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Safeguarding – Child Protection

Document Name: Safeguarding – Child Protection
Document Status: Final
Document Owner: Isabelle Faulkner, Françoise Zurbach
Next Review Date: September 2019

Date Produced	Version
June 2017	V8
July 2017	Approved by Board Member IF
January 2018	Update
September 2018	Update

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1. Introduction

1.1 This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004; the Education Act 2002, and with regard to government publications: National Minimum Standards (March 2015), "Working Together to Safeguard Children" 2017, Revised Safeguarding Statutory Guidance 2 "Framework for the Assessment of Children in Need and their Families" 2000, "What to do if You are Worried a Child is Being Abused" 2003. The guidance reflects "Safeguarding Children and Safer Recruitment in Education" DfES Jan 2007, and the Local Safeguarding Children Board for Hammersmith & Fulham, Kensington and Chelsea and Westminster replaces the previous three LSCBs (since April 2012), Keeping Children Safe in Education (Sept 2018) (KCSIE), Child Sexual Exploitation, DfE (February, 2017), The Education (Child Information) (England) Regulations 2005, and section 26 of the Counter-Terrorism and Security Act 2015 (the Prevent Duty), (September, 2015).

1.2 The policy is applicable to EIFA as an organisation and to each of its sites including Early Years. In this document the School is used to encompass the whole organisation and each of its sites.

1.3 The School recognises that all adults, staff (including temporary staff and contractors), volunteers and Directors, have a full and active part to play in protecting our students from harm, and that the child's welfare is our paramount concern.

1.4 The School believes that the education setting should provide a caring, positive safe and stimulating environment that promotes the social, physical and moral development of the individual child.

1.5 The aims of this policy are:

1.5.1 To support the child's development in ways that will foster security, confidence and independence.

1.5.2 To provide an environment in which children and young people feel safe, secure, valued and respected, and feel confident, and know how to approach adults if they are in difficulties, believing they will be effectively listened to.

1.5.3 To raise the awareness of all teaching and non-teaching staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse (see Appendices 1, 2 and 3).

1.5.4 To provide a systematic means of monitoring children known or thought to be in need or at risk of harm, and to ensure the School contributes to assessments of

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need and support packages for those children.

1.5.5 To emphasise the need for good levels of communication between all members of staff.

1.5.6 To maintain a structured procedure within the School which will be followed by all members of the School community in cases of suspected abuse.

1.5.7 To develop and promote effective working relationships with other agencies that are responsible for the social care of children and families.

1.5.8 To ensure that all staff working within the School that have access to children and who undertake regulated activity have been checked for suitability, including verification of their identity and qualifications, and other checks including, but not limited to, DBS check and that a central record is kept for audit.

1.5.9 In accordance with the guidance KCSIE 2018 all staff including DSL's will be updated annually on any additional guidance issued on safeguarding to provide them with relevant skills and knowledge to safeguard children effectively.

1.5.10 The School should ensure that **all staff** in their school **read and sign to say that they have read and can implement** at least Part one of this guidance. (KCSiE 2018)

1.5.11 The School should ensure that mechanisms are in place to assist staff to carry out their duties.

1.5.12 **All** staff members should be aware of systems within their school which support safeguarding and these should be explained to them as part of staff induction. The School should ensure that staff are aware that the DSLs are taking a holistic view to ensure wider environmental factors are considered that may be a threat to safety and welfare of children

1.5.13 This should include:

- the child protection policy
- the staff behaviour policy (sometimes called a code of conduct); and
- the role of the designated safeguarding lead. Copies of policies and a copy of Part one of this document (Keeping Children Safe in Education2018) should be provided to staff at induction
- the Schools' safeguarding response to children who go missing from education
- **all** staff members should receive appropriate safeguarding and child

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protection training which is regularly updated. In addition all staff members should receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively

- **all** staff should be aware that safeguarding issues can manifest themselves via peer on peer abuse
- it is essential that children are safeguarded from potentially harmful and inappropriate online material. As such governing bodies and proprietors should ensure appropriate filters and appropriate monitoring systems are in place.

Terminology used in this Policy

Child includes everyone under the age of 18, or older if still an EIFA student.

Child protection refers to the processes undertaken to protect children who have been identified as suffering, or at risk of suffering significant harm.

Parent includes birth parents and other adults who are in a parenting role, for example stepparents, foster carers and adoptive parents.

Safeguarding refers to the process of protecting children from maltreatment, preventing the impairment of health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care, taking action to enable all children to have the best outcomes and promoting the welfare of children.

Staff refers to all those working for or on behalf of the School, full time or part time, temporary or permanent, in either a paid or voluntary capacity.

Types of Abuse and Neglect

EIFA recognises that there are multiple types of abuse and neglect. EIFA draws its understanding of the terminology used to describe these from Keeping Children Safe in Education (Sept. 2018).

2. Safe School

2.1 The Board of EIFA takes seriously its responsibility under section 175 of the Education Act 2002 to safeguard and promote the welfare of children, and to work together with other agencies to ensure adequate arrangements within our School to identify, assess, and support those children who are suffering harm.

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2.2 EIFA recognises that schools play a significant part in the prevention of harm to our children by providing children with good lines of communication with trusted adults, supportive friends and an ethos of protection.

2.3 The EIFA community will therefore:

2.3.1 Work to establish and maintain an ethos where children feel secure and are encouraged to talk and are always listened to.

2.3.2 Include regular consultation with children, e.g. through safety questionnaires, asking children to report whether they have had happy/sad lunchtimes/playtimes.

2.3.3 Ensure that all children know there is an adult in the School whom they can approach if they are worried or in difficulty.

2.3.4 Include across the curriculum opportunities that equip children with the skills they need to stay safe from harm and to know to whom they should turn for help. In particular this will include anti-bullying work, eSafety, road safety, and pedestrian and cycle training.

2.4 The School commits to ensure that:

2.4.1 All members of the EIFA Board understand and fulfil their responsibilities, namely to:

- Recognise the School's duty to safeguard and protect all children in the School, including children in need and children at risk of harm
- Ensure that there is a Safeguarding and Child Protection policy that is reviewed annually by the proprietors and the Board, and more frequently if required, and that is published internally and externally on the School website
- Ensure that a member of the Board has training in safeguarding, which is updated annually
- Ensure that the School operates safer recruitment procedures
- Ensure that the School has procedures for dealing with allegations of abuse against staff as detailed in KCSIE 2018
- Ensure that Designated Safeguarding Lead (DSL) responsibilities are in place
- Ensure that DSLs undertake inter-agency training and DSL training updates every 2 years
- Ensure that all other staff have safeguarding training every 3 years
- Ensure that all staff read and confirm that they will implement Part 1 of Keeping Children Safe in Education 2018 and the Prevent Duty.
- Ensure that any weaknesses in Safeguarding or Child Protection are remedied as soon as possible.

2.4.2 The DSLs (senior members of staff within the School) are listed in Appendix 1. All

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DSLs have undertaken the compulsory training delivered through an approved external training provider, and will undertake other training as required, at least every 2 years.

2.4.3 This training will also be updated annually in line with new guidance.

2.4.4 The DSLs who are involved in recruitment, other staff as required, and at least one member of the EIFA Board will complete Safer Recruitment Training to be renewed every 5 years.

2.4.5 All members of staff are provided with induction training that includes: EIFA Safeguarding and Child Protection Policy, Employee Handbook, names of DSLs and copies of Keeping Children Safe in Education 2018 and the Prevent Duty.

2.4.6 All members of staff receive regular updates in eSafety and reporting concerns.

2.4.7 All parents/carers are made aware of the responsibilities of staff members with regard to safeguarding and child protection procedures through publication of EIFA Safeguarding and Child Protection Policy on the website and intranet.

2.4.8 EIFA policies seek to ensure the suitability of adults working with children on School sites at any time.

2.4.9 Community users organising activities for children are aware of the School's safeguarding and child protection guidelines and procedures.

2.4.10 Safeguarding and child protection concerns or allegations against adults working in the School are referred to the appropriate statutory and regulatory bodies. Any member of staff found not suitable to work with children will be notified as required to the disclosure and barring service for consideration for barring, following resignation, dismissal, or when the School ceases to use their service.

2.4.11 Appropriate checks are made that no prohibition from management of independent schools order exists for candidates to management positions.

2.4.12 No member of teaching staff who has been prohibited from teaching will work at the School.

2.4.13 Procedures are in place to be followed if a child harms another child or if a member of staff is accused of abuse or suspected of abuse.

2.4.14 Where it is suspected that a crime has been committed, the School will notify the police.

2.4.15 Under safer recruitment procedures additional information when seeking

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references (these should be sought for internal as well as external candidates, requested from a senior person with appropriate authority, and if electronic, checked to ensure they originate from a legitimate source), an additional outcome for allegation investigations, which is 'Unfounded'

2.5 The School acknowledges its responsibilities under the Childcare (Disqualification) Regulations 2009 under section 75 of the Childcare Act 2006, which set out the circumstances in which an individual will be disqualified for the purposes of section 75 of the Act. The School is mindful that under section 76(2) of the 2006 Act, a person who is disqualified under the 2009 Regulations may not provide relevant childcare provision or be directly concerned in the management of such provision. The School further acknowledges that under section 76(3) schools are prohibited from employing a disqualified person in connection with relevant childcare provision in the settings set out at paragraph 6 of the Disqualification under the Childcare Act 2006 Statutory guidance for local authorities, maintained schools, academies and free schools (February 2015). The School has discharged its responsibilities to ensure staff who are covered by this amended guidance are aware of their status under the Act and are assisted to take appropriate steps.

2.6 The School acknowledges its responsibilities under the Counter Terrorism and Security Act 2015 to have "due regard to the need to prevent people from being drawn into terrorism."

2.7 The trained Prevent Officer is Françoise Zurbach.

2.8 EIFA's procedures will be regularly reviewed and updated.

3. Roles and Responsibilities

3.1 The School recognises that safeguarding and child protection are every community member's responsibility. The School ensures that all staff are alert to the signs of abuse and know to whom they should report any concerns or suspicions. The Designated Safeguarding Lead and deputies are available for this purpose. However, staff members with concerns about safeguarding and child protection may also speak directly to children's social care services.

3.2 The Head of School is responsible for the implementation of this policy and other associated policies at their campus. This responsibility includes:

- Allocating sufficient time, training, support and resources, including cover arrangements when necessary, to enable the DSL and deputies to carry out their roles effectively, including the assessment of students and attendance at strategy discussions and other meetings.
- Ensuring that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistleblowing procedures.

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- Ensuring that students are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online.
- Liaising with the appropriate Local Authorities where an allegation is made against a member of staff.
- Ensuring that anyone who has harmed a child or who may pose a risk to a child is referred to the appropriate authorities, (for example the Disclosure and Barring Service).

3.3 Designated Safeguarding Leads are appointed in order to:

3.3.1 Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments.

3.3.2 Be alert to those children within the School who are at risk of:

- child missing from education
- child missing from home or care
- child sexual exploitation (CSE)
- bullying including cyberbullying and peer on peer abuse
- domestic violence
- drugs
- fabricated or induced illness
- faith abuse
- female genital mutilation (FGM)
- forced marriage
- gangs and youth violence and county lines
- gender-based violence/violence against women and girls (VAWG)
- mental health
- private fostering
- preventing radicalisation
- sexting
- teenage relationship abuse
- trafficking

3.3.3 Have a working knowledge of how the local authority conducts a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.

3.3.4 Be alert to the specific needs of children in need, those with special educational needs and young carers.

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3.3.5 Be able to keep detailed, accurate, secure written records of concerns and referrals.

3.3.6 Obtain access to resources and attend any relevant or refresher training courses.

3.3.7 In any protection measures taken, encourage a staff culture of listening to children, to take account of their wishes and feelings

3.3.8 Link with the (Local Safeguarding Children Board (LSCB)) now called safeguarding hub to make sure staff are aware of training opportunities and the latest local policies on safeguarding.

3.4 The DSLs are responsible for:

3.4.1 Making prompt contact with the responsible authorities to refer a child where there are concerns that a child may be in need of help or at risk (including possible abuse).

3.4.2 Making all referrals in writing following a telephone call to the appropriate agencies.

3.4.3 Keeping written records of concerns about a child even if there is no need to make an immediate referral.

3.4.4 Ensuring that all such records are kept confidentially and securely and are separate from student records, until the child's 25th birthday, and that they are copied on to the child's next school or college as soon as possible but separately from the main file.

3.4.5 Ensuring that where such records are stored electronically they are protected with a different password from the child's other files and accessible only by the DSLs and the Head of Schools.

3.4.6 Ensuring that an indication of the existence of the additional file in 3.4.3 above is marked on the student records.

3.4.7 Liaising with other agencies and professionals.

3.4.8 Liaising with the Head of Schools to inform them of issues, especially new or on-going child protection investigation enquiries and police investigations.

3.4.9 Acting as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.

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3.4.10 Ensuring that any student with a current Child Protection Plan who is absent in the educational setting without explanation for 2 days is referred to their key worker's Social Care Team (in some cases any absence may be a cause for concern and warrant immediate reporting).

3.4.11 Providing, with the Heads of Schools, an annual report for the EIFA Board, detailing any changes to the policy and procedures; training undertaken by the DSL, deputies and/or by all staff and members of the EIFA Board; the number and type of incidents/cases, and the number of children on the Child Protection register (anonymised).

3.4.12 Ensuring that they (or in some cases the class teacher or a key worker) attends safeguarding and child protection conferences, core groups or other multi-agency planning meetings, contributes to assessments, and provides a report which will normally have been shared with the parents. (In some circumstances it may not be appropriate to share the report to conference with parents. If the DSL is uncertain on this point advice can be obtained from the allocated social worker.)

3.4.13 Ensuring that Deputy DSLs receive relevant training, have relevant status and their role as DDSL is included in their job description.

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4. Supporting Children

4.1 The School recognises that a child who is abused or who witnesses violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self worth.

4.2 The School recognises that a school setting may be the only stability in the lives of children who have been abused or who are in need or at risk of harm.

4.3 The School recognises that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.

4.4 DSLs and their deputies are aware of the need for uniform approaches to dealing with children in need or who have been abused or are suspected of being in need or having been abused. The School will support all children by:

4.4.1 Encouraging self-esteem and self-assertiveness, through the curriculum as well as our relationships, whilst not condoning aggression or bullying.

4.4.2 Promoting a caring, safe and positive environment within the School.

4.4.3 Liaising and working together with all other support services and those agencies involved in the safeguarding of children.

4.4.4 Notifying the appropriate social care providers as soon as there is a significant concern.

4.4.5 Providing continuing support to a child about whom there have been concerns who leaves the School, by ensuring that appropriate information is copied under confidential cover to the child's new setting and ensuring the school medical records are forwarded as a matter of priority.

5. Monitoring of Children

5.1 The School will provide systematic means of monitoring children known or thought to be at risk of harm, and we ensure the School contributes to the assessments of need and support packages for those child. The school is committed to inter-agency working, which includes providing a coordinated offer of early help when the additional needs of children are identified.

5.2 The School emphasises the need for good communication between all members of staff and between the School and other agencies.

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6. Confidentiality

6.1 The School recognises that all matters relating to Child Protection are confidential.

6.2 The Head of Schools or DSLs will disclose any information about a child to other members of staff on a need-to-know basis only.

6.3 All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.

6.4 All staff must be aware that they cannot promise confidentiality to a child, which might compromise the child's safety or wellbeing.

6.5 The School undertakes to share our intention to refer a child to the appropriate authority with their parents/carers unless to do so could put the child at greater risk of harm, or impede a criminal investigation. If in doubt, the School will consult with the appropriate safeguarding authorities.

6.6 Guidance about sharing information, can be found in the DfE booklet 'Information sharing guidance for practitioners and managers' DCSF-00807-2008.

6.7 Where children leave the School the receiving school should now ensure their DSL and SENCOs are aware of the requirements set out in KCSIE about transferring a child protection file to a new school. The DSL of the transferring school should also consider if it would be appropriate to share information with a new school in advance of a student leaving i.e. to help support victims of abuse when moving to a different establishment.

7. Supporting Staff

7.1 The School recognises that staff who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting.

7.2 The School will support such staff by providing an opportunity to talk through their anxieties with the DSL and to seek further support as appropriate.

8. Safeguarding Students Against the Actions of Other Students

8.1 The School recognises that students will on occasion display behaviours that cause concern to other students or act in ways that cause harm to other students. These

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behaviours may include one or more of the following, which is regarded as a non-exhaustive list and one to which future trends of behaviour may add:

- Grooming (where an individual seeks to gain the trust of a child in order to carry out harmful behaviour)
- Sexting (the act of sending explicit photographs or messages)
- Distribution of sexually harmful or violent literature
- Bullying including cyberbullying
- Radicalisation (the process by which an individual or group comes to adopt increasingly extreme political, social, or religious ideals and/or rejects the freedom of speech of others)
- Coercion, intimidation and peer on peer abuse. (see part Five on 'Child on Child Sexual Violence and Sexual Harassment)
- Initiation ceremonies or ritual misconduct

8.2 The School recognises its responsibilities with regard to the thresholds of concern associated with these behaviours, and others like them, including recognition of the legal thresholds, and will address allegations of any such concerns with the appropriate agencies.

8.3 The School declares that abuse by one or more students against another student is not tolerated, especially by those in positions of trust, including senior students.

9. Allegations against Staff

9.1 An allegation is any information that indicates that a member of staff/volunteer may have:

- Behaved in a way that has, or may have harmed a child.
- Possibly committed a criminal offence against/related to a child.
- Behaved towards a child or children in a way which indicates s/he would pose a risk of harm if they work regularly or closely with children

9.2 This applies to any child with whom the member of staff/volunteer has contact in their personal, professional or community life.

9.3 To reduce the risk of allegations, all staff should be aware of safer working practice and should be familiar with the guidance contained in the Government document 'Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings'

9.4 The person to whom an allegation is first reported should take the matter seriously and keep an open mind. S/he should not investigate or ask leading questions if seeking clarification. It is important not to make assumptions. Confidentiality should not be promised and the person should be advised that the concern will be shared on a 'need to know' basis only. Actions to be taken include: making an immediate written record of the allegation using the informant's words - including time, date

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and place where the alleged incident took place, brief details of what happened, what was said and who was present. This record should be signed, dated and immediately passed on to the Head of School.

9.5 If staff members have concerns about another staff member, including the DSL, then this should be referred to the Head of School. Where there are concerns about the Head of School they should be referred to the acting Chairman of the Board of EIFA, Bassam Shlewet.

9.6 If an allegation is made that meets any of the three criteria set out in 9.1, contact will always be made with the appropriate authority without delay. If it is decided that the allegation meets the threshold for safeguarding, the case will be progressed in accordance with the advice and counsel of the appropriate local safeguarding team. However, there is now an additional outcome for allegation investigations, which can be declared 'Unfounded'.

9.7 If, at the completion of the allegations management process an individual is dismissed (or would have dismissed had the individual not left first) because of the risk of harm posed by that individual to children, the School will make a referral to the Disclosure and Barring Service in line with its legal duty.

9.8 All staff should be aware of the School's own behaviour management procedures described in the Employee Handbook and reviewed annually during induction and pre-planning.

9.9 Guidance about conduct and safe practice, including safe use of mobile devices by staff and volunteers will be given at induction.

9.10 The School recognises that a student may make an allegation against a member of staff.

9.11 The School will follow local procedures for managing allegations against staff. Under no circumstances will we send a child home, pending such an investigation, unless this advice is given exceptionally, as a result of a consultation with the Local Authorities.

9.12 The School recognises that suspension of the member of staff against whom an allegation has been made, deserves and requires careful consideration, and the Head of School will seek the advice of the Local Authorities and legal advice in making this decision. In the event of an allegation against the Head of School, the decision to suspend will be made by the acting Chairman of EIFA Board.

10. Whistleblowing

10.1 The School recognises that children cannot be expected to raise concerns in an

environment where staff fail to do so.

10.2 All staff should be aware of their duty to raise concerns, where they exist, about the management of Child Protection, which may include the attitude or actions of colleagues.

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

- General guidance can be found at- Advice on whistleblowing
- The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk.
- From September 2016 A section 128 direction prohibits or restricts a person from taking part in the management of an independent school.

11. Physical Intervention

11.1 The School acknowledges that staff must only ever use physical intervention as a last resort, when a child is endangering him/herself or others, and that at all times it must be the minimal force necessary to prevent injury to another person. The School is guided in its practices on physical restraint by the document "Use of reasonable force, advice for headteachers, staff and governing bodies (July 2015)".

11.2 Such events should be recorded and signed by a witness. These records will be retained in the log of incidents of physical restraint kept in the Head of School's office.

11.3 We understand that physical intervention of a nature which causes injury or distress to a child may be considered under child protection or disciplinary procedures.

11.4 We recognise that touch is appropriate in the context of working with children, and all staff have been given guidance to ensure they are clear about the professional boundaries associated with this recognition.

12. Anti-Bullying

12.1 The School policy on anti-bullying is set out in a separate document and acknowledges that bullying behaviour may be considered to contravene safeguarding and child protection procedures as well as anti-bullying procedures. The School recognises that bullying may take numerous forms including, but not restricted to, cyber, racist, homophobic and gender- related bullying. The School maintain records of known bullying incidents. All staff are aware that children with Special Educational

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Needs or Disability (SEND) and/or differences/perceived differences are more susceptible to being bullied/victims of child abuse.

13. Health & Safety

13.1 The School Health & Safety Policy is set out in a separate document.

14. Early Childhood / EYFS

14.1 The Safeguarding and Child Protection Policy also applies to the EYFS divisions including Little EIFA. The School will designate a practitioner to take lead responsibility for safeguarding children within the EYFS setting and liaising with the appropriate EIFA and external personnel. The DSL for Little EIFA is Rebecca Naylor.

14.2 The School will inform the appropriate government inspection authorities of any allegations of serious harm or abuse by any person working, or looking after children at the premises as soon as is reasonably practicable.

15. Mobile Phones and Photography

Please refer to our Mobile Telephone Policy and the Staff and Students Acceptable Use Agreements.

16. Monitoring and Evaluation of the Policy

16.1 The School commits to ensuring that an effective Safeguarding and Child Protection Policy is in place and is reviewed annually, together with the staff behaviour policy (code of conduct). The School commits to providing these policies to all staff - including temporary staff and volunteers on induction and to ensuring that staff are kept up to date with changes. All staff are obligated to seek support and advice from either the DSL or appointed deputies if they have concern about the welfare of a child.

16.2 The monitoring and evaluation of the School's Child Protection and Safeguarding Policy and Procedures will be guided by practices including but not limited to:

- EIFA Board visits to the School
- Scrutiny of EIFA Board minutes
- Scrutiny of the School Senior Management Team agenda and minutes
- School Senior Management Team discussions with children and staff
- Scrutiny of attendance data
- Scrutiny of risk assessments
- Logs of major incidents for school Leadership Team and EIFA Board to monitor
- Review of parental concerns and parent questionnaires
- An annual safeguarding audit by an external reviewer.
- Annual review by the Board.

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- Annual detailed review of the single central register.

17. Other Information and Procedures supporting this policy

This policy also links to our policies on:

- Keeping Children Safe in Education (September 2018) part 1
- Health and Safety
- Anti-Bullying
- Prevent
- Parents Grievance
- Acceptable Use of Information Technology
- Attendance
- Risk Assessment
- Code of Conduct
- Anti-bullying
- Educational Visits
- Safer Recruitment
- Staff Disciplinary, Dismissal, Grievance and Whistle Blowing Policy
- Any information on Prevent

These policies above are available on request for parents and statutory bodies. This Safeguarding policy can also be found on the School's website.

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Appendix 1 – Details for EIFA

Designated Safeguarding Leads and Deputies

Françoise Zurbach: Designated Safeguarding Lead (DSL), Duchess House fzurbach@ecole-ifa.com

Bonita Regan: EYFS and Junior School-Designated Safeguarding Lead (DSL), br@ecole-ifa.com

Rebecca Naylor: Little EIFA and EYFS – Designated Safeguarding Lead (DSL), littleeifa@ecole-ifa.com

Françoise Zurbach: Prevent officer, fzurbach@ecole-ifa.com

Tel: +44 20 7637 5351

Safeguarding and child protection concerns or allegations against adults working in the school are referred to the appropriate statutory and regulatory bodies. Any member of staff found not suitable to work with children will be notified as required for consideration for barring, following resignation, dismissal, or when the School ceases to use their service, as a result of a substantiated allegation. This would include notification to the Disclosure and Barring Service, henceforth referred to in this policy as the DBS. Furthermore the School will consider making a referral to the National College for Teaching and Leadership where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate.

Appropriate checks are made that no prohibition from management of independent schools order exists for candidates to management positions, in accordance with section 128 of the Education and Skills Act 2008.

DSL responsibilities include making prompt contact with the responsible authorities to refer a child where there are concerns that a child may be in need of help or at risk (including possible abuse). The relevant authorities may include Children's Services Area Team and the police if a criminal offence is suspected. The School refers all cases of suspected abuse in writing to the LSCB hub in accordance with the guidance provided by the LSCB. All referrals will be made in writing following a telephone call using the Multi Agency Referral Form (MARF).

The School recognises that the thresholds of concern in regard to any child's concerning behaviours, may require inter-agency support from authorities such as the police, the Local Safeguarding Children Board, CEOP, CAMHS and Channel.

All staff and parents and carers should be aware that their duty to raise concerns, where

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they exist, about the management of Child Protection, may necessitate consultation with bodies outside of the School. In this instance, staff members and parents should first speak to the Area Education Officer/LADO following the Whistleblowing Policy. The DSL should then be informed.

The Child Protection and Safeguarding policy also applies to the school's Early Years Foundation Stage (EYFS) at the School, including Little EIFA. The School will designate a practitioner to take lead responsibility for safeguarding children within the EYFS setting and liaising with Local Statutory Children Agencies as appropriate.

The School will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegation relates to harm or abuse committed on the premises or elsewhere), or any other abuse which is alleged to have taken place on the premises, and of the action taken in respect of these allegations as soon as is reasonably practicable, but at the latest within 14 days.

For advice and guidance and to report an issue about an adult who is working with children and young people please contact:

Kembra Healy, TriBorough Safeguarding and Organisations Manager and Local Authority Designated Officer (LADO).

Kembra.Healey@lbhf.gov.uk

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LSCB arrangements for Hammersmith & Fulham, Kensington and Chelsea and Westminster

The Local Safeguarding Children Board for Hammersmith & Fulham, Kensington and Chelsea and Westminster replaces the previous three LSCBs (since April 2012). The Board ensures the coordination of safeguarding work by all agencies and monitors the effectiveness of child protection work across the three local authority areas.

The Board has an Independent Chair: Jean Daintith, and has representatives from the key local agencies on its main Board, Subgroups and short life working groups. An integrated LSCB team supports and services the Board.

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Each local area retains a multi-agency group to ensure the maintenance and development of effective local partnerships.

Tim Deacon - LSCB Manager for the Hammersmith & Fulham, Kensington and Chelsea and Westminster LSCB

Jean Daintith - Independent Chair of the Hammersmith & Fulham, Kensington and Chelsea and Westminster LSCB The LSCB Team can be contacted on: **020 8753 3914.**

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Appendix 2 - Recognising signs of child abuse

Categories of Abuse:

- Physical Abuse
- Emotional Abuse (including Domestic Abuse)
- Sexual Abuse
- Neglect

Terms Associated with Safeguarding and Child Protection:

The School is guided in its policy and procedures by a common understanding of terms associated with safeguarding and child protection which are informed by Keeping Children Safe in Education (Sept, 2018) and other official publications. In addition the School acknowledges its duty to ensure staff are aware of the specific safeguarding issues listed below. The School commits to ensuring that, where such risks may be more likely, staff are guided on how to understand and act accordingly where there is concern about:

Child Sexual Exploitation (CSE) 2017 – "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."

Bullying, including cyber bullying – The school's anti-bullying policy defines bullying as "behaviour by an individual or group usually repeated over time, that intentionally hurts another individual or group either physically or emotionally".

Domestic violence – The School's understanding of domestic violence is informed by Keeping Children Safe in Education (Sept, 2018) which uses the term to refer to any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality.

Drugs – The School's understanding of drugs is informed by the government publication DfE and ACPO Drug Advice for Schools (September, 2012).

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Fabricated or induced illness - The School's understanding of fabricated or induced illness is informed by the government publication Safeguarding Children in whom Illness is Fabricated or Induced(2008)

Faith abuse - The School's understanding of faith abuse is informed by the government publication National Action Plan to Tackle Child Abuse Linked to Faith or Belief.

Female genital mutilation (FGM) – The School's understanding of FGM is informed by Keeping Children Safe in Education (Sept, 2018) which defines the term as comprising all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs for nonmedical reasons.

Forced marriage - The School's understanding of forced marriage is informed by Keeping Children Safe in Education (Sept, 2018) which defines such marriages as where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used.

Gangs and youth violence – The School's understanding of gangs and youth violence is informed by the government publication Preventing Youth Violence and Gang Involvement (March, 2015).

Gender-based violence/violence against women and girls (VAWG).

Mental health – The School's understanding of mental health is informed by the government document No Health Without Mental Health (February, 2011).

Private fostering - The School's understanding of private fostering is informed by the Replacement Children Act 1989 Guidance on Private Fostering.

Preventing radicalisation – The School's understanding of preventing radicalisation is informed by the Prevent Duty (June, 2015) and supporting non-statutory guidance. This guidance has been presented formally to all teachers who have also signed the online check to indicate they have read and understood the guidance. The School's understanding of preventing radicalisation is further informed by the Channel Duty Guidance.

Protecting children from the risk of radicalisation should be seen as part of schools' wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation it is possible to intervene to prevent vulnerable people being radicalised. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying

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an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include making a referral to the Channel programme.

For further details, please see the School Prevent Policy.

Self-harm – The School understands that self harm, defined as any act of self- poisoning or self-injury, irrespective of the apparent purpose of the act, can be an indicator of neglect as well as other safeguarding concerns, as is described in the government publication What to do if you're worried a child is being abused: advice for practitioners (March, 2015).

Sexting – The School's understanding of sexting is informed by Keeping Children Safe in Education (Sept 2018) which defines the term as when a young person takes an indecent or sexually explicit image of him or herself and sends it to their friends (usually a boyfriend or girlfriend) via electronic means (usually a mobile phone). This is illegal in the UK if the image depicts a minor.

Teenage relationship abuse – The School's understanding of teenage relationship abuse is informed by the "This is Abuse" campaign (June, 2013).

Trafficking - The School's understanding of the responsibilities associated with safeguarding children who may have been trafficked is informed by the Department for Education and Home Office advice (contained in the publication Safeguarding Children who May have been Trafficked: Practice Guidance (October, 2011).

The School follows these government departments' definition of trafficking of persons which is the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.

Signs of Abuse in Children:

The following non-specific signs may indicate something is wrong:

- Significant change in behaviour
- Extreme anger or sadness
- Aggressive and attention-seeking behaviour
- Suspicious bruises with unsatisfactory explanations
- Lack of self-esteem
- Self-injury
- Depression
- Age inappropriate sexual behaviour
- Child Sexual Exploitation.

Risk Indicators

The factors described in this section are frequently found in cases of child abuse. Their presence is not proof that abuse has occurred, but:

- Must be regarded as indicators of the possibility of significant harm.
- Justifies the need for careful assessment and discussion with designated/named/lead person, manager (or in the absence of all those individuals, an experienced colleague).
- May require consultation with and/or referral to Children's Services.

The absence of such indicators does not mean that abuse or neglect has not occurred.

In an abusive relationship the child may:

- Appear frightened of the parent/s.
- Act in a way that is inappropriate to her/his age and development (though full account needs to be taken of different patterns of development and different ethnic groups).

The parent or carer may:

- Persistently avoid child health promotion services and treatment of the child's episodic illnesses.
- Have unrealistic expectations of the child.
- Frequently complain about/to the child and may fail to provide attention or praise (high criticism/low warmth environment).
- Be absent or misusing substances.
- Persistently refuse to allow access on home visits.
- Be involved in domestic abuse.

Staff should be aware of the potential risk to children when individuals, previously known or suspected to have abused children, move into the household.

Recognising Physical Abuse

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The following are often regarded as indicators of concern:

- An explanation that is inconsistent with an injury.
- Several different explanations provided for an injury.
- Unexplained delay in seeking treatment.
- The parents/carers are uninterested or undisturbed by an accident or injury.
- Parents are absent without good reason when their child is presented for treatment.
- Repeated presentation of minor injuries (which may represent a "cry for help" and if ignored could lead to a more serious injury).
- Family use of different doctors and A&E departments.
- Reluctance to give information or mention previous injuries.

Bruising

Children can have accidental bruising, but the following must be considered as non-accidental unless there is evidence or an adequate explanation provided:

- Any bruising to a pre-crawling or pre-walking baby.
- Bruising in or around the mouth, particularly in small babies, which may indicate force-feeding.
- Two simultaneous bruised eyes, without bruising to the forehead, (rarely accidental, though a single bruised eye can be accidental or abusive).
- Repeated or multiple bruising on the head or on sites unlikely to be injured accidentally.
- Variation in colour possibly indicating injuries caused at different times.
- The outline of an object used, e.g. belt marks, handprints or a hairbrush.
- Bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting.
- Bruising around the face.
- Grasp marks on small children.
- Bruising on the arms, buttocks and thighs may be an indicator of sexual abuse.

Bite Marks

Bite marks can leave clear impressions of the teeth. Human bite marks are oval or crescent shaped. Those over 3 cm in diameter are more likely to have been caused by an adult or older child.

A medical opinion should be sought where there is any doubt over the origin of the bite.

Burns and Scalds

It can be difficult to distinguish between accidental and non-accidental burns and scalds, and will always require experienced medical opinion. Any burn with a clear outline may be suspicious, e.g.:

- Circular burns from cigarettes (but may be friction burns if along the bony

protuberance of the spine).
- Linear burns from hot metal rods or electrical fire elements.
- Burns of uniform depth over a large area.
- Scalds that have a line indicating immersion or poured liquid (a child getting into hot water of his/her own accord will struggle to get out and cause splash marks).
- Old scars indicating previous burns/scalds that did not have appropriate treatment or adequate explanation.

Scalds to the buttocks of a small child, particularly in the absence of burns to the feet, are indicative of dipping into a hot liquid or bath.

Fractures

Fractures may cause pain, swelling and discolouration over a bone or joint. Non-mobile children rarely sustain fractures.

There are grounds for concern if:

- The history provided is vague, non-existent or inconsistent with the fracture type.
- There are associated old fractures.
- Medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain or loss of movement.
- There is an unexplained fracture in the first year of life.

Scars

A large number of scars or scars of different sizes or ages, or on different parts of the body, may suggest abuse.

Recognising Emotional Abuse

Emotional abuse may be difficult to recognise, as the signs are usually behavioural rather than physical. The manifestations of emotional abuse might also indicate the presence of other kinds of abuse.

The indicators of emotional abuse are often also associated with other forms of abuse.

The following may be indicators of emotional abuse:

- Developmental delay
- Abnormal attachment between a child and parent/carer
- Indiscriminate attachment or failure to attach
- Aggressive behaviour towards others
- Scapegoated within the family

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- Frozen watchfulness, particularly in pre-school children
- Low self esteem and lack of confidence
- Withdrawn or seen as a "loner" – difficulty relating to others.

Recognising Signs of Sexual Abuse

Boys and girls of all ages may be sexually abused and are frequently scared to say anything due to guilt and/or fear. This is particularly difficult for a child to talk about and full account should be taken of the cultural sensitivities of any individual child/family.

Recognition can be difficult, unless the child discloses and is believed. There may be no physical signs and indications are likely to be emotional/behavioural.

Some behavioural indicators associated with this form of abuse are:

- Inappropriate sexualised conduct
- Sexually explicit behaviour, play or conversation, inappropriate to the child's age
- Continual and inappropriate or excessive masturbation
- Self-harm (including eating disorder), self mutilation and suicide attempts
- Involvement in prostitution or indiscriminate choice of sexual partners
- An anxious unwillingness to remove clothes, e.g. for sports events (but this may be related to cultural norms or physical difficulties).

Some physical indicators associated with this form of abuse are:

- Pain or itching of genital area
- Blood on underclothes
- Pregnancy in a younger girl where the identity of the father is not disclosed
- Physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen on vagina, anus, external genitalia or clothing.

Sexual Abuse by Young People

The boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred. The determination of whether behaviour is developmental, inappropriate or abusive will hinge around the related concepts of true consent, power imbalance and exploitation. This may include children and young people who exhibit a range of sexually problematic behaviour such as indecent exposure, obscene telephone calls, fetishism, bestiality and sexual abuse against adults, peers or children.

Developmental Sexual Activity encompasses those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional and behavioural relationships with each other. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent.

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Inappropriate Sexual Behaviour can be inappropriate socially, inappropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a child or young person. It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry, physical damage, etc. It may also be that the behaviour is "acting out" which may derive from other sexual situations to which the child or young person has been exposed.

If an act appears to have been inappropriate, there may still be a need for some form of behaviour management or intervention. For some children, educative inputs may be enough to address the behaviour.

Abusive sexual activity included any behaviour involving coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base.

Assessment

In order to more fully determine the nature of the incident the following factors should be given consideration. The presence of exploitation in terms of:

- **Equality** – consider differentials of physical, cognitive and emotional development, power and control and authority, passive and assertive tendencies.
- **Consent** – agreement including all the following:
  - ✓ Understanding that is proposed based on age, maturity, development level, functioning and experience
  - ✓ Knowledge of society's standards for what is being proposed
  - ✓ Awareness of potential consequences and alternatives
  - ✓ Assumption that agreements or disagreements will be respected equally
  - ✓ Voluntary decision
  - ✓ Mental competence.
- **Coercion –** the young perpetrator who abuses may use techniques like bribing, manipulation and emotional threats of secondary gains and losses that is loss of love, friendship, etc. Some may use physical force, brutality or the threat of these regardless of victim resistance.

In evaluating sexual behaviour of children and young people, the above information should be used only as a guide. Further information and advice is available in the Westminster multi-agency protocol "Working with Sexually Active Young People" (2009), can also assist professionals in identifying sexual behaviour of concern in children and adolescents.

Recognising Neglect

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Evidence of neglect is built up over a period of time and can cover different aspects of parenting. Indicators include:

- Failure by parents or carers to meet the basic essential needs, e.g. adequate food, clothes, warmth, hygiene and medical care
- A child seen to be listless, apathetic and irresponsive with no apparent medical cause
- Failure of child to grow within normal expected pattern, with accompanying weight loss
- Child thrives away from home environment
- Child frequently absent from school
- Child left with adults who are intoxicated or violent
- Child abandoned or left alone for excessive periods.

Child Sexual Exploitation

The following list of indicators is not exhaustive or definitive but it does highlight common signs, which can assist professionals in identifying children, or young people who may be victims of sexual exploitation.

Signs include:

- Underage sexual activity
- Inappropriate sexual or sexualised behaviour
- Sexually risky behaviour, 'swapping' sex
- Repeat sexually transmitted infections
- In girls, repeat pregnancy, abortions, miscarriage
- Receiving unexplained gifts or gifts from unknown sources
- Having multiple mobile phones and worrying about losing contact via mobile
- Having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs)
- Changes in the way they dress
- Going to hotels or other unusual locations to meet friends
- Seen at known places of concern
- Moving around the country, appearing in new towns or cities, not knowing where they are
- Getting in/out of different cars driven by unknown adults
- Having older boyfriends or girlfriends
- Contact with known perpetrators
- Involved in abusive relationships, intimidated and fearful of certain people or situations

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- Hanging out with groups of older people, or anti-social groups, or with other vulnerable peers
- Associating with other young people involved in sexual exploitation
- Recruiting other young people to exploitative situations
- Truancy, exclusion, disengagement with school, opting out of education altogether
- Unexplained changes in behaviour or personality (chaotic, aggressive, sexual)
- Mood swings, volatile behaviour, emotional distress
- Self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders
- Drug or alcohol misuse
- Getting involved in crime
- Police involvement, police records
- Involved in gangs, gang fights, gang membership
- Injuries from physical assault, physical restraint, sexual assault.

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Appendix 3

Forced Marriage (FM)

This is an entirely separate issue from arranged marriage. It is a human rights abuse and, in the UK, falls within the Crown Prosecution Service definition of domestic violence. Young men and women can be at risk in affected ethnic groups.
Whistleblowing may come from younger siblings. Other indicators may be detected by changes in adolescent behaviours. Never attempt to intervene directly as a school or through a third party. In the UK always call either the Contact Centre or the Forced Marriage Unit 020 7008 0151.

Female Genital Mutilation (FGM)

It is essential that staff are aware of FGM practices and the need to look for signs, symptoms and other indicators of FGM.

What is FGM?

It involves procedures that intentionally alter/injure the female genital organs for non-medical reasons.

4 types of procedure:

- Type 1 - Clitoridectomy – partial/total removal of clitoris
- Type 2 - Excision: partial/total removal of clitoris and labia minora
- Type 3 - Infibulation entrance to vagina is narrowed by repositioning the inner/outer labia
- Type 4 - all other procedures that may include: pricking, piercing, incising, cauterising and scraping the genital area.

Why is it carried out?

Belief that:

- FGM brings status/respect to the girl – social acceptance for marriage
- Preserves a girl's virginity
- Part of being a woman/rite of passage
- Upholds family honour
- Cleanses and purifies the girl
- Gives a sense of belonging to the community
- Fulfils a religious requirement
- Perpetuates a custom/tradition
- Helps girls be clean/hygienic

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- Is cosmetically desirable
- Mistakenly believed to make childbirth easier.

Is FGM legal?

FGM is internationally recognised as a violation of human rights of girls and women. It is **illegal** in most countries including the UK.

Circumstances and occurrences that may point to FGM happening are:

- Child talking about getting ready for a special ceremony
- Family taking a long trip abroad
- Child's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leon, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afghani, Kurdistan, Indonesia and Pakistan)
- Knowledge that the child's sibling has undergone FGM
- Child talks about going abroad to be 'cut' or to prepare for marriage.

Signs that may indicate a child has undergone FGM:

- Prolonged absence from school and other activities
- Behaviour change on return from a holiday abroad, such as being withdrawn and appearing subdued
- Bladder or menstrual problems
- Finding it difficult to sit still and looking uncomfortable
- Complaining about pain between the legs
- Mentioning something somebody did to them that they are not allowed to talk about
- Secretive behaviour, including isolating themselves from the group
- Reluctance to take part in physical activity
- Repeated urinal tract infection
- Disclosure.

The 'One Chance' rule

As with Forced Marriage there is the 'One Chance' rule. It is essential that any suspicion be reported immediately to the DSL.

Mandatory Reporting Duty

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) will place a statutory duty upon teachers, along with social workers and healthcare professionals, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It

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will be rare for teachers to see visual evidence, and they should not be examining students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. The Mandatory reporting duty commenced in October 2015. Once introduced, teachers must report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate.

Preventing Radicalisation

Protecting children from the risk of radicalisation should be seen as part of schools' wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation it is possible to intervene to prevent vulnerable people being radicalised. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism12. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include making a referral to the Channel programme.

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 designated safeguarding lead. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

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

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

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

- Content: being exposed to illegal, inappropriate or harmful material
- Contact: being subjected to harmful online interaction with other users
- Conduct: personal online behaviour that increases the likelihood of, or causes, harm
- Proprietors should ensure that as part of the requirement for staff to undergo regularly updated safeguarding training (paragraph 64) and the requirement to ensure children are taught about safeguarding, including online (paragraph 68), that online safety training for staff is integrated, aligned and considered as part of the overarching safeguarding approach.

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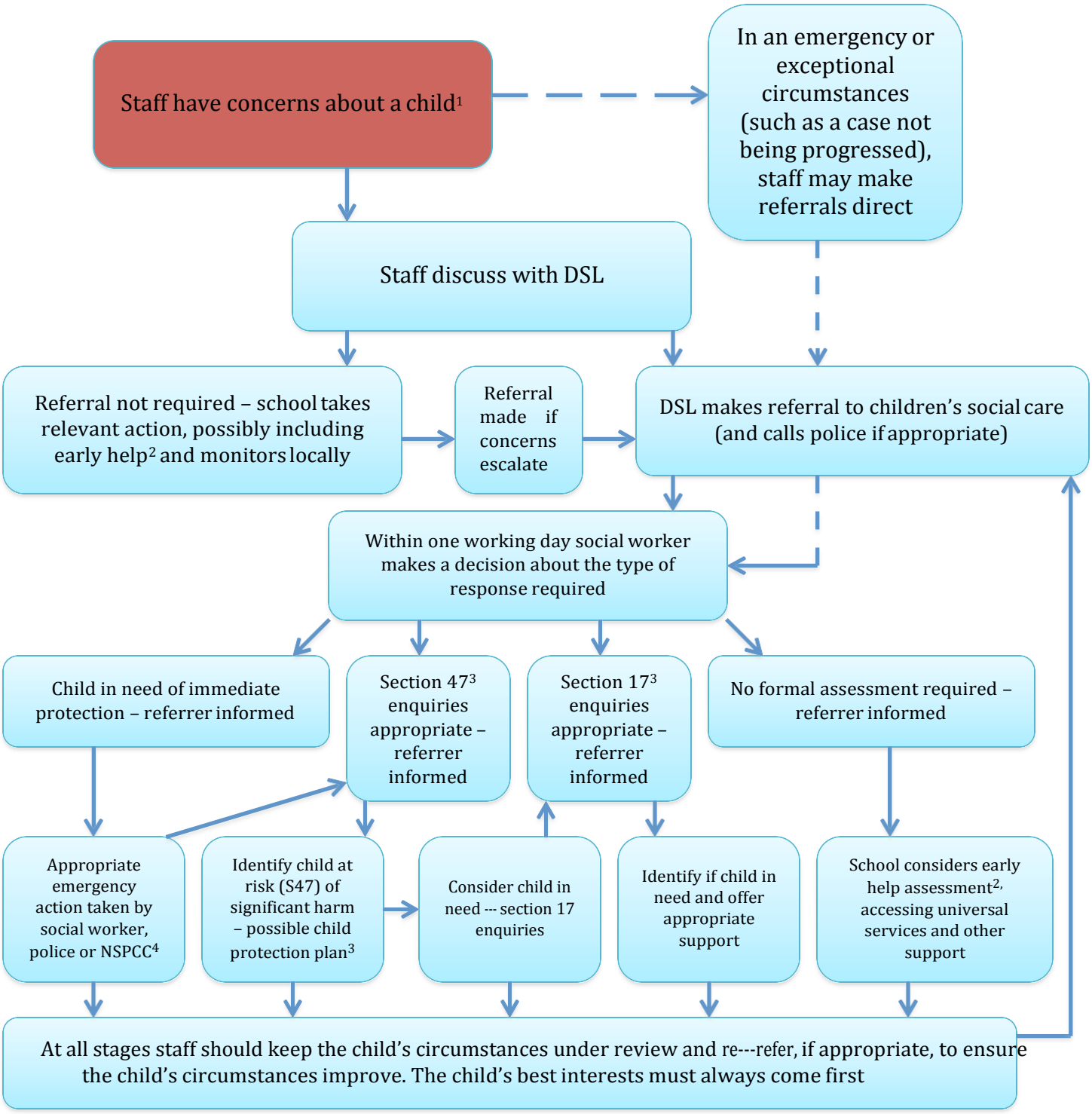
Appendix 4 - Action when a child has suffered or is likely to suffer harm

This diagram illustrates what action should be taken and who should take it where there are concerns about a child. If, at any point, there is a risk of immediate serious harm to a child a referral should be made to children's social care immediately.



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[1] In cases which also involve an allegation of abuse against a staff member, the School will follow the guidance set out in *Keeping Children safe in Education (Sept 2016)* which explains action schools should take in respect of the staff member.

[2] Early help means providing support as soon as a problem emerges in any point in a child's life. Where a child would benefit from coordinated early help and early help inter-agency assessment should be arranged. Chapter one of *Working Together to Safeguard Children* (March 2015) provides detailed guidance on the early help process.

[3] EIFA is guided by the Childcare Act 1989 in regard to its cooperation with local authorities in the UK and elsewhere for the provision of safeguarding and welfare support and services for children in need. This can include an assessment of children in need guided by section 17 or section 47 of the Children Act. Full details are provided in Chapter one of *Working Together to Safeguard Children* (March 2015).

[4] This could include applying for an emergency protection order.

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Appendix 5 - Useful Contact Details

Ofsted Piccadilly Gate, Store Street, Manchester, M1 2WD Tel: 03001234234
Email: enquiries@ofsted.gov Web: www.ofsted.gov.uk

Disclosure and Barring Service (DBS)
Address for referrals: PO Box 181, Darlington, DL1 9FA Telephone for referrals: 01325 953 795
Telephone for customer services: 0870 909 08 Email: customerservices@dbs.gsi.gov.uk

NSPCC Child Protection Helpline: 0808 800 5000
Childline: Tel: 0800 1111 www.childline.org.uk

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

Complaints: All complaints arising from the operation of this policy should be referred to the DSL (who will keep the Head and Directors informed).

References - This policy has also been drawn up with reference to the following:
Education (Independent School Standards) (England) Regulations (2014) and (January 2015)
http://www.legislation.gov.uk/id/uksi/2014/3283

Preventing and tackling bullying (DfE: 2017)
https://www.gov.uk/government/publications/preventing-and-tackling-bullying

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

Channel Duty Guidance Protecting vulnerable people from being drawn into terrorism (HM Government: 2015)
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/425189/Channel_Duty_Guidance_April_2015.pdf

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

Female Genital Mutilation: multi agency practice guidelines (HM Government 2014)
https://www.gov.uk/government/publications/female-genital-mutilation-guidelines

Preventing youth violence and gang involvement (Home Office: March 2015)
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/418131/Preventing_youth_violence_and_gang_involvement_v3_March2015.pdf

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

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

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

No Health Without Mental Health strategy
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/213762/dh_125123.pdf

Keeping Children Safe in Education. Statutory guidance for schools and colleges. (DfE: September 2018)
https:www.gov.ukgovernment/publications/keeping-children-safe-in-education

This is Abuse Discussion Guide (Home Office: 2013)
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/443659/Discussion_Guide_-This_is_Abuse_update_July15_v2_Final.pdf

Working Together to Safeguard Children (2018)

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

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

Schedule 10 of the Equality Act (2010)
http://www.legislation.gov.uk/ukpga/2010/15/pdfs/ukpga_20100015_en.pdf

Special Educational Needs and Disability Code of Practice, 0-25 years (DfE and Department for Health: January 2015)
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/398815/SEND_Code_of_Practice_January_2015.pdf
Safeguarding Our Children - 4LSCB Procedures (2007)
http://www.4lscb.org.uk/documents/4lscbproceduresupdated220708.pdf

Supporting children and young people who are bullied: advice for schools (DfE: 2014)
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/444864/Supporting_bullied_children.pdf

Guidance for Safer Working practices for Adults who Work with Children and Young People (2007)
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Child sexual exploitation – February 2017
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/591903/CSE_Guidance_Core_Document_13.02.2017.pdf

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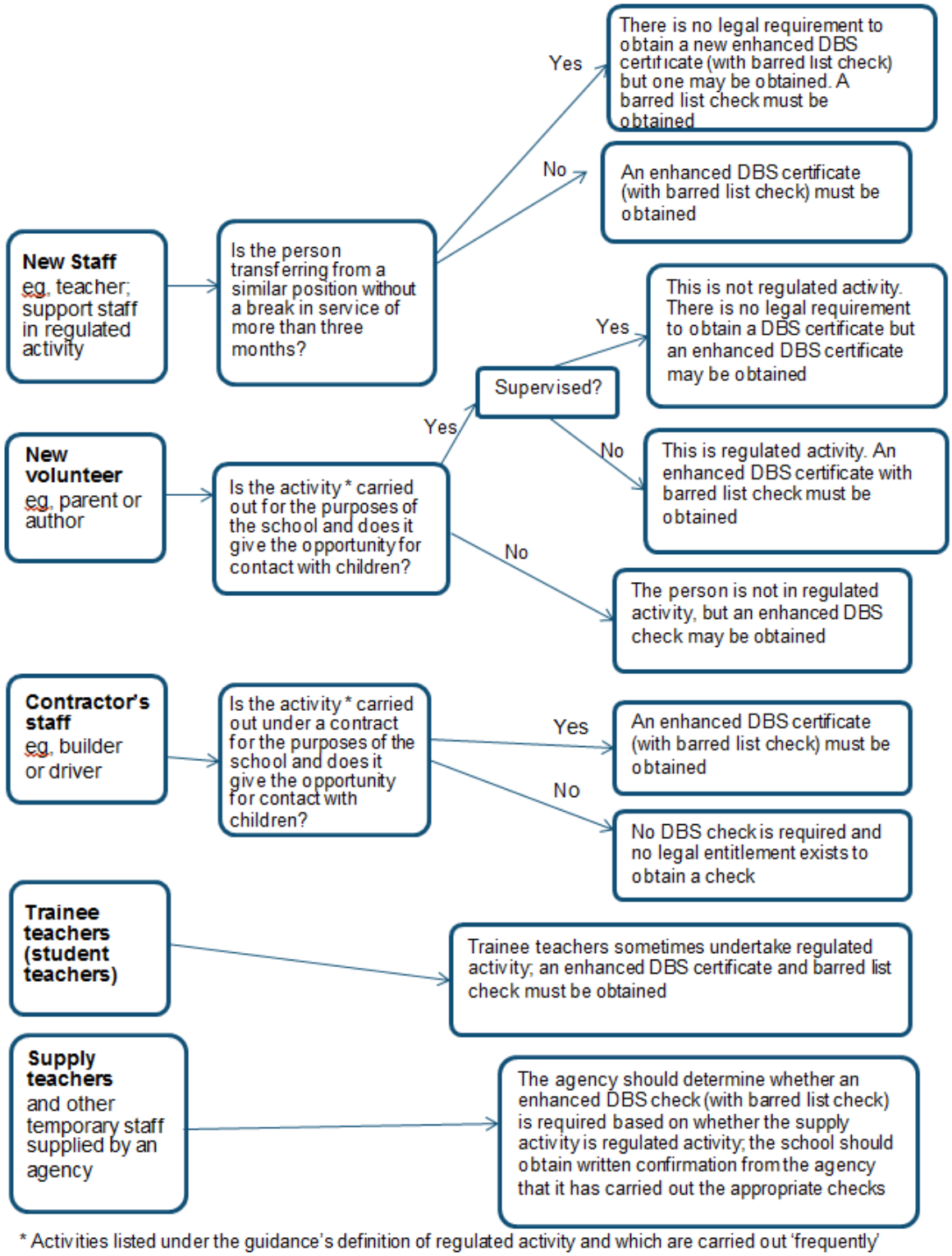
Appendix 6

Flowchart of Disclosure and Barring Service criminal record checks and barred list checks from Keeping Children Safe in Education (2018)



* Activities listed under the guidance's definition of regulated activity and which are carried out 'frequently'

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