CFBL has appropriate mobile and smart technology and image use policies in place, which are shared and understood by all members of the community. The Règlements Intérieurs, Behaviour and E-safety and Use of Internet, Mobile Phones and Other Electronic Equipment Policy (for pupils) policies can be found on our website and on the Staff Shared Drive.

6.2 Appropriate Filtering and Monitoring

- CFBL will do all it reasonably can to limit children’s exposure to online risks through School provided IT systems and will ensure that appropriate filtering and monitoring systems are in place.
 - We use Fortinet FortiGate Web Filter for web filtering and monitoring the use of internet at School, based on the government guidance. It includes a complete web filtering by categories across all platforms and allows our pupils to use the internet safely whilst at School.
The Web Filtering Appliance filters and monitors all outgoing internet traffic from the School local network including all wires and wireless devices (computers, laptops, iPads and Chromebooks). The only route to connect to the internet from the School local network is via the FortiGate Web Filter, no other route is available. FortiGate categorises websites into pre-set categories and some websites remain uncategorised. The Web Filtering Appliance blocks sites that fall into categories such as Potential Liabile (Drug Abuse, Hacking, Illegal or Unethical, Discrimination, Explicit Violence, Extremist Groups, Proxy Avoidance, Plagiarism, Child Sexual Abuse, Terrorism, Crypto Mining, Potentially Unwanted Program), Adult/Mature Content (Alternative Beliefs, Abortion, Other Adult Materials, Advocacy Organizations, Gambling, Nudity and Risque, Pornography, Dating, Weapons (Sales), Marijuana, Sex Education, Alcohol, Tobacco, Lingerie and Swimsuit, Sports Hunting and War Games), Bandwidth Consuming, Security Risk and any other unsuitable categories.
Uncategorised websites, posing no risk to pupils, are allowed. However, the URL of any unsuitable sites are blocked individually when reported. If staff find any unsuitable uncategorised website, a request with the URL is sent to the IT Support to block it immediately.
 - All classroom computers are equipped with LanSchool Application that allows the teachers to monitor and control the pupils screen when they use the laptops or chromebooks. The teachers can blank the screen of the pupils if an unsuitable website is opened.
If learners or staff discover unsuitable sites or material, the teacher will block the screen of the pupil via the LanSchool Application and report immediately the URL to the IT Support so that it can be blocked on the Web Filtering.
 - All users will be informed that use of our systems can be monitored, and that monitoring will be in line with data protection, human rights, and privacy legislation.
 - Filtering breaches or concerns identified through our monitoring approaches will be recorded and reported to the DSL in charge of eSafety who will respond as appropriate.
 - Any access to material believed to be illegal will be reported immediately to the appropriate agencies, such as the [Internet Watch Foundation](#) and the police.
 - When implementing appropriate filtering and monitoring, CFBL will ensure that “over blocking” does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.
- CFBL acknowledges that whilst filtering and monitoring is an important part of CFBL online safety responsibilities, it is only one part of our approach to online safety.
 - The secondary school librarian organizes classes on the use of the Internet.
 - Learners will use appropriate search tools, apps and online resources as identified following an informed risk assessment.
 - Learners internet use will be supervised by staff according to their age and ability.
 - Learners will be directed to use age appropriate online resources and tools by staff.

6.3 Information Security and Access Management

- CFBL is responsible for ensuring an appropriate level of security protection procedures are in place, in order to safeguard our systems as well as staff and learners. Further information can be found in our e-safety and Use of Internet, Mobile Phones and Other Electronic Equipment Policy (for pupils) and Staff Handbook.
- CFBL will review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

6.4 Staff Training

- CFBL will ensure that all staff receive online safety training as part of induction and that ongoing online safety training and updates for all staff will be integrated, aligned and considered as part of our overarching safeguarding approach.

6.5 Educating Learners

- CFBL will ensure a comprehensive whole School curriculum response is in place to enable all learners to learn about and manage online risks effectively as part of providing a broad and balanced curriculum.

6.6 Working with Parents/Carers

- CFBL will build a partnership approach to online safety and supports parents/carers to become aware and alert of the potential online benefits and risks for children by:
 - providing information through existing communication channels (such as official social media, newsletters etc.), offering specific online safety events for parents/carers (either directly or with the help of APC, the School's PTA) or highlighting online safety at existing events.
- Parents/carers will be made aware of what their children are being asked to do online, including the sites they will be asked to access. CFBL will continue to be clear who from the School their child is going to be interacting with online.
- Parents/carers will be encouraged to ensure children are appropriately supervised online and that appropriate parent controls are implemented at home.

6.7 Remote Learning

- CFBL will ensure any remote sharing of information, communication and use of online learning tools and systems will be in line with privacy and data protection requirements.
- All communication with learners and parents/carers will take place using School provided or approved communication channels.
- Staff and learners will engage with remote teaching and learning in line with existing behaviour principles as set out in our CFBL's *Règlements Intérieurs*, *Charte de bonne conduite enseignement à distance*, Behaviour and Discipline policy, Staff handbook and Acceptable Use Policies.
- Staff and learners will be encouraged to report issues experienced at home and concerns will be responded to in line with our child protection and other relevant policies.
- When delivering remote learning, staff will follow our *Charte de bonne conduite enseignement à distance*.

7. Staff Engagement and Expectations

7.1 Awareness, Induction and Training

- All members of staff have been provided with a link to access Part One of 'Keeping Children Safe in Education' 2023 which covers safeguarding information for staff.
 - CFBL leaders, including the DSLs will read KCSIE in its entirety.
 - CFBL leaders and all members of staff who work directly with children will read annex B.
 - All members of staff are asked to confirm in writing that they have read and understood the national guidance shared with them. This information is kept in the employee details folder securely kept by the HR department and will be recorded in the single central record.
- The DSLs will ensure that all new staff and volunteers (including agency, third-party staff) receive safeguarding and child protection training (including online safety), including information to ensure they are aware of the School internal safeguarding processes, as part of their induction. This will be achieved through e-Learning on Educare.
- All staff members (including agency and third-party staff) will receive appropriate child protection training (including online safety) to ensure they are aware of a range of safeguarding issues; this training will be updated at least annually.
- At the start of the academic school year, all new staff members will receive face-to-face Safeguarding and child protection training.
- Safeguarding training for staff, including online safety training, will be integrated, aligned and considered as part of the whole School safeguarding approach and wider staff training and curriculum planning.
- In addition to specific child protection training, all staff will receive regular safeguarding and child protection updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively This will be achieved through training delivered during inset days.
- Staff will be encouraged to contribute to and shape CFBL safeguarding arrangements and child protection policies by inviting input at staff meetings.
- The DSLs and headteacher will provide an annual report to the governing body detailing safeguarding training undertaken by all staff and will maintain an up to date register of who has been trained.
- Although CFBL has a nominated lead for the governing body, all members of the governing body will access appropriate safeguarding training which covers their specific strategic responsibilities on a regular basis. All members of the governing body are requested to train in Child Protection or update their training regularly.

7.2 Safer Working Practice

- All members of staff are required to work within our clear guidelines on safer working practice as outlined in the School's Staff Handbook.
- The DSLs will ensure that all staff and volunteers (including agency and third-party staff) have read the child protection policy and are aware of the School's expectations regarding safe and professional practice via the Staff Behaviour Policy.
- Staff will be made aware of the School's behaviour management and physical intervention policies. Staff will manage behaviour effectively to ensure a good and safe educational environment and will have a clear understanding of the needs of all children. Physical interventions and/or use of reasonable force will be in line with our agreed policy and procedures and national guidance. (Camden's Physical intervention and restraint policy.
<https://cscp.org.uk/professionals/schools-and-nurseries-safeguarding-policies/>

- All staff will be made aware of the professional risks associated with the use of social media and electronic communication (such as email, mobile phones, texting, social networking). Staff will adhere to relevant school policies included in the Staff Handbook.

7.3 Supervision and Support

- The induction process will include familiarisation with child protection responsibilities and procedures to be followed if members of staff have any concerns about a child's safety or welfare.
- The School will ensure that members of staff who are working within the foundation stage are provided with appropriate supervision in accordance with the statutory requirements of Early Years Foundation Stage (EYFS) 2023.
- CFBL recognises regular, planned, and accountable supervision, which is a two-way process, offers support and develops the knowledge, skills and values of an individual, group or team. We see its purpose is to monitor the progress of professional practice and to help staff to improve the quality of the work they do, thus improving outcomes for children as well as achieving agreed objectives. Supervision also provides an opportunity to discuss sensitive issues including the safeguarding of children and any concerns raised about an individual or colleague's practice
- CFBL will provide appropriate supervision and support for all members of staff to ensure that:
 - All staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children
 - All staff are supported by the DSLs in their safeguarding role.
 - All members of staff have regular reviews of their own practice to ensure they improve over time.
- Any member of staff affected by issues arising from concerns for children's welfare or safety can seek support from the DSLs.
- The DSLs will also put staff in touch with outside agencies for professional support if they so wish. Staff can also approach organisations such as their Union, the Education Support Partnership or other similar organisations directly.

7.4 Working with violent parents

- Where schools are working with families who are known to CSSW and there are concerns about the behaviour of parents towards members of school staff, this must be discussed with the head teacher and the designated safeguarding lead and the information shared with CSSW.
- If there are high levels of risk involved in contact with parents, CSSW may convene a risk assessment meeting with the network in order to discuss strategies to reduce risk, and it is vital that schools and colleges are part of this process.

8. Safer Recruitment and Allegations

8.1 Safer Recruitment and Safeguarding Checks

- CFBL is committed to ensure it develops a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with children and staff.
- The Governing Body of CFBL is responsible for ensuring that the setting follows safe recruitment processes outlined within guidance, including accurate maintenance of the staff records/Single Central Record (SCR). The SCR is a list of staff, volunteers and registered person/trustees/committee members and includes appropriate information which may include:
 - Dates of recruitment
 - References
 - Identity checks
 - Criminal records check reference number, including date and details of person who completed it
 - Eligibility to work in the UK checks
 - Other essential key data.

- CFBL will obtain an enhanced check by Disclosure and Barring Service (DBS) in respect of every person aged 16 and over (including for unsupervised volunteers, and supervised volunteers who provide personal care) who:
 - works directly with children
 - lives on the premises on which the childcare is provided and/or
 - works on the premises on which the childcare is provided (unless they do not work on the part of the premises where the childcare takes place, or do not work there at times when children are present).
- An additional check by the DBS (or checks if more than one country) will also be made for anyone who has lived or worked abroad.
- In addition, as part of the shortlisting process, the School will carry out an online search as part of their due diligence on the 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.
- CFBL will follow the Safer recruitment policy to ensure that staff and volunteers who are recruited to work in the early years setting are carefully selected and vetted to ensure they are suitable to work with children, have the relevant qualifications and are not disqualified from working in childcare settings.
- The Governing Body of CFBL is responsible for ensuring that the setting adopts an application, vetting and recruitment process which places safeguarding at its centre, regardless of employee or voluntary role.
- The Governing Body of CFBL is responsible for ensuring that the setting follows safer recruitment processes outlined within guidance. In depth information can be found re safe recruitment procedures being followed at CFBL in its Safer Recruitment Policy available on our website.
- At least one member of the interview panel must have completed safer recruitment training.
- The Governing Body of CFBL is aware of the requirements to make appropriate checks regarding the disqualification status of all staff, including volunteers and temporary staff.
- CFBL are committed to supporting the statutory guidance from the Department for Education on the application of the Childcare (Disqualification) Regulations 2009 and related obligations under the Childcare Act 2006 in schools.
- We advise all staff to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, cautions, reprimands, and warnings.
- Where the School places a learner with an alternative provision provider, the School will continue to be responsible for the safeguarding of that child.
 - CFBL will undertake appropriate checks to ensure the provider meets the needs of the pupil, including written confirmation that appropriate safeguarding checks have been carried out on individuals working at the establishment.
- Where CFBL organises homestays as part of exchange visits, we will follow the advice and guidance as identified in part Three and Annex E of KCSIE 2023.
- Where early years staff are taking medication that may affect their ability to care for young children, this will be notified to the head teacher.

8.2 Allegations/concerns raised in relation to teachers, including supply teachers, other staff, volunteers and contractors

- The School will respond to allegations in line with CSCP Guidance for School on Dealing with Allegation Against Staff and Volunteers (<https://cscp.org.uk/wp-content/uploads/2022/09/Guidance-for-schools-on-dealing-with-allegations-against-staff-2022.pdf>)

- In depth information can be found within our Staff Behaviour policy, Low Level Concerns policy and Procedure for dealing with Allegations Made against Staff. The Staff Behaviour Policy is available in the Staff Handbook and is also attached to this policy as Appendix 5.
- Any concerns or allegations about staff, including those which do not meet the allegation/harm threshold (8.2.1) will be recorded and dealt with appropriately in line with national and local guidance and our Low Level Concerns Policy and Procedures for Dealing With Allegations of Abuse Against Staff. Ensuring concerns are dealt with effectively will protect those working in or on behalf of the CFBL from potential false allegations or misunderstandings.
- Where the headteacher is unsure how to respond, for example if the School is unsure if a concern meets the harm 'thresholds', advice will be sought via the [Local Authority Designated Officer](#) (LADO) Enquiry Line and/or the [Education Safeguarding Service](#).

8.2.1 Concerns that meet the 'harm threshold'

- CFBL recognises that it is possible for any member of staff, including volunteers, governors, contractors, agency and third-party staff (including supply teachers) and visitors to behave in a way that indicates a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school or college. This includes when someone has
 - behaved in a way that has harmed a child, or may have harmed a child and/or
 - possibly committed a criminal offence against or related to a child and/or;
 - behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
 - behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- Allegations against staff which meet this threshold will be referred immediately to the headteacher who will contact the [LADO](#) to agree further action to be taken in respect of the child and staff member. In the event of allegations of abuse being made against the headteacher, staff are advised that allegations should be reported to the chair of governors/trustees who will contact the LADO. Our procedures for dealing with any such allegations are set out in the School's Procedures for Dealing with Allegations of Abuse Made Against Staff (available up request or on the Staff Shared Drive).

8.2.2 Concerns that do not meet the 'harm threshold'

- CFBL may also need to take action in response to 'low-level' concerns about staff, which typically would be behaviours inconsistent with our staff code of conduct, including inappropriate conduct outside of work and concerns that do not meet the allegations threshold.
- CFBL's procedures for dealing with low level concerns are set out in its Low Level Concerns Policy available from the Staff Shared Drive.
- Where a low-level concern has been identified, this will be reported as soon as possible to the Designated Safeguarding Leads (DSL) or Deputy-DSL, in the DSL's absence. The DSL should inform the headteacher of all the low-level concerns and in a timely fashion according to the nature of each particular low-level concern.
- Low-level concerns about the DSLs will be reported to the headteacher and those about the headteacher to the Chair of the Governors.
- The headteacher/principal should be the ultimate decision maker in respect of all low-level concerns, although it is recognised that depending on the nature of some low-level concerns and/or the role of the DSL in some schools/colleges, the headteacher/principal may wish to consult with the DSL and take a more collaborative decision making approach.
- Where low-level concerns are reported to the School, the headteacher or DSLs will share or liaise with the LADO enquiries officer via the [LADO Enquiry Line](#) if in doubt about the level of concern.

- Low-level concerns are recorded in writing in a secured log, which access is restricted to the DSLs and headteacher. This log is reviewed regularly by the DSLs and the headteacher so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern is identified, the School will implement appropriate action, for example consulting with [the LADO enquiry line](#) and following our disciplinary procedures.

8.2.3 Safe Culture

- As part of our approach to safeguarding, the School has created and embedded a culture of openness, trust and transparency in which our values and expected behaviours from staff, volunteers, governors, parents and learners as set out in our policies (including staff behaviour policy, Pupils Behaviour and Discipline policy, Trustees code of conduct policy) are constantly lived, monitored and reinforced by all staff (including supply teachers, volunteers and contractors) and where all concerns are dealt with promptly and appropriately.
- All staff and volunteers should feel able to raise any concerns about poor or unsafe practice and potential failures in the School safeguarding regime. The leadership team at CFBL will take all concerns or allegations received seriously.
- All members of staff are made aware of the School Whistleblowing procedure, which is available in the Staff Shared Drive. It is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child at risk.
- Staff can access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email help@nspcc.org.uk.
- CFBL has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left. The DBS will consider whether to bar the person.
 - If these circumstances arise in relation to a member of staff at our School, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the [LADO](#).
- CFBL has a duty to inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children in Early Years at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere). We will also notify Ofsted of the action taken in respect of the allegations. Notifications will be made as soon as is reasonably practicable, but at the latest within 14 days of the allegations being made and are aware that to not do so would be an offence.

9. Opportunities to teach safeguarding

- CFBL will ensure that children are taught about safeguarding, including online safety, as part of providing a broad and balanced curriculum. This will include covering relevant issues through Relationships Education (primary schools)/Relationships and Sex Education (secondary schools) and Health Education.
- CFBL recognises that children learn best when they are healthy, safe, and secure, when their individual needs are met, and when they have positive relationships with the adults caring for them. Our setting will provide a welcoming, safe, and stimulating environment where children can enjoy learning and grow in confidence.
- CFBL will provide age appropriate educational opportunities to enable early years children to develop self-awareness, self-esteem, social and emotional understanding, assertiveness, and decision making so that they have a range of contacts and strategies to ensure their own protection and understand the importance of protecting others, including online.
- We recognise that school plays an essential role in helping children to understand and identify the parameters of what is appropriate child and adult behaviour, what is 'safe', to recognise when they and others close to them are not safe, and how to seek advice and support when they are concerned. Our curriculum provides opportunities for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that learners have a range of age appropriate contacts and strategies to ensure their own protection and that of others.

- CFBL recognises that a one size fits all approach may not be appropriate for all children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed.
- Our School systems support children to talk to a range of staff. Children will be listened to and heard, and their concerns will be taken seriously and acted upon as appropriate.

10. Physical Safety

10.1 Use of 'reasonable force'

- There may be circumstances when it is appropriate for staff to use reasonable force in order to safeguard children from harm. Further information regarding our approach and expectations can be found in our Behaviour and Discipline Policy.
- The School will take all reasonable steps to ensure that behaviour management techniques are appropriate to the child's age and that corporal punishment is not used or threatened. However, staff will be permitted to use appropriate physical intervention in line with Camden's Physical intervention and restraint policy.
Physical-intervention-and-restraint-policy-for-schools.pdf (cscp.org.uk)

10.2 The Use of Premises by Other Organisations

- Where services or activities are provided separately by another body using the School's facilities/premises, the headteacher and governing body will have evidence that:
 - the organisation provides an overview of what it intends to teach so that the board of governors is able to make a judgement on whether this is in line with the promotion of British values;
 - the organisation can provide copies of child protection policies and procedures and the school accept these as adequate;
 - the organisation can provide evidence that they have followed safer recruitment practices and that their staff have the requisite DBS checks;

If this assurance is not achieved, an application to use premises will be refused.

- The following reasonable and due diligence checks are taken out on the organisation by the School;
 - an internet search on the organisation
 - checks with Camden's Community Groups and Schools Consultant (020 7974 7319)
 - checks with Prevent Education officer (020 7974 1008)
 - checks with Camden Community Safety and the local police (020 7974 2915)
- Organisations will be expected to meet the requirements set out in the Department of Education guidance before the school/college will allow the premises to be used. Details of the agreement are recorded on the partnership agreement record and Safeguarding requirements will be included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises. Failure to comply with this will lead to termination of the agreement.
- Any allegations arising from incidents happening when the school is being used by another organisation should be dealt with by the school/college under the CSCP Guidance for schools on dealing with allegations against staff and volunteers. Introduction (cscp.org.uk)

10.3 Site Security

- All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light.
- Appropriate checks will be undertaken in respect of visitors and volunteers coming into School as outlined within national guidance. Visitors will be expected to sign in and out via the office visitors log and to display a visitor's badge whilst on site.
- Any individual who is not known or identifiable on site should be challenged for clarification and reassurance.

- The head teacher and the board of governors will ensure that any contract entered into with contractors' sets out clearly the expectations for worker's behaviour and the responsibility of contractors to monitor and ensure compliance with CFBL policies.
- Contracted workers will not be allowed to approach or speak to pupils in any circumstances and must ensure that all equipment and working practices are in line with health and safety standards.
- Where the visitor is employed by an organisation where DBS checks are normally required, for example NHS staff, the head teacher will request written confirmation that relevant checks have been carried out for that individual.
- Visiting organisations such as theatre groups who will be performing for or working directly with pupils will be expected to have adequate child protection procedures in place and must agree with class teachers in advance what level of supervision or contact they will have regarding pupils.
- The School will not accept the behaviour of any individual (parent or other) that threatens School security or leads others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the School site.

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Appendix 1: Categories of Abuse

All staff should be aware that abuse, neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

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. They may be abused by an adult or adults or another child or children. It should be noted that abuse can be carried out both on and offline and be perpetrated by men, women, and children.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not 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 (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Signs that MAY INDICATE Sexual Abuse

- Sudden changes in behaviour and performance
- Displays of affection which are sexual and age inappropriate
- Self-harm, self-mutilation or attempts at suicide
- Alluding to secrets which they cannot reveal
- Tendency to cling or need constant reassurance
- Regression to younger behaviour for example thumb sucking, playing with discarded toys, acting like a baby
- Distrust of familiar adults e.g. anxiety of being left with relatives, a childminder or lodger
- Unexplained gifts or money
- Depression and withdrawal
- Fear of undressing for PE
- Sexually transmitted disease
- Fire setting

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.

Signs that MAY INDICATE physical abuse

- Bruises and abrasions around the face
- Damage or injury around the mouth
- Bi-lateral injuries such as two bruised eyes
- Bruising to soft area of the face such as the cheeks
- Fingertip bruising to the front or back of torso
- Bite marks
- Burns or scalds (unusual patterns and spread of injuries)
- Deep contact burns such as cigarette burns
- Injuries suggesting beatings (strap marks, welts)
- Covering arms and legs even when hot
- Aggressive behaviour or severe temper outbursts.
- Injuries need to be accounted for. Inadequate, inconsistent, or excessively plausible explanations or a delay in seeking treatment should signal concern.

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 not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental

capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Signs that MAY INDICATE emotional abuse

- Over reaction to mistakes
- Lack of self-confidence/esteem
- Sudden speech disorders
- Self-harming
- Eating Disorders
- Extremes of passivity and/or aggression
- Compulsive stealing
- Drug, alcohol, solvent abuse
- Fear of parents being contacted
- Unwillingness or inability to play
- Excessive need for approval, attention, and affection

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 as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing, and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Signs that MAY INDICATE neglect.

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Inadequate clothing
- Frequent lateness or non-attendance
- Untreated medical problems
- Poor relationship with peers
- Compulsive stealing and scavenging
- Rocking, hair twisting and thumb sucking
- Running away
- Loss of weight or being constantly underweight
- Low self esteem

Appendix 2: Support Organisations

NSPCC 'Report Abuse in Education' Helpline

- [0800 136 663](tel:0800136663) or help@nspcc.org.uk

National Organisations

- NSPCC: www.nspcc.org.uk
- Barnardo's: www.barnardos.org.uk
- Action for Children: www.actionforchildren.org.uk
- Children's Society: www.childrenssociety.org.uk

Support for Staff

- Education Support Partnership: www.educationsupportpartnership.org.uk
- Professional Online Safety Helpline: www.saferinternet.org.uk/helpline

Support for Learners

- ChildLine: www.childline.org.uk
- Papyrus: www.papyrus-uk.org
- The Mix: www.themix.org.uk
- Shout: www.giveusashout.org
- Fearless: www.fearless.org
- Victim Support: www.victimsupport.org.uk

Support for Adults

- Family Lives: www.familylives.org.uk
- Crime Stoppers: www.crimestoppers-uk.org
- Victim Support: www.victimsupport.org.uk
- The Samaritans: www.samaritans.org
- NAPAC (National Association for People Abused in Childhood): www.napac.org.uk
- MOSAC: www.mosac.org.uk
- Action Fraud: www.actionfraud.police.uk
- Shout: www.giveusashout.org
- Advice now: www.advicenow.org.uk

Support for Learning Disabilities

- Respond: www.respond.org.uk
- Mencap: www.mencap.org.uk
- Council for Disabled Children: <https://councilfordisabledchildren.org.uk>

Contextual Safeguarding Network

- <https://contextualsafeguarding.org.uk/>

Substance Misuse

- We are with you (formerly Addaction): www.wearewithyou.org.uk/services/kent-for-young-people/
- Talk to Frank: www.talktofrank.com

Domestic Abuse

- Domestic abuse services: www.domesticabuseservices.org.uk
- Refuge: www.refuge.org.uk
- Women's Aid: www.womensaid.org.uk
- Men's Advice Line: www.mensadviceline.org.uk
- Mankind: www.mankindcounselling.org.uk
- National Domestic Abuse Helpline: www.nationaldahelpline.org.uk
- Respect Phonenumber: <https://respectphonenumber.org.uk>

Criminal and Sexual Exploitation

- National Crime Agency: www.nationalcrimeagency.gov.uk/who-we-are

- It's not okay: www.itsnotokay.co.uk
- NWG Network: www.nwgnetwork.org

Honour Based Abuse

- Forced Marriage Unit: www.gov.uk/guidance/forced-marriage
- FGM Factsheet:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/496415/6_1639_HO_SP_FGM_mandatory_reporting_Fact_sheet_Web.pdf
- Mandatory reporting of female genital mutilation: procedural information:
www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information

Peer on Peer abuse, including bullying, sexual violence and harassment

- Rape Crisis: <https://rapecrisis.org.uk>
- Brook: www.brook.org.uk
- Disrespect Nobody: www.disrespectnobody.co.uk
- Upskirting – know your rights: www.gov.uk/government/news/upskirting-know-your-rights
- Lucy Faithfull Foundation: www.lucyfaithfull.org.uk
- Stop it Now! www.stopitnow.org.uk
- Parents Protect: www.parentsprotect.co.uk
- Anti-Bullying Alliance: www.anti-bullyingalliance.org.uk
- Diana Award: www.antibullyingpro.com/
- Bullying UK: www.bullying.co.uk
- Kidscape: www.kidscape.org.uk

Online Safety

- CEOP: www.ceop.police.uk
- Internet Watch Foundation (IWF): www.iwf.org.uk
- Think U Know: www.thinkuknow.co.uk
- Childnet: www.childnet.com
- UK Safer Internet Centre: www.saferinternet.org.uk
- Report Harmful Content: <https://reportharmfulcontent.com>
- Marie Collins Foundation: www.mariecollinsfoundation.org.uk
- Internet Matters: www.internetmatters.org
- NSPCC: www.nspcc.org.uk/onlinesafety and www.net-aware.org.uk
- Get Safe Online: www.getsafeonline.org
- Parents Protect: www.parentsprotect.co.uk
- Cyber Choices: <https://nationalcrimeagency.gov.uk/what-we-do/crime-threats/cyber-crime/cyberchoices>
- National Cyber Security Centre (NCSC): www.ncsc.gov.uk

Mental Health

- Mind: www.mind.org.uk
- Moodspark: <https://moodspark.org.uk>
- Young Minds: www.youngminds.org.uk
- We are with you (formerly Addaction): www.wearewithyou.org.uk/services/kent-for-young-people/
- Anna Freud: www.annafreud.org/schools-and-colleges/

Radicalisation and hate

- Educate against Hate: www.educateagainsthate.com
- Counter Terrorism Internet Referral Unit: www.gov.uk/report-terrorism
- True Vision: www.report-it.org.uk

Children with Family Members in Prison

- National information Centre on Children of Offenders (NICCO): <https://www.nicco.org.uk/>

Annex 3 - Safeguarding children monitoring/incident form

CFBL Safeguarding Record of Concern Form To return to DSL (Marjorie Lacassagne or Jean Saillard) or Deputy DSL (Elodie Malard or Vincent Wiemann) as appropriate	
Child's Name:	
Primary section /Secondary section (delete as appropriate)	
Date and time of concern:	
Your account of the concern: (what was said, observed, reported and by whom)	
Additional information: (your opinion, context of concern/disclosure)	
Your response: (what did you do/say following the concern)	
Your name :	Your signature:
Your position in school:	Date and time of this recording:
Action and response of DSL/Deputy DSL	

Feedback given to member of staff reporting concern:	Information shared with any other staff? If so, what information was shared and what was the rationale for this?
Name: Date:	

Annex 4 Legal duties

Human Rights Act 1998

The Human Rights Act 1998 sets out an individual's rights and freedoms under the European Convention and public organisations such as schools must ensure that these rights and freedoms are protected whenever decisions are being made about an individual pupil. The relevant rights are:

- Right to an education (Article 2)
- Right to freedom from inhuman and degrading treatment (Article 3); this is an absolute right that cannot be limited in any way
- Right to respect for privacy and family life (Article 8); this is a qualified right which must be balanced against the rights of others.

Any form of (sexual) harassment, violence or abuse may be a breach of these Rights.

Equality Act 2010

The Equality Act states that public organisations such as schools must not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy or maternity, or sexual orientation. This means schools must consider whether they are affording the same level of safeguarding to pupils with these protected characteristics as all other pupils.

Schools must be able to demonstrate that they have taken proportionate positive action and/or made reasonable adjustments in order to deal with the disadvantages faced by these groups. For more guidance see: Equality Act 2010: advice for schools - GOV.UK (www.gov.uk)

Equality Duty

Under the Equality Act, public organisations such as schools have a duty to eliminate unlawful discrimination, harassment and victimisation and ensure equality of opportunity for all pupils. When making decisions, schools must be aware of this duty and ensure that decisions do not unlawfully discriminate against groups of pupils who are protected under the Act. For example, schools should be aware that some groups of pupils, for examples girls or LGBTQ pupils may be more vulnerable to sexual violence or harassment.

For more information please see: Technical Guidance on the Public Sector Equality Duty: England | Equality and Human Rights Commission (equalityhumanrights.com)

Annex 5 CFBL Staff Behaviour Policy

Collège Français Bilingue de Londres
("CFBL" or the "School" or "we")

Staff Behaviour Policy

Authorised by:	The Board of Governors of CFBL
Last review:	WR 11.12.23
Next review date:	December 2024 (a least <u>annually or sooner in case of updates in laws and regulations</u>)
Circulation:	Governors/all staff/volunteers, automatically Staff: on Staff shared drive > HR > Employee handbook and Staff HR policies

This policy is written in conjunction with the Staff Handbook, the Child Protection & Safeguarding policy, the Low-Level Concern Policy and Procedures for Dealing with Allegations of Abuse Made Against Staff.

In this document, "employees", "personnel" or "staff" include all individuals who work or volunteer in the School, whether or not they are employed by the School.

Introduction

At CFBL we believe in creating a whole school culture that is safe and inclusive. This Staff Behaviour Policy is designed to give clear guidance on the standards of behaviour all School staff are expected to observe.

School staff are in a unique position of influence and must adhere to behaviour that models the highest possible standards for all the pupils within the School. As a member of a school community, each employee has an individual responsibility to maintain their reputation and the reputation of the School, whether inside or outside of working hours.

Our aims underpin the School culture: to develop a happy, friendly, secure and well-disciplined atmosphere and to encourage a caring, respectful and trusting relationship between all children and adults.

This Staff Behaviour Policy sets out the key principles for the creation and maintenance of a safe school culture. All staff employed under Teachers' Terms and Conditions of Employment have a statutory obligation to adhere to the 'Teachers' Standards 2012' and in relation to this policy, Part 2 of the Teachers' Standards - Personal and Professional Conduct. Staff failure to adhere to this policy may result in disciplinary action including dismissal.

Objectives of a safe school culture:

- To safeguard pupils and protect staff
- To make explicit expectations of performance and conduct
- To minimise opportunities for abuse
- For all staff to have confidence to report concerns with full confidentiality
- To respond promptly to concerns: issues will always be investigated and addressed
- To exercise appropriate sanctions
- To create and maintain an ethos of mutual respect, openness and fairness

PART 1 - OUR CODE OF CONDUCT

1. All staff are expected to follow the school's policies: including behaviour; anti bullying; equal opportunity in all interactions in school.

Pupils and staff are expected to work together to build a school whose relationships are characterised by mutual and appropriate respect. Praise and building on the positive should always come first. Where firmness/admonition is called for this should be exercised calmly, and staff should avoid shouting at pupils unless there is a Health and Safety risk. This School Behaviour Policy and associated documents establish expectations and approved sanctions. All new staff should be issued with a copy of these policies, and any behaviour concerns should be dealt with in line with them.

Where a member of staff is having difficulties managing pupil behaviour, they should discuss this matter with the headteacher or his deputies at the earliest opportunity.

2. All staff should be aware of what physical contact with pupils is appropriate

Staff should only exercise physical restraint as a last resort to prevent injury.

Staff are allowed to comfort a child who is hurt/distressed in a manner appropriate to the age of the child.

Adults should not initiate any physical contact unnecessarily, and there should be clear boundaries:

- Children should not be picked up (unless medically necessary or being restrained);
- Adults should avoid being in a room alone with a child where the door is closed.
If you need to talk to a child, either leave a door open and position yourself within sight of the door, or ask another adult to be present.
- In the exceptional circumstance where a search needs to be conducted, strict rules apply as described in the Behaviour and Discipline Policy for pupils. You **MUST NOT** conduct or allow a search to be conducted in the absence of witnesses.

Further information on interactions with pupils is provided in part 2 below.

3. All staff are expected to treat each other with respect

Relationships between staff should be characterised by fairness, openness and respect, whether at the workplace or outside or online. This means valuing all contributions, acknowledging differences, and working together to build a climate of continuous improvement. Politeness and respect are essential ingredients: where differences occur, they should be dealt with calmly and fairly.

4. All staff should treat resources responsibly, and exercise due financial care

All staff have a responsibility to look after the resources of the School. This includes: not wasting resources unnecessarily (including physical resources and those such as heat/electricity); following the principles of 'reduce, re-use, recycle' where appropriate; signing out for items taken from the school premises (school iPads and laptops). All money handled should be clearly labelled and sent to the school office by the end of the working day.

5. Acceptable use of ICT Equipment

This policy should be read in conjunction with the Use of IT Policy (Use of Telephone, Email System & Internet Policy and Social Media Policy), the Taking, Storing and Using Images of Pupils Policy, the Data Protection Policy and Privacy Notices, and the Child Protection & Safeguarding Policy.

Staff who are in contact with pupils should not use their mobile phones in School during their directed hours / paid hours of employment. Outside of these times, mobile phones should only be used in areas of the School where pupils are not present.

The school requests all staff to use School's devices (iPhones, iPads, cameras ...) to record pupils' images. Only when this is not feasible and except in the Early Years (where this is never authorised), staff may use their personal device provided that they immediately send the photos by email to the School's drive and delete all copies on all their personal devices (included cloud). Staff can only take images of pupils in suitable dress.

Staff must ensure that they review the list of pupils not having consented to their image being shared externally to the School and that the use made of the photographs respect individual wishes. Also see Part II, Clause 9 below.

6. All staff are expected to behave professionally and exercise confidentiality

All staff are expected to behave thoughtfully and responsibly. Staff should be punctual and well-prepared, and should carry out tasks to the best of their ability, taking pride in their work. All absences should be genuine. Staff are expected to dress appropriately; all staff should set a good example in what they wear, avoiding clothing that is overly casual. Staff should exercise due confidentiality towards matters that are either discussed or overheard. Staff must exercise caution when using information technology and be aware of the risk to themselves and others. Staff must have no personal contact with former pupils until they reach the age of eighteen, and they have not been a pupil at CFBL for a minimum of seven years.

Staff must not engage in inappropriate use of social network sites which may bring themselves, the school, school community or employer into disrepute. Please refer to CFBL's Social Media Policy (available in the Use of Telephone, Email System and Internet Policy) for more details.

Gifts / Hospitality

Staff must ensure not to accept any gift/offer of hospitality that might be construed as a bribe by others, or lead the giver to expect preferential treatment.

However, there may be occasions where pupils or parents wish to give a small token of appreciation to staff, for example at religious festivities or at the end of the year.

It is unacceptable to receive gifts on a regular basis or to suggest to pupils that gifts are appropriate or desired. Money must not be accepted as a gift. If you are unsure whether to accept a gift you should consult your line manager. It is unacceptable to accept any gifts on a regular basis or of any significant value.

Personal gifts must not be given by staff to pupils or their families and any reward to pupils should be in accordance with CFBL's anti-bribery policy, recorded and not based on favouritism.

Please refer to CFBL's Anti-Bribery Policy for more details.

One-to-One Situation

Staff working individually with pupils should be aware of the potential vulnerability of pupils and staff in one-to-one situations. Staff should manage these situations with regard to the safety of the pupil and to themselves.

Individual work with pupils should not be undertaken in isolated areas or rooms where there is no external viewing panel. Where it is necessary to close doors for reasons of confidentiality, a colleague should be made aware of this and asked to remain vigilant.

One to one out of school must be in an appropriate public place (e.g. library).

Smoking and using illegal substances during school trips: Although smoking cigarettes during school trips is left at the discretion of individual staff, staff must always remember they act as role models and should be always mindful of their usage of cigarettes while in charge of pupils.

The use of illegal drugs and/or illegal substances is forbidden during school trips.

7. Conduct Outside of Work

Staff must not engage in conduct outside work which could seriously damage the reputation and standing of the School or the employee's own reputation or the reputation of other members of the School community. Any such conduct could lead to dismissal. In particular, criminal offences that involve violence or possession or use of illegal drugs or sexual misconduct are likely to be regarded as unacceptable and could lead to dismissal.

Staff must exercise caution when using information technology and be aware of the risks to themselves and others. Staff must not use social media e.g. Facebook/Twitter/Instagram/WhatsApp etc. with pupils or former pupils unless the former pupil is aged at least eighteen and has not been a pupil at the school for over seven years. Staff must not engage in inappropriate use of social network sites which may bring themselves, the School, School community or employer into disrepute. Where families or pupils are known to staff members in a personal capacity, it is the responsibility of the staff member to ensure that a declaration is made to the Designated Safeguarding Lead (DSL) or the Chair of Governors in the case of the DSL. Staff must only use their School email account or School learning platform account when communicating electronically with pupils, parents and colleagues.

Staff may undertake work outside School, either paid or voluntary, provided that it does not conflict with the interests of the School and is not to a level which may contravene the working time regulations or affect an individual's work performance. All members of staff must declare any business interests outside of School that may be connected either to the supply of goods / services to the School or be rewarded through association with the School.

Behaviour at work-related events and after-work parties: in Education, there is an expectation that employees will uphold the teaching profession, and the professionalism and behaviour expected of them. Employees may be disciplined for their misconduct at a social event organised by the School or its parents association, whether occurring outside of the School or at School but outside working time.

8. Confidentiality

Where staff have access to confidential information about pupils/students or their parents or carers, staff must not reveal such information except to those colleagues who have a professional role in relation to the pupil/student. All staff are likely at some point to witness actions which need to be confidential (e.g where a pupil/student is bullied by another pupil/student/member of staff), this needs to be reported and dealt with in accordance with the appropriate school procedure. It must not be discussed outside the School, including with the pupil's/student's parent or carer, nor with colleagues in the School except with a senior member of staff with the appropriate role and authority to deal with the matter. However, staff have an obligation to share with their line manager, the DSLs or the Headteacher any information which gives rise to concern about the safety or welfare of a pupil/student. Staff must never promise a pupil/student that they will not share information that they are told by the pupil/student.

9. Staff should seek to establish a good and open relationship with parents

Staff should aim to create a welcoming and open relationship with parents. All parental concerns should be treated seriously and dealt with promptly.

10. All staff need to be aware of the policy and procedures for Child Protection & Safeguarding

It is essential that all staff have regular training in Child Protection & Safeguarding issues and know the procedures for dealing with and reporting concerns. All staff have a duty to look out for signs of physical, emotional or sexual abuse or neglect of pupils in the light of a child's behaviour. Staff must pass any concerns on to the Designated Safeguarding Leads (DSLs) or their deputies. Avoid trying to involve yourself too closely with any issues: always pass concerns on.

The current DSLs are Ms Marjorie Lacassagne, for the Primary School, and Mr Jean Saillard, for the Secondary School. Ms Elodie Malard (School Nurse) and Mr Vincent Wiemann (CPE) are their deputies.

11. All staff need to exploit the potential of the curriculum to develop a proactive approach to behaviour and child protection issues.

Staff need to take a proactive approach towards both child protection and behaviour policies, through the creation of a positive classroom environment where all children are respected, and through PSHE and circle time in particular. This includes not undermining fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs. The expression of extremist views by staff will not be tolerated and should be reported to the Chair of governors or Headteacher and DSLs, who will contact relevant authorities if necessary.

12. All staff need to be aware of how to record/report concerns about another member of staff

Where staff have any concerns about another member of staff, poor or unsafe practice or potential failures in the School's safeguarding regime, these should be reported immediately to the Headteacher, the DSLs or the Deputy DSLs. Where the concern is about the Headteacher, it should be reported directly to the Chair of Governors (via the Clerk, clerk@cfbl.org.uk).

Please refer to the School's Low Level Concern Policy, the Procedures for Dealing with Allegations of Abuse and the School's Whistleblowing Policy, which are available in the Staff shared drive > HR > Employee Handbook and Policies Only for Staff. All concerns will be investigated thoroughly and confidentially, and appropriate action will be taken.

13. Children missing from education

The School monitors all pupil absences from school and promptly addresses concerns about irregular attendance with the parent/carer. In some circumstances, the School has a legal duty to report absences to the Local Authority. Please refer to CFBL's Missing Child Policy and Procedures when a child is not collected on time and CFBL's Attendance and Absence Policy.

14. All staff should take care of their physical and mental wellbeing

All staff are encouraged to look after their physical and mental wellbeing. This includes maintaining a healthy work-life balance. We take issues of stress very seriously, and look to provide appropriate support and help in these cases.

15. All staff should have access to counselling and support

Staff needing support are encouraged to discuss issues and concerns with their line manager or the HR Manager in confidence. The line manager or HR Manager may encourage them to discuss their issues and concerns with the headteacher. Support can be provided both internally (eg through the provision of a mentor), or externally through the Occupational Health Service.

Trade Unions also provide help, support and advice for their members, and membership of a trade union is strongly encouraged.

PART 2 – SAFEGUARDING PUPILS; INTERACTIONS WITH PUPILS

The safety and well-being of every pupil at CFBL is of paramount importance. Every child has the right to grow up and to live in a safe environment.

All staff have a duty to protect pupils from abuse and bullying and to promote their well-being.

Every member of staff should read this Staff Behaviour Policy in conjunction with the school's Child Protection & Safeguarding Policy and other associated policies. Staff are invited to review this Staff Behaviour Policy annually.

1. Safer recruitment

CFBL follows the Government's guidelines for the safer employment of staff who work with children as outlined in CFBL's Safer Recruitment Policy. New staff and Governors receive child protection training as part of their induction process. This training is repeated at not more than two yearly intervals.

2. Designated Safeguarding Leads (DSLs)

Ms Marjorie Lacassagne, Deputy Head for primary and EYFS, and Mr Jean Saillard, Deputy Head for secondary, are CFBL's Designated Safeguarding Leads (DSLs). Mrs Elodie Malard, Nurse, and Mr Vincent Wiemann, Student Support Officer, are their Deputies. Their responsibilities are outlined in the School's Child Protection & Safeguarding Policy.

Access to the School's records on child protection is restricted to the DSLs (and DDSLs) and the Headteacher, who can decide to share the records to other members of staff on a need to know basis.

3. Promoting Awareness

Our curriculum and pastoral systems are designed to foster the spiritual, moral, social, and cultural development of all our pupils. All our teaching staff play a vital role in this process, helping to ensure that all of our pupils relate well to one another and feel safe and comfortable within the School. We expect all the teaching and nonteaching staff to lead by example, and to play a full part in promoting an awareness that is appropriate to their age amongst all our pupils on issues relating to health, safety, and well-being. All the staff, including all non-teaching staff, have an important role in insisting that our pupils always adhere to the standards of behaviour set out in our School Rules (Règlement intérieur), Behaviour and Discipline Policy and in enforcing our Anti-bullying policy.

Time is allocated in PSHE and form time to discussions of what constitutes appropriate behaviour and on why bullying and lack of respect for others are never right. Assemblies, drama and RSE lessons are also used to promote tolerance and mutual respect and understanding. We use opportunities, such as the Keep Your Child Safe On-line, to teach about the unacceptability of bullying and abusive behaviour and to promote the safe use of the internet and mobile phones, inside and outside of School.

4. Staff/Pupil Contact

Staff should avoid unnecessary contact with pupils outside School:

- they must not give pupils their home address, home phone number, mobile phone number or personal e-mail address.
- they must not plan to meet pupils, outside School other than on School trips or School events authorised by the Headteacher.
- they must avoid contacting pupils at home unless this is strictly necessary (for instance during the COVID 19 pandemic, if a pupil is self isolating); they should keep a record of any such occasion.
- they must not give a pupil a lift in their own vehicle.
- they must not have pupils as "friends" on social networking sites and ensure that they themselves only use a secure setting on such systems.
- they must take a school mobile phone on any residential trip and use only this mobile for any necessary contact with pupils in connection with the trip. Mobile numbers of pupils must be deleted from the school mobile at the end of the trip.

Members of staff who are friends with parents of pupils or who, for example, are voluntary workers in youth organisations attended by pupils, will of course have contact with those pupils outside School. However, they must still respect the above advice wherever possible and must keep the Headteacher informed of such relationships.

5. Language

Staff should not swear, blaspheme, or use any sort of offensive language in front of pupils. Staff should not make sexual innuendos or any comments of a sexual nature (other than in the context of the curriculum, and should avoid displays of affection either personally or in writing (e.g. messages in birthday cards, text messages, emails etc.) Staff should avoid words or actions which are over familiar.

Jokes related to physical traits, gender, ethnicity, religion, disability or any other topic that may humiliate or discriminate against pupils or staff, whether verbally or in writing, are strictly forbidden.

6. Physical Contact

Reasonable force: By law, teaching staff, and other staff who are authorised by the Headteacher to have control or charge of pupils, may use such force or physical contact as is reasonable in the circumstances to prevent a pupil from doing, or continuing to do any of the following:

- committing a criminal offence
- injuring themselves or others
- causing damage to property, including their own
- engaging in any behaviour prejudicial to good order and discipline at the School or among any of its pupils, whether that behaviour occurs in a classroom or elsewhere.

This applies when a teacher, or other authorised person, is on School premises and when he or she is in control or charge of the pupil elsewhere, for example on a field trip or other authorised out of School activity. It only applies where no other form of control is available and where it is necessary to intervene.

Before intervening physically, a teacher should, wherever practicable, tell the pupil to stop and what will happen if they don't. The member of staff should continue attempting to communicate with the pupil throughout the incident and should make it clear that physical contact or restraint will stop as soon as it ceases to be necessary.

Staff should always avoid touching or holding a pupil in a way that might be considered indecent. Nor should they act in a way that might reasonably be expected to cause injury. The member of staff involved should inform the Headteacher or Deputy Head immediately following an incident, except the most minor or trivial, where force has been used. This is to help prevent any misunderstanding or misrepresentation of the incident, and it will be helpful in the event of a complaint. The member of staff should provide a written report as soon as possible afterwards.

Action taken in self-defence or in an emergency: The law allows anyone to defend themselves against an attack provided they do not use more force than is necessary. Similarly, where a pupil is at risk of immediate injury or on the point of inflicting injury on someone else, any member of staff (whether authorised or not) would be entitled to intervene.

Contact in other situations: The law does not cover some other occasions when physical contact may be proper or necessary. Some physical contact may, for example, be necessary to demonstrate exercises or techniques during music or PE lessons or sports coaching, or if a member of staff has to give first aid. In such circumstances the member of staff should first explain the intended action to the pupil. Do not proceed with the action if the pupil appears to be apprehensive or reluctant or if you have other concerns about the pupil's likely reaction. If at all possible ensure that the door is open and if you are in any doubt, ask a colleague or another pupil to be present during the demonstration.

Touching may also be appropriate where a pupil is in distress and needs comforting. Staff should use their own professional judgement when they feel a pupil needs this kind of support.

Note: there is no legal definition of "reasonable force". It will always depend on the circumstances. Note that:

- physical force could not be justified to prevent a pupil from committing a trivial misdemeanour
- any force used should always be the minimum needed to achieve the desired result
- whether it is reasonable to use force and the degree of force that could be reasonably employed might also depend on the age, understanding, and sex of the pupil.

7. The Classroom

Staff should not incorporate in lessons material that is inappropriate or use highly personal information about themselves or others.

8. Relationships

It is inappropriate for a member of staff to have a sexual or intimate relationship with a pupil of any age and it may be a criminal offence under the Sexual Offences Act 2003 even if the pupil is aged 16 or 17. To have such a relationship even with a pupil over 18 also contravenes the Duty of Care (see Child Protection Policy) and will result in referral to the relevant authorities.

Wherever possible, staff should avoid being alone in a room with a pupil. Where, for reasons of timetabling, confidentiality or other circumstances, this is not practicable, staff should ensure that the door to the room has a glass panel or is left open.

9. Photographs

Parents and pupils in 4e and over are asked at the start of the school year if they allow photographs where their child/they appear to be used for promotional material and outside the school community. Please refer to the Taking, storing and using images of children policy available on the Staff Shared Drive > Policies and to the Consent for audio or visual recordings and photographs sent to parents and children over 13.

Staff should ensure they have an updated list of children for whom photographic consent has not been granted or has been withdrawn.

10. Confidentiality and data protection

Staff should respect the privacy of pupils, parents and colleagues and should not pass information about, for example, addresses or telephone numbers to others, without checking first with the person concerned.

Lists of pupils/parents names and addresses must not be used for any purpose without the consent of the Headteacher. Information about pupils, parents, or colleagues should never be disclosed to telephone enquiries.

Note: Never give an undertaking of confidentiality to a pupil where child protection issues are involved (see separate Child Protection & Safeguarding Policy).

If a Pupil Reports Abuse

Pupils who have a problem may speak to someone whom they trust. It is important that the member of staff sets the boundaries firmly at the outset of such a conversation, making it clear that no one can offer absolute confidentiality. A pupil who is insistent upon confidentiality should be referred to an external source, such as ChildLine (details are given on notice boards around the school). If the pupil is only prepared to speak if absolute confidentiality is guaranteed, the member of staff should terminate the conversation at that point. The adult should provide the relevant DSL with a written account of what has transpired as a matter of urgency.

If a pupil decides to speak to a member of staff about the fact that either they, or a pupil known to them, is being bullied, harassed and abused, the member of staff should:

- React professionally, and remember that they are not carrying out an investigation, (which is a task for specialists),
- Take what the child says seriously, and calmly, without becoming emotionally involved,
- Make it clear why unconditional confidentiality cannot be offered,
- Explain that any adult member of staff is obliged to inform the DSL, if their child protection or safeguarding issues are involved, in order that specialist help can be arranged.
- Encourage the pupil to speak directly to the relevant DSL.
- Explain that only those who have a professional "need to know" will be told, and, if appropriate, measures will be set up to protect the pupil from retaliation and further abuse.
- Reassure the child that he/she was right to tell, and that he/she is not to blame for having been bullied or abused.
- Allow the child to tell his/her own story, without asking detailed or leading questions.
- Record what has been said.
- Inform a DSL as soon as possible - at least by the end of the morning/afternoon session of that day.

- Inform the Headteacher or a DSL immediately in cases where abuse from a member of staff is alleged, or if the incident happened inside the School, or on a school trip. (If the Headteacher or a DSL is unavailable – or is involved - the Chairman of Governors should be told immediately).

Staff should bear in mind that children may not find it easy to disclose abuse and may need time before they feel ready to do so. Any concern should be reported to the DSLs even if the child did not make a disclosure.

Where there are evident signs of physical injury, that may (or may not) be the result of abuse or bullying, medical help should be summoned, or the pupil should be taken to the Medical Room. In serious cases, the Police should be informed from the outset.

11. Action to Protect the Child

Information about possible abuse may come to a member of staff in several ways - direct allegation from a child that has been abused, through a friend, relative or other child, through a child's behaviour or through observation of an injury to the child. In the case of an allegation being made by the child concerned or by a third party it is important to remember that:

- Defendants have been acquitted where leading questioning or inappropriate investigation has been proven.
- It is vital that subsequent enquiries should not be prejudiced by detailed questioning in School.

The DSLs will consider how best to support and monitor the pupil concerned through any process of investigation, liaising closely with parents, carers, Local Safeguarding Children Partnership (LSCP), or other agencies involved to identify the support strategies that will be appropriate.

12. Whistleblowing

If a teacher or member of staff has concerns about the behaviour of another member of staff towards a pupil, they should report it at once to the Headteacher or the DLs. If there is evidence of criminal activity, the Police will always be informed. Wherever possible, and subject to the rights of the pupil, the member of staff will be informed of the outcome of the investigation. No one who reports a genuine concern in good faith needs to fear retribution. A member of staff who uses the Low-Level Concern Policy, the Procedures for Dealing with Allegations of Abuse Made against Staff or the Whistleblowing procedure is entitled to have their name protected from being disclosed by the Headteacher or DSLs to the alleged perpetrator, without their prior approval. However, it has to be recognised that their evidence may be required by the Police to be used in any criminal proceedings or by the TRA in the event of gross misconduct.

13. Where a Member of Staff has concerns about a Pupil

If a teacher or other member of staff has concerns about any pupil or incident that touches upon child protection issues, they should report them as soon as possible to one of the DSLs.

The early identification of potential problems, and the provision of early help, relies upon staff maintaining a vigilant, open-minded, 'it could happen here' attitude.

Definition of Abuse

Abuse can affect children of all ages, sexes, different races and cultures and all social classes. In some cases, behaviours or physical injuries suggest clearly that abuse is occurring but in others the signs will be less apparent. Full details are in the school's Child Protection Policy (Appendix 1) and in Part 1, paragraphs 21 and s. of the Keeping Children Safe in Education.

Technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face.

Parents

In general, we believe at CFBL that parents should be informed about any concerns regarding their children. It is important that we are honest and open in our dealings with them. However, concerns of this nature must be referred to the DSL who will advise the Headteacher on the appropriate response. In a very few cases, it may not be right to inform parents of our concerns immediately as that action could prejudice any investigation, or place the child at further risk. In such cases, advice will be sought from the Local Safeguarding Children Partnership (LSCP).

REMEMBER

Your aim should be to establish as quickly and accurately as possible the details of the injury or abuse. Questioning should be brief and gentle using open rather than closed questions ("How did it happen?" rather than "Did [] hit you?"). Keep a note of what you heard and saw.

BETTER STILL with care and sensitivity, pass the pupil to the DSL immediately. **Child protection is always our top priority.**

14. Preventing radicalisation (the Prevent Duty)

It is a key role of the School to support children and to provide stability in the lives of children who may be at risk of harm. We recognise that our pupils can be vulnerable and exploited by others. Staff will be alert to the signs of vulnerability and/or susceptibilities to any extremist indoctrination.

Staff acknowledge the need for a culture of vigilance to be present in the school to support safeguarding. This includes awareness and sensitivity to attitude changes of pupils which may indicate they are at risk of radicalisation. Guidance on Radicalisation and the Prevent duty is available [here](#).

If you have any concerns, you must discuss them with the DSL.

15. So-called 'Honour Based' Violence, including forced marriage and female genital mutilation (FGM)

All teachers have a statutory duty to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18.

The Multi-agency statutory guidance on FGM can be found [here](#) and the Multi-agency guidelines: Handling case of forced marriage is available [here](#).

CONCLUSION

All staff are expected to demonstrate consistently high standards of personal and professional conduct. By adhering to this Staff Behaviour Policy, staff can be assured they are playing their part in safeguarding pupils and protecting themselves. It is our expectation that all staff confirm that they have read and understood this policy and all staff members will be asked to do so annually by Google form.

Last review: November 2023