

## Child Protection and Safeguarding Policy

Collège Français Bilingue de Londres (The "School")

Including “CFBL staff Obligations in Safeguarding”

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### INTRODUCTION

Safeguarding and promoting the welfare of children is the responsibility of **everyone** within the School and mechanism are in place to assist all members of staff to understand and discharge their responsibilities.

Our procedure complies with the relevant DfE statutory and non-statutory guidance, including [Keeping Children Safe in Education \(KCSIE 2018\)](#).

All members of staff have a duty to safeguard our pupils' welfare and must therefore familiarise themselves and comply at all times with this Policy. **"CFBL Staff obligations in safeguarding"** (which can be referred to as "staff behaviour policy" or "code of conduct") are annexed to this Policy, to CFBL Employee Handbook (for employees) and to CFBL Rules and Policies Handbook (for contractors, workers and volunteers).

In this document, any reference to 'staff' includes all employees including part time employees, workers and volunteers.

**All members of staff are obliged to make an annual affirmation statement that they have read and understood: this Policy, the CFBL document called "Staff Obligations in Safeguarding Pupils" and Part 1 of KCSIE 2018.**

Schools and their staff form part of the wider safeguarding system for children. This system is described in statutory guidance [Working together to safeguard children](#).

**The School's Designated Safeguarding Lead (DSLs) are:**

- **David Gassian (ext 7418) for the primary; and Rodrigue Barbosa (ext 7408) for the secondary**

**The Deputy Designated Safeguarding Lead is Maud Donatucci (ext 7411), the School nurse.**

**At least one DSL or Deputy DSL is always available to discuss any safeguarding concerns.**

## **PRINCIPLES OF SAFEGUARDING**

Children have a right to be safe and to feel catered for and supported. Adults have a responsibility to protect children. The safeguarding of children and the promotion of their welfare is of paramount importance to the School.

Safeguarding and promoting the welfare of children is defined by KCSIE 2018 as: protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

### **What is child abuse?**

Risks can arise from many different sources and be categorised in a number of different ways. All children are potentially at risk, but children with disabilities or special educational needs are especially vulnerable.

The source of a risk may be from people known to the child and in close physical proximity, or it may be more remote and anonymous, including via the internet. The risk may be from peers and other children (e.g. bullying), or it may come from adults, including teachers or other professionals. A risk to welfare may also manifest itself through a child harming itself, whether consciously or otherwise. Being sensitive to the indicators of risk is central to our culture of safeguarding, and underpins the induction of staff, and ongoing awareness-building and training of staff. Risk indicators which help staff identify vulnerability of children to various categories of harm or abuse are included in Appendix 2 and 4 of "Staff Obligations in Safeguarding" (Annexed to this Policy)

DfE advice: [What to do if you are worried a child is being abused - Advice for Practitioners](#) should be referred to by all staff in raising their awareness of and helping them to identify the signs of child abuse. The [NSPCC website](#) also provides helpful information on types of abuse and what to look out for.

Annex A of [KCSIE 2018](#) (which includes guidance on child missing from education/FGM/HBV/radicalisation) should be referred to by all senior members of staff and by all members of staff who work directly with children.

## **Other Safeguarding issues, including allegations of abuse against pupils**

All staff should have an awareness of safeguarding issues. Staff should be aware that behaviours linked to the likes of drug taking, alcohol abuse, truancing and sexting put children in danger.

All staff should be aware safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but is not limited to: bullying (including cyber-bullying), gender based violence/sexual assaults and sexting. The School's approach to sexting (when someone sends or receives a sexually explicit text, image or video) and how this is approached by the School is set out in CFBL's E-safety and ICT Policy and the School Rules (*règlements intérieurs*)

The School also recognises the different gender issues that can be prevalent in peer on peer abuse, for example, girls being sexually touched or boys being subjected to initiation/hazing type violence. All peer on peer abuse will be managed in accordance with this Policy and a bullying incident will be treated as a child protection concern where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, which will warrant a response under these procedures rather than the School's Behaviour and Discipline Policy.

A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation. The School will take advice from Camden Safeguarding Children Board (CSCB) on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the alleged victim and perpetrator. If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of CSCB, the parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the School and advice will be sought as necessary from CSCB or police as appropriate.

Victims and perpetrators of peer on peer abuse will be offered support by the School, as appropriate.

The School recognises the specific guidance on managing reports of **child on child sexual violence and sexual harassment**, including the immediate response to a report, the need to carry out an immediate risk assessment where there is a report of sexual violence and to consider carrying out such an assessment where the report is of sexual harassment, and on-going management of and response to the report. This guidance is available in Part 5 of KCSIE 2018. The School's position is that child on child sexual violence and sexual harassment is not acceptable and will not be tolerated.

The School will report to the Local Authority any private fostering arrangement that comes to its attention where the School is not satisfied that the Local Authority has been or will be notified of the arrangement, in accordance with the DfE Guidelines [Every Child Matters](#).

## **Staff obligations**

School staff have an important role in safeguarding children. They are in a position to identify concerns early and provide help for children.

Staff obligations are set out in details in "Staff Obligations in Safeguarding Pupils" which is annexed to this Policy.

The DSLs and the Deputy DSL provide support to staff in their safeguarding duties and will liaise with services such as Camden Children Safeguarding Children Board.

All staff members should:

- be aware of the signs of abuse neglect and specific safeguarding issues. Types of abuse and neglect are set out in appendix 1 of “Staff Obligations in Safeguarding” and more information is provided in the DfE advice: [What to do if you are worried a child is being abused](#) ;
- identify children that may benefit from early help (see KCSIE 2018 for what to look out for) which means providing support as soon as a problem emerges;
- be aware of the systems within CFBL which support safeguarding and child protection and the role of the DSLs and the Deputy DSL.

Staff should not assume that that someone else will take action should there be a concern about a child; information that might be critical in keeping children safe should be shared.

All staff are required to notify the School immediately if there are any reasons why they should not be working with children. This includes any staff who are disqualified from childcare or registration as someone who has unspent cautions or convictions for a relevant offence.

## **Duty of parents**

This policy focuses on the duties and responsibilities of the School and its staff but we expect parents to help their children to behave in a non-violent and non-abusive way towards both staff and other pupils.

In general, we believe that parents should be informed about any safeguarding concerns regarding their children. It is important that we are honest and open in our dealings with parents. Concerns of this nature must be referred to the DSL or the Head who will decide 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 Authority Designated Officer (LADO).

## **Best interests of the Child**

Where there is a safeguarding concern the School will ensure the pupil's wishes and feelings are taken into account when determining what action to take and what services to provide. When concerned about the welfare of a child, staff members should always consider what is in the best interests of the child.

The scope of pupils’ welfare is wide and this Policy should be read in conjunction with our other policies which directly or indirectly address welfare (including the policies listed at the end of this document)

## **MANAGEMENT OF SAFEGUARDING**

### **Safer employment practices**

CFBL operates ‘safer recruitment’ procedures as outlined in Part 3 of [KCSIE 2018](#) for all positions involving regulated activity. Detailed Policy and Procedure is set out in **CFBL Safer Recruitment Policy**. All prospective staff are subject to criminal records checks, checks by the Disclosure and Barring Service (DBS) List and compliance with the Independent School Standards Regulations (Part 3).

The Governors require that the Head, the Deputies of Head and the HR Manager have undertaken safer recruitment training.

Any offer of appointment to a successful candidate, including one who has lived or worked abroad, must be conditional upon satisfactory completion of pre-employment checks. When appointing new staff, the following steps must be taken:

- verify a candidate’s identity, preferably from current photographic ID and proof of address except where, for exceptional reasons, none is available;

- obtain a certificate for an enhanced DBS check with a barred list information where the person will be engaging in regulated activity. Refer to Annex G of KCSIE 2018 for eligibility for DBS checks for more details;
- obtain a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available;
- check that a candidate to be employed as a teacher is not subject to a prohibition order (or an interim prohibition order) issued by the Secretary of State, using the Teacher Services system;
- for anyone engaged in management roles, an additional check is required to ensure they are not barred under section 128 of the Independent Educational Provision in England (Prohibition on participation in management) Regulations 2014;
- verify the candidate's mental and physical fitness to carry out their work responsibilities. A job applicant can be asked relevant questions about disability and health in order to establish whether they have the physical and mental capacity for the specific role;
- verify the person's right to work in the UK.
- obtain at least two references from prior employment, or if there is good reason for these being unavailable, from other appropriate sources;
- if the person has lived or worked outside the UK, make any further checks the School considers appropriate. This should include a check for information about any teacher sanction or restriction that an EEA professional regulating authority has imposed using the NCTL Teacher Services system;
- verify professional qualifications, as appropriate;

We maintain a Single Central Register containing a record of all appropriate checks on staff.

### **Referral by the School to the barred list**

There is a legal requirement for employers to make a **referral to the DBS** where they think that an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child (see Part 3 of KCSIE 2018 for more details).

We observe the requirement to report to the Disclosure and Barring Service (DBS), within one month of leaving the school any person (whether employed, contracted, a volunteer or student) whose services are no longer used because s/he is considered unsuitable to work with children.

### **Raising awareness**

Ms Gaëlle Aziz-Picardet is the designated governor for safeguarding issues. The role of the designated governor is to liaise with the local authority on issues of child protection or in case of allegations against the Head or a member of the Governing Body.

The governors, in conjunction with the Designated Safeguarding Leads carry out an annual review of the School's safeguarding policy and procedures with day-to-day issues being delegated to its Pastoral Committee (*commission de vie scolaire*), which comprises the Headteacher, the Deputies to the Head, the Deputy DSL and School counsellor (*psychologue scolaire*).

The governing body is responsible for:

- reviewing the procedures for and the efficiency with which the safeguarding duties have been discharged;
- ensuring that any deficiencies or weaknesses in safeguarding arrangements are remedied without delay; and
- approving amendments to safeguarding arrangements in the light of changing Regulations or recommended best practice.

We recognise that the School plays a significant part in the prevention of harm to our pupils by providing good lines of communication with trusted adults, supported friends and an ethos of protection. We include within this the emotional wellbeing of our pupils and recognise the role school plays in recognising and protecting our children who may be vulnerable to radicalisation or exposed to extremist views.

## **The Role of the Designated Safeguarding Lead**

**Mr David Gassian** (Deputy to Head of Primary) and **Mr Rodrigue Barbosa** (Deputy to Head of Secondary) are our Designated Safeguarding Leads for the primary and secondary section respectively (DSLs). Our DSLs have been fully trained for the demands of this role in child protection and inter-agency working in accordance with the locally agreed procedures and as set out in [Annex B of KCSIE 2018](#). The DSLs are members of the senior management team.

**Mrs Maud Donatucci** (School Nurse) is the deputy DSL. The deputy is trained to the same standard as the DSLs.

Both the DSLs and the deputy DSL undergo Child Protection level 3 training at least every two years in order to provide them with the knowledge and skills to carry out their role. They also attend refresher updated at regular intervals, as required, but at least annually to ensure that they remain conversant with best practice and to keep up with developments relevant to their role.

The DSL role is to ensure that each member of staff has access to and is aware of and understands the School's safeguarding policy and procedures. Their training meets the requirements of KCSIE.

The DSLs each have ultimate responsibility for safeguarding and child protection in the School's primary and secondary section respectively. This responsibility cannot be delegated.

The DSLs and/or the deputy DSL can be contacted at any time (during school hours) for staff to raise or discuss any safeguarding concerns.

The DSLs maintain close links with the Camden Safeguarding Children Board and report at least once a year to the governors on the child protection issues outlined above. The DSLs and/or the deputy DSL will make prompt contact with children's social care where there are concerns that a child may be in need of help or is at risk of harm. The DSLs and/or the deputy DSL will also make prompt contact with the Local Authority Designated Officer ("LADO") in relation to allegations against someone working at the School and/or the police if a criminal offence is suspected.

The DSLs and/or the deputy DSL will liaise with the local authority when necessary and work with other agencies in line with [Working Together to Safeguard Children 2015](#) as updated on 16 February 2017 and attendance at strategy meetings. The DSLs and/or the deputy DSL will work with partner agencies to seek advice, support and guidance, drawing on multi agency expertise, knowledge and experience to support pupils at risk of harm including emotional and intellectual harm via social media and use of the internet.

The DSLs and the deputy DSL receive focused training to support learning and understanding of the ever changing landscape of safeguarding which is underpinned by legislation and guidance and includes issues such as radicalisation. The DSLs and the deputy DSL have undertaken Prevent awareness training to enable them to provide advice and support to staff on protecting children from the risk of radicalisation. The DSLs' and the School's focus is to support children in need through seeking early help and/or inter agency working.

The School's records on child protection are kept securely in the Head's office, and are separated from routine pupil records. Access is restricted to the Head, the DSLs and the Deputy DSL.

## **Induction and training**

All staff are provided with CFBL Child Protection and Safeguarding Policy and KCSIE (Part 1) as part of their induction programme. They are required to affirm annually that they have read and understood these documents. Induction also covers the identity and function of the DSL, the staff code of conduct ('Staff Obligations in Safeguarding'), pupil behaviour policy, the safeguarding response to children missing from education and whistle-blowing procedures.

Child protection training updates are provided regularly (minimum annually) in line with KCSIE 2018 and advice from the LSCB. In the absence of any prevailing minimum intervals for formal training of all staff, we deem 2 years from their last training to be appropriate, unless particular circumstances require greater frequency.

Training includes:

- the early help process and the role of all staff in identifying emerging problems
- recognition and reporting of concerns immediately as they arise
- what to do if a child tells staff they are being abused or neglected, including appropriate levels of confidentiality, liaising with professionals (including the DSLs), and never promising to a child that they will not tell anyone about an allegation
- identification of signs of abuse and when it is appropriate to make a referral
- awareness of the process for making referrals to children's social care, and for subsequent statutory assessments, along with the role staff might be expected to play in such assessments
- a working knowledge of how the LSCB operates, the conduct of a child protection case conference and how to contribute to these effectively when required
- e-safety training
- 'prevent' training

## Preventing radicalisation

All schools are subject to a 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". This duty is known as the **Prevent duty**.

For further information, the Department for Education has published advice for schools on the [Prevent duty](#), and has launched a website [educate against hate](#).

We recognise that it is a key role of the School to support children and that School may provide stability in the lives of children who may be at risk of harm. We also 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 attitudinal changes of pupils which may indicate they are at risk of radicalisation and may need help or protection. However, staff acknowledge that there is no single way of identifying an individual who is likely to be susceptible to an extremist ideology and family, friends and online influences can all play a major factor in the radicalisation of young people.

Further guidance on radicalisation, extremism and the Prevent duty are set out in Appendix 3 of "Staff Obligations in Safeguarding" annexed to this Policy.

## Visiting speakers

The Prevent statutory guidance requires schools to have clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. The School's responsibility to our pupils is to ensure that they can critically assess the information that they receive as to its value to themselves, and that the information is aligned to the ethos and values of the School and British values.

The School is required to undertake a risk assessment before agreeing to a Visiting Speaker being allowed to attend the School. This will take into account any vetting requirements considered appropriate in the circumstances, and may include a DBS check if relevant.

Visiting speakers will be expected to understand that where appropriate their session should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. In some cases, the School may request a copy of the Visiting Speaker's presentation and/or footage in advance of the session being provided.

Visiting Speakers, whilst on the School site, will be supervised by a School employee. On attending the School, Visiting Speakers will be required to show original current identification document including a photograph such as a passport or photo card driving licence. The School shall also keep a formal register of visiting speakers retained in line with its Privacy Notice.

### **Children missing from education**

A child going missing from education, particularly on repeat occasions, is a potential indicator of abuse or neglect including that a child may be at risk of radicalisation, FGM or forced marriage. Unauthorised absences from school will be managed in accordance with CFBL Missing Child Policy.

The School will monitor all pupil absences from school and promptly address concerns about irregular attendance with the parent/carer. A pupil who fails to attend school regularly or has been absent from school without the School's permission for a continuous period of 10 school days or more will be reported to the local authority.

For further details on when the School has a duty to report to the local authority, please refer to the Missing Child Policy and Procedure when a Child is not Collected on Time.

### **Child sexual exploitation**

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

The School recognises that children who are victims of child sexual exploitation may go missing from education. School staff will be alert to possible indicators of child sexual exploitation and any concerns will be managed in accordance with this policy.

### **So-called 'honour based' violence ('HBV')**

So-called HBV can include forced marriage and Female Genital Mutilation ('FGM'). School staff will be alert to possible indicators of HBV. Guidance on the warning signs of HBV can be found on pages 38-41 of the Multi-agency statutory guidance of FGM (<https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation>) and pages 13-14 of the Multi-agency guidelines: Handling case of forced marriage (<https://www.gov.uk/guidance/forced-marriage>). The annexed Staff Obligations in Safeguarding Pupils sets out the School's approach.

### **Special educational needs and disability**

All staff also need to be alert to the specific needs of those pupils who special educational needs and/or disabilities, including young carers. Those with SEND may not outwardly shown signs of abuse and/or may have



difficulties in communication about abuse or neglect. Staff will support such pupils in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL as appropriate. The School recognises that SEND pupils can be more prone to peer group isolation than other children and will consider extra pastoral support for children with SEND.

## Online safety

The School will ensure that:

- appropriate filters and monitoring systems are in place to keep children safe online. The School's systems are equipped with devices and software (Firewall, Web Filtering (WebSense Security) and Antivirus/Malware protection) to manage and monitor incoming and outgoing traffic from and to the school's network. Such systems aim to reduce the risk of children being exposed to: illegal, inappropriate and harmful materials online; reduce the risk of children being subjected to harmful online interaction with others; and help manage online behaviour that can increase a child's likelihood of, or causes, harm;
- children are taught about safeguarding, including online safety in ICT lessons; and
- staff are equipped with the knowledge to safeguard children online via appropriate briefings .

The School's E-Safety and ICT Policy also sets out the School's approach to online safety.

## Procedures for dealing with concerns or suspicions of Abuse or Neglect

The School treats the safeguarding of the pupils in its care as the highest priority and recognises the important role it has to play in the recognition and referral of children who may be at risk. All our school staff are made aware of their duty to safeguard and promote the welfare of children in the School's care. Staff members are alerted to the particular potential vulnerabilities of looked after children.

**CFBL's procedures for dealing with allegations of abuse, including for dealings with allegations against staff, volunteers and the Head are set out in "Staff Obligations in Safeguarding Pupils annexed to this policy. It also includes a definition of child abuse.**

## Promoting awareness

The School's curriculum and pastoral systems (*'vie scolaire'*) are designed to foster the spiritual, moral, social and cultural development of all our pupils. All teaching staff play a vital role in this process, helping to ensure that all pupils relate well to one another and feel safe and comfortable within the School. We expect all the teaching, supervising and medical 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 staff, including all non-teaching staff, have an important role in insisting that pupils always adhere to the standards of behaviour set out in our behaviour policy and in enforcing CFBL Anti-Bullying Policy.

Time is allocated in the school day (for example in civic education lessons) to discussions of what constitutes appropriate behaviour and on why bullying and lack of respect for others is never right.

All pupils know that there are adults to whom they can turn to if they are worried, including the School counsellor (*psychologue scolaire*), the School's Deputies to the Head and the School nurse. If the School has concerns about a child there is always a recognised requirement for sensitive communication and designated staff members are aware of the need to avoid asking leading questions. Our support to pupils includes the following:

- All pupils can have access to a telephone enabling them to call for support in private, including calling confidential help lines and are given web addresses for external specialists such as ChildLine, Kidscape, Get Connected and the Samaritans.
- Our infirmary displays advice on where pupils can seek help.

- We provide lessons to pupils on e-safety in ICT lessons and ensure that all pupils understand and adhere to the School's guidelines in this area. This includes guidance on educating pupils to stay safe including e-safety and online protection. For more details on cyber-bullying please refer to CFBL Anti-Bullying Policy.

## **Position of trust**

As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people in education settings are in positions of trust in relation to the young people in their care. A relationship between a member of staff and a pupil cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people and all members of staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

Wherever possible, staff should avoid behaviour which might be misinterpreted by others, and report and record any incident with this potential. Staff should refer the School's Staff Handbooks (the Employee Handbook or the Rules and Policies Handbook) which includes its Social Media Policy.

## **TRANSPARENCY**

Copies of this Policy, together with our other policies relating to issues of child protection are on our website and we hope that parents and guardians will always feel able to take up any issues or worries that they may have with the School.

Allegations of child abuse or concerns about the welfare of any child will be dealt with consistently in accordance with this Policy. Open communications are essential

## **RECORDS**

All concerns, discussions and decisions (with reasons) made in accordance with this policy will be recorded in writing.

## **MONITORING AND EVALUATION OF THIS POLICY**

The School monitors and evaluates its safeguarding policy and procedures through the following activities:

- Governors are invited to visit the School;
- Annual external safeguarding audit with reporting to the governors;
- Senior leadership team discussion sessions with children and staff
- Frequent scrutiny of attendance data
- Risk assessments are regularly reviewed
- Logs of bullying and/or racist behaviour incidents are reviewed regularly by the senior leadership team and reported to the governing body by the Head as required.
- Regular review of training offered to staff.

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## **Related School Safeguarding policies:**

- Anti-Bullying Policy
- E-Safety and use of internet, mobile phone and other electronic equipment Policy
- Induction of Staff, Governors and volunteers in Child protection
- Staff Obligations in Safeguarding Pupils
- Missing Child Policy and procedure when child is not collected on time

- Safer Recruitment Policy and Procedures
- Whistleblowing Policy
- Educational visits policy
- Health and Safety policy
- SEND Policy

#### External services:

Camden Safeguarding Children Board: <http://www.cscb-new.co.uk/>

#### Camden Designated Officer

All LADO referrals must be made directly to the Multi-Agency Safeguarding Hub team (MASH) Tel: **020 7974 3317** Email: [LBCMASHadmin@camden.gov.uk](mailto:LBCMASHadmin@camden.gov.uk) or Secure email: [LBCMASHadmin@camden.gov.uk.cjism.net](mailto:LBCMASHadmin@camden.gov.uk.cjism.net). If the referrer is in doubt that the threshold is met, please discuss the case with the LADO on Duty on Tel: **020 7974 4556** who will direct your call to the Duty LADO.

#### Disclosure and Barring Service (DBS)

Helpline: 03000 200190

Barring referrals: [dbsdispatch@dbs.gsi.gov.uk](mailto:dbsdispatch@dbs.gsi.gov.uk)

#### Further information on specific safeguarding topics:

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues (for eg TES website and the NSPCC website.)

Schools can also access government guidance on the issues listed below via links to the GOV.UK website:

- child missing from education <https://www.gov.uk/government/publications/school-attendance>
- child missing from home or care <https://www.gov.uk/government/publications/children-who-run-away-or-go-missing-from-home-or-care>
- child sexual exploitation (CSE) <https://www.gov.uk/government/publications/what-to-do-if-you-suspect-a-child-is-being-sexually-exploited>
- bullying including cyberbullying <https://www.gov.uk/government/publications/preventing-and-tackling-bullying>
- domestic violence <https://www.gov.uk/domestic-violence-and-abuse>
- drugs <https://www.gov.uk/government/publications/drugs-advice-for-schools>
- fabricated or induced illness <https://www.gov.uk/government/publications/safeguarding-children-in-whom-illness-is-fabricated-or-induced>
- faith abuse <https://www.gov.uk/government/publications/national-action-plan-to-tackle-child-abuse-linked-to-faith-or-belief>
- female genital mutilation (FGM) <https://www.gov.uk/government/publications/female-genital-mutilation-guidelines>
- forced marriage <https://www.gov.uk/forced-marriage>

- gangs and youth violence  
[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/418131/Preventing\\_youth\\_violence\\_and\\_gang\\_involvement\\_v3\\_March2015.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/418131/Preventing_youth_violence_and_gang_involvement_v3_March2015.pdf)
- gender-based violence/violence against women and girls (VAWG)  
<https://www.gov.uk/government/policies/violence-against-women-and-girls>
- mental health <https://www.gov.uk/government/publications/the-mental-health-strategy-for-england>
- private fostering <https://www.gov.uk/government/publications/children-act-1989-private-fostering>
- preventing radicalisation <https://www.gov.uk/government/publications/channel-guidance>
- sexting <https://www.ceop.police.uk/Media-Centre/Press-releases/2009/What-does-sexting-mean/>
- teenage relationship abuse <https://www.gov.uk/government/collections/this-is-abuse-campaign>
- trafficking <https://www.gov.uk/government/publications/safeguarding-children-who-may-have-beentrafficked-practice-guidance>
- Whistleblowing: The NSPCC whistle-blowing helpline number 0800 028 0285

## Staff Obligations in Safeguarding Pupils

**Including procedures for responding to the discovery or disclosure of a safeguarding concern and for dealing with disclosures or allegations of abuse against members of staff (Code of conduct on interaction with pupils)**

### INTRODUCTION

All schools have a responsibility to identify children who may be in need of extra help or who are suffering, or likely to suffer harm.

Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children.

These procedures need to be read by every member of staff in conjunction with CFBL Child Protection and Safeguarding Policy, and the DfE's publication [Keeping Children Safe in Education](#) ("KCSIE 2018").

**All members of staff are required to make an annual affirmation statement that they have read and understood CFBL Child Protection and Safeguarding Policy, this document and Part 1 of KCSIE (2018).**

**The School's Designated Safeguarding Lead (DSLs) are:**

**David Gassian (ext 7418) for the primary; and Rodrigue Barbosa ( ext 7408)for the secondary The Deputy Designated Safeguarding Lead is Maud Donatucci (ext 7411), the School nurse.**

In this document, any reference to 'staff' includes part-time employees and volunteers and workers.

This document is reviewed annually and was approved by the Board of Governors on 20 November 2017. It was re-amended in light of KCSIE 2018 on 31 August 2018.

### STAFF OBLIGATIONS

CFBL staff fully recognise their professional responsibilities for protection from harm to all children in the School care. CFBL Child Protection and Safeguarding Policy applies to all staff, volunteers and everyone working in the School as:

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

All staff have a responsibility to take appropriate action, working with other services as needed.

The early identification of potential problems, and the provision of early help, relies upon the following general expectations which apply to all staff at all times:

- Staff must be vigilant and open-minded, and maintain the attitude 'it could happen here'.

- Staff must regularly encourage all children to share any concerns they have with an adult and they must listen sympathetically, taking any allegations seriously.
- Staff must ensure that they:
  - always act in the best interests of the child
  - understand the systems and processes which support the welfare and safeguarding of children in the school, and seek clarification if anything is not clear to them.
  - are able to identify children who may be in need of additional help, and respond in appropriate ways consistent with CFBL SEND Policy and deciding how those needs should be met, where necessary involving a team of professionals working together with the family to address the child's needs. S.17 of the Children Act 1989 defines a child in need as one (a) being unlikely to achieve or maintain a reasonable standard of health or development without the provision of services by a local authority; (b) whose health or development is likely to be significantly impaired without the provision of such services; or (c) is disabled.)
  - are familiar with the indicators of various types of child abuse. (Appendix 2 provides a list of risk indicators)
  - report suspicions of child-abuse immediately. Child abuse is defined below along with procedures to be followed. (Appendix 1 describes the different categories of harm and abuse.)
  - have received appropriate child protection training on induction, and at appropriate intervals thereafter. Whilst it is the DSL's responsibilities to ensure that staff have received the appropriate level of training, staff-members have a reciprocal responsibility to check with the DSL if they are unsure about their training requirements, or feel that they need further training.
  - recognise their responsibility to raise concerns about poor or unsafe practice and potential failures in the school safeguarding regime (cf: whistleblowing Policy), and to follow-up if such concerns are not taken seriously by the management team.

## **Induction and training**

Every new member of staff, including part-timers, temporary, visiting, volunteers and contract staff working in the School, receives appropriate induction training on their responsibilities in being alert to the signs of abuse, bullying or children at risk of radicalisation and on the procedures for recording and referring any concerns to the DSL or the Headteacher and, if required, to the main points of local procedures of the London Borough of Camden Children Board, or, in certain circumstances, the police.

Child Protection training is also given to the governor in charge of safeguarding and to volunteers.

All staff attend regular refresher training in line with advice from Camden Safeguarding Children Board with the DSL and the Head teacher receiving training every two years.

Training includes a review of the school's safeguarding policy including the staff standards of behaviour and these obligations in safeguarding pupils, the school's whistleblowing policy, the school's policy on pupil behaviour and on children missing from education, awareness training to equip staff to identify children at risk of being drawn into terrorism, the identity of the DSL and a copy of Part 1 of KCSIE. Training also promotes staff awareness of child sexual exploitation, forced marriage and female genital mutilation. Staff are made aware of the signs, symptoms and indicators of such practices and are required to take action without delay if such a practice is suspected.

## **Disqualification from providing childcare or registration**

All CFBL staff are required to notify the school immediately if there are any reasons why they should not be working with children. This includes any staff who are disqualified from childcare or registration as someone who

has unspent cautions or convictions for a relevant offence (please see a list of the relevant offences set out here: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/719794/Disqualification\\_under\\_the\\_childcare\\_act\\_July2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/719794/Disqualification_under_the_childcare_act_July2018.pdf)) The Childcare (Disqualification) Regulations 2018 apply to those providing early years childcare or later years' childcare, including before school and after school clubs, to children who have not attained the age of 8 AND to those who are directly concerned in the management of that childcare. Please contact the HR Dpt to check whether it applies to you.

The school takes its responsibility to safeguard children very seriously and any staff member who is aware of anything that may affect his/her suitability to work with children must notify the HR Manager immediately. This will include notification of any convictions, cautions, court orders, reprimands or warnings he/she may receive.

Staff who are disqualified from childcare or registration may apply to Ofsted for a waiver of disqualification. Such staff may not be employed in the areas from which they are disqualified, or involved in the management of those settings, unless and until such waiver is confirmed. Please speak to the HR Manager for more details.

### **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.

Staff will consider the level of risk of being drawn into terrorism to identify the most appropriate referral, which could include reference to Channel or Children's Social Care.

Guidance on Radicalisation and the Prevent duty is set out in Appendix 3 to this document.

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

### **Children missing from education**

The School monitors all pupil absences from school and promptly address 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 Missing Child Policy and Procedures when a child is not collected on time and CFBL Attendance and Absence Policy.

### **So called 'Honour-based' Violence - Female Genital Mutilation**

So-called HBV can include forced marriage and Female Genital Mutilation ('FGM'). School staff will be alert to possible indicators of HBV. Guidance on the warning signs of HBV can be found on pages 38-41 of the Multi-agency statutory guidance of FGM (<https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation>) and pages 13-14 of the Multi-agency guidelines: Handling case of forced marriage (<https://www.gov.uk/guidance/forced-marriage>).

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. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils.

For the purposes of the mandatory reporting duty, a teacher is someone who undertakes teaching work as follows (including through distance learning or computer aided techniques):

- planning and preparing lessons and courses for pupils;
- delivering lessons to pupils;
- assessing the development, progress and attainment of pupils; and
- reporting on the development, progress and attainment of pupils.

These activities are not teaching work if the person carrying out the activity does so (other than for the purposes of induction) subject to the direction and supervision of a qualified teacher or other person nominated by the head teacher to provide such direction. The mandatory reporting duty will not therefore apply to supervised teaching assistants.

Unless the teacher has a good reason not to, they should consider and discuss any case of FGM with the DSL (and in his/her absence the Headteacher) and involve children's social care as appropriate.

If staff have concerns that FGM has taken place, as well as reporting this to the DSL who will contact the police and activate local safeguarding procedures using existing and national and local protocols.

The local police non-emergency number is 101.

## **E-Safety and ICT Policy**

Please refer to CFBL E-Safety and ICT Policy which sets out the School's approach to online safety.

## **Position of Trust**

As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people in education settings are in positions of trust in relation to the young people in their care. A relationship between a member of staff and a pupil cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people and all members of staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

Wherever possible, staff should avoid behaviour which might be misinterpreted by others, and report and record any incident with this potential. Staff should refer the school's Staff Handbook which also includes its Internet Policy and use of social media by staff.

## **PROCEDURES FOR RESPONDING TO THE DISCOVERY OR DISCLOSURE OF A SAFEGUARDING CONCERN**

All members of staff should be aware of the signs of abuse, neglect and specific safeguarding issues. The categories of abuse and neglect are set out in Appendix 1 and in paragraphs 30-58 of KCSIE 2018. **KCSIE (2018) flowchart page 13 and [what to do if you are worried a child is being abused –Advice for practitioners \(2015\) provide more information on understanding and identifying abuse and neglect.](#)**

If a member of staff is made aware of any allegation of abuse, or if knowledge of possible abuse comes to his/her attention, it is his/her duty to listen to the child, to provide re-assurance and to record the child's statements, but not to probe or put words into the child's mouth. Notes should not be taken while the child is speaking as this can put unhelpful pressure on the child.

On hearing an allegation of abuse or complaint about abuse directly from a child, a member of staff should limit questioning to the minimum necessary for clarification. Leading questions should be avoided. No inappropriate



guarantees of confidentiality should be given; rather the child should be told that the matter will be referred in confidence to the appropriate people in positions of responsibility.

It is not the role of the School or the DSL to investigate allegations of abuse. It is their role simply to gather sufficient information to be able to make a preliminary decision about how to proceed.

Every member of staff, including part-timers, temporary, visiting, contract and volunteer staff working in School should report any concerns (including those where a pupil may benefit from early help or where it includes alleged abuse by one or more pupils against another pupil) to the DSL and submit an accurate written record of the disclosure or concerns. The note should be signed with a time and date and should use the child's words as far as possible. However, any staff member can make a direct referral to children's social care or other external services such as early help services in accordance with the referral threshold set out by Camden Safeguarding Children Board (CSCB)

Where staff have concerns that a child is in **immediate danger** or is at risk of harm a referral should be made to children's social care and/or the police immediately. **Anyone** can make a referral. If anyone other than the DSL makes a referral, they should inform the DSL that a referral has been made as soon as possible. Staff must share information with children's social care and/or the police where there are any concerns that a child may be at risk of harm or neglect.

If staff members are unsure about whether or not a referral should be made, they should speak to the DSL. The DSL will contact the Local Authority Designated Officer (LADO also known as DO) for advice or direction and will inform Ofsted if appropriate.

The DSL will refer **all** allegations or suspicions of abuse or cases where there is reasonable cause to suspect a child is suffering, or is likely to suffer significant harm, to the local authority designated officer (LADO) within 24 hours.

Borderline cases will be discussed with the LADO without identifying individuals in the first instance and following discussions the LADO will judge whether or not an allegation or concern meet the relevant threshold. The LADO will decide in the circumstances what further steps should be taken. This could involve calling the police.

Where staff highlight a safeguarding issue they must receive feedback on what has been done and how the child is safer as a result. Where there is an allegation about staff this information may be much more restricted but should still contain sufficient detail to assure the staff member that the perceived risk to the child is reduced.

Where the outcome of a referral is not reported to the referring member of staff or DSL and/or where a child's situation does not appear to be improving, the School will follow this up with the children's social care and push for reconsideration where appropriate. Any member of staff who has concerns that a child's situation does not appear to be improving should press for re-consideration.

The School will not do anything that may jeopardise any external investigation. Once the matter has been referred, all further responsibility for gathering information and deciding what happens next will rest with social services and the police.

With regard to the Prevent Duty, the School will co-operate with Channel panels and the Police with assessments are being undertaken.

In the case of pupil-on-pupil abuse which the School has reported to the LADO and which the LADO or statutory child protection authority decides to investigate further, the matter will be dealt with under the School Safeguarding Policy after discussion with the LADO.

Where the suspicion or complaint is in relation to terrorism or extremism ideas involving a pupil, staff must firstly raise this with the Head or DSL without delay. The Head or DSL will consult with external agencies, as appropriate in accordance with this policy. Where the level of risk is such that there is an immediate risk of harm or staff have

a genuine concern that there is an immediate risk of harm, any member of staff may make a referral directly to children's social care or the police. The School will not discuss any concerns in relation to possible radicalisation without first agreeing with children's social care or the police what information can be disclosed.

The deputy DSL will report all safeguarding concerns to the Head (provided they do not concern the Head).

The School's local authority is Camden Safeguarding Children Board ( see below for contact details)

## **PROCEDURES FOR MANAGING ALLEGATIONS OF ABUSE AGAINST STAFF, VOLUNTEERS AND THE HEAD**

Refer to Part 4 of [KCSIE 2018](#) for guidance

The School's procedures for dealing with allegations against any staff member (and volunteers who work with children) aims to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from vexatious allegations. The School will make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered.

The School will liaise with the Local Authority Designated Officer (LADO), police and social services as to managing confidentiality as appropriate. The School's procedures for managing allegations against staff (including the Head and DSL) and volunteers follows Departmental guidance and CSCB arrangements and apply when staff, including volunteers, have (or alleged to have):

- Behaved in a way that has harmed a pupil, or may have harmed a pupil;
- Possibly committed a criminal offence against or related to a pupil; or
- Behaved towards a pupil in a way that indicated that they may pose a risk of harm if they were to work regularly or closely with children.

Should the allegation of abuse concern the Deputy DSL, the member of staff should inform the Headteacher and should the allegation of abuse concern the Head, the member of staff should inform the deputy to the DSL. Should the allegation be against the Headteacher or a School governor the deputy DSL or the DSL (as appropriate) will immediately inform the Chairman of Governors without the Head or School governor being informed first. It will be the Chair's responsibility to contact the LADO.

If the allegation concerns a member of staff, the Head or a volunteer, he/she would normally be informed as soon as possible after the result of any initial investigation authorised or conducted by the LADO is known. Advice will always be sought from the LADO first, however. The School will normally appoint a member of staff to keep the person informed of the likely course of action and the progress of the case.

The outcome of investigation of an allegation will record whether it is substantiated (sufficient evidence either to prove or disprove it), unsubstantiated (insufficient evidence either to prove or disprove it), false (sufficient evidence to disprove it), unfounded (there is no evidence or proper basis which supports the allegation but there may be evidence which supports the contrary basis) or malicious (sufficient evidence to disprove it and that there has been a deliberate act to deceive). If it is established that the allegation is malicious, no details of the allegation will be retained on the individual's personnel records. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with DfE advice. A copy will only be provided to the individual concerned following consultation with appropriate agencies and agreement has been reached as to what information can be disclosed. Allegations proven to be false, unsubstantiated or malicious will not be included in employer references.

If the LADO or any of the statutory child protection authorities decide to take the case further, any staff member concerned may be suspended if this is felt appropriate. The reasons and justification for suspension will be recorded and the staff member informed of them. Where a member of the residential staff is suspended pending an investigation of a child protection nature, suitable arrangements must be put in place for alternative accommodation away from children. The School recognises it has a duty of care to staff but may take action in the event of allegations against staff in accordance with its disciplinary procedures. The School will ensure support is in place for individuals facing an allegation and a representative will be appointed to keep the individual informed of progress of the case and to consider what other support is available and appropriate for the individual.

During the course of the investigation the School in consultation with the LADO will decide what information should be given to parents, staff and other pupils and how press enquiries are to be dealt with. In reaching their decision due consideration will be given to the provisions in the Education Act 2011 and in Keeping Children Safe in Education relating to reporting restrictions identifying teachers who are the subject of allegations from pupils.

Any pupils who are involved will receive appropriate care.

Staff should also have regard to the Staff Behaviour Policy to minimise the risk of allegations being made.

## **Whistleblowing**

If staff and volunteers have concerns about poor or unsafe practices or potential failures in the School's safeguarding regime, these should be raised in accordance with the School's Whistleblowing Policy. Concerns regarding the behaviour of colleagues which are likely to put pupils at risk of abuse or other serious harm may be dealt with in accordance with the School's Managing Allegations of Abuse against staff procedure (see above). There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith. The NSPCC whistle-blowing helpline number 0800 028 0285

## **External Reporting**

We follow Disclosure and Barring Service (DBS) guidance and procedures regarding referrals and barring decisions and the Safeguarding Vulnerable Groups Act 2006 and the Safeguarding Vulnerable Groups Act (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009. Separate to involvement of the LADO, schools have a legal duty to refer to the 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) at the school, or would have been removed had they not left.

CFBL will make such a referral as soon as possible after the resignation or dismissal of any individual (whether employed, contracted, a volunteer or a student) whose services are no longer used because he or she is considered unsuitable to work with children. This includes dismissal, non-renewal of a fixed term contract, no longer using supply teacher engaged directly or supplied by an agency, terminating the placement of a trainee or volunteer, no longer using staff employed by a contractor and resignation and voluntary withdrawal from any of the above.

Further, or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the school will consider making a referral to the Teaching Regulation Authority (TRA) and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence). The school will make a serious incident report to the Charity Commission whenever the Commission's guidelines deem it appropriate to do so.

Where the school ceases to use the services of a teacher because of serious misconduct, or would have dismissed them had they not resigned, it will consider whether to refer the case to the Secretary of State, as required by sections 141D and 141E of the Education Act 2002. The Secretary of State may investigate the case, and if s/he finds there is a case to answer, must then decide whether to make a prohibition order in respect of the person.

The School will make a serious incident report to the Charity Commission whenever the Commission's guidelines deem it appropriate to do so.

Since October 2015, section 5B of the Female Genital Mutilation Act 2003 has placed a statutory duty on teachers along with social workers and healthcare professionals to report to the police where they discover that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the school's DSL and involve children's social care as appropriate.

Should historical allegations of child abuse be made against a teacher who is no longer teaching, the School will, in accordance with Keeping Children Safe in Education, report the matter to the police. Similarly, allegations against a teacher who is no longer working at the School will also be referred to the police. All allegations of historical abuse should be referred to the Head or DSL straight away.

**Camden Safeguarding Children Board:** <http://www.cscb-new.co.uk/>

#### **Camden Designated Officer**

All LADO referrals must be made directly to the Multi-Agency Safeguarding Hub team (MASH) Tel: **020 7974 3317** Email: [LBCMASHadmin@camden.gov.uk](mailto:LBCMASHadmin@camden.gov.uk) or Secure email: [LBCMASHadmin@camden.gov.uk.cjism.net](mailto:LBCMASHadmin@camden.gov.uk.cjism.net)

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

## Appendix 1

### Categories of harm and abuse

(Including first line responses)

Abuse, neglect and safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another. Similarly, all staff should be aware that safeguarding issues are not confined to instances where children are harmed by adults but can also manifest themselves via peer-on-peer abuse, such as bullying, gender-based violence, sexual assaults and sexting. In addition to the CFBL Child Protection and Safeguarding Policy and to their obligations set out in this document, staff should also consider the provisions of our Anti-bullying policy. If staff are unsure as to how these policies work together they should seek guidance from the DSL.

Despite these overlapping realities, it is helpful to give some definitions of types of abuse and harm.

- **Physical abuse** (includes female genital mutilation 'FGM')
- **Emotional abuse**
- **Sexual abuse** (includes child sexual exploitation 'CSE')
- **Neglect** (includes 'children missing from education')
- **'Honour based' violence**
- **Ideological harm** (includes radicalisation, extremism and the 'Prevent Duty') – see Appendix 3

Risk indicators of child abuse are included in Appendix 2 and 4

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#### Physical abuse

This is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating, excessive physical constraint, or otherwise causing physical harm to a child. It may involve consumption of drugs or alcohol. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child.

Staff are reminded that children who have been physically abused will often go to some lengths to hide or cover-up their injuries, for example by wearing long clothing even it hot weather.

Physical abuse also includes female genital mutilation (FGM), which is an extremely harmful practice and is illegal in the UK. Despite being an embedded practice in some cultures, FGM is not a matter which can be decided by personal preference. Staff must be alert to the indicators that a child may be at risk of FGM, and **must** refer any suspicions to the DSL (**statutory duty on teachers to report to the police where they discover that FGM has been carried out on a girl under 18**). More information on FGM, including the Multi-Agency Practice Guidelines, indicators of imminent risk or post-FGM trauma, and measures the DSL should consider implementing to raise awareness of FGM are available on the government website: <https://www.gov.uk/government/publications/female-genital-mutilation-guidelines>

#### Emotional abuse

Some level of emotional abuse will generally occur in all types of maltreatment. It may be defined as the persistent emotional maltreatment of a child such that it will cause severe and adverse effects on the child's emotional development. It may involve a relationship with an adult which is inappropriate or grossly inconsistent; the persistent denial of love and affection; conveying that a child is worthless, 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, or making them feel stupid. Children also suffer if they are persistently shouted at, or used as scapegoats.

Emotional abuse 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, such as the observation of serious bullying, or domestic violence, or exposure to extreme horror or violence through audio-visual media. It may involve being a victim of serious bullying (including online or 'cyberbullying'), causing the child frequent feelings of humiliation or fear for their safety.

This category of abuse may also involve the moral, economic, or ideological corruption of children. Such corruption could be for the purposes of gratification or criminality, or it might be ideologically motivated, for example through a child's exposure to propaganda promoting extremist views ( see statutory duty for staff to prevent children from being drawn into terrorism).

### **Sexual abuse**

Child sexual abuse involves forcing or enticing a child 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 the production of, sexual images, 'sexting' (sexting is when a person takes an indecent image of himself/herself and sends it to another person/people via a mobile device), 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.

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

One of the key factors found in most cases of child sexual exploitation is the presence of some form of exchange (sexual activity in return for something); for the victim and/or perpetrator or facilitator. If sexual gratification, or exercise of power and control, is the only gain for the perpetrator (and there is no gain for the child/young person) this would not normally constitute child sexual exploitation, but should be responded to as a different form of child sexual abuse. More information on Child Sexual Exploitation is available at [Child sexual exploitation: definition and guide for practitioners - GOV.UK](#)

Under the Sexual Offences Act 2003, it is an abuse of a position of trust, and thus a criminal offence, for a member of staff to 'groom' or engage in sexual activity with a pupil under the age of 18. The consent of the young person (or the agreement of a parent) is irrelevant. Furthermore, a relationship between a member of staff and a pupil over the age of 18, or a recent former pupil, is also deemed inappropriate, and will lead to questions about that member of staff's suitability for work in an educational context.

### **Neglect**

Neglect is defined as 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.

## Children missing from education

All children, regardless of their circumstances, are entitled to a full-time education. A child going missing from education is a potential indicator of neglect, and of other forms of abuse. As required by law all schools to have an admissions register and an attendance register. All pupils must be placed on both registers and attendance must be logged daily. Beyond general concerns of neglect arising from absences, all staff must be alert to the risks of potential safeguarding concerns triggered by children missing education such as: travelling to conflict zones, FGM and forced marriage.

The local authority (LB of Camden) must be informed of any child who is going to be deleted from the admission register where they:

- have been taken out of school by their parents and are being educated outside the school system e.g. home education;
- have ceased to attend school and no longer live within reasonable distance of the school at which they are registered;
- have been certified by the school medical officer as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither he/she nor his/her parent has indicated the intention to continue to attend the school after ceasing to be of compulsory school age;
- are in custody for a period of more than four months due to a final court order and the proprietor does not reasonably believe they will be returning to the school at the end of that period; or,
- have been permanently excluded.

Notification should be made as soon as the grounds for deletion are met, but no later than deleting the pupil's name from the register. It is essential that schools comply with this duty, so that local authorities can, as part of their duty to identify children of compulsory school age who are missing education, follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse or neglect.

All school must inform the local authority of any pupil who fails to attend regularly, or has been absent without the school's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the school and the local authority (or in default of such agreement, at intervals determined by the Secretary of State.

## **Honour based violence**

So-called 'honour-based' violence (HBV) encompasses 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. All forms of so called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubts staff should speak to the DSL.

## Indicators

There are a range of potential indicators that a child may be at risk of HBV. Guidance on the warning signs that FGM or forced marriage may be about to take place, or may have already taken place, can be found on pages 38-41 of the Multi agency statutory guidance on FGM (pages 59-61 focus on the role of schools and colleges) and pages 13-14 of the Multi-agency guidelines: Handling case of forced marriage.

## Actions

If staff have a concern regarding a child that might be at risk of HBV they should activate the safeguarding procedures described in this policy, using existing national and local protocols for multi-agency liaison with police and children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers to report such cases to the police. Additional information about specific forms of abuse and safeguarding issues can be found in Annex A of KCSIE 2016.

## Appendix 2

### Risk indicators of child abuse

#### Physical Abuse:

- Injuries, bruises, burns, bite marks which are unexplained or implausibly explained
- Repeated injuries or requests to be excused through injury, illness
- Fear, watchfulness, over-anxiety to please
- Reluctance to get changed for sports etc.

#### Sexual abuse

- Comments about sexual activity
- Sexual knowledge, comments, behaviour inconsistent with a child of that age
- Unexpected reaction of fear or wariness to people
- Repeated urinary or genital infections
- Pregnancy/sexually transmitted diseases
- Genital trauma

#### Emotional abuse

- Withdrawn, anxious behaviour, lack of self-confidence. Mood swings.
- Challenging/disruptive/aggressive behaviour which is inconsistent with previous experience of the child
- Self-harm and eating disorders
- Demanding or attention-seeking behaviour
- Unwillingness to communicate. Secretive and reluctant to share information
- Repetitive, nervous behaviour such as rocking, hair twisting or pulling
- General indicators of abuse or neglect
- Poor attendance or frequent absences which are implausibly explained
- Deterioration in educational progress
- Parents show little interest in child's performance (conversely, excessive interest from parents, along with unrealistic expectations of their child and evidence of pressure which is causing the child distress should also be given careful consideration) or behaviour and are non-responsive or dismissive to professional concerns.
- The child's clothes are often dirty, scruffy or unsuitable for the weather
- No one seeks medical help when the child is ill or hurt
- Poor hygiene (smelly, dirty)
- The child is left alone with unsuitable carers
- The child is thin, pale, lacking in energy
- The child talks of running away
- Evidence of alcohol or other substance abuse
- Unexplained gifts of money

**Please note:** this is not a comprehensive list. Staff should consult with the DSL if in doubt about any symptoms which might be indicative of abuse.



## Appendix 3:

### Ideological harm: radicalisation, extremism and the “prevent Duty”

Radicalisation refers to the process by which a person comes to support terrorism or forms of extremism. Consistent with the requirement to promote fundamental British values, all staff have a statutory duty to have due regard to the need to prevent children from being drawn into terrorism. In interpreting what is meant by ‘due regard’, we take guidance from the government’s Prevent strategy, including the Channel programme, which aims to ensure that vulnerable children of any faith, ethnicity or background receive support before their vulnerabilities are exploited by those that would want them to embrace terrorism. Success of this programme depends on effective communication and co-operation between staff, individuals, their families and (where appropriate) the Local Authority and other agencies.

Without undermining values such as freedom of speech, mutual respect and tolerance, all staff must respond to the ideological challenge of extremist views. ‘Extremism’ is defined as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, mutual respect, and tolerance of different faiths and beliefs. The definition specifically includes calls for the death of members of our armed forces, whether in this country or overseas. It also includes the notion of non-violent extremism, which can create an atmosphere conducive to terrorism, and can popularise views which terrorists exploit. Extremism can take many forms whether ideological, political or religious. It can manifest itself explicitly and aggressively, for example through inciting hatred or a call to arms, or through more subtle and sophisticated channels of propaganda, including social media. These channels exploit aspirational images of success, status and belonging, and personal and moral duty which can capture the imagination of young minds.

Our classrooms are safe spaces where children can understand and discuss a wide range of sensitive topics, including extremism. In the process of promoting critical thinking, and in learning how to challenge terrorist ideologies, we recognise that staff may occasionally find themselves faced with a paradox. In an educational and developmental context, it is natural for children to want to explore and question different views and beliefs, some of which may, if only hypothetically or temporarily, challenge *fundamental British values*. Staff must exercise careful professional judgment in such cases, and above all, whether inside or outside the classroom, they must be particularly alert to risk indicators of vulnerable children and, if appropriate, must seek further guidance. This is a complex and sensitive area, and over-simplified assessments can increase, rather than reduce risk.

There are five dimensions to the actions we take in response to the Prevent Duty:

- Risk assessment
- Working in partnership with local authorities
- Awareness raising amongst staff.
- Protection from terrorist and extremist material when accessing the internet in school
- Building resilience to radicalisation through the curriculum, e.g. through citizenship and religious education, and considerations for pupils’ spiritual, moral, social and cultural (SMSC) development. These aspects are addressed through our PSHEE policy.

### Specific tasks for the DSL relating to the Prevent Duty

The DSL should establish appropriate and proportionate measures to raise awareness of the Prevent Duty amongst staff and to achieve the following:

- assess the risk of children being drawn into terrorism. Document the risk assessment and any subsequent action plan.
- ensure that safeguarding arrangements take into account the Prevent policies and procedures of the Camden Safeguarding Children Board (CSCB)

- ensure that staff have training that gives them the knowledge and confidence to identify children at risk of being drawn into terrorism, and to challenge extremist ideas which can be used to legitimise terrorism. As a minimum, the DSL should attend WRAP (Workshop Raising Awareness of Prevent) training where available, and be aware of the process for referring individual cases of vulnerability to the Channel programme, as opposed to local Children's Services in the normal way
- ensure that there is appropriate supervision of visiting speakers to the school to prevent presentations (including the distribution of materials) which are not contrary to fundamental British values
- the incorporation of any necessary syllabus amendments (e.g. in citizenship, history, politics, religious education)
- protection for children from terrorist or extremist material when accessing the internet.

More guidance on the Channel programme is available here:  
<https://www.gov.uk/government/publications/channel-guidance>

For details of measures to minimise the risk of internet exposure to harmful material, refer to CFBL E-Safety and ICT Policy.

## Appendix 4

### Risk indicators of being drawn into terrorism

*NB references below are to 'child' which includes young people up to the age of 18.*

#### Vulnerability

- Identity Crisis - Distance from cultural/religious heritage and uncomfortable with their place in the society around them
- Personal Crisis – Family tensions; sense of isolation; adolescence; low self-esteem; disassociating from existing friendship group and becoming involved with a new and different group of friends; searching for answers to questions about identity, faith and belonging
- Personal Circumstances – Migration; local community tensions; events affecting country or region of origin; alienation from UK values; having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy
- Unmet Aspirations – Perceptions of injustice; feeling of failure; rejection of civic life
- Criminality – Experiences of imprisonment; poor resettlement/ reintegration, previous involvement with criminal groups

#### Access to extremism / extremist influences

- Is there reason to believe that the child associates with those known to be involved in extremism - either because they associate directly with known individuals or because they frequent key locations where these individuals are known to operate? (e.g. the child is the partner, spouse, friend or family member of someone believed to be linked with extremist activity)
- Does the child frequent, or is there evidence to suggest that they are accessing the internet for the purpose of extremist activity? (e.g. Use of closed network groups, access to or distribution of extremist material, contact associates covertly via Skype/email etc)
- Is there reason to believe that the child has been or is likely to be involved with extremist/ military training camps/ locations?
- Is the child known to have possessed or is actively seeking to possess and/ or distribute extremist literature/ other media material likely to incite racial/ religious hatred or acts of violence?
- Does the child sympathise with, or support illegal/illicit groups e.g. propaganda distribution, fundraising and attendance at meetings?
- Does the child support groups with links to extremist activity but not illegal/illicit e.g. propaganda distribution, fundraising and attendance at meetings?
- Experiences, Behaviours and Influences
- Has the child encountered peer, social, family or faith group rejection?
- Is there evidence of extremist ideological, political or religious influence on the child from within or outside UK?
- Have international events in areas of conflict and civil unrest had a personal impact on the child resulting in a noticeable change in behaviour? It is important to recognise that many people may be emotionally affected by the plight of what is happening in areas of conflict (i.e. images of children dying) it is important to differentiate them from those that sympathise with or support extremist activity

- Has there been a significant shift in the child's behaviour or outward appearance that suggests a new social/political or religious influence?
- Has the child come into conflict with family over religious beliefs/lifestyle/ dress choices?
- Does the child vocally support terrorist attacks; either verbally or in their written work?
- Has the child witnessed or been the perpetrator/ victim of racial or religious hate crime?

### **Travel**

- Is there a pattern of regular or extended travel within the UK, with other evidence to suggest this is for purposes of extremist training or activity?
- Has the child travelled for extended periods of time to international locations known to be associated with extremism?
- Has the child employed any methods to disguise their true identity? Has the child used documents or cover to support this?

### **Social Factors**

- Does the child have experience of poverty, disadvantage, discrimination or social exclusion?
- Does the child experience a lack of meaningful employment appropriate to their skills?
- Does the child display a lack of affinity or understanding for others, or social isolation from peer groups?
- Does the child demonstrate identity conflict and confusion normally associated with youth development?
- Does the child have any learning difficulties/ mental health support needs?
- Does the child demonstrate a simplistic or flawed understanding of religion or politics?
- Does the child have a history of crime, including episodes in prison?
- Is the child a foreign national, refugee or awaiting a decision on their immigration/ national status?
- Does the child have insecure, conflicted or absent family relationships?
- Has the child experienced any trauma in their lives, particularly any trauma associated with war or sectarian conflict?
- Is there evidence that a significant adult or other in the child's life has extremist view or sympathies?

### **More critical risk factors could include: -**

- Being in contact with extremist recruiters
- Articulating support for extremist causes or leaders
- Accessing extremist websites, especially those with a social networking element
- Possessing extremist literature
- Using extremist narratives and a global ideology to explain personal disadvantage
- Justifying the use of violence to solve societal issues
- Joining extremist organisations
- Significant changes to appearance and/or behaviour

**If you have any concerns discuss them with your Safeguarding Lead and local Prevent Officer.**